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

11 In the Matter of the Accusation Against:
12 **INSTITUTE OF MEDICAL EDUCATION**
13 **BINDU BABURAJAN, Owner**
14 **130 S. Almaden Blvd.**
15 **San Jose, CA 95113**
16 **Institution Code No. 69608217**
17 **7901 Oakport Street**
18 **Oakland, CA 94621**
19 **School Code No. 81701347**
20 Respondent.

Case No. 997952
ACCUSATION

20 Complainant alleges:

21 **PARTIES**

22 1. Joanne Wenzel (Complainant) brings this Accusation solely in her official capacity as
23 the Deputy Bureau Chief of the Bureau for Private Postsecondary Education (Bureau),
24 Department of Consumer Affairs.

25 2. On or about November 1, 2004, the former Bureau for Private Postsecondary and
26 Vocational Education¹ (BPPVE) issued a Temporary Approval to Operate the Institute of Medical

27 ¹ The former Bureau for Private Postsecondary and Vocational Education sunsetted on
28 July 1, 2007. On October 11, 2009, the Private Postsecondary Education Act of 2009 (AB 48)
(continued...)

1 Education, Bindu Baburajan, Owner (Institution Code No. 69608217) (Respondent or Institute).

2 On or about October 27, 2005, BPPVE issued a Full Approval to Operate the Institute.

3 3. On or about February 8, 2005, BPPVE issued an Approval to Operate a Phlebotomy
4 program and an EKG Technician program at the Institute.

5 4. On or about May 16, 2006, BPPVE issued an Approval to Operate a Vocational
6 Nursing program at the Institute.

7 5. On or about March 22, 2007, BPPVE issued a Full Approval to Operate a satellite
8 location at the Institute located at 2235 Polvorosa Avenue, Suite 200, San Leandro, CA 94577
9 (School Code No. 81701347). On this same date, BPPVE issued an Approval to Operate a
10 Physical Therapy Aide program and a Nursing Assistant program at the Institute.

11 6. On or about April 11, 2007, BPPVE issued an Approval to Operate a Medical
12 Assistant program at the Institute.

13 7. On or about May 7, 2010, the Bureau issued an Approval to Operate an Associate of
14 Science in Nursing degree and an Associate of Arts in Dental Hygiene degree at the Institute.

15 8. On or about May 11, 2010, the Bureau issued an Approval to Operate an Associate of
16 Applied Science in Physical Therapy degree at the Institute.

17 **JURISDICTION**

18 9. This Accusation is brought before the Bureau under the authority of the following
19 laws. All section references are to the Education Code unless otherwise indicated.

20 10. Business and Professions Code section 118, subdivision (b) provides that the
21 suspension, expiration, surrender, or cancellation of a license shall not deprive a board of
22 jurisdiction to proceed with a disciplinary action during the period within which the license may
23 be renewed, restored, reissued, or reinstated.

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27 was signed into law. The Act, which became operative on January 1, 2010, established the
28 Bureau for Private Postsecondary Education.

STATUTORY PROVISIONS

11. Section 94813 states: “ ‘Accredited’ means an institution is recognized or approved by an accrediting agency recognized by the United States Department of Education.”

12. Section 94814 states: “ ‘Accrediting agency’ is an agency recognized by the United States Department of Education.”

13. Section 94836 states: “ ‘Educational materials’ means textbooks, supplies, implements, tools, machinery, computers, electronic devices, or other goods related to any education, training, or experience required for participation in an educational program.”

14. Section 94862 states: “ ‘Satellite location’ means an auxiliary classroom or teaching site within 50 miles of the branch or main location.”

15. Section 94893 states: “If an institution intends to make a substantive change to its approval to operate, the institution shall receive prior authorization from the bureau. Except as provided in subdivision (a) of Section 94896, if the institution makes the substantive change without prior bureau authorization, the institution’s approval to operate may be suspended or revoked.”

16. Section 94894 provides in pertinent part:

“The following changes to an approval to operate are considered substantive changes and require prior authorization:

“(a) A change in educational objectives, including an addition of a new diploma or a degree educational program unrelated to the approved educational programs offered by the institution.”

17. Section 94897 provides in pertinent part:

“An institution shall not do any of the following:

...

