

1 ROB BONTA
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 MOLLY E. SELWAY
Deputy Attorney General
4 State Bar No. 234519
600 West Broadway, Suite 1800
5 San Diego, CA 92101
Telephone: (619) 738-9082
6 Facsimile: (916) 732-7920
E-mail: Molly.Selway@doj.ca.gov
7 *Attorneys for Complainant*

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

12 In the Matter of the Statement of Issues
Against:
13 **AMERICAN LIBERTY UNIVERSITY**
14 **Application for Approval to Operate for an**
15 **Institution Non-Accredited, Institution Code**
No. 3014471
16 Respondent.

Case No. BPPE25-1069

STATEMENT OF ISSUES

18 **PARTIES**

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

22 2. On or about January 4, 2023, the Bureau for Private Postsecondary Education
23 received an application for an Approval to Operate from American Liberty University
24 (Respondent). On or about January 4, 2023, Hamid (aka Kevin) Soltani certified under penalty of
25 perjury to the truthfulness of all statements, answers, and representations in the application. The
26 Bureau denied the application on September 30, 2025.

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28 ///

JURISDICTION

1
2 3. This Statement of Issues 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. Code section 94885 states:

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

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

10 (2) The institution maintains specific written standards for student admissions
11 for each educational program and those standards are related to the particular
12 educational program.

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

15 (4) The institution maintains a withdrawal policy and provides refunds.

16 (5) The directors, administrators, and faculty are properly qualified.

17 (6) The institution is financially sound and capable of fulfilling its
18 commitments to students.

19 (7) That, upon satisfactory completion of an educational program, the
20 institution gives students a document signifying the degree or diploma awarded.

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

23 (9) The institution is maintained and operated in compliance with this chapter
24 and all other applicable ordinances and laws.

25 ...

26 5. Code section 94886 states that, “Except as exempted in Article 4 (commencing
27 with Section 94874) or in compliance with the transition provisions in Article 2 (commencing
28 with Section 94802), a person shall not open, conduct, or do business as a Private Postsecondary
Educational Institution in this State without obtaining an approval to operate under this chapter.”

6. Code section 94887 states:

 An approval to operate shall be granted only after an applicant has
presented sufficient evidence to the Bureau, and the Bureau has independently
verified the information provided by the applicant through site visits or other

1 methods deemed appropriate by the Bureau, that the applicant has the capacity to
2 satisfy the minimum operating standards. The Bureau shall deny an application
3 for an approval to operate if the application does not satisfy those standards. The
4 Bureau may deny an application for an approval to operate institutions that would
be owned by, have persons in control of, or employ institution managers that had
knowledge of, should have known, or knowingly participated in any conduct that
was the cause for revocation or unmitigated discipline at another institution.

5 **STATUTORY PROVISIONS**

6 7. Section 94897 of the Code states, in pertinent part:

7 ...

8 (q) In any manner commit fraud against, or make a material untrue or
9 misleading statement to, a student or prospective student under the institution's
authority or the pretense or appearance of the institution's authority.

10 8. Section 94909 of the Code states, in pertinent part:

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

13 ...

14 (5) A description of the programs offered and a description of the instruction
15 provided in each of the courses offered by the institution, the requirements for
16 completion of each program, including required courses, any final tests or
examinations, any required internships or externships, and the total number of credit
hours, clock hours, or other increments required for completion.

17 ...

18 (9) The schedule of total charges for a period of attendance and an estimated
19 schedule of total charges for the entire educational program.

20 ...

21 **REGULATORY PROVISIONS**

22 9. Title 5, California Code of Regulations (CCR), section 71105 states:

23 (a) For an application for approval to operate or a substantive change, the owner
24 of an unaccredited institution also requesting provisional approval to offer a degree
25 program shall submit to the Bureau, for its approval, a plan for achieving institutional
26 accreditation by an accrediting agency recognized by the United States Department of
Education, with the scope of that accreditation covering the offering of at least one
degree program.

