

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

In the Matter of the Citation Against:

**JAGER TRUCKING SCHOOL,
JAGER TRUCKING SCHOOL, INC., Owner,**

Citation No.: 24250189

BPPE Case No. BPPE23-0132

OAH Case No.: 2025101205

Respondent.

DECISION AND ORDER

The attached Proposed Decision of the Administrative Law Judge 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 September 17, 2026.

It is so ORDERED August 14, 2026.

"Original Signature on File"

Ryan Marcroft
Deputy Director
Legal Affairs Division
Department of Consumer Affairs

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

In the Matter of the Citation Against:

JAGER TRUCKING SCHOOL,

JAGER TRUCKING SCHOOL, INC., Owner,

Respondent.

Citation No. 24250189

Case No. BPPE23-0132

OAH No. 2025101205

PROPOSED DECISION

Jennifer M. Russell, Senior Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter by videoconference on June 25, 2026.

Leslie Walden, Deputy Attorney General, represented complainant Elizabeth Elias, Deputy Bureau Chief of Enforcement, Bureau for Private Postsecondary Education (BPPE or Bureau), Department of Consumer Affairs (Department). Gurmit Singh, owner, represented respondent Jager Trucking School, Inc., and Jager Trucking School.

The record closed and the matter was submitted for decision at the conclusion of the hearing on June 25, 2026. The Administrative Law Judge makes the following Factual Findings, Legal Conclusions, and Order.

FACTUAL FINDINGS

Procedural History and Jurisdictional Matters

1. On February 7, 2023, the Bureau received an anonymous complaint claiming Jager Trucking School ("the institution") was operating without the proper approval to do so and recently moved to the High Desert area. The complaint included a screenshot of a social media post from an account in the name of Ricky Navarro announcing the institution opened a new location in Victorville, California that operates 12 hours daily, and which offers a Class A license course for \$3,000. Anyone who refers a new client is offered \$100 cash.

2. Leslie Feist is an Enforcement Analyst in the Bureau's Complaint Investigations Unit. That same day Feist received the anonymous complaint she telephoned the institution and spoke with Manjodh Singh, who identified himself as the institution's chief executive officer. As memorialized in a December 5, 2024 Investigation Report Enforcement Analyst Feist prepared, and which was entered into the evidentiary record as Exhibit 5, Manjodh informed Feist respondent charges \$3,000 for the Class A driver's license course at its Rialto location and \$3,500 at its Victorville location. A \$1,000 downpayment is required with the balance due before the student is tested at the Department of Motor Vehicles (DMV). Should the student complete the program within three weeks, the student receives a discount that brings the total cost at either location to \$2,500.

3. On September 5, 2024, Enforcement Analyst Feist obtained the following information about respondent from records maintained by the California Secretary of State: respondent's main location is located in Rialto, California, respondent's administrative office is located in San Bernardino, California, and respondent has a satellite location in Victorville, California. Feist also emailed admin@jagertruckingschool.com requesting pricing information but received none.

4. Enforcement Analyst Feist determined respondent is in violation of Education Code (Code) section 94886. Respondent is not approved by the Bureau to operate a private postsecondary institution. Bureau records indicate respondent has not submitted an application for approval to operate or for verification of exempt status. Respondent offers educational programs in excess of \$2,500.

5. On February 27, 2025, the Bureau issued Citation number 24250189 to respondent.

6. On August March 5, 2025, the Bureau received respondent's appeal with a request for an informal conference and administrative hearing.

7. On May 19, 2025, Deputy Bureau Chief of Enforcement Elias held an informal conference with Manjodh Singh to go over the violations listed in the citation. During the informal conference Manjodh expressed his views that the Bureau did not have an accurate understanding of how the institution operates. He said students' tuition costs and all other costs are below \$2,400. Students have the option of renting trucks after graduation to test. The truck rental fee is \$700 in Rialto and \$1,100 in Victorville. The truck rental fee covers three attempts to pass the test. Manjodh stated respondent never advertised course costs over \$2,500. He said different staff takes calls from prospective students and he was uncertain whether any staff told

prospective students the program costs more than \$2,500. Manjodh said he was working on submitting an application for approval to operate but it has not been submitted to the Bureau.

8. On May 29, 2025, Deputy Bureau Chief of Enforcement Elias issued an Affirmed Citation Order to respondent for violation of Code section 94886. The Affirmed Citation Order assesses an administrative fine of \$25,000 and includes an order of abatement directing respondent to cease operating as a private postsecondary educational institution unless exempt under Code section 94874 or until an approval to operate is obtained; to discontinue recruiting, enrolling, instruction, and advertising; to disconnect identified telephone numbers; to submit a signed statement of attestation it has ceased to operate; and to refrain from enforcing loans pursuant to Code section 94917.

