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7

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

12
13 In the Matter of the Statement of Issues
Against:

Case No. 1003472

14 **COLLEGE OF SOUTHERN**
15 **CALIFORNIA, AARON RHEE, OWNER**

STATEMENT OF ISSUES

16 **Application for Renewal for Approval to**
17 **Operate for an Institution Non-Accredited**

18 **Institution Code: 1928101**

19 Respondent.

20
21 Complainant alleges:

22 **PARTIES**

23 1. Dr. Michael Marion, Jr. (Complainant) brings this Statement of Issues solely in his
24 official capacity as the Chief of the Bureau for Private Postsecondary Education, Department of
25 Consumer Affairs.

26 2. On or about August 2, 2013, the Bureau for Private Postsecondary Education received
27 an Application for Renewal for Approval to Operate for an Institution Non Accredited from
28 College of Southern California, with Aaron Rhee as owner (Respondent). On or about July 22,

1 2013, Aaron Rhee certified under penalty of perjury to the truthfulness of all statements, answers,
2 and representations in the application. The Bureau denied the application on April 23, 2018.

3 **JURISDICTION**

4 3. This Statement of Issues is brought before the Director of the Department of
5 Consumer Affairs (Director) for the Bureau for Private Postsecondary Education, under the
6 authority of the following laws. All section references are to the Education Code unless
7 otherwise indicated.

8 **STATUTORY PROVISIONS**

9 4. Business and Professions Code of 22 defines the term "board" to include "bureau."

10 5. Education Code section 94885¹ states:

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

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

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

16 (3) The facilities, instructional equipment, and materials are sufficient to enable students to
17 achieve the educational program's goals.

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

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

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

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

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

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

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28 ¹ California Private Postsecondary Education Act of 2009, Ed. Code §§ 94800 et seq.

1 (b) Except as provided in Section 94885.1, an institution offering a degree must satisfy one
2 of the following requirements:

3 (1) Accreditation by an accrediting agency recognized by the United States Department of
4 Education, with the scope of that accreditation covering the offering of at least one-degree
5 program by the institution.

6 (2) An accreditation plan, approved by the bureau, for the institution to become fully
7 accredited within five years of the bureau's issuance of a provisional approval to operate to the
8 institution. The provisional approval to operate to an unaccredited degree-offering institution
9 shall be in compliance with Section 94885.5.

10 6. Education Code Section 94886 states:

11 Except as exempted in Article 4 (commencing with section 94874) or in compliance with
12 the transition provisions in Article 2 (commencing with Section 94802), a person shall not open,
13 conduct, or do business as a private postsecondary educational institution in this state without
14 obtaining an approval to operate under this chapter.

15 7. Education Code Section 94887 states:

16 ~~An approval to operate shall be granted only after an applicant has presented sufficient~~
17 evidence to the bureau, and the bureau has independently verified the information provided by the
18 applicant through site visits or other methods deemed appropriate by the bureau, that the applicant
19 has the capacity to satisfy the minimum operating standards. The bureau shall deny an application
20 for an approval to operate if the application does not satisfy those standards.

21 **REGULATORY PROVISIONS**

22 8. Title 5, California Code of Regulations (CCR), section 71700 states:

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

25 9. Title 5, CCR, section 71475 states:

26 a) Unless renewed, an approval to operate shall expire at 12 midnight on the last day of the
27 institution's term of approval to operate as granted pursuant to section 94802 or section 94889 of
28 the Code.

1 (b) An institution seeking to renew its Approval to Operate pursuant to section 94891 of
2 the Code shall, prior to its expiration, complete and submit to the Bureau the "Application for
3 Renewal of Approval to Operate and Offer Educations Programs for Non-Accredited
4 Institutions," Form Application 94891 (rev. 2/10).

5 (c) The application for renewal of approval to operate and offer educational programs for
6 non-accredited institutions shall include all of the following:

7 (1) The name, institution/school code and website address of the institution.

8 (2) The physical address of the institution's primary administrative location in California.

9 (3) The mailing address, identified either by physical address or by post office box number,
10 telephone number and fax number of the institution.

11 (4) The physical address, phone number and fax number of each campus and branch at
12 which the educational programs will be offered, including the identification of the institution's
13 main location and branch locations.