“(e) Advertise, or indicate in promotional material, that the institution is accredited, unless the institution has been accredited by an accrediting agency.”

18. Section 94927 states:

“An institution shall be considered in default of the enrollment agreement when an educational program is discontinued or canceled or the institution closes prior to completion of

1 the educational program. When an institution is in default, student institutional charges may be
2 refunded on a pro rata basis if the bureau determines that the school has made provision for
3 students enrolled at the time of default to complete a comparable educational program at another
4 institution at no additional charge to the students beyond the amount of the total charges in the
5 original enrollment agreement. If the institution does not make that provision, a total refund of all
6 institutional charges shall be made to students.”

7 19. Section 94930.5 provides in pertinent part:

8 “An institution shall remit to the bureau for deposit in the Private Postsecondary Education
9 Administration Fund the following fees, in accordance with the following schedule:

10 ...

11 “(d)(1) In addition to any fees paid to the bureau pursuant to subdivisions (a) to (c),
12 inclusive, each institution that is approved to operate pursuant to this chapter shall remit both of
13 the following:

14 “(A) An annual institutional fee, in an amount equal to three-quarters of 1 percent of the
15 institution’s annual revenues derived from students in California, but not exceeding a total of
16 twenty-five thousand dollars (\$25,000) annually.

17 ...”

18 20. Section 94937 provides in pertinent part:

19 “(a) As a consequence of an investigation, and upon a finding that an institution has
20 committed a violation, the bureau may place an institution on probation or may suspend or revoke
21 an institution’s approval to operate for:

22 ...

23 “(2) A material violation or repeated violations of this chapter or regulations adopted
24 pursuant to this chapter that have resulted in harm to students. For purposes of this paragraph,
25 ‘material violation’ includes, but is not limited to, misrepresentation, fraud in the inducement of a
26 contract, and false or misleading claims or advertising, upon which a student reasonably relied in
27 executing an enrollment agreement and that resulted in harm to the student.”

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1 achievement of the institution's mission and objectives and the operation of the educational
2 programs.”

3 27. California Code of Regulations, title 5, section 71745 provides in relevant part:

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

6 “(1) Provide all of the educational programs that the institution represented it would
7 provide.

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

10 ...

11 “(6) ... [F]or an institution participating in Title IV of the federal Higher Education Act of
12 1965, meet the composite score requirements of the U.S. Department of Education. . . .”

13 28. California Code of Regulations, title 5, section 71920, subdivision (a) states: “The
14 institution shall maintain a file for each student who enrolls in the institution whether or not the
15 student completes the educational service.”

16 29. California Code of Regulations, title 5, section 71930, subdivision (e) states: “All
17 records that the institution is required to maintain by the Act or this chapter shall be made
18 immediately available by the institution for inspection and copying during normal business hours
19 by the Bureau and any entity authorized to conduct investigations.”

20 30. California Code of Regulations, title 5, section 74000 provides in relevant part:

21 “(a) An institution shall pay the fees established by Article 17 of the Act. . . .

22 ...

23 “(e)(1) If an institution fails to pay any fee and any penalty fees timely, the Bureau may
24 initiate proceedings to revoke the institution's approval to operate for failure to pay fees.”

25 31. California Code of Regulations, title 5, section 74200 states: “Every institution shall
26 notify the Bureau in writing at least 30 days before the institution ceases to offer to the public any
27 educational program.”

28 32. California Code of Regulations, title 5, section 75100 provides in relevant part:

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Unauthorized Substantive Change to Approval to Operate)**

3 37. Respondent is subject to disciplinary action under Education Code sections 94893,
4 94894, subdivision (a), and 94937, subdivision (a)(2), and California Code of Regulations, title 5,
5 section 75100, subdivisions (a) and (b) in that the Institute added programs in MRI Technology
6 and Ultrasound Technology without obtaining prior authorization from the Bureau. The MRI
7 Technology and Ultrasound Technology programs are unrelated to the approved educational
8 programs offered by the Institute. This conduct resulted in harm to students. The circumstances
9 of Respondent's conduct are as follows:
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11 38. On its website, the Institute advertises that it offers programs in "MRI Technology"
12 and "Ultrasound Technology".
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14 39. The Institute's "2010-2011 Catalog & Student Handbook" states that the Institute
15 offers programs in MRI Technology and Ultrasound Technology.