9. On June 30, 2025, a Bureau enforcement analyst notified respondent by mail that compliance with the Affirmed Citation Order had not been received and, absent a response by the close of business, the matter would be forwarded to the Attorney General's Office. Respondent did not respond.

10. On November 6, 2025, the Office of the Attorney General served a Notice of Hearing setting this matter for hearing on June 25, 2026.

Complainant's Evidence

11. Enforcement Analyst Feist testified at hearing. Her testimony was consistent with the December 5, 2024 Investigation Report she prepared. She described her review of the anonymous complaint and attached social media advertisement, her investigative interview with Manjodh, her online research, and her verification of ownership information through the Secretary of State website. She

testified respondent required Bureau approval to operate the institution unless it qualified for an exemption, respondent held neither an approval nor a verified exemption, and respondent's pricing exceeded \$2,500.

Respondent's Evidence

12. Gurmit Singh completed high school in India. He has more than 25 years of experience in the trucking industry, which includes driving commercially in India and Italy and, since 2009, in the United States. Mr. Singh testified on behalf of respondent.

13. In 2021 or 2022, when respondent opened the institution respondent hired School Builder Plus, a third-party consultant, to advise it on regulatory requirements. School Builder Plus advised respondent the \$2,500 charge limitation is "regulated up until graduation" and that a truck rental fee is a "post-graduation" charge falling outside that limitation. Mr. Singh credibly testified respondent relied in good faith on the consultant's guidance and believed it was doing the right thing. Upon learning the guidance was incorrect, respondent immediately made changes. Program fees are now set at \$2,000.

14. Respondent offered in evidence an email from School Builder Plus, dated May 15, 2025, in advance of the May 19, 2025 informal conference discussed above. The email articulates respondent's position that educational program fees are charged to students while optional truck rental fees are charged to graduates. Respondent's practice of putting all fees on a single invoice made the program fees appear to exceed the \$2,500 limitation. Respondent revised its billing procedures to charge rental fees separately. The email was forwarded to complainant's counsel during the June 25, 2026 hearing.

///

15. Mr. Singh denied respondent posted the social media advertisement included in the anonymous complaint sent to the Bureau. Mr. Singh testified the hearing was the first time he had seen the advertisement, there is no person named “Ricky” associated with the institution, and the telephone number appearing on the advertisement does not belong to the institution.

16. In November 2025, Mr. Singh experienced serious cardiac health problems resulting in his hospitalization. Because of his health problems he had no contact with the Bureau. Otherwise, he would have reached out to the Bureau to resolve the matter.

17. Mr. Singh testified about respondent’s financial situation. Respondent netted approximately \$75,000 in 2024 and \$62,000 in 2025. In May 2026, four students enrolled. To date, 2026 revenues are approximately \$68,000. Respondent pays monthly rent in the amount of \$7,000. Respondent employs two of Mr. Singh’s sons. The Singh family relies on respondent for funds to pay the whole family’s expenses. Mr. Singh maintained respondent is not in a financial position to pay the \$25,000 fine. He respectfully requested a reduction of the \$25,000 administrative fine or a payment plan, or both, without minimizing the Bureau’s oversight responsibilities.

LEGAL CONCLUSIONS

Applicable Law

1. Under the California Private Postsecondary Education Act of 2009 (the ACT), Code section 94800 et seq, the Bureau has oversight responsibility for private postsecondary educational institutions. Bureau’s responsibilities include, among other things, protecting students and consumers against fraud, misrepresentation, or other

business practices that may lead to a loss of student tuition and related education funds and establishing and maintaining minimum operating standards for fiscal integrity, financial stability, and educational quality.

2. To fulfill these public protection goals, Code section 94886 provides, except as exempted, no person or entity may open, conduct, or do business as a private postsecondary educational institution in California without first obtaining an approval to operate in the state from the Bureau.

3. Persons or entities seeking an approval to operate must submit a formal application, i.e., Form Application 94886, detailing their educational programs, physical facilities, financial stability, and faculty qualifications to the Bureau. (Cal. Code Regs., tit. 5, §§ 71220, 71260, 71745, 74115.)

