

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

In the Matter of the Statement of Issues)	
Against:)	
PACIFIC BEAUTY COLLEGE OF LOS)	Case No. 1001140
ANGELES; MARGARET A. GOINES,)	
Owner,)	OAH-No.-20J6050854
)	
)	
Respondent.)	
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DECISION AFTER REJECTION OF PROPOSED DECISION

This matter was heard before Administrative Law Judge (ALJ) Howard W. Cohen, State of California, with the Office of Administrative Hearings, in Los Angeles, California on January 24, 2017. Vinodhini R. Keller, Deputy Attorney General, represented complainant Joanne Wenzel, Chief of the Bureau for Private Postsecondary Education (Bureau),¹ Department of Consumer Affairs, State of California. Respondent Pacific Beauty College of Los Angeles (respondent or College) was represented by Margaret A. Goines, its owner. The matter was submitted on January 24, 2017, and the Proposed Decision issued on February 23, 2017.

On or about April 14, 2017, the Director of the Department via his designee issued a Notice of Nonadoption of the proposed decision. The parties were provided the opportunity to submit written argument on any issues the parties wished to address. The Director was particularly interested in arguments as to whether pursuant to title 5 California Code of Regulations, section 71400, subdivision (d)(1) a school can be granted conditional approval to operate where there are findings that significant deficiencies in its application exist as to such items like the failure to provide currently reviewed financial statement by a certified public accountant, failure to establish sufficient financial resources, and missing student performance fact sheets and Student Tuition Recovery Fund assessment forms, as well as whether, pursuant to title 5, California Code of Regulations, section 71410, subdivision (a), which applies to the provisional approval granted to a degree-granting program that has not met its accreditation

¹ The former Bureau for Private Postsecondary Education and Vocational Education sunsetted on July 2, 2007. From July 2007 through December 31, 2009, no regulatory body had oversight of private postsecondary schools in California. On October 11, 2009, the Bureau for Private Postsecondary Education Act of 2009 (Act) was signed into law; the Act became operative on January 1, 2010, establishing the Bureau for Private Postsecondary Education.

requirements, a conditional approval can be suspended. The transcript was ordered. Written argument having been submitted by both parties and such written argument, together with the record, having been read and considered pursuant to Government Code section 11517(c)(2)(E), the Director hereby makes the following decision:

FACTUAL FINDINGS

Jurisdiction and Parties

1. On April 28, 2016, complainant filed and served the Statement of Issues in this matter while acting in her official capacity. Respondent timely filed a notice of defense.

2. The Bureau issued an Approval to Operate to respondent and its owner on September 1, 1997, assigning respondent School Code 1906931. The Bureau approved respondent's cosmetology program, instructor trainee (cosmetology) program, and manicurist program on June 1, 1984. The manicurist program approval was discontinued on January 1, 2002. Respondent has operated the college as an unaccredited institution since the Approval to Operate issued in September 1997.² Respondent's Approval to Operate expired on June 5, 2012.³

Respondent's Application for a Renewal of Approval to Operate from the Bureau

3. Shauna Hernandez, a licensing analyst at the Bureau, testified that unaccredited private post-secondary schools are largely vocational schools, preparing students to enter the job market. The primary goal of the Act and of the Bureau's regulations is to protect current and prospective students, to provide them with information relevant to their choice of schools, and to ensure that the regulated institutions are solvent and have the ability to provide quality educational services.

4. On May 31, 2012, the Bureau received respondent's Application for Renewal of Approval to Operate and Offer Educational Programs for Non-Accredited Institutions (Application). The Bureau assigned it Application Number 24880.

5. A Bureau office technician performed a "thirty-day review" of the Application, a review for completeness, not for deficiencies. By letter dated June 8, 2012, the Bureau requested additional documentation from respondent, noting that the Application's section 4.1, on page 2, and agent for service of process section, on page 3, were incomplete, and respondent had failed

² The institution has not been accredited by an accrediting agency recognized by the U.S. Department of Education.

³ Respondent also has an establishment license, number A304053, issued by the Board of Barbering and Cosmetology on March 10, 2016, valid until March 31, 2018.

to provide advertising and other public statements, an Enrollment Agreement, and current reviewed financial statements.

6. On July 17, 2012, respondent sent the Bureau additional documents.

7. Over three years passed, while respondent continued to operate.

8. Then, in a letter to respondent dated September 21, 2015, Ms. Hernandez identified multiple statutory and regulatory deficiencies in 11 different sections of respondent's Application. The deficiencies included problems with respondent's website, ownership information, agent for service of process, enrollment agreement with students, advertising, financial statements, catalog, graduation or completion documents, and declaration, among other things. The Bureau's letter gave respondent guidance on how to correct the problems and stated that "[t]he Bureau will afford you one attempt to revise your documents so that they are in compliance with the California Education [C]ode and the California Code of Regulations. If your application documents do not fall in compliance, the application will be forwarded to management with a recommendation for denial. [II] Please submit all requested information to my attention by October 21, 2015." (Ex. 6, p. 82.)

9. On October 26, 2015, respondent submitted additional materials to the Bureau in an attempt to address the deficiencies.

10. On November 12, 2015, the Bureau responded with a Notice of Denial of Application for Renewal of Approval to Operate (Notice of Denial), denying the Application and setting forth the reasons for the denial. Ms. Hernandez testified that there were still many significant deficiencies in the Application in violation of various sections of the Education Code and title 5 of the California Code of Regulations (CCR). She testified that among the deficiencies still remaining in respondent's application after its October 26, 2015, submittals were the following:

a. Respondent did not submit Student Tuition Recovery Fund (STRF) assessment reporting forms for the prior four quarters, i.e., April, July, and October 2014, and January 2015.

b. Respondent's application was incomplete in that it failed to contain accurate website information; accurate ownership information; complete information regarding the institution representative; a script, or a reason why a script was not included, for television or radio advertisements; and a signature date for the owner's declaration.

c. Respondent's application provided an impermissible address for respondent's agent for service of process.

d. Respondent's exemplars of student enrollment agreements lacked a statement indicating how the school communicates information to students whose primary language is not English; lacked information required by the Education Code to be in the same size font as the majority of the text, and included illegible information; lacked information about the time period covered by the agreement or the date by which a student must cancel or withdraw; lacked a schedule of total charges, including a list of nonrefundable charges; lacked required language, to be underlined and capitalized, regarding charges; lacked required language about charges related to the STRF; lacked required disclosures about students' rights to cancel the agreement and refunds; lacked a required statement that students are responsible for repaying educational loans, plus interest, less the amount of any refund; lacked a statement about the consequences of a student defaulting on a federal or state loan; lacked a required disclosure concerning transferability of credits; lacked required language directing students to the Bureau for questions and complaints; lacked required statements and a signature line regarding provision of the catalog, School Performance Fact Sheet, and information regarding completion and placement rates and other pertinent information; omitted required language in the enrollment agreement about its legally binding effect and the student's acknowledgement of that effect; omitted required language for an institution extending credit or lending money to students; and omitted a clear indication of the availability of consumer loans to students and compliance with the federal Truth in Lending Act.

e. Respondent failed to provide currently reviewed financial statement prepared by an independent certified public accountant (CPA) for the most recent fiscal year.

f. Respondent provided a defective catalog, omitting a statement indicating how often the catalog is updated and a statement indicating how the catalog is provide to prospective students and the public; omitting required language encouraging students to review the catalog and the Student Performance Fact Sheet (SPFS); omitting a description of the facilities, equipment, and materials; omitting required language directing students to the Bureau for unanswered questions; omitting requirements for ability-to-benefit students and information regarding transferring credits between respondent and other institutions; omitting language proficiency information, a schedule of total charges, required language related to the Student Tuition Recovery Fund, a cancellation and refund policy, and information regarding the faculty and their qualifications; containing contradictory information regarding federal and state aid programs; omitting a statement regarding students' obligations to repay loans; omitting required housing information; and omitting policies on the retention of student records.

g. Respondent did not provide an SPFS for each of its educational programs.

h. Respondent did not provide copies of graduation or completion documents for Instructor Trainee (Cosmetology).

11. By letter dated November 22, 2015, Ms. Goines appealed the denial of approval to operate and requested 60 days to correct the deficiencies. Eventually, between December 8, 2016, and January 20, 2017, shortly before this hearing, respondent submitted to the Bureau additional documentation for review. Ms. Hernandez testified that, although respondent's application was still incomplete, she reviewed the additional documentation because she saw that respondent was attempting to comply with its legal obligations.

