

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

In the Matter of the Accusation Against:

**LOS ANGELES VOCATIONAL INSTITUTE, INC. dba L.A. VOCATIONAL INSTITUTE**

3440 Wilshire Blvd. 10th floor, Unit 1014

Los Angeles, CA 90010

Institution Code: 1939591

BPPE Case No. BPPE24-0985

OAH Case No.: 2025110591

Respondent.

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary Order 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 April 22, 2026.

It is so ORDERED March 20, 2026.

"Original Signature on File"

\_\_\_\_\_  
RYAN MARCROFT  
Deputy Director  
Legal Affairs Division  
Department of Consumer Affairs

1 ROB BONTA  
Attorney General of California  
2 ARMANDO ZAMBRANO  
Supervising Deputy Attorney General  
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7 *Attorneys for Complainant*

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

11  
12 In the Matter of the Accusation Against:  
13 **LOS ANGELES VOCATIONAL**  
**INSTITUTE, INC., DBA L.A.**  
14 **VOCATIONAL INSTITUTE**  
3440 Wilshire Blvd., 10th Fl, Unit 1014  
15 Los Angeles, CA 90010  
16 **Institution Code No. 1939591**  
17 Respondent.

Case No. BPPE24-0985  
OAH No. 2025110591  
**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

18  
19  
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. Deborah Cochrane (Complainant) is the Chief of the Bureau for Private  
24 Postsecondary Education (Bureau). She brought this action solely in her official capacity and is  
25 represented in this matter by Rob Bonta, Attorney General of the State of California, by Elyse M.  
26 Davidson, Deputy Attorney General.

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1 CULPABILITY

2 9. Respondent understands and agrees that the charges and allegations in First Amended  
3 Accusation No. BPPE24-0985, if proven at a hearing, constitute cause for imposing discipline  
4 upon its Institution Code.

5 10. For the purpose of resolving the First Amended Accusation without the expense and  
6 uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could  
7 establish a factual basis for the charges in the First Amended Accusation, and that Respondent  
8 hereby gives up its right to contest those charges.

9 11. Respondent agrees that Respondent's Approval to Operate is subject to discipline and  
10 agrees to be bound by the Director's probationary terms as set forth in the Disciplinary Order  
11 below.

12 CONTINGENCY

13 12. This stipulation shall be subject to approval by the Director of the Department of  
14 Consumer Affairs or the Director's designee. Respondent understands and agrees that counsel for  
15 Complainant and the staff of the Bureau for Private Postsecondary Education may communicate  
16 directly with the Director and staff of the Department of Consumer Affairs regarding this  
17 stipulation and settlement, without notice to or participation by Respondent. By signing the  
18 stipulation, Respondent understands and agrees that Respondent may not withdraw its agreement  
19 or seek to rescind the stipulation prior to the time the Director considers and acts upon it. If the  
20 Director fails to adopt this stipulation as the Decision and Order, the Stipulated Settlement and  
21 Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible  
22 in any legal action between the parties, and the Director shall not be disqualified from further  
23 action by having considered this matter.

24 13. The parties understand and agree that Portable Document Format (PDF) and facsimile  
25 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile  
26 signatures thereto, shall have the same force and effect as the originals.

27 14. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an  
28 integrated writing representing the complete, final, and exclusive embodiment of their agreement.

1 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
2 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary  
3 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a  
4 writing executed by an authorized representative of each of the parties.

5 15. In consideration of the foregoing admissions and stipulations, the parties agree that  
6 the Director may, without further notice or formal proceeding, issue and enter the following  
7 Disciplinary Order:

8 **DISCIPLINARY ORDER**

9 IT IS HEREBY ORDERED that Approval to Operate Institution Code No. 1939591, issued  
10 to Respondent Los Angeles Vocational Institute, Inc., dba L.A. Vocational Institute, is revoked  
11 and accepted by the Bureau. However, the revocation is stayed and Respondent is placed on  
12 probation for five (5) years on the following terms and conditions:

13 **Severability Clause.** Each condition of probation contained herein is a separate and  
14 distinct condition. If any condition of this Order, or any application thereof, is declared  
15 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other  
16 applications thereof, shall not be affected. Each condition of this Order shall separately be valid  
17 and enforceable to the fullest extent permitted by law.

18 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws and  
19 regulations governing the operation of a private postsecondary educational institution in  
20 California. Respondent shall submit, in writing, a full detailed account of any and all violations  
21 of the law to the Bureau within five (5) days of discovery.

