



## CITATION ORDER

<p><b>Citation Issued To:</b>          First Lady Permanente, LLC Education Center          901 Geer Road          Turlock, CA 95380</p> <p><b>Institution Code:</b>          27053651</p>	<p><b>Citation Number:</b>          24250244</p>
	<p><b>Total Fine Amount:</b>  <span style="color: red; font-weight: bold;">\$25,002.00</span></p>
	<p><b>Order of Abatement Included:</b> Yes</p>

Elizabeth Elias issues this citation in her official capacity as Deputy Bureau Chief of Enforcement at the Bureau for Private Postsecondary Education, California Department of Consumer Affairs (hereinafter referred to as the "Bureau").

### LICENSING HISTORY

1. On or about August 29, 2022, the Bureau renewed an Approval to Operate a Private Postsecondary Institution, Institution Code 27053651, to First Lady Permanente, LLC Education Center, hereinafter referred to as the "Institution." This Approval to Operate will expire on or about August 29, 2027, unless renewed.

### DISCIPLINE HISTORY

2. The Institution has no prior discipline history.

### CITATION JURISDICTION

3. This administrative citation is issued to the Institution pursuant to California Education Code (CEC) section 94936; and Title 5 of the California Code of Regulations (5 CCR) section 75020 et seq. for the violation(s) described below.

### CAUSE FOR CITATION & ASSESSMENT OF FINE AND/OR ORDER OF ABATEMENT

4. The Institution is in violation of the following Bureau laws and regulations:

Citation Number: 24250244

Institution: First Lady Permanente, LLC Education Center

Institution Code: 27053651

**Violation #1:**

**5 CCR section 74112(m)(1-9) - Uniform Data – Annual Report, Performance Fact Sheet and 5 CCR section 71930(e) – Maintenance of Records**

**Cause for Citation:** On or about February 15, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff conducted a review of the Institution's 2020/2021 School Performance Fact Sheet (SPFS) supporting documentation and found that the Institutions substantiating data failed to include all the required data points pursuant to 5 CCR section 74112(m).

**Administrative Fine:** Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of \$2,501.00.

**Order of Abatement:** Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to correct the violation by providing an electronic copy of the template used by the Institution to document supporting data for SPFS, for the Bureau to verify the Institution is collecting the required data points pursuant to 5 CCR section 74112.

In addition, the Institution must submit a statement of attestation they have corrected the violation and will ensure that the supporting data for SPFS is maintained and immediately available during an inspection. The statement of attestation must be dated and signed by an authorized representative of the Institution.

**Violation #2:**

**5 CCR section 71920(b)(10) – Student Records, and 5 CCR section 71930(e) – Maintenance of Records**

**Cause for Citation:** On or about February 15, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff reviewed three withdrawn student files and found that two of the withdrawn student files reviewed failed to include refund documents consistent with 5 CCR section 71920(b)(10).

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**Administrative Fine:** Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class B" violation. The Institution is issued a fine of \$2,501.00.

**Order of Abatement:** Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to submit a statement of attestation that they will maintain required student records pursuant to 5 CCR section 71920 and 5 CCR section 71930. The statement of attestation must be signed and dated by an authorized representative of the Institution.

**Violation #3:**

**5 CCR section 71750(b), (c) and (e) - Withdrawals and Refunds and CEC section 94920(e) - Mandatory Cancellation, Withdrawal and Refund Policies**

**Cause for Citation:** On or about February 15, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff reviewed three withdrawn student files and found the Institution failed to provide one withdrawn student with a pro rata refund, in accordance with its own stated policy in the School Catalog, and pursuant to 5 CCR section 71750.

Additionally, the Institution failed to provide a refund for the remaining credit balance within 45 days of the student's cancellation or withdrawal pursuant to CEC section 94920(e).

**Administrative Fine:** Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of \$5,000.00.

**Order of Abatement:** Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to submit a statement of attestation confirming compliance with 5 CCR section 71750 and CEC section 94920. Additionally, the statement of attestation must confirm that the Institution will provide a refund, as required pursuant to 5 CCR section 71750(c) to any

student who has requested one and is eligible. The statement of attestation must be dated and signed by an authorized representative of the Institution.

**Violation #4:**

**CEC section 94920(b) and (e)- Mandatory Cancellation, Withdrawal and Refund Policies, 5 CCR section 71750(b) - Withdrawals and Refunds and 94897(u) - Prohibited Business Practices**

**Cause for Citation:** On or about February 15, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff reviewed three withdrawn student files and found the Institution did not refund 100 percent of the amount paid for institutional charges less a reasonable deposit or application fee not to exceed two hundred fifty dollars for one withdrawn student whose cancellation was within the cancellation period pursuant to CEC section 94920(b).

Bureau staff also found that the Institution did not remit a 100% refund to one withdrawn student who cancelled within the cancellation period in accordance with the Institutions "drop out policy" as stated in the catalog, and institution's refund policies stated in the catalog and enrollment agreement.

**Administrative Fine:** Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of \$5,000.00.

**Order of Abatement:** Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to submit a statement of attestation confirming it will issue refunds in accordance with CEC section 94920 and 94897. The statement of attestation must be dated and signed by an authorized representative of the Institution.

Additionally, the statement of attestation must confirm that the Institution will provide a refund, as required pursuant to 5 CCR section 71750 to any student that is eligible. The statement of attestation must be dated and signed by an authorized representative of the Institution.