12. The additional documentation respondent submitted only partially corrected the deficiencies noted in the November 2015 Notice of Denial. The documentation:

a. Partially corrected a deficiency by including STRF assessment forms for the first and second quarters of 2014 and the first quarter of 2015. Those forms were deficient, however, omitting certain required information, and respondent still did not provide an STRF form for the third quarter of 2014.

b. Partially corrected deficiencies in its application. The application still contained incorrect information about respondent's website address; did include ownership information, though still incomplete, about Margaret Goines; included the name of the institution representative, but the name was illegible; still omitted a reason as to why a script for television or radio advertisements was not included; and still omitted an original signature in the declaration under penalty of perjury.

c. Still omitted a compliant address for agent for service of process.

d. Still omitted a separate statement indicating how respondent will provide information to students for whom English is a second language, but corrected a deficiency by including an enrollment agreement containing required information in the correct font size. Included an enrollment agreement that still omitted the period covered and the date by which a student must cancel; partially corrected a deficiency by including a schedule of total charges but omitting to state that the STRF fee is nonrefundable; still omitted required language regarding total charges and student payments; still did not include required verbatim language about the STRF; partially corrected a deficiency by including procedures for cancelling enrollment, but included some contradictory information and still omitted required language about refunds from certain financial aid programs; still omitted a required statement about students' loan repayment responsibilities; still omitted required information about defaults on federal or state loans; still omitted required transferability disclosures; still omitted a required statement directing students to the Bureau for unanswered questions and complaints; still omitted statements encouraging students to review the catalog and SPFS and acknowledging that review; corrected a deficiency by including a statement that the enrollment agreement is legally binding but still omitted a required statement that the student acknowledged that fact; corrected a deficiency by stating that it does not offer financial aid; and corrected a deficiency by stating that it does not offer consumer loans that would require compliance with the federal Truth and Lending Act.

e. Submitted compiled financial statements for the years ending September 30, 2014, and September 30, 2015, that were neither reviewed nor current; the 2014 financial statements reflected that respondent did not meet the minimum required ratio of current assets to current liabilities, and both years' financial statements indicated that respondent cannot pay all operating expenses due within 30 days.

f. Corrected deficiencies in the catalog by including a statement about how often and when the catalog is updated; including language encouraging students to review the catalog and SPFS before signing the enrollment agreement; including a description of the facilities, equipment, and materials; including admission requirements, information about ability-to-benefit students, and information about transfer agreements with other institutions; including information directing students to the Bureau for questions or complaints, but providing an incorrect website for the Bureau; including language proficiency information and information about appropriate documentation of proficiency; including information regarding instructors and their qualifications; including a statement that respondent does not participate in federal and state aid programs; including a statement that respondent has no responsibility to find or assist students with housing, but still omitted some required housing information; including information about respondent's cancellation and refund policies but containing contradictory information; including information about refunds but omitting information about students' obligation to repay the full amount of loans; and including policies on records retention.

g. Attempted to correct a deficiency by providing the 2013 and 2014 SPFS for the Cosmetology Program, but failing to provide the SPFS for the Instructor Trainee (Cosmetology) Program, failing to provide an SPFS for 2015, and failing to include language required by provisions of title 5 of the CCR effective July 1, 2016.

h. Failed to provide a copy of graduation or completion documents for the Instructor Trainee (Cosmetology) Program.

Respondent's Actions Since Denial

13. Five months ago, after respondent's renewal application was denied, respondent rehired Jovonna Morrison, respondent's supervising instructor. Ms. Morrison has worked at respondent on and off for over 10 years. Ms. Morrison was responsible for respondent's submission of additional documentation and its attempts to correct deficiencies. Ms. Morrison testified that she has had "problems" to deal with in the office, but she is confident she will find the time and be able to bring respondent's application into conformity with legal requirements. But respondent did not assign Ms. Morrison or any other staff member to work full time on the application process; nor has respondent sought additional assistance by hiring an outside consultant. As a consequence of having failed to dedicate sufficient resources to the issue, respondent has thus far failed to comply with all applicable legal requirements.

14. At hearing, Cedric Goines, respondent's director, acknowledged making many mistakes in the application process. Mr. Goines attributed respondent's failures to a lack of available time and resources. Because of the low tuition respondent charges, Mr. Goines testified, respondent has not had the funds or the staff available to devote to the application renewal process. He stressed that respondent provides a quality education and that many graduates of respondent's programs obtain employment or own their own salons. He testified that respondent has competed successfully against other beauty schools in competitions in southern and northern California.

15. The Bureau has given respondent over 16 months to bring its Application materials into compliance, and respondent has, despite its recent efforts, failed to cure many of its deficiencies. This raises serious concerns about the welfare of students and potential students who rely on promotional and instructional materials that do not comply with statutes and regulations intended to protect them. Respondent has not devoted the resources and personnel required to make a serious and successful effort to comply.

16. The evidence suggests that respondent is sincerely interested in providing a quality educational program for underserved students and to provide them a path to employment. But respondent's efforts to comply with legal requirements designed to protect current and prospective students have been piecemeal and inadequate, reflecting a misplaced belief that the laws governing the school's operations are of secondary importance. The importance of providing current and compliant documents such as financial documents has been reduced to "filling out documents."

17. In view of respondent's fairly recent rehiring of Ms. Morrison, her proven ability to correct at least some deficiencies, and her confidence that she can correct the rest of the deficiencies if afforded the time and resources to do so, it is appropriate that respondent be granted a conditional authorization to operate for a period of six months to permit the institution to correct those deficiencies identified. (Title 5, C.C.R., § 71400, subd. (d)(l).)

LEGAL CONCLUSIONS

1. Education Code section 94875⁴ authorizes the Bureau to regulate private postsecondary educational institutions under the California Private Postsecondary Education Act of 2009 (Act), sections 94800 through 94950.

2. Section 94885 requires the Bureau to adopt by regulation certain minimum operating standards for institutions, including facilities and materials "sufficient to enable students to achieve the educational program's goals," financial solvency, maintenance of

⁴ All further statutory references are to the Education Code, except as otherwise stated.

adequate records and transcripts, and operation in compliance with the Act and other applicable laws.

3. The Bureau may grant an application to operate:

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 methods deemed appropriate by the bureau, that the applicant has the capacity to satisfy the minimum operating standards. The bureau shall deny an application for an approval to operate if the application does not satisfy those standards. (§ 94887.)

4. Institutions that have been operating with the Bureau's approval must periodically apply to the Bureau for a renewal of their approval to operate. "To be granted a renewal of an approval to operate, the institution shall demonstrate its continued capacity to meet the minimum operating standards." (§ 94891, subd. (b).)

5. Respondent bears the burden of proving that it meets all prerequisites necessary for the requested renewal. (See *Kensington Univ. v. Council for Private Postsecondary and Vocational Education* (1997) 54 Cal.App.4th 27, 47, fn. 7.) This burden of proof requires proof by a preponderance of the evidence. (*Ibid.*; see also Evid. Code, § 115.)

6. CCR, title 5, section 71475⁵ implements section 94891 by specifying requirements for renewal applications. Among other things, it requires institutions to submit an "Application for Renewal of Approval to Operate and Offer Education Programs for Non-Accredited Institutions," Form Application 94891 (rev.2/10). (CCR, 71475, subd. (b).) It requires applicants for renewal to submit current financial statements that meet the requirements of section 74115, i.e., financial statements must be either audited or reviewed, depending on the institution's gross revenues. (CCR, 71475, subd. (e); see Legal Conclusion 7.) It requires information about the institution's address, website, ownership, agent for service of process, contact person, advertising, and graduation documents, and a certification under penalty of perjury of the institution's capacity to meet minimum operating standards. (CCR, 71475, subds. (c), (h), (m), (q), (cc), and (gg); see student enrollment agreements. (CCR, 71475, subd. (o); see Legal Conclusion 8.) It also requires a copy of the institution's catalog, which must meet the requirements of the Act and CCR section 71810. (CCR, 71475, subd. (bb); see Legal Conclusion 9.) "An incomplete application filed under this section will render the institution ineligible for renewal." (CCR, §71475, subd. (kk).) An institution must provide the Bureau with its written standards for student admissions for each educational program and its credits transfer policy.

⁵ All further references to the CCR are to title 5 thereof.

(CCR, 71770.) An institution must demonstrate compliance with all requirements for STRF's, the details of which are set forth at CCR section 76130.

7. To demonstrate that "[t]he institution is financially sound and capable of fulfilling its commitment to students" (§ 94885, subd. (a)(6)), audited or reviewed financial statements must comply with numerous requirements set forth in CCR sections 74115 and 71745. Financial statements must include a balance sheet, an income statement, and a cash flow statement. They must be audited or reviewed, and prepared on an annual basis by an independent CPA in accordance with GAAP. They must demonstrate that the institution meets certain financial resources requirements. They must be current, i.e., completed no sooner than 120 days prior to submission to the Bureau, and covering no less than the most recent complete fiscal year. If more than eight months will have elapsed from fiscal year end to the time of submission, the statements shall also cover no less than five months of the current fiscal year.

8. Detailed requirements for student enrollment agreements, as well as for student loans, are set forth at sections 94906, subdivision (a), 94908, 94911, subdivisions (b) through (k), 94916, and 94918, and CCR sections 71800, subdivisions (a) and (d), and 76215, subdivisions (a) and (b).

9. An institution's catalog must describe programs offered, requirements for completion, requirements for eligibility for licensure if applicable, a detailed description of the institution's policies, and information regarding the transferability of credits, among other things. 94909, CCR, 71810.) Catalogs must be updated annually, and must include information regarding required English language proficiency and proficiency required in any other language, a description of the facilities and types of equipment and material to be used, housing information, and policies on student records retention, among other things. (CCR, § 71810, subd. (b).)

10. An SPFS must be provided to each student prior to the student's signing an enrollment agreement with the institution. (§§ 94902, 94910.) The SPFS must include specified information regarding students' completion rates, placement rates for each educational program, license examination passage rates for programs leading to employment for which passage of a state licensing examination is required, salary or wage information, and calculation methodology used. (§ 94910.) The institution must report annually to the Bureau the information published in its SPFS. (§ 94929.5.) The Bureau has the authority to ensure that the information and the manner in which it is collected and reported is useful to students and policymakers and is based on credible and verifiable data, while not imposing undue compliance burdens on an institution. (§ 94929.5, subd. (b).) Detailed formatting requirements for, and instructions for calculating the figures that appear in, the SPFS are set forth at CCR section 74112.

11. Cause exists to deny respondent's application for renewal of approval to operate, under section 94891, subdivision (b), and CCR section 76130, on the grounds that respondent

failed to fully comply with STRF assessment reporting form requirements, based on Factual Findings 3 through 15.

12. Cause exists to deny respondent's application for renewal of approval to operate, under section 94891, subdivision (b), and CCR section 71475, subdivision (kk), on the grounds that respondent failed to submit a complete application that met the statutory and regulatory requirements, based on Factual Findings 3 through 15.

13. Cause exists to deny respondent's application for renewal of approval to operate, under section 94891, subdivision (b), and CCR section 71475, subdivision (h), on the grounds that respondent provided incomplete or incorrect information regarding its agent for service of process, based on Factual Findings 3 through 15.

14. Cause exists to deny respondent's application for renewal of approval to operate, under sections 94891, subdivision (b), 94906, subdivision (a), 94908, 94911, subdivisions (b) (c), (d), (e)(1), (2), and (3), (f), (g), (h), (i), (j), and (k), 94916, and 94918, and CCR sections 71800, subdivisions (a) and (d), 76215, subdivisions (a) and (b), on the grounds that respondent failed to provide complete and correct student enrollment agreements and related information, based on Factual Findings 3 through 15.

15. Cause exists to deny respondent's application for renewal of approval to operate, under sections 94891, subdivision (b), and 94885, subdivision (a)(6), and CCR sections 74115 and 71745, in that respondent did not provide currently reviewed financial statements prepared by an independent CPA for the most recent fiscal year, based on Factual Findings 3 through 15.

16. Cause exists to deny respondent's application for renewal of approval to operate, under sections 94891, subdivision (b), and 94909, subdivision (a), and CCR sections 71770, 71810, subdivisions (a) and (b)(4), (9), (13), and (15), and 76215, subdivisions (a) and (b), on the grounds that respondent's catalog failed to meet the statutory and regulatory requirements, based on Factual Findings 3 through 15.

17. Cause exists to deny respondent's application for renewal of approval to operate, under sections 94891, subdivision (b), and 94910, and CCR section 74112, on the grounds that respondent failed to provide an SPFS for each of its educational programs, based on Factual Findings 3 through 15.