22 2. **Quarterly Reporting.** Respondent shall fully comply with the terms and conditions  
23 of probation established by the Bureau and shall cooperate with representatives of the Bureau in  
24 its monitoring and investigation of the Respondent's compliance with probation. Respondent,  
25 within ten (10) days of completion of the quarter, shall submit quarterly written reports to the  
26 Bureau on a Quarterly Report of Compliance form obtained from the Bureau.

27 3. **Personal Appearances.** Upon reasonable notice by the Bureau, Respondent shall  
28 report to and make personal appearances at times and locations as the Bureau may direct.

1           4.    **Notification of Address and Telephone Number Changes(s).** Respondent shall  
2 notify the Bureau, in writing, within five (5) days of a change of name, title, physical home  
3 address, email address, or telephone number of each person, as defined in section 94855 of the  
4 Code, who owns or controls 25% or more of the stock or an interest in of the institution and, to  
5 the extent applicable, each general partner, officer, corporate director, corporate member or any  
6 other person who exercises substantial control over the institution’s management or policies.

7           5.    **Notification to Prospective Students.** When currently soliciting or enrolling (or re-  
8 enrolling) a student for any program, respondent shall provide notification of this action to each  
9 current or prospective student prior to accepting their enrollment, and to those students who were  
10 enrolled at the time of the conduct that is the subject of this action as directed by the Bureau.  
11 This notification shall include a copy of the Accusation, Statement of Issues, Stipulated  
12 Settlement, or Disciplinary Decision (whichever applies).

13           6.    **Student Roster.** Within 15 days of the effective date of this Decision, and with the  
14 Quarterly Reports thereafter, provide to the Bureau the names, addresses, phone numbers, email  
15 addresses, and the programs in which they are or were enrolled, of all persons who are currently  
16 or were students of the institution within 60 days prior to the effective date of the Decision, and  
17 those students who were enrolled at the time of the conduct that is the subject of this action.

18           7.    **Instruction Requirements and Limitations.** During probation, Respondent shall  
19 provide approved instruction in the State of California. If respondent is not providing instruction,  
20 the period of probation shall be tolled during that time.

21           8.    **Record Storage.** Within 5 days of the effective date of this Decision, provide the  
22 Bureau with the location of the repository for all records as they are required to be maintained  
23 pursuant to Title 5, California Code of Regulations, section 71930.

24           9.    **Maintenance of Current and Active Approval to Operate.** Respondent shall, at all  
25 times while on probation, maintain a current and active approval to operate with the Bureau  
26 including any period during which approval is suspended or probation is tolled.

27           10. **Comply with Citations.** Respondent shall comply with all final orders resulting  
28 from citations issued by the Bureau. Further, in resolution of Citation No. 22230827, Respondent

1 shall submit to the Bureau, within five days of the effective date of this Order, an attestation  
2 signed and dated by an authorized institutional representative confirming the following:  
3 “Respondent shall comply with all statutory and regulatory obligations related to the preparation  
4 and submission of annual reports and financial statements” pursuant to Bureau regulations (5  
5 CCR section 74110 and CEC section 94934).

6       **11. Cost Recovery Requirements.** Respondent shall pay to the Bureau its costs of  
7 investigation and enforcement in the amount of \$11,728.00 no later than one year before the  
8 termination of probation. Such costs shall be payable to the Bureau and are to be paid regardless  
9 of whether the probation is tolled. Failure to pay such costs shall be considered a violation of  
10 probation. Except as provided above, the Bureau shall not renew or reinstate the approval to  
11 operate of any respondent who has failed to pay all the costs as directed in a Decision.

12       **12. Violation of Probation.** If respondent violates probation in any respect, the Bureau,  
13 after giving respondent notice and opportunity to be heard, may revoke probation and carry out  
14 the disciplinary order which was stayed. If an Accusation or a Petition to Revoke Probation is  
15 filed against respondent during probation, the Bureau shall have continuing jurisdiction until the  
16 matter is final, and the period of probation shall be extended, and respondent shall comply with  
17 all probation conditions, until the matter is final.

18       **13. Future Approvals to Operate.** If respondent subsequently obtains other approvals  
19 to operate during the course of this probationary order, this Decision shall remain in full force and  
20 effect until the probationary period is successfully terminated. Future approvals shall not be  
21 granted, however, unless respondent is currently in compliance with all of the terms and  
22 conditions of probation.