27 (b) The plan shall include:

28 (1) Identification of the accrediting agency from which the institution will seek
accreditation;

1 (2) Identification of the accrediting agency's eligibility requirements;

2 (3) Identification of the accrediting agency's minimum requirements for
3 institutional accreditation covering at least one degree program offered by the
4 institution with an outline of the process and timeline for complying within two years
5 of provisional approval with the accrediting agency's requirements for submission of
6 a completed application for initial accreditation with the required fee; and

7 (4) An outline of the process and timeline whereby the institution will achieve
8 full accreditation within five years of provisional approval, including all of the
9 following, if applicable:

10 (A) Attendance at the accrediting agency's required accreditation applicant
11 workshop;

12 (B) Submission of financial statements as required by the accrediting agency;

13 (C) Submission of a self-evaluation report; and

14 (D) Hosting of a site visit by the accrediting agency.

15 10. CCR section 71210 states:

16 (a) The institution shall identify and describe the educational program it offers,
17 or proposes to offer. If the educational program is a degree program, the institution
18 shall identify the full title which it will place on each degree awarded.

19 (c) In addition, the institution shall list the following for each educational
20 program offered:

21 ...

22 (5) The method of instruction;

23 ...

24 11. CCR section 71220 states:

25 For each educational program that the institution offers or proposes to offer, the
26 Form Application 94886 shall contain a statement that the educational program meets
27 the requirements of section 71710, as well as the following:

28 (a) A description of the educational program.

(b) A description of the equipment to be used during the educational program.

(c) A description of the number and qualifications of the faculty needed to teach
the educational program.

(d) A projection, and the bases for the projection, of the number of students that
the institution plans to enroll in the educational program during each of the three
years following the date the Form Application 94886 was submitted.

(e) A description of the learning, skills, and other competencies to be acquired
by students who complete the educational program.

1 (f) If licensure is a goal of an educational program, a copy of the approval from
2 the appropriate licensing agency if required. A copy of the intent to approve
3 conditioned solely upon institutional approval from the Bureau will also meet this
4 requirement. Upon request, the institution shall provide to the Bureau copies of the
5 curriculum or syllabi required pursuant to section 71710.

6 12. CCR section 71260 states:

7 ...

8 (b) For facilities that are leased or rented, the Form Application 94886 shall
9 contain the name and address of the lessor or landlord, together with a copy of any
10 use, lease, or rental agreements for the facilities.

11 13. CCR section 71270 states:

12 The Form Application 94886 shall include a description of library holdings,
13 services, and other learning resources, including policies and procedures for
14 supplying them to students who do not receive classroom instruction. The description
15 need not consist of a list of each holding. The description shall include an explanation
16 of how the library and other learning resources are sufficient to support the
17 instructional needs of students and, if no facilities exist at the institution, how and
18 when students may obtain access to a library and other learning resources as required
19 by the curriculum.

20 14. CCR section 71700 states:

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

24 15. CCR section 71710 states:

25 (a) In order to meet its mission and objectives, the educational program defined
26 in section 94837 of the Code shall be comprised of a curriculum that includes:

27 ...

28 (2) Subject areas and courses or modules that are presented in a logically
organized manner or sequence to students;

(3) Course or module materials that are designed or organized by duly qualified
faculty. For each course or module, each student shall be provided with a syllabus or
course outline that contains:

(A) A short, descriptive title of the educational program;

(B) A statement of educational objectives;

(C) Length of the educational program;

(D) Sequence and frequency of lessons or class sessions;

(E) Complete citations of textbooks and other required written materials;

1 (F) Sequential and detailed outline of subject matter to be addressed or a list of
skills to be learned and how those skills are to be measured;

2 (G) Instructional mode or methods.

3 16. CCR section 71715 states:

4 ...

5 (d) Distance education as defined in section 94834 of the Code, does not
6 require the physical presence of students and faculty at the same location but provides
7 for interaction between students and faculty by such means as telecommunication,
8 correspondence, electronic and computer augmented educational services, postal
service, and facsimile transmission. In addition to the other requirements of this
chapter and the Act, an institution offering distance education shall:

9 ...

10 (3) Ensure that the materials and programs are current, well organized, designed
11 by faculty competent in distance education techniques and delivered using readily
available, reliable technology;

12 ...

13 (6) Timely complete student evaluations of learning outcomes by duly qualified
14 faculty, which are appropriate for use with the distance education methods used, and
evaluated by duly qualified faculty.

15 ...