18. Cause exists to deny respondent's application for renewal of approval to operate, under sections 94891, subdivision (b), and 94885, subdivision (a)(7), and CCR section 71475, subdivision (cc), on the grounds that respondent did not provide copies of graduation or completion documents for its Instructor Trainee (Cosmetology) Program, based on Factual Findings 3 through 15.

19. The Bureau's regulations provide that a conditional authorization while bringing the institution into full compliance is available under certain circumstances:

(d) Pursuant to section 94887 of the Code, the Bureau will either grant or deny an application.

(1) When specific minor deficiencies are identified during processing but the institution is substantially in compliance with the requirements of the Code and this Division, a conditional authorization to operate may be granted for a period not to exceed six (6) months, to permit the institution to correct those deficiencies identified. If those deficiencies are not corrected after the first period of conditional approval, or the condition upon which an approval may be granted is not satisfied, the conditional authorization to operate may be extended for a period not to exceed six (6) months if the program demonstrates to the Bureau a good faith effort and ability to correct the deficiencies. A conditional authorization to operate shall expire at the end of its stated period and the application shall be deemed denied, unless the deficiencies are removed prior to its expiration and an approval to operate has been granted before that date. (CCR, 71400, subd. (d)(1).)

20. Here, the Bureau repeatedly identified deficiencies both major and minor during the processing of respondent's application for renewal, reviewing respondent's submissions through the week prior to hearing, to allow respondent to bring itself into compliance. The Bureau was fully justified in denying respondent's still-deficient application. (Factual Findings 1-15.)

21. Nevertheless, respondent rehired Ms. Morrison, who has, in addition to her other responsibilities, worked with some success to correct respondent's deficiencies. (Factual Findings 13-17.) Because, as Ms. Hernandez testified and as the evidence shows, respondent is making an effort to comply with the laws governing the operation of the institution, and has come into compliance with some of those laws, some significant remaining deficiencies notwithstanding, a conditional authorization to operate for six months provides an opportunity for this motivated respondent to prove it can meet these important objectives. During that six-month period, respondent must bring itself into compliance with the current statutes and regulations governing continued licensure. Respondent may wish to consider also employing the services of a consultant knowledgeable and experienced in this area, at least until the Bureau confirms that respondent is in compliance.

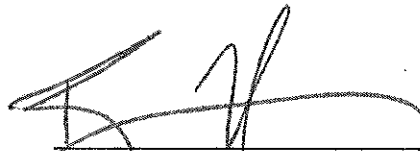
ORDER

A conditional authorization to operate and offer the programs requested in the 2012 Application for Renewal of Approval to Operate and Offer Educational Programs for Non-Accredited Institutions for School Code 1906931 is hereby issued to respondent Margaret A. Goines for six months, upon the following terms and conditions:

1. Respondent shall file with the Bureau the required documentation to complete and update the 2012 Renewal Application as set out in the Statement of Issues and in this decision; specifically, the deficiencies enumerated in paragraphs 12a – 12h of the Factual Findings.
2. Failure to timely comply with these requirements shall result in the expiration of the conditional authorization to operate and the renewal application shall be deemed denied, and no further administrative appeals shall be permitted.
3. If the documentation submitted does not correct the deficiencies noted after the first six months of the conditional approval granted, or the conditions upon which an approval may be granted are not satisfied, pursuant to 5 C.C.R. § 71400(d)(1), the conditional authorization to operate may be extended for a period not to exceed six (6) months if the program demonstrates to the Bureau a good faith effort and ability to correct the deficiencies. A conditional authorization to operate shall expire at the end of its stated period and the application shall be deemed denied, and no further administrative appeals shall be permitted, unless the deficiencies are removed prior to its expiration and an approval to operate has been granted before that date.
4. Upon completion of the terms and conditions to the satisfaction of the Bureau, respondents' 2012 renewal application shall be granted as of the effective date of this decision.

Respondents shall comply with any and all other provisions of law applicable to the operation of a private postsecondary institution. The Bureau has continuing jurisdiction to investigate compliance with the laws and bring any enforcement action it deems necessary, regardless of the status of the conditional authorization or granting of the renewal application.

Dated: September 19, 2017



RYAN MARCROFT
Deputy Director, Legal Affairs
Department of Consumer Affairs