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**Violation #5:**

**5 CCR section 71750(c)(3) - Withdrawals and Refunds and CEC Section 94897(j) - Prohibited Business Practices**

**Cause for Citation:** On or about February 15, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff reviewed three withdrawn student files and found that the Institution withheld an orientation fee as a non-refundable charge despite not identifying the fee as non-refundable in the enrollment agreement or catalog refund policy.

Therefore, Bureau staff also found that the Institution failed to remit a proper pro rata refund to the same student.

**Administrative Fine:** Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of \$5,000.00.

**Order of Abatement:** Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to submit a statement of attestation confirming compliance with 5 CCR section 71750 and CEC section 94897(j). Additionally, the statement of attestation must confirm that the Institution will provide a refund, as required pursuant to 5 CCR section 71750 to any student that is eligible. The statement of attestation must be dated and signed by an authorized representative of the Institution.

**Violation #6:**

**CEC Section 94897(u) - Prohibited Business Practices**

**Cause for Citation:** On or about February 15, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). During the inspection, Bureau staff determined that the Institution failed to comply with its own published policies outlined in the school catalog, including those related to student withdrawal or "drop out policy" and tuition refunds.

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**Administrative Fine:** Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of \$5,000.00.

**Order of Abatement:** Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to submit a statement of attestation that they have corrected the violation and will ensure that the institution adheres to its stated policies pursuant to CEC section 94897(u). The statement of attestation must be dated and signed by an authorized representative of the Institution.

### COMPLIANCE WITH ORDER OF ABATEMENT

5. In accordance with the provisions of CEC section 94936 and 5 CCR section 75020, the Bureau issues the order(s) of abatement described above. Evidence of compliance with the order of abatement must be submitted to the Bureau within 30 days from the date of issuance of this citation. Evidence of compliance with the order of abatement may be sent by mail or email to:
- Mail: Bureau for Private Postsecondary Education  
Attn: Discipline Unit – Aurzella Izmarai-Karimi  
1747 North Market, Blvd., Suite 225  
Sacramento, CA 95834
  - Email: [bppe.discipline@dca.ca.gov](mailto:bppe.discipline@dca.ca.gov)
    - In the subject line, please include the Institution name and citation number.

### COMPLIANCE WITH ASSESSMENT OF FINE

6. In accordance with the provisions of CEC section 94936, and 5 CCR sections 75020 and 75030, the Bureau hereby orders this assessment of fines in the total amount of \$25,002.00 for the violations described above. Payment of the fines must be made to the Bureau within 30 days from the date of service of this citation unless an informal conference or hearing is requested. To assist the Bureau in processing the payment of fines, please submit the enclosed *Payment of Fine – Waiver of Appeal* form.

Payment must be sent to the Bureau by mail at:

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Institution: First Lady Permanente, LLC Education Center

Institution Code: 27053651

- Bureau for Private Postsecondary Education  
Attn: Discipline Unit – Aurzella Izmarai-Karimi  
1747 North Market, Blvd., Suite 225  
Sacramento, CA 95834

### **NOTICE OF APPEAL RIGHTS**

7. You have the right to contest this citation through an informal conference with the Bureau pursuant to 5 CCR section 75020 and/or through an administrative hearing in accordance with Chapter 5 (Commencing with section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

If you wish to contest this citation, the Bureau must receive a written request within 30 days from the date of issuance of this citation asking for an informal conference and/or administrative hearing or you may also submit the enclosed *Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing* form.

The written request may be sent by email or mail to the addresses below:

- Mail: Bureau for Private Postsecondary Education  
Attn: Discipline Unit – Aurzella Izmarai-Karimi  
1747 North Market, Blvd., Suite 225  
Sacramento, CA 95834
- Email: [bppe.discipline@dca.ca.gov](mailto:bppe.discipline@dca.ca.gov)
  - In the subject line, please include the Institution name and citation number.

Failure to submit a written request for an informal conference and/or administrative hearing within 30 days from the date of issuance of this citation will forfeit your ability to appeal the citation.

If a hearing is requested, you are not required to comply with this citation until a final order is entered against you.

### **COMPLIANCE WITH FINE AND/OR ORDER OR ABATEMENT DISCLOSURE**

8. Pursuant to BPC section 125.9 and 5 CCR section 75050, payment of fine and/or compliance with any order of abatement does not constitute an

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admission of the violation charged and shall be represented as satisfactory resolution of the matter for the purposes of public disclosure.

Pursuant to 5 CCR section 75050, failure to comply with this citation order, its order of abatement, and/or administrative fine by the required due date is grounds for denial or discipline of an approval to operate. Where a citation is not contested and fine is not paid, the full amount of the assessed fine shall be added to the fee for renewal of the approval to operate. An approval to operate shall not be renewed without payment of the renewal fee and fine.

### **BUREAU CONTACT INFORMATION**

9. If you have any questions regarding this Citation, please contact Aurzella Izmarai-Karimi, Citation Analyst by email at [Aurzella.Izmarai@dca.ca.gov](mailto:Aurzella.Izmarai@dca.ca.gov) or by phone at (916) 574-7344.

"Original Signature on File"

6/27/2025

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Elizabeth Elias  
Deputy Bureau Chief of Enforcement

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Citation Date of Issuance

#### Enclosures:

- Notice of Appeal of Citation: Request for Informal Conference and/or Administrative Hearing
- Payment of Fine – Waiver of Appeal
- Declaration of Service by Certified and First-Class Mail