16 (8) Shall maintain a record of the dates on which lessons, projects, and
17 dissertations were received and responses were returned to each student.

18 ...

19 17. CCR, section 71720 states:

20 (a) An Educational Program Leading to a Degree.

21 (1) An institution offering an educational program that leads to a degree shall
employ duly

22 qualified faculty sufficient in number to provide the instruction, student
23 advisement, and learning outcomes evaluation necessary for the institution to
document its achievement of its stated mission and objectives, and for students to
achieve the specific learning objectives of each course offered;

24 ...

25 (4) The faculty shall have sufficient expertise to support the institution's
26 awarding of a degree identifying a specialty or major field of emphasis, demonstrated
by, at a minimum:

27 (A) That the person possesses one of the following:

28 1. A degree from: an institution approved by the Bureau or previously

1 approved by a predecessor agency of the Bureau; or an accredited institution in the
2 United States or Canada; or other state approved institution that documents that the
3 institution at which the faculty member earned his or her degree is equivalent to an
4 institution that is approved by the Bureau; or an institution outside the United States
5 or Canada and in addition provides a comprehensive evaluation of the degree
6 performed by a foreign credential evaluation service that is a member of the National
7 Association of Credential Evaluation Services (NACES).

8 2. A credential generally recognized in the field of instruction.

9 (B) The degree, professional license, or credential possessed by the person shall
10 be at least equivalent to the level of instruction being taught or evaluated;

11 ...

12 (9) The institution shall maintain records documenting that each faculty
13 member is duly qualified and was qualified to perform the duties to which the faculty
14 member was assigned, including providing instruction, evaluating learning outcomes,
15 evaluating graduate dissertations, theses, and student projects, and participating on
16 doctoral committees.

17 18. CCR section 71740 states:

18 (a) A degree granting institution shall make available for student use a library
19 and other learning resources.

20 (b) An institution shall provide or make provisions for the library and other
21 learning resources needed to support each educational program it offers, including
22 resources such as reference works, periodicals, monographs, and media and
23 equipment specific to the educational programs offered.

24 (c) An institution shall describe onsite library and other learning resources, if
25 any, that enable students to pursue inquiries, searches for information and
26 documentation, and assignments connected with their study programs.

27 (d) An institution that depends for library and other learning resources primarily
28 on other institutions' collections and resources not in its possession shall do all of the
following:

(1) Describe those library and other learning resources, in the application and
catalog.

(2) Provide students and faculty with access to the regular services of a
professional librarian or information specialist experienced in the electronic retrieval
of information, who shall provide support for faculty in curriculum matters and
actively serve as a resource guide for both graduate and undergraduate students.

(3) Assure that students have access to the library collections and resources of
another institution, organization, or library.

(4) Document compliance with paragraphs (1), (2), and (3).

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19. CCR section 71750 states:

(a) Upon cancellation of enrollment in an educational program, the institution shall make refunds that are no less than the refunds required under the Act and this Division and shall not enforce any refund policy that is not specified in the catalog as required pursuant to section 94909(a)(8)(B) of the Code.

(1) Student cancellations shall be noticed in writing as required by sections 94919(b) and 94920(a) of the Code.

(A) Institutions shall refund 100 percent of the amount paid for institutional charges, less a reasonable deposit or application fee, not to exceed two hundred fifty dollars (\$250), if notice of cancellation is made through attendance at the first class session, or the seventh calendar day after enrollment, whichever is later.

20. CCR section 71770 states:

(b) The institution shall specify the maximum credit it will transfer from another institution for each educational program, and the basis upon which the transferred credit will be awarded.

(2) No more than 20% of graduate semester units or the equivalent in other units awarded by another institution may be transferred for credit toward a Master's degree. An institution may accept transfer credits only from the institutions of higher learning described in subsection (1)(A).

21. CCR section 71810 states:

...

(b) The catalog shall contain the information prescribed by Section 94909 of the Code and all of the following:

...

(10) A description of library and other learning resources and the procedures for student access to those resources;

...

22. CCR section 71865 states:

...