23       **14. Comply with All Accreditation Standards.** As applicable, respondent shall comply  
24 with all standards set by its accreditor in order to maintain its accreditation. Respondent shall  
25 submit to the Bureau, in writing, a full detailed account of any and all actions taken by any  
26 accrediting agency against Respondent regarding any institution operated by Respondent,  
27 including an order to show cause, or conditions or restrictions placed on accreditation, within five  
28 (5) days of occurrence.



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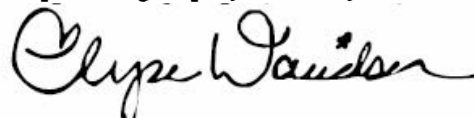
**ENDORSEMENT**

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Director of the Department of Consumer Affairs.

DATED: 03/02/2026

Respectfully submitted,

ROB BONTA  
Attorney General of California  
ARMANDO ZAMBRANO  
Supervising Deputy Attorney General



Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**First Amended Accusation No. BPPE24-0985**

1 ROB BONTA  
Attorney General of California  
2 ARMANDO ZAMBRANO  
Supervising Deputy Attorney General  
3 ELYSE M. DAVIDSON  
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7 *Attorneys for Complainant*

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

11 In the Matter of the First Amended Accusation  
12 Against:

Case No. BPPE24-0985

13 **L.A. VOCATIONAL INSTITUTE,**  
14 **OWNED BY LOS ANGELES**  
15 **VOCATIONAL INSTITUTE, INC.**  
3440 Wilshire Blvd., 10th Fl, Unit 1014  
Los Angeles, CA 90010

**FIRST AMENDED ACCUSATION**

16 **Institution Code No. 1939591**

17 Respondent.

18  
19  
20 **PARTIES**

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

24 2. On or about April 27, 2000, the Bureau for Private Postsecondary Education issued  
25 an Approval to Operate Institution Code Number 1939591 to L.A. Vocational Institute  
26 (Respondent), owned by Los Angeles Vocational Institute, Inc. The Institution Code was in full  
27 force and effect at all times relevant to the charges brought herein and will expire on May 19,  
28 2026, unless renewed.

1 **JURISDICTION AND STATUTORY PROVISIONS**

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

6 4. Business and Professions Code section 118, subdivision (b), states:

7 (b) The suspension, expiration, or forfeiture by operation of law of a license  
8 issued by a board in the department, or its suspension, forfeiture, or cancellation by  
9 order of the board or by order of a court of law, or its surrender without the written  
10 consent of the board, shall not, during any period in which it may be renewed,  
11 restored, reissued, or reinstated, deprive the board of its authority to institute or  
continue a disciplinary proceeding against the licensee upon any ground provided by  
law or to enter an order suspending or revoking the license or otherwise taking  
disciplinary action against the licensee on any such ground.

12 5. Section 94875 of the Code states:

13 (a) As a consequence of an investigation, which may incorporate any materials  
14 obtained or produced in connection with a compliance inspection, and upon a finding  
15 that an institution has committed a violation, the bureau may place an institution on  
probation or may suspend or revoke an institution's approval to operate for:

16 (1) Obtaining an approval to operate by fraud.

17 (2) A material violation or repeated violations of this chapter or regulations  
18 adopted pursuant to this chapter that have resulted, or may result, in harm to students.  
19 For purposes of this paragraph, "material violation" includes, but is not limited to,  
misrepresentation, fraud in the inducement of a contract, and false or misleading  
claims or advertising, upon which a student reasonably relied in executing an  
enrollment agreement and that resulted, or may result, in harm to the student.

20 (b) The bureau shall adopt regulations, within one year of the enactment of this  
21 chapter, governing probation and suspension of an approval to operate.

22 (c) The bureau may seek reimbursement pursuant to Section 125.3 of the  
Business and Professions Code.

23 (d) An institution shall not be required to pay the cost of investigation to more  
24 than one agency.

25 6. Section 94875 of the Code states:

26 The Bureau for Private Postsecondary Education, as established by Section 6 of  
27 Chapter 635 of the Statutes of 2007, is continued in existence and shall commence  
28 operations. This chapter establishes the functions and responsibilities of the bureau,  
for the purposes of Section 6 of Chapter 635 of the Statutes of 2007. The bureau shall  
regulate private postsecondary educational institutions through the powers granted,

1 and duties imposed, by this chapter. In exercising its powers, and performing its  
2 duties, the protection of the public shall be the bureau's highest priority. If protection  
3 of the public is inconsistent with other interests sought to be promoted, the protection  
4 of the public shall be paramount.