16 40. The Institute enrolled students in its MRI Technology program in 2008, 2009, 2010,
17 2011, and 2012. The Institute enrolled students in its Ultrasound Technology program in 2009,
18 2010, and 2011. On or about October 27, 2011, Sunil Vethody (Sunil), the Institute's Chief
19 Executive Officer, informed an investigator from the Division of Investigation that prospective
20 students had registered for the next MRI Technology and Ultrasound Technology courses, and
21 that these courses were scheduled to begin soon.
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23 41. Neither BPPVE nor the Bureau has ever issued the Institute an approval to operate
24 either an MRI Technology program or an Ultrasound Technology (Diagnostic Medical
25 Sonography) program.

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SECOND CAUSE FOR DISCIPLINE

(False Advertising of Accreditation)

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3 42. Respondent is subject to disciplinary action under Education Code sections 94813,
4 94814, 94897, subdivision (e), and 94937, subdivision (a)(2), and California Code of Regulations,
5 title 5, section 75100, subdivisions (a) and (b) in that the Institute advertised on its website that it
6 was accredited at a time when it was not accredited by an accrediting agency. This conduct
7 resulted in harm to students. The circumstances of Respondent’s conduct are as follows:

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9 43. As an institution the Institute is, and at all times pertinent to this Accusation has been,
10 accredited by the Western Association of Schools and Colleges Accrediting Commission for
11 Schools (WASC-ACS). As an institution the Institute is not, nor at any time pertinent to this
12 Accusation was it, accredited by any other accrediting commission, association, agency, or
13 organization.

14 44. As of October 26, 2010, WASC-ACS ceased to be recognized by the United States
15 Department of Education (USDOE). As a result, WASC-ACS has not been an “accrediting
16 agency” for purposes of section 94814 since that date. Consequently, the Institute has not been
17 “accredited” for purposes of section 94813 since October 26, 2010. Nonetheless, since October
18 26, 2010, the Institute represented to enrolled and prospective students that it is accredited.
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20 45. The Institute maintains a website. The website contains an “Accreditations” tab. The
21 top portion of the “Accreditations” section of the website contains a check mark with the word
22 “ACCREDITATIONS” next to it. Beneath this word the website states the following: “The
23 Institute of Medical Education is approved and accredited by the following: Western Association
24 of Schools and Colleges (WASC) Accrediting Commission of Schools and Colleges:
25 <http://www.acswasc.org/>”
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1 status, IME is no longer financially viable. As a result, we are sorry to inform you of the change
2 to the IME Dental Hygiene Program. This letter serves as notice that the Institute of Medical
3 Education Dental Hygiene program will be closing on February 03, 2012.”

4 50. On or about February 6, 2012, Sunil sent a follow-up letter to the Institute’s Dental
5 Hygiene program students in which he stated the following: “To clarify, the letter dated on
6 February 3, 2012, regarding the closure of the Dental Hygiene program at IME, pertains to only
7 the Junior Class of 2013 (Batch 2). However, the Senior Class of 2012 (Batch 1), will continue
8 classes and clinic until graduation, with the expected date being the 15th of March, 2012.”

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10 **FOURTH CAUSE FOR DISCIPLINE**

11 **(Maintenance of Permanent Student Records at Satellite Location)**

12 51. Respondent is subject to disciplinary action under Education Code section 94937,
13 subdivision (a)(2) and California Code of Regulations, title 5, sections 71717, subdivision (b) and
14 75100, subdivision (a) in that the Institute maintained permanent student records at its satellite
15 location in Oakland, California. This conduct resulted in harm to students. The circumstances of
16 Respondent’s conduct are as follows:

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18 52. During a meeting with an investigator from the Division of Investigation on or about
19 October 27, 2011, Sunil disclosed that all student records for students enrolled at the Institute’s
20 Oakland campus are stored at the Institute’s Oakland campus. Sunil acknowledged that storing
21 student records at a satellite location is “a violation.”