(c)(1) A Doctor of Philosophy degree (Ph.D.) is a research-oriented degree requiring a minimum of three years of full-time graduate education or the equivalent in part-time study. Such a doctoral program shall include substantial instruction in both theory and research at an advanced level in a designated field and specialty, and may only be awarded to a student who has completed a program of study that includes research methodology and demonstrated learning achievement through original research directly attributable to the student. Each educational program leading to a Doctor of Philosophy degree shall involve preparation for scholarship and systematic inquiry.

1 (2)(A) Each Doctor of Philosophy program shall include a minimum of two
2 formal evaluations of the student by a doctoral committee. The doctoral committee
3 shall be composed of at least three members of the institution's own faculty who
4 meet the qualifications in subdivision (c)(3).

5 (B) The first evaluation shall consider the student's qualifications, including the
6 student's knowledge, skills, and conceptual framework, for undertaking rigorous
7 inquiry into the student's designated field.

8 (C) The second evaluation shall consider the design procedures and products of
9 a formal original inquiry proposed and completed by the student.

10 (3) The faculty members who serve on each student's doctoral examining
11 committee shall meet the following qualifications:

12 (A) Each member shall have earned a Doctoral degree from: an institution that
13 is approved by the Bureau or previously approved by a predecessor agency of the
14 Bureau; or an accredited institution in the United States or Canada; or other state
15 approved institution that documents that the institution at which the faculty member
16 earned his or her degree is equivalent to an institution that is approved by the Bureau;
17 or an institution outside the United States or Canada and in addition provides a
18 comprehensive evaluation of the degree performed by a foreign credential evaluation
19 service that is a member of the National Association of Credential Evaluation
20 Services (NACES).

21 (B) The chair and the majority of the committee shall have earned degrees
22 related to the student's field of investigation.

23 (C) A minimum of 50% of the faculty on the committee shall have degrees
24 conferred by an

25 institution accredited by an accrediting association recognized by the United
26 States Department

27 of Education or the American Bar Association, unless the accreditation does not
28 exist.

(D) All of the faculty shall have three or more years of field or research
experience related to their degrees obtained after they obtained their degrees.

(E) All of the faculty shall have been active in their field of scholarship or
profession during the five year period preceding their participation on the committee.

(4) The formal evaluation procedures shall provide the committee as a whole
with the opportunity to jointly examine the candidate.

(5) If the candidate is not physically present and the evaluation must take place
by telephone or other means of electronic communication, one of the following shall
apply:

(A) One faculty member on the student's doctoral committee from the main
location (i.e., the state in which the program is licensed or otherwise officially
approved) must be present at the location where the doctoral student is examined.

(B) A proctor, selected and approved by the doctoral committee, shall sit as an
observer with the student at the distant location and verify, under penalty of perjury

1 under the laws of the State of California, the identity of the student and the facts that
2 the student received no prompting by anyone and did not have access to unallowed
3 materials during the evaluation process.

4 (6) If a project includes more than one student, the individual student's role and
5 contributions shall be clearly identified and documented.

6 (7) The institution shall maintain a written record of the evaluations. This
7 record shall include the names and signatures of all committee members who
8 participated in the evaluations.

9 (d) No more than 25 percent of the credits required for graduate degree
10 programs may be awarded for a final product such as a thesis, dissertation, or product.

11 (e) Dissertations, thesis and other products submitted by a student as part of a
12 graduate

13 program shall be signed by all faculty members recommending the student for
14 an award of a degree.

15 **FACTUAL ALLEGATIONS**

16 23. On January 4, 2023, the Bureau received Respondent's Application for Approval to
17 Operate an Institution Non-Accredited.

18 24. On March 9, 2023, an intake letter was sent by the Bureau identifying the following
19 sections of the application that were incomplete: Section 12: Instruction and Degrees Offered,
20 Section 15: Financial Resources and Statements, and Section 22: Recordkeeping; Custodian of
21 Records. On May 12, 2023, an intake letter response was received by the Bureau. It provided
22 additional information for the following sections of the application: Section 12: Instruction and
23 Degrees Offered, Section 13: Description of Educational Program, Section 14: Instruction in
24 Languages Other Than English, Section 15: Financial Resources and Statements, Section 18:
25 Libraries and Other Learning Resources, Section 19: Job Placement Assistance, Section 20: Copy
26 of Catalog, Section 21: Graduation or Completion Documents, Section 22: Record Keeping;
27 Custodian of Records, Section 23: Self-Monitoring Procedures, Section 24: Addition Information,
28 and an additional packet of information entitled "Important Notes" containing information on
student records, among other documents.

29 25. On October 17, 2023, the Bureau mailed a deficiency letter identifying deficiencies in
the following sections of the application: Section 5: Organization and Management, Section 9:
Exemplars of Student Agreements, Section 12: Instruction and Degrees Offered, Section 13:

1 Description of Educational Program, Section 16: Faculty, Section 18: Libraries and Other
2 Learning Resources, Section 20: Catalog, Section 21: Graduation or Completion Documents,
3 Section 22: Recordkeeping; Custodian of Records (regulation identified), and Section 23: Self-
4 Monitoring Procedures.

5 26. On November 13, 2023, the Bureau received a deficiency letter response. It sought to
6 resolve deficiencies in the following sections of the application: Section 5: Organization and
7 Management, Section 9: Exemplars of Student Agreements, Section 12: Instruction and Degrees
8 Offered, Section 13: Description of Educational Program, Section 16: Faculty, Section 18:
9 Libraries and Other Learning Resources, Section 20: Catalog, Section 21: Graduation or
10 Completion Documents, Section 22: Recordkeeping; Custodian of Records (custodian identified),
11 and Section 23: Self-Monitoring Procedures.

12 27. On January 10, 2024, the Bureau mailed a deficiency letter identifying deficiencies in
13 the following sections of the application: Section 9: Exemplars of Student Agreements, Section
14 16: Faculty, and Section 20: Catalog.

15 28. On January 23, 2024, the Bureau received a deficiency letter response. It sought to
16 resolve deficiencies in the following sections of the application: Section 9: Exemplars of Student
17 Agreements, Section 16: Faculty, and Section 20: Catalog. On February 23, 2024, the Bureau
18 mailed a deficiency letter identifying deficiencies in the catalog.

19 29. On February 24, 2024, the Bureau received a copy of Respondent's catalog.

20 30. On June 12, 2025, the Bureau's Senior Education Specialist mailed a deficiency letter
21 identifying deficiencies in the following sections of the application: Section 5: Organization
22 and Management, Section 11: Advertising and Other Public Statements, Section 12: Instruction
23 and Degrees Offered, Section 13: Description of Educational Program, Section 16: Faculty,
24 Section 17: Facilities and Equipment, Section 18: Libraries and Other Learning Resources, and
25 Section 20: Catalog.

26 31. On June 26, 2025, Respondent's owner/contact emailed the Senior Education
27 Specialist to request a 60-day extension and to communicate that American Liberty University
28 had decided to discontinue its Traditional Medicine degree programs and Postdoctoral certificate

1 programs, citing market demand and public interest. Respondent planned instead to offer only
2 two degree programs: a Master's in Business Administration (MBA) and a Ph.D. in Business
3 Administration.

4 32. On June 27, 2025, the Senior Education Specialist replied to grant the extension and
5 remind Respondent to make sure to provide all information required by the application and
6 requested syllabi for the newly proposed MBA program.

7 33. On August 20, 2025, the Bureau received a hard copy deficiency letter response
8 (emailed copy received August 14, 2025). It sought to resolve deficiencies in the following
9 sections of the application: Section 5: Organization and Management, Section 11: Advertising
10 and Other Public Statements, Section 12: Instruction and Degrees Offered, Section 13:
11 Description of Educational Program, Section 16: Faculty, Section 17: Facilities and Equipment,
12 Section 18: Libraries and Other Learning Resources, and Section 20: Catalog.

13 34. On or about September 30, 2025, the Bureau sent a Notice of Denial of the
14 Application for Approval to Operate Non-Accredited.

15 **FIRST CAUSE FOR DENIAL OF APPLICATION**

16 **(Minimum Operating Standards – Accreditation Plan)**

17 35. Respondent's application is subject to denial under California Education Code
18 sections 94887, in conjunction with CCR section 71105, for failing to meet the legally required
19 minimum operating standards at the time of its application. As of September 30, 2025,
20 Respondent was required to submit an accreditation plan that conforms to requirements outlined
21 in CCR section 71105. The TRACS accreditation plan provided by Respondent was incomplete
22 and does not satisfy outlined criteria.

23 **SECOND CAUSE FOR DENIAL OF APPLICATION**

24 **(Failure to Meet Minimum Operating Standards: Description of Method of Instruction)**

25 36. Respondent's application is subject to denial under Code section 94887, in
26 conjunction with CCR sections 71210 (c)(5), 71710(a), and 71715(d)(3), (6)&(8), in that
27 Respondent did not adequately describe the method of instruction, did not identify a learning
28

1 management system, did not identify a livestream platform and did not provide the requested log-
2 in access so that the curriculum could be accessed.

3 **THIRD CAUSE FOR DENIAL OF APPLICATION**

4 **(Failure to Meet Minimum Operating Standards: MBA Program)**

5 37. Respondent's application is subject to denial under Code section 94887, in
6 conjunction with CCR section 71210, in that Respondent did not complete Section 12: Instruction
7 and Degrees Offered questions for the proposed Executive MBA program.

8 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

9 **(Failure to Meet Minimum Operating Standards: Description of Education Program)**

10 38. Respondent's application is subject to denial under Code section 94887, in
11 conjunction with CCR section 71700, for failing to meet the legally required minimum operating
12 standards at the time of its application and as confirmed by the Bureau's investigation. The
13 deficiencies are as follows:

- 14 a. Respondent did not complete Section 13: Description of Educational Program questions
15 for the proposed Executive MBA program. (CCR §71220.)
- 16 b. Respondent was asked when and by whom curriculum was last updated to ensure that
17 the materials and programs are current, well organized, and designed by faculty
18 competent in distance education techniques. Respondent responded that "The catalog
19 has been updated in August 2025 by ALU's team." Respondent did not explicitly
20 address when and by whom the curriculum was last updated; thus, the Bureau could not
21 determine compliance. (CCR §71715(d)(3) and §71710(a)(3).)
- 22 c. Submitted syllabi contain numerous deficiencies. For example: Course lengths are not
23 consistent despite being on the same semester system; Syllabi do not identify
24 synchronous class meeting times, though some synchronous instruction is indicated in
25 other application materials; Textbooks are not listed on some course syllabi. For those
26 provided, citations are largely incomplete. Numerous textbooks could not be accurately
27 identified due to incomplete information. Some identified textbooks are outdated
28

1 editions and/or include incorrect publication years; The method(s) of instructional
2 delivery are not identified. (CCR §71710(a)(3)(C), (D), (E), & (G).)

- 3 d. Respondent provided two different syllabi for the same strategic management course
4 with no explanation given. The syllabi present different course content and objectives.
5 (CCR §71710(a).)
- 6 e. Respondent's Syllabi present a variety of pre-requisites from basic knowledge to
7 admissions standards, to apparent foundation course requirements like introductory
8 research methods. However, Respondent's catalog references no such pre-requisite
9 requirements. In addition, courses are not presented in a logically organized manner or
10 sequence to students. (CCR §71710(a)(2).)
- 11 f. Respondent was asked to provide a copy of the documentation that will be provided to
12 doctoral candidates which describes all dissertation-related policies and procedures.
13 The requested documentation was not provided. Partial information displayed in other
14 submitted materials does not demonstrate compliance with all Ph. D dissertation
15 requirements outlined in regulation. (CCR §71865(c)(1-7), (d) & (e).)

16 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

17 **(Failure to Meet Minimum Operating Standards: Faculty)**

18 39. Respondent's application is subject to denial under Code section 94887, in
19 conjunction with CCR section 71700, for failing to meet the legally required minimum operating
20 standards at the time of its application and as confirmed by the Bureau's review. The deficiencies
21 are as follows:

- 22 a. Identified faculty do not appear to be qualified to teach graduate level business courses
23 based on the information provided. Requested *curriculum vitae* and transcripts were not
24 provided to the Bureau to demonstrate necessary faculty qualifications. (CCR
25 §71720(a)(1) & (4).)
- 26 b. Insufficient qualified faculty were identified to serve on doctoral committees for
27 Business Administration Ph. D candidates. (CCR §71720(a)(9).)