4. Code section 94858 defines a “private postsecondary educational institution” as a private entity with a physical presence in California that offers postsecondary education to the public for an institutional charge. Code section 94857 defines “postsecondary education” to include formal institutional educational programs whose purpose is academic, vocational, or continuing professional education. Code section 94868 defines “to offer to the public” as to advertise, publicize, solicit, or recruit. Code section 94817.5 provides that “approved to operate” means the institution has received authorization to offer to the public and to provide postsecondary educational programs.

5. Code section 94874, subdivision (f), exempts from the approval requirement an institution that does not award degrees and that solely provides educational programs for total charges of \$2,500 or less when no part of the total charges is paid from state or federal student financial aid programs. Code section

94870 defines "total charges" as the sum of institutional and noninstitutional charges. Code section 94874.5 provides a process by which institutions may obtain Bureau verification of their exempt status.

6. Code section 94936 authorizes the Bureau to issue citations containing orders of abatement and administrative fines for violations of the Act.

7. California Code of Regulations, title 5 (CCR), sections 75020 and 75030 governs the issuance of the citation and assessment of fines. CCR section 75040 governs appeal of citations.

Standard and Burden of Proof

8. Complainant bears the burden of proving by a preponderance of the evidence the Bureau has cause to issue Citation 24250189 to respondent. (Evid. Code, §§ 115, 500.)

Discussion

9. Respondent is a private entity with a physical presence in California. Respondent offers a formal vocational educational program—Class A commercial driver training—to the public for an institutional charge. Respondent solicits the public for prospective students. Bureau records confirm respondent never submitted an application for approval to operate or for verification of exempt status.

10. The evidentiary record establishes respondent's institutional charges offered to the public exceeded \$2,500. During her investigation, Enforcement Analyst Feist learned from Manjodh Singh that respondent charged \$3,000 at its Rialto location and \$3,500 at its Victorville location. A conditional discount to lower the charges to an amount less than \$2,500 was available only to some enrolled students

completing the program within three weeks. Conditional discounts are not controlling. The charges offered to the public and invoiced to students are controlling.

11. The truck rental fees were similarly presented to students at the time of enrollment and were billed to the same invoice as the tuition. Any recharacterization of institutional charges in excess of \$2,500 as optional post-graduation truck rental fees is therefore rejected.

12. Respondent's subsequent corrective measure revising its billing procedures to charge truck rental fees separately, while commendable, confirms rather than negates the violation. Respondent's reliance on the erroneous advice of a private consultant does not excuse the violation. The obligation to comply with the Act rests with respondent.

13. Cause exists pursuant to Code section 94946 and CCR sections 75020 and 75030 to affirm Citation 24250189 issued to respondent. A preponderance of the evidence proves respondent offered postsecondary education to the public in California for a charge. Respondent holds no approval to operate or a valid exemption, in violation of Code section 94866.

14. Respondent requests a reduction of the \$25,000 administrative fine. Considering factors governing assessment of administrative fines, including the nature and gravity of the violation, respondent's good faith and subsequent remediation, and respondent's financial evidence, a reduction of the \$25,000 administrative fine is warranted. Under the facts and circumstances of this matter, an administrative fine in an amount totaling \$12,500 adequately serves the purposes of deterrence, accountability, and public protection without imposition of an unnecessary punitive financial burden. The abatement order will remain fully effective and will

independently ensure respondent cannot operate as a postsecondary educational institution, unless respondent qualifies for an exemption or until respondent obtains approval to operate from the Bureau.

ORDER

1. Respondent Jager Trucking School and its owner Jager Trucking School Inc.'s violation of Education Code section 94886 is AFFIRMED.

2. Citation number 24250189, issued February 27, 2025, and affirmed May 29, 2025, to Jager Trucking School and its owner Jager Trucking School, Inc., is MODIFIED. The administrative fine in the amount of \$25,000 is reduced to \$12,500. The \$12,500 administrative fine shall be paid to the Bureau for Private Postsecondary Education in accordance with an approved payment plan.

3. The Order of Abatement contained in Citation number 24250189, issued February 27, 2025, and affirmed May 29, 2025, to Jager Trucking School and its owner Jager Trucking School, Inc., is AFFIRMED.

4. Evidence of compliance with the Order of Abatement shall be submitted to the Bureau for Private Postsecondary Education within 30 days after the effective date of this Proposed Decision.

DATE: 07/27/2026

A handwritten signature in black ink that reads "Jennifer Russell". The signature is written in a cursive, flowing style.

JENNIFER M. RUSSELL

Senior Administrative Law Judge

Office of Administrative Hearings