14 (5) The name, address, email address, telephone number, and fax number of an individual
15 who will function as the institution's contact person for the purposes of the application.

16 (6) The form of business organization of the institution (e.g., sole proprietorship, general or
17 limited partnership, for-profit corporation, nonprofit corporation, or Limited Liability
18 Corporation). If the institution is incorporated, the institution shall also identify the state within
19 which the institution is incorporated and the date of incorporation, and provide copies of the
20 articles of incorporation and bylaws.

21 (7) The name, title, address, email address, telephone number, nature of interest and
22 percentage of ownership of each person, as defined in section 94855 of the Code, who owns or
23 controls 25% or more of the stock or an interest in the institution and, to the extent applicable,
24 each general partner, officer, corporate director, member of the board of directors, and any other
25 person who exercises substantial control over the institution's management or policies. For the
26 purpose of this paragraph, a person exercises "substantial control over the institution's
27 management or policies" if the person has the authority to cause the institution to expend money
28 or incur debt in the amount of five thousand dollars (\$ 5,000) or more in any year.

1 (A) For each address required, the institution shall provide a physical home address, and
2 may request that the address, email address, and telephone number, of each person described in
3 paragraph (7) be maintained as personal information.

4 (B) The federal employer identification number for partnerships or the social security
5 number for individual owners identified in the application pursuant to section 71130(a)(1).

6 (d) In addition to the form required in (b), the institution shall submit all information
7 required by section 71100(b), and the appropriate renewal fee as provided in Sections
8 94930.5(b)(1) and 94930.5(b)(2) of the Code, as applicable, to the Bureau. Except for the
9 financial statements required by subdivision (e) of this section and the statement required in
10 subdivision (f) of this section, if the information required in order to renew its approval to operate
11 is substantially similar to the information submitted by the institution in its last renewal
12 application, or initial application if it is the first renewal, the institution may state that there are no
13 substantial changes.

14 (e) The institution shall submit at the time it applies for renewal current financial
15 statements that meet the requirements of section 74115 as follows: (1) for an institution with
16 annual gross revenues of \$ 500,000 and over, statements shall be audited; (2) for an institution
17 with annual gross revenues less than \$ 500,000, statements shall be reviewed.

18 (f) The renewal application shall include a statement from any person identified in
19 subdivision (h)(1) of this section who --

20 (1) Was found in any judicial or administrative proceeding to have violated the Act or the
21 law of any other state related to untrue or misleading advertising, the solicitation of prospective
22 students for enrollment in an educational service, or the operation of a postsecondary school;

23 (2) Was denied any type of license on grounds set forth in Section 480 of the Business and
24 Professions Code;

25 (3) Was adjudicated as responsible for the closure of an institution in which there were
26 unpaid liabilities to the state or federal government or any uncompensated pecuniary losses
27 suffered by students;

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1 (4) Has stipulated to a judgment or administrative order or entered a consent decree
2 involving any of the matters described in this section.

3 (5) Was convicted of any misdemeanor or felony as provided in Section 480(a)(1) of the
4 Business and Professions Code;

5 (g) The institution shall furnish in the application an explanation of any legal action
6 pending against the institution or ownership or any of the institution's owners, officers, corporate
7 directors, administrators, or instructors by any federal, state, or local law enforcement agency
8 involving alleged acts of fraud, dishonesty, financial mismanagement, unpaid liabilities to any
9 governmental agency or claims for pecuniary loss suffered by any student.

10 (h) The institution shall include in its application the name, title, physical address,
11 telephone number, fax number, and e-mail address for the agent for service of process in
12 California as required by section 94943.5 of the Code. The agent shall be at an address other than
13 the address of the institution or any branch. The agent must confirm the information and
14 acknowledge in writing that he or she is the designated agent for service of process. The
15 information shall be kept current pursuant to section 74190.

16 (i) The institution shall include in its application an organization chart that shows the
17 governance and administrative structure of the institution and the relationship between faculty
18 and administrative positions. If there have been no substantive changes since the last submission
19 of an organizational chart, the institution may so state and is not required to submit
20 documentation.

21 (j) The institution shall provide in the application a description of the job duties and
22 responsibilities of each administrative and faculty position. If there have been no substantive
23 changes since the last submission, the institution may so state and is not required to submit
24 documentation.