28 ///

1 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

2 **(Failure to Meet Minimum Operating Standards: Facilities and Equipment)**

3 40. Respondent's application is subject to denial under Code section 94891, subdivision
4 (b), in conjunction with CCR sections 71260, subdivisions (b), in that Respondent did not provide
5 an executed rental agreement for the proposed facilities.

6 **SEVENTH CAUSE FOR DENIAL OF APPLICATION**

7 **(Failure to Meet Minimum Operating Standards: Library and Other Learning Resources)**

8 41. Respondent's application is subject to denial under Code section 94891, subdivision
9 (b), in conjunction with CCR sections 71270 and 71740, in that Respondent inconsistently
10 represents what library and learning resources are to be offered to students. Statements made
11 regarding the library and learning resources are not consistent between the application and the
12 catalog. In addition, requested access to online resources was not provided. Despite relying on
13 online resources and other entities' collections, Respondent has not identified a librarian or
14 learning resource specialist to assist. It is unclear how sufficient resources are to support proposed
15 graduate level work.

16 **EIGHTH CAUSE FOR DENIAL OF APPLICATION**

17 **(Minimum Operating Standards – Catalog)**

18 42. Respondent's application is subject to denial under California Education Code
19 sections 94891 subdivision (b), in conjunction with CCR section 71700, for failing to meet the
20 legally required minimum operating standards at the time of its application and as confirmed by
21 the Bureau's investigation. The deficiencies are as follows:

- 22 a. Respondent was asked to remove errant information from its catalog; however,
23 inaccurate information remains in the catalog. For example, reference is made to
24 another institution where it should be referring to American Liberty University.
25 Reference is made to a staff position that does not appear on the organizational chart.
26 Numerous statements in the catalog contradict statements made elsewhere in the
27 catalog as well as elsewhere in the application. Respondent's catalog makes materially
28 untrue or misleading statements to a student or prospective student under

1 Respondent's authority or the pretense or appearance of Respondent's authority. (Cal.
2 Educ. Code §94897(q).)

- 3 b. The catalog description of library and other learning resources and the procedures for
4 student access to those resources do not correspond to information presented in
5 Section 18 of the application: Libraries and Other Learning Resources. The Bureau
6 cannot determine what Respondent is truly proposing to offer. (CCR §71810(b)(10).)
- 7 c. The catalog describes a non-compliant transfer of credit policy for the Executive MBA
8 program. It indicates 15 units may be transferred into the 42-unit program; however,
9 regulation allows a maximum of 20% of a program's units to be transferred into a
10 master's degree. (CCR §71770(b)(2).)
- 11 d. Catalog program descriptions are not consistent. (Cal. Educ. Code §94909(a)(5).)
- 12 e. The schedule of charges displayed in the catalog does not identify all of the same fee
13 as the finally submitted enrollment agreement. Moreover, non-refundable registration
14 and application fees identified in the catalog total more than the maximum allowance
15 of \$250. (CCR §71750(c)(3) and Cal. Educ. Code §94909(a)(9).)

16 **DISCIPLINARY CONSIDERATIONS**

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18 43. To determine the degree of discipline, if any, to be imposed on Respondent,
19 Complainant alleges in a prior disciplinary action titled *In Matter of the First Amended Statement*
20 *of Issues Against American Liberty University*, Case No. 1002965 (OAH Case No. 2018110412),
21 the Bureau issued a Decision and Order effective October 11, 2019, in which Respondent's
22 Application for Approval to Operate for an Institution Non-Accredited was denied.

23 44. To determine the degree of discipline, if any, to be imposed on Respondent,
24 Complainant alleges that on or about September 6, 2018, the Bureau issued Citation #1819030
25 and ordered Respondent to pay a civil penalty in the amount of \$5,000.00, and to submit a written
26 policy, or procedure, of future compliance with title 5, California Code of Regulations 74250 and
27 76240(a)(4)(A)(B)(6) and Education Code 94926(a)(b) and 94868. Respondent did not pay the
28 citation fine.

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PRAYER

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. Denying the application of American Liberty University for an Approval to Operate for an Institution Non-Accredited; and
- 2. Taking such other and further action as deemed necessary and proper.

DATED: 4/30/2026

"Original Signature on File"
DEBORAH COCHRANE
Chief
Bureau for Private Postsecondary
Education
Department of Consumer Affairs
State of California
Complainant

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