BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR

DEPARTMENT OF CONSUMER AFFAIRS • BUREAU FOR PRIVATE POSTSECONDARY EDUCATION
1747 N. Market Blvd., Suite 225, Sacramento, CA 95834

P (916) 574-8900 | Toll-Free (888) 370-7589 | www.bppe.ca.gov



CITATION ORDER

Citation Issued To:

American Medical Careers (formally known as FTI - L.A. and Managed Career Solutions (MCS) dba Foreign Trade Institute (LA)) 3333 Wilshire Blvd, Ste 405 Los Angeles, CA 90010

Citation Number: 25260010

Total Fine Amount:

\$16,507.00

Order of Abatement Included: Yes

Institution Code:

41424440

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 March 10, 2020, the Bureau renewed an Approval to Operate a Private Postsecondary Institution, Institution Code 41424440, to American Medical Careers (formally known as FTI - L.A. and Managed Career Solutions (MCS) dba Foreign Trade Institute (LA)) hereinafter referred to as the "Institution." This Approval to Operate expired on or about March 10, 2025, and has not been renewed.

DISCIPLINE HISTORY

- 2. The Institution has the following discipline history:
 - Citation No. 23240267, issued April 16, 2024
 - o Evidence of compliance; citation satisfied June 11, 2024

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.

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

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

Violation #1:

5 CCR section 71660 – Notifications of Non-Substantive Changes

Cause for Citation: On or about October 29, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). During the inspection, Bureau staff found that the Institution is operating out of an unapproved location at 3333 Wilshire Blvd., Suite 807, Los Angeles, California 90010. Therefore, the Bureau determined that the Institution failed to notify the Bureau of a non-substantive change of location less than 10 miles within 30 days of the change.

Administrative Fine: Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class C" violation. The Institution is issued a fine of \$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 written notice of the non-substantive change. The Institution shall also submit a statement of attestation stating that they have submitted the written notice of non-substantive change to the Bureau and will provide notice to the Bureau for any future changes in compliance with 5 CCR section 71660. The statement of attestation shall be dated and signed by an authorized representative of the Institution.

Violation #2:

5 CCR section 71930(e) – Maintenance of Records

Cause for Citation: On or about October 29, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff requested to review current, graduated and withdrawn/incomplete student files and was informed by the Institution that some student records are maintained offsite at the Institution's warehouse. Therefore, the Institution was unable to make all student records immediately available for inspection.

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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 \$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 ensure all student records follow the law pursuant to 5 CCR section 71930. The Institution must submit a statement of attestation they have corrected the violation and ensured that student records are maintained in an electronic format and readily available to a Bureau representative upon request.

Violation #3:

5 CCR section 74112(m)(1-6) and (m)(8-9) - Uniform Data and 5 CCR section 71930(e) – Maintenance of Records

Cause for Citation: On or about October 29, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff requested supporting documentation for information reported on the Institution's 2021/2022 School Performance Fact Sheet (SPFS). The Bureau found the Institution failed to collect or maintain the required data points pursuant to 5 CCR section 74112, specifically subsections (m)(1-6) and (m)(8-9).

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

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maintained and immediately available during an inspection. The statement of attestation must be dated and signed by an authorized representative of the Institution.

Violation #4:

5 CCR section 71920(b)(1)(A)(B) – Student Records and CCR, 5 CCR section 71930(e) – Maintenance of Records

Cause for Citation: On or about October 29, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a).

Bureau staff reviewed three graduated, and three withdrawn student files and found that all of the student files reviewed failed to contain verification of high school completion or equivalency or other documentation establishing the student's ability to do college level work.

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

Violation #5:

5 CCR section 71920(b)(8) and (b)(9) – Student Records and 5 CCR section 71930(e) – Maintenance of Records

Cause for Citation: On or about October 29, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff reviewed three graduated, and three withdrawn student files and found that all the student files reviewed failed to contain a copy of documents related to student financial aid and failed to contain documents showing the total

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amount of money received from or on behalf of the student and the date or dates on which the money was received.

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 \$1,001.00.

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 sections 71920 and 71930. The statement of attestation must be signed and dated by an authorized representative of the Institution.

Violation #6:

5 CCR section 71920(b)(4) – Student Records and 5 CCR section 71930(e) – Maintenance of Records

Cause for Citation: On or about October 29, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff conducted a random sampling of three graduated, and three withdrawn student files and found that three withdrawn student files failed to contain record of the withdrawal from the Institution.

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 \$2,500.00.

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 sections 71920 and 71930. The statement of attestation must be signed and dated by an authorized representative of the Institution.

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Violation #7:

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

Cause for Citation: On or about October 29, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff conducted a random sampling of three graduated, and three withdrawn student files and found that three withdrawn student files reviewed failed to include refund documents consistent with 5 CCR section 71920(b)(10).

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

Violation #8:

94900.5(b)- Required Institutional Records and 5 CCR section 71930(a) and (e) – Maintenance of Records

Cause for Citation: On or about October 29, 2024, the Bureau conducted an announced compliance inspection pursuant to CEC 94932.5(a). Bureau staff requested to review faculty files, including the file for the Chief Academic Officer (CAO) and found that the Institution was only able to provide one faculty file and stated all other faculty files, including the CAO file are maintained offsite at the Institution's warehouse. Therefore, the institution failed to make all faculty files immediately available for inspection.

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.

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

The Bureau orders the Institution to ensure all faculty records follow the law pursuant to 5 CCR section 71930 and CEC section 94900.5. The Institution must submit a statement of attestation they have corrected the violation and ensured that all faculty records are in compliance with the law. 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
 - 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 \$16,507.00 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:

 Bureau for Private Postsecondary Education Attn: Discipline Unit – Aurzella Izmarai-Karimi

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

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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 or by phone at (916) 574-7344.

"Original Signature on File"	9/22/2025
Elizabeth Elias	Citation Date of Issuance
Deputy Bureau Chief of Enforcement	

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