5 7. Section 94932 of the Code states:

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

15 8. Section 94933 of the Code states:

16 The bureau shall provide an institution with the opportunity to remedy  
17 noncompliance, impose fines, place the institution on probation, or suspend or revoke  
18 the institution's approval to operate, in accordance with this article, as it deems  
19 appropriate based on the severity of an institution's violations of this chapter, and the  
20 harm that results or may result to students.

21 9. Section 94936 of the Code states:

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

28 (b) The citation may contain any of the following:

(1) An order of abatement that may require an institution to demonstrate how  
future compliance with this chapter or regulations adopted pursuant to this chapter  
will be accomplished.

(2) Notwithstanding Section 125.9 of the Business and Professions Code, an  
administrative fine not to exceed five thousand dollars (\$5,000) for each violation. . .

...

(c)(1) The citation shall be in writing and describe the nature of the violation  
and the specific provision of law or regulation that is alleged to have been violated.

(2) The citation shall inform the institution of its right to request a hearing in  
writing within 30 days from service of the citation.

...

(4) If a hearing is not requested, payment of the administrative fine is due 30  
days from the date of service, and shall not constitute an admission of the violation  
charged.

1 (5) If a hearing is conducted and payment of an administrative fine is ordered,  
the administrative fine is due 30 days from when the final order is entered.

2 \*\*\*

3 **REGULATORY PROVISIONS**

4 10. California Code of Regulations, title 5, section 74000, subdivision (e)(1) states:

5 (e)(1) If an institution fails to pay any fee and any penalty fees timely, the  
6 Bureau may initiate proceedings to revoke the institution's approval to operate for  
failure to pay fees.

7 11. California Code of Regulations, title 5, section 75050, subdivision (b), states:

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

10 12. California Code of Regulations, title 5, section 71745 states, in pertinent part:

11 (a) The institution shall document that it has at all times sufficient assets and  
12 financial resources to do all of the following:

13 (1) Provide all of the educational programs that the institution represented it  
would provide.

14 (2) Ensure that all students admitted to its educational programs have a  
15 reasonable opportunity to complete the programs and obtain their degrees or  
diplomas.

16 (3) Maintain the minimum standards required by the Act and this chapter.

17 (4) Pay timely refunds as required by Article 13 of the Act.

18 (5) Pay all operating expenses due within 30 days.

19 (6) Maintain a ratio of current assets to current liabilities of 1.25 to 1.00 or  
20 greater at the end of the most recent fiscal year when using generally accepted  
21 accounting principles, or for an institution participating in Title IV of the federal  
Department of Education. For the purposes of this section, current assets does not  
22 include: intangible assets, including goodwill, going concern value, organization  
expense, startup costs, long-term prepayment of deferred charges, and non-returnable  
23 deposits, or state or federal grant or loan funds that are not the property of the  
institution but are held for future disbursement for the benefit of students. Unearned  
24 tuition shall be accounted for in accordance with general accepted accounting  
principles.

25 \*\*\*

26 13. California Code of Regulations, title 5, section 74115 states, in pertinent part:

27 (a) This section applies to every set of financial statements required to be  
28 prepared or filed by the Act or by this chapter.

1 (b) A set of financial statements shall contain, at a minimum, a balance sheet,  
2 an income statement, and a cash flow statement, and the preparation of financial  
statements, shall comply with all of the following:

3 (1) Audited and reviewed financial statements shall be conducted and prepared  
4 in accordance with the generally accepted accounting principles established by the  
5 American Institute of Certified Public Accountants by an independent certified public  
6 accountant who is not an employee, officer, or corporate director or member of the  
7 governing board of the institution.

8 (2) Financial statements prepared on an annual basis as required by section  
9 74110(b) shall be prepared in accordance with the generally accepted accounting  
10 principles established by the American Institute of Certified Public Accountants.  
11 Nonprofit institutions shall provide annual financial statements as required under  
12 generally accepted accounting principles for nonprofit organizations.

13 (3) The financial statements shall establish that the institution meets the  
14 requirements for financial resources required by Section 71745.

15 (4) If an audit performed to determine compliance with any federal or state  
16 student financial aid program reveals any failure to comply with the requirements of  
17 the program and the noncompliance creates any liability or potential liability for the  
18 institution, the financial statements shall reflect the liability or potential liability.

19 (5) Any audits shall demonstrate that the accountant obtained an understanding  
20 of the institution's internal financial control structure, assessed any risks, and has  
21 reported any material deficiencies in the internal controls.

22 ...

### 23 COST RECOVERY

24 14. Section 94937, subdivision (c), of the Code provides that the Bureau may seek  
25 reimbursement costs of investigation and enforcement pursuant to Business and Professions Code  
26 section 125.3.

27 15. Business and Professions Code section 125.3 provides, in pertinent part, that the  
28 Board 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.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Failure to Maintain Sufficient Financial Resources)**

3 16. Respondent is subject to disciplinary action under Code section 94937, subdivision  
4 (a)(2) and California Code of Regulations, title 5, sections 71745, subdivision (a)(6), and 74115,  
5 subdivision (b)(3), in that Respondent does not meet the minimum standards for financial  
6 resources, as follows:

7 a. According to the unaudited financial statements submitted by Respondent for the  
8 2022 fiscal year, Respondent's current assets totaled \$22,270.00 and its current liabilities totaled  
9 \$25,000.00. This results in an assets to liabilities ratio of 0.89 to 1.00. The minimum operating  
10 standards regarding financial resources require an institution maintain an assets to liabilities ratio  
11 of 1.25 to 1.00 or greater.

12 b. According to the unaudited financial statements submitted by Respondent for the  
13 2023 fiscal year, Respondent's current assets totaled \$18,243.00 and its current liabilities totaled  
14 \$25,000.00. This results in an assets to liabilities ratio of 0.73 to 1.00. The minimum operating  
15 standards regarding financial resources require an institution maintain an assets to liabilities ratio  
16 of 1.25 to 1.00 or greater.

17 **SECOND CAUSE FOR DISCIPLINE**

18 **(Failure to Adhere to Financial Statement Requirements)**

19 17. Respondent is subject to disciplinary action under Code section 94937, subdivision  
20 (a)(2) and California Code of Regulations, title 5, section 74115, subdivisions (b)(1) and (b)(2), in  
21 that Respondent failed to adhere to financial statement requirements, as follows:

22 a. Respondent failed to provide audited and reviewed financial statements for the 2022  
23 and fiscal year.

24 b. Respondent failed to provide audited and reviewed financial statements for the 2023  
25 and fiscal year.

26 c. Respondent failed to have its financial statements for the 2022 fiscal year prepared in  
27 accordance with generally accepted accounting principles (GAAP).

28 ///

1 d. Respondent failed to have its financial statements for the 2023 fiscal year prepared in  
2 accordance with generally accepted accounting principles (GAAP).

3 **THIRD CAUSE FOR DISCIPLINE**

4 **(Failure to Comply with Citation No. 2223087)**

5 18. Respondent is subject to disciplinary action under California Code of Regulations,  
6 title 5, section 75050, subdivision (b), in that Respondent failed to comply Citation Number  
7 2223087, as follows. On or about March 15, 2023, the Bureau issued Citation Number 2223087  
8 to Respondent for failure to submit all components of its 2020 and 2021 Annual Report. The  
9 Bureau assessed an administrative fine of \$10,000.00 and included an Order of Abatement to  
10 submit the completed 2020 and 2021 Annual Reports. On or about October 4, 2024, Respondent  
11 submitted its 2020 Annual Report. The Bureau mailed Respondent demand letters for  
12 compliance on or about June 19, 2023, August 14, 2023, December 18, 2023, July 9, 2024, and  
13 October 5, 2024. On July 28, 2025, the Bureau received a payment in the amount of \$5,833.35  
14 for the outstanding administrative fine. However, the 2021 Annual Report is still outstanding. As  
15 such, to date, Respondent has failed to comply with Citation Number 2223087.

16 **DISCIPLINARY CONSIDERATIONS**

17 19. To determine the degree of discipline, if any, to be imposed on Respondent,  
18 Complainant alleges the following:

19 20. On or about August 13, 2020, the Bureau issued Citation Number 2021047 to  
20 Respondent for failure to submit its Student Tuition Recovery Fund (STRF) Assessment  
21 Reporting Form for the 2nd, 3rd, and 4th quarters of 2019 and the 1st and 2nd quarters of 2020,  
22 failure to pay the 2017 and 2020 Annual Fees, and failure to pay the 90-day late payment penalty  
23 for 2017, 2019, and 2020. The Citation is now final.

24 21. On or about July 29, 2021, the Bureau issued Citation Number 2122014 to  
25 Respondent for failure to submit its Student Tuition Recovery Fund (STRF) Assessment  
26 Reporting Form for the 4th quarter of 2020 and the 1st quarter of 2021. The Citation is now final.

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