25 (k) The institution shall identify in the application the chief executive officer, chief
26 operating officer, and chief academic officer and describe their education, experience, and
27 qualifications to perform their duties and responsibilities. If there have been no substantive
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1 changes since the last submission, the institution may so state and is not required to submit
2 documentation.

3 (l) If the institution has a governing board, the application shall include the name, work
4 address, email address, and telephone number of each member of the governing board. If there
5 have been no substantive changes since the last submission, the institution may so state and is not
6 required to submit documentation.

7 (m) The application shall contain the name, work address, email address, fax number and
8 telephone number of the person with whom the Bureau will correspond and conduct legal
9 transactions on behalf of the institution. If there have been no substantive changes since the last
10 submission, the institution may so state and is not required to submit documentation.

11 (n) The institution shall describe in the application, in detail its mission and objectives. If
12 there have been no substantive changes since the last submission, the institution may so state and
13 is not required to submit documentation.

14 (o) The institution shall include, with its application, exemplars of all student enrollment
15 agreements and instruments of indebtedness.

16 (p) If an institution receives financial aid because its students qualify for it under any state
17 or federal financial aid program, the application shall include a statement of its policies, practices,
18 and disclosures regarding financial aid. If there have been no substantive changes since the last
19 submission, the institution may so state and is not required to submit documentation.

20 (q) The institution shall include in its application copies of advertising and other statements
21 disseminated to the public in any manner by the institution or its representatives that concern,
22 describe, or represent each of the following:

23 (1) The institution.

24 (2) Each educational program offered by the institution.

25 (3) If advertising is broadcast by television or radio, the application shall also include a
26 copy of the script.

27 (r) The institution shall identify and describe, in the application, the educational program it
28 offers, or proposes to offer. If the educational program is a degree program, the institution shall

1 identify the full title which it will place on each degree awarded. If there have been no substantive
2 changes since the last submission, the institution may so state and is not required to submit
3 documentation.

4 (s) The application shall include, in addition to the general title, such as "Bachelor of Arts"
5 or "Master of Science", the name of a specific major field of learning involved. If there have been
6 no substantive changes since the last submission, the institution may so state and is not required
7 to submit documentation.

8 (t) In addition, the institution shall list in the application, the following for each educational
9 program offered unless there have been no substantive changes since the last submission. If there
10 have been no substantive changes made the institution may so state and is not required to provide
11 documentation.

12 (1) The admissions requirements, including minimum levels of prior education,
13 preparation, or training;

14 (2) If applicable, information regarding the ability-to-benefit examination as required by
15 section 94904 of the Code.

16 (3) The types and amount of general education required;

17 (4) The title of the educational programs and other components of instruction offered,
18 including a description of the level of the courses (e.g., below college level, undergraduate level,
19 graduate level);

20 (5) The mode of instruction;

21 (6) The graduation requirements.

22 (7) Whether the educational program is designed to fit or prepare students for employment
23 in any occupation. If so, the application shall identify each occupation and job title to which the
24 institution represents the educational program will lead.

25 (u) For each educational program that the institution offers or proposes to offer, the
26 application shall contain a statement that the educational program meets the requirements of
27 section 71710, as well as the following unless there have been no substantive changes since the
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1 last submission. If there have been no substantive changes made the institution may so state and is
2 not required to provide documentation:

3 (1) A description of the educational program.

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

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

7 (4) A projection, and the bases for the projection, of the number of students that the
8 institution plans to enroll in the educational program during each of the three years following the
9 date the application was submitted.

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

12 (6) If licensure is a goal of an educational program, a copy of the approval from the
13 appropriate licensing agency. A copy of the intent to approve conditioned solely upon
14 institutional approval from the Bureau will also meet this requirement.

15 ~~(7) Upon request, the institution shall provide to the Bureau copies of the curriculum or~~
16 ~~syllabi required pursuant to section 71710.~~

17 (v) If the institution offers an educational program, or a portion of it, in a language other
18 than English, the application shall contain a description of all of the following for each
19 educational program or portion thereof unless there have been no substantive changes since the
20 last submission. If there have been no substantive changes made the institution may so state and is
21 not required to provide documentation.

22 (1) The language in which each educational program will be offered.

23 (2) A statement that the institution has contracted with sufficient duly qualified faculty who
24 will teach each language group of students.

25 (3) The language of the textbooks and other written materials to be used by each language
26 group of students.

27 (w) (1) The application shall contain a statement that the institution has and can maintain
28 the financial resources required pursuant to section 71745.

1 (2) The institution shall submit current, audited financial statements at the time it applies
2 for approval to operate. Each set of financial statements shall comply with Section 74115 of this
3 chapter.

4 (x) The application shall include a statement that the institution has contracted with
5 sufficient duly qualified faculty members who meet the qualifications of section 71720 unless
6 there have been no substantive changes since the last submission. If there have been no
7 substantive changes made the institution may so state and is not required to provide
8 documentation.

9 (y) (1) For each program offered, the application shall contain a description of the facilities
10 and the equipment which is available for use by students at the main, branch, and satellite
11 locations of the institution unless there have been no substantive changes since the last
12 submission. If there have been no substantive changes made the institution may so state and is not
13 required to provide documentation.

14 (2) For facilities that are leased or rented, the application shall contain the name and
15 address of the lessor or landlord, together with a copy of any use, lease, or rental agreements for
16 the facilities unless there have been no substantive changes since the last submission. If there
17 have been no substantive changes made the institution may so state and is not required to provide
18 documentation.

19 (3) The application shall include, in addition to the description of the physical facilities,
20 building diagrams or campus maps to assist the Bureau in locating these facilities. The diagrams
21 or maps shall identify the location of classrooms, laboratories, workshops, and libraries unless
22 there have been no substantive changes since the last submission. If there have been no
23 substantive changes made the institution may so state and is not required to provide
24 documentation.

25 (4) The description in the application shall include specifications of significant equipment
26 that demonstrate that the equipment meets the standards prescribed by the Code and this chapter
27 and is sufficient to enable students to achieve the educational objectives of each education
28 program unless there have been no substantive changes since the last submission. If there have

1 been no substantive changes made the institution may so state and is not required to provide
2 documentation.

3 (5) For each item of significant equipment, the description in the application shall indicate
4 whether the equipment is owned, leased, rented, or licensed for short- or long-term, or owned by
5 another and loaned to be used without charge unless there have been no substantive changes since
6 the last submission. If there have been no substantive changes made the institution may so state
7 and is not required to provide documentation.

8 (6) The application shall contain a list of all permits, certifications, or other evidence of
9 inspections or authorizations to operate required by the jurisdictions within which the institution
10 operates that the institution has obtained, and/or an explanation as to why those permits,
11 certifications, or inspections have not yet been obtained unless there have been no substantive
12 changes since the last submission. If there have been no substantive changes made the institution
13 may so state and is not required to provide documentation.

14 (z) The application shall include a description of library holdings, services, and other
15 learning resources, including policies and procedures for supplying them to students who do not
16 receive classroom instruction. The description need not consist of a list of each holding. The
17 description shall include an explanation of how the library and other learning resources are
18 sufficient to support the instructional needs of students and, if no facilities exist at the institution,
19 how and when students may obtain access to a library and other learning resources as required by
20 the curriculum unless there have been no substantive changes since the last submission. If there
21 have been no substantive changes made the institution may so state and is not required to provide
22 documentation.

23 (aa) If an institution represents to the public, in any manner, that it offers job placement
24 assistance, the application shall include a description of the job placement assistance that it
25 provides unless there have been no substantive changes since the last submission. If there have
26 been no substantive changes made the institution may so state and is not required to provide
27 documentation.

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1 (bb) The application shall include a copy of the institution's catalog, in published or
2 proposed-to-be-published form. The catalog shall meet the requirements of the Act and of section
3 71810.

4 (cc) The institution shall submit with the application, a copy of the document that is
5 awarded to a graduating student upon successful completion of each educational program unless
6 there have been no substantive changes since the last submission. If there have been no
7 substantive changes made the institution may so state and is not required to provide
8 documentation.

9 (dd) (1) The application shall contain a description of how records required by Article 9 of
10 the Act or this chapter are or will be organized and maintained, the types of documents contained
11 in student files, how the records are stored, and whether academic and financial records are
12 maintained in separate files. The description shall include a statement of the institution's
13 procedures for security and safekeeping of records unless there have been no substantive changes
14 since the last submission. If there have been no substantive changes made the institution may so
15 state and is not required to provide documentation.

16 (2) The description in the application shall include the name, physical address, email
17 address, and telephone number of the custodian of records, and the physical addresses and
18 telephone numbers of the offices or buildings where the records will be maintained unless there
19 have been no substantive changes since the last submission. If there have been no substantive
20 changes made the institution may so state and is not required to provide documentation.

21 (ee) The application shall contain a description of the procedures used by the institution to
22 assure that it is maintained and operated in compliance with the Act and this Division.

23 (ff) (1) The institution shall include in the application any material facts as defined by
24 section 71340, which have not otherwise been disclosed in the application that might reasonably
25 affect the Bureau's decision to grant an approval to operate. In this context, a fact would be
26 "material" if it would change the Bureau's decision concerning the institution's ability to comply
27 with any applicable provisions of the Act.

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1 (2) The institution may also include in the application any other facts which the institution
2 would like the Bureau to consider in deciding whether to grant an approval to operate.

3 (3) For the purposes of this section, a fact is "material" if, without its inclusion into the
4 application, the information contained in the application would be false, misleading, or
5 incomplete.

6 (gg) The institution demonstrates its continued capacity to meet the minimum operating
7 standards by submitting the renewal application signed and dated, and each fact stated therein and
8 each attachment thereto declared to be true under penalty of perjury, as follows:

9 (1) Signatories:

10 (A) Each owner of the institution, or

11 (B) If the institution is incorporated, the chief executive officer of the corporation and each
12 person who owns or controls 25 percent or more of the stock or interest in the institution, or

13 (C) Each member of the governing body of a nonprofit corporation.

14 (2) The declaration shall be in the following form:

15 ~~"I declare under penalty of perjury under the laws of the State of California that the~~
16 ~~foregoing and all attachments are true and correct.~~

17 _____
18 (Date)

17 _____
18 (Signature)"

19 (hh) In addition to the fees required by subdivision (d) of this section:

20 (1) An application for renewal that is received by the Bureau more than 30 days after the
21 expiration of the approval to operate shall be submitted with the 25 percent late payment penalty
22 fee required by section 94931(a) of, the Code.

23 (2) An application for renewal that is received by the Bureau more than 90 days after the
24 expiration of the approval to operate shall be submitted with the 35 percent late payment penalty
25 fee required by section 94931(b) of the Code.

26 (ii) Provided that a complete renewal application is received by the Bureau prior to the
27 expiration of the approval, a valid approval to operate shall continue until the Bureau has acted
28 upon the renewal application.

1 (jj) An approval to operate that has expired may be renewed at any time within 6 months
2 after its expiration on filing of an application for renewal and, as a condition precedent to
3 renewal, payment of all accrued and unpaid renewal fees, late payment penalty fees prescribed in
4 subdivision (e) of this section, and any other fees that would have been due in order to renew
5 timely. After an approval to operate has expired for more than 6 months, the approval is
6 automatically cancelled and the institution must submit a complete application pursuant to section
7 71100, meet all current requirements, and pay all fees that would have been due in order to timely
8 renew, in order to apply for approval.

9 (kk) An incomplete application filed under this section will render the institution ineligible
10 for renewal.

11 10. Title 5, CCR, section 71745 states:

12 “(a) The institution shall document that it has at all times sufficient assets and financial
13 resources to do all of the following:

14 (1) Provide all of the educational programs that the institution represented it would
15 provide.

16 (2) Ensure that all students admitted to its educational programs have a reasonable
17 opportunity to complete the programs and obtain their degrees or diplomas.

18 (3) Maintain the minimum standards required by the Act and this chapter.

19 (4) Pay timely refunds as required by Article 13 of the Act.

20 (5) Pay all operating expenses due within 30 days.

21 (6) Maintain a ratio of current assets to current liabilities of 1.25 to 1.00 or greater at the
22 end of the most recent fiscal year when using generally accepted accounting principles, or for an
23 institution participating in Title IV of the federal Higher Education Act of 1965, meet the
24 composite score requirements of the U.S. Department of Education. For the purposes of this
25 section, current assets does not include: intangible assets, including goodwill, going concern
26 value, organization expense, startup costs, long-term prepayment of deferred charges, and non-
27 returnable deposits, or state or federal grant or loan funds that are not the property of the

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1 institution but are held for future disbursement for the benefit of students. Unearned tuition shall
2 be accounted for in accordance with general accepted accounting principles.

3 (b) At an institution's request, the Bureau may consider the financial resources of a parent
4 company if the parent company, as defined by section 94853 of the Code, meets and maintains all
5 of the following provisions:

6 (1) Consents in writing to be sued in California;

7 (2) Consents in writing to be subject to the jurisdiction of the Bureau with respect to the
8 institution's regulation under the Act and this Chapter;

9 (3) Designates and maintains an agent for service of process, consistent with section
10 74190;

11 (4) Agrees in writing to pay any refund, claim, penalty, or judgment that the institution is
12 obligated to pay; and

13 (5) Files financial reports, maintains financial records, and consents in writing to permit the
14 inspection and copying of financial records to the same extent as is required of the institution.

15 (c) ~~An institution shall provide to the Bureau its most current financial statements upon~~
16 ~~request.~~"

17 11. Title 5, CCR, section 74115 states:

18 (a) This section applies to every set of financial statements required to be prepared or filed
19 by the Act or by this chapter.

20 (b) A set of financial statements shall contain, at a minimum, a balance sheet, an income
21 statement, and a cash flow statement, and the preparation of financial statements, shall comply
22 with all of the following:

23 (1) Audited and reviewed financial statements shall be conducted and prepared in
24 accordance with the generally accepted accounting principles established by the American
25 Institute of Certified Public Accountants by an independent certified public accountant who is not
26 an employee, officer, or corporate director or member of the governing board of the institution.

27 (2) Financial statements prepared on an annual basis as required by section 74110(b) shall
28 be prepared in accordance with the generally accepted accounting principles established by the

1 American Institute of Certified Public Accountants. Nonprofit institutions shall provide annual
2 financial statements as required under generally accepted accounting principles for nonprofit
3 organizations.

4 (3) The financial statements shall establish that the institution meets the requirements for
5 financial resources required by Section 71745.

6 (4) If an audit performed to determine compliance with any federal or state student
7 financial aid program reveals any failure to comply with the requirements of the program and the
8 noncompliance creates any liability or potential liability for the institution, the financial
9 statements shall reflect the liability or potential liability.

10 (5) Any audits shall demonstrate that the accountant obtained an understanding of the
11 institution's internal financial control structure, assessed any risks, and has reported any material
12 deficiencies in the internal controls.

13 (c) Work papers for the financial statements shall be retained for five years from the date
14 of the statements and shall be made available to the Bureau upon request.

15 (d) ~~"Current" with respect to financial statements means completed no sooner than 120~~
16 ~~days prior to the time it is submitted to the Bureau, and covering no less than the most recent~~
17 ~~complete fiscal year. If more than 8 months will have elapsed between the close of the most~~
18 ~~recent complete fiscal year and the time it is submitted, the fiscal statements shall also cover no~~
19 ~~less than five months of that current fiscal year.~~

20 FIRST CAUSE FOR DENIAL OF APPLICATION

21 (Failure to Meet Minimum Operating Standards - Financial Resources and Statements)

22 12. Respondent's application is subject to denial under Education Code section 71745
23 subdivision (a)(6) in that Respondent's financial statements demonstrate a ratio of current assets
24 to current liability that is below the required minimum ratio. The circumstances are as follows:

25 13. The institution submitted financial reports that demonstrate a ratio of current assets to
26 current liabilities of 0.96 to 1.00. The required minimum is 1.25 to 1.00.

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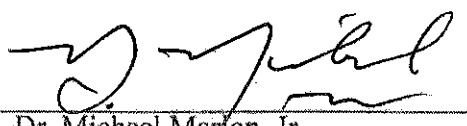
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PRAYER

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 College of Southern California, Aaron Rhee, Owner, for an Application for Renewal of Approval to Operate an Institution Non-Accredited;
2. Taking such other and further action as deemed necessary and proper.

DATED: 3/28/19



Dr. Michael Mapion, Jr.
Chief
Bureau for Private Postsecondary Education
Department of Consumer Affairs
State of California
Complainant

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(Revised 3/20/19)