22 **FIFTH CAUSE FOR DISCIPLINE**

23 **(Failure to Employ Sufficient Number of Qualified Faculty)**

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25 53. Respondent is subject to disciplinary action under Education Code section 94937,
26 subdivision (a)(2) and California Code of Regulations, title 5, sections 71720, subdivision (a)(1)
27 and 75100, subdivision (a) in that the Institute failed to employ qualified faculty in its Dental
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1 Hygiene program sufficient in number to provide the instruction, student advisement, and
2 learning outcomes evaluation necessary for the Institute to document its achievement of its stated
3 mission and objectives, and for Dental Hygiene program students to achieve the specific learning
4 objectives of the courses offered. This conduct resulted in harm to students. The circumstances
5 of Respondent's conduct are as follows:

6 54. The Institute has failed to provide adequate educational materials for the students
7 enrolled in its Dental Hygiene program. As a result, several of the program's instructors have left
8 the Institute.
9

10 55. The Institute does not have a sufficient number of instructors for its Dental Hygiene
11 program. As a result, many Dental Hygiene classes have been canceled. Those instructors that
12 do teach courses in the Dental Hygiene program lack the specialization and teaching experience
13 necessary to provide the program's students with adequate instruction.

14 56. The Institute has failed to provide students enrolled in its Dental Hygiene program
15 sufficient clinical time with patients, which is a required part of the program. As a result, these
16 students have been forced to pay for their own family members to come into the Institute's Dental
17 Hygiene clinic so that the students can use them as patients.
18

19 57. On or about October 27, 2011, Sunil met with an investigator from the Division of
20 Investigation. During that meeting, Sunil told the investigator the following:

- 21 a. The Institute had been without a school director for the past month.
22 b. The Institute had been without a Dental Hygiene program director for one week.
23 c. In September 2011, some of the instructors in the Dental Hygiene program quit
24 because of their concerns with the Institute's accreditation issues.
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SIXTH CAUSE FOR DISCIPLINE

(Failure to Employ Sufficient Administrative Personnel)

58. Respondent is subject to disciplinary action under Education Code section 94937, subdivision (a)(2) and California Code of Regulations, title 5, sections 71730, subdivision (f) and 75100, subdivision (a) in that the Institute failed to employ sufficient administrative personnel to adequately service the Institute's students. This conduct resulted in harm to students. The circumstances of Respondent's conduct are as follows:

59. In her January 17, 2012, letter to USDOE, Bindu stated the following:

a. "I know that there are several Federal regulations to meet but I really want you to know that ours is a unique situation here and our lack of trained personnel to administer [financial aid] has occurred due to no fault of ours."

b. "Our employee turnover in the last 12 months has been very high and most of the trained staff in the financial aid department did leave or got terminated."

60. In 2011 and 2012 the Institute experienced a high rate of turnover of administrative personnel.

SEVENTH CAUSE FOR DISCIPLINE

(Failure to Document Sufficient Assets and Financial Resources)

61. Respondent is subject to disciplinary action under Education Code section 94937, subdivision (a)(2) and California Code of Regulations, title 5, sections 71745, subdivision (a) and 75100, subdivision (a) in that the Institute failed to document that it has sufficient assets and financial resources to do the following: (1) provide all of the educational programs that the Institute represented it would provide; (2) ensure that all students admitted to its educational programs have a reasonable opportunity to complete the programs and obtain their degrees or diplomas; and (3) meet the composite score requirements of the United States Department of

1 Education. This conduct resulted in harm to students. The circumstances of Respondent's
2 conduct are as follows:

3 62. On or about May 14, 2011, Martina Fernandez-Rosario, an employee with USDOE,
4 wrote a letter to Bindu stating the following:

5 a. As of October 26, 2010, WASC-ACS, which is the Institute's primary accreditor,
6 is no longer a nationally recognized accrediting agency.

7 b. Since the Institute is no longer accredited by a nationally recognized accrediting
8 agency, the Institute no longer qualifies as an "eligible institution" for purposes of participation in
9 federal financial aid programs.

10 63. On or about November 2, 2011, Patricia Dickerson, an employee with USDOE, wrote
11 a letter to Bindu stating the following:

12 a. A team from USDOE completed a review of audited financial statements from the
13 Institute for the fiscal year ending on December 31, 2010.

14 b. In assessing the Institute's financial strength, a USDOE financial analyst reviewed
15 the financial statements using the indicators set forth in 34 Code of Federal Regulations section
16 668.171.

17 c. The Institute's financial statements yielded a composite score of 0.7 out of a
18 possible 3.0. "A minimum score of 1.5 is necessary to meet the requirement of the financial
19 standards. Accordingly, IME fails to meet the standards of financial responsibility as described in
20 34 C.F.R. § 668.172, Financial Ratios."
21

22 64. On or about January 19, 2012, Martina Fernandez-Rosario wrote a letter to Bindu
23 stating the following:

24 a. USDOE transferred the Institute "from the Advance method of payment to the
25 Heightened Cash Monitoring 2 (HCM2) method of payment effective January 12, 2012."
26

1 b. USDOE instituted this change “because as of October 26, 2010 IME was no longer
2 accredited by a nationally recognized accrediting agency for purposes of participation in the Title
3 IV financial aid programs.”

4 c. The Institute is allowed to continue to participate in the financial aid programs
5 under provisional certification for a period of 18 months until April 26, 2012, by which time the
6 Institute must have secured accreditation from a nationally recognized accrediting agency.

7 d. “[A] program review initiated at IME on January 11, 2012, indicates that IME has
8 not fulfilled its fiduciary responsibilities in administering the Title IV programs. In particular,
9 IME has unsubstantiated cash draws and unreconciled records for Title IV expenditures. As a
10 fiduciary of Federal funds, IME is required to reconcile expenditures on a monthly basis, and
11 must have records readily available that unquestionably support all Title IV drawdowns and
12 disbursements to students. The review team found that IME did not have such records available
13 for the team’s review.”

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15 65. In her January 17, 2012, letter to USDOE, Bindu stated the following:

16 a. USDOE’s placement of the Institute on the HCM2 method of payment “is going to
17 affect us terribly.”

18 b. “As a result of [our] expansion plan, we have signed leases for 30+K square
19 footage of space for [certain] programs and our rent went up to \$70k (extra space not being used)
20 which is just draining out of our current revenue.”

21 c. “[W]e have started to see our enrollment and the corresponding revenue slashed by
22 50% of the original revenue (before the withdrawal of WASC). I am sure you have the resources
23 to verify the reduction in our student community who have applied for financial aid in the last 6
24 months.”

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1 d. “[I]t is very crucial and critical that US DOE allow us to draw down the funds for
2 the current student on a HCM1 basis. We cannot move forward in HCM II as we do not have
3 current capability to wait for a month to get the funds as well as to advance the student the money
4 before we get paid from US DOE. In the event that US DOE freezes this account till we finish
5 our reconciliation, we will have no choice but to close our doors to 380+ students as well to 90+
6 employees of ours. We are really concerned about our student community”

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8 66. On or about January 30, 2012, Sunil sent a letter to the Institute’s students in which
9 he stated the following: “It has come to my attention that the default rate for student tuition is
10 alarmingly high. Please understand that IME is not a financing agency in any manner and cannot
11 afford to have a high default rate from tuition payment. . . . Failure to pay tuition by the 5th of
12 each month will put our institution in a great financial difficulty.”

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14 67. On or about February 3, 2012, Sunil sent a letter to the Institute’s Dental Hygiene
15 program students in which he stated the following: “In light of the recent change in accreditation
16 status, IME is no longer financially viable. As a result, we are sorry to inform you of the change
17 to the IME Dental Hygiene Program. This letter serves as notice that the Institute of Medical
18 Education Dental Hygiene program will be closing on February 03, 2012.”

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20 68. On or about February 6, 2012, Sunil sent a follow-up letter to the Institute’s Dental
21 Hygiene program students in which he stated the following: “To clarify, the letter dated on
22 February 3, 2012, regarding the closure of the Dental Hygiene program at IME, pertains to only
23 the Junior Class of 2013 (Batch 2). However, the Senior Class of 2012 (Batch 1), will continue
24 classes and clinic until graduation, with the expected date being the 15th of March, 2012.”

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26 69. Effective February 7, 2012, the Institute lost its eligibility to participate in the Title IV
27 federal financial aid programs due to its voluntary relinquishment of its participation in the
28 programs.

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EIGHTH CAUSE FOR DISCIPLINE

(Failure to Make Records Available for Inspection and Copying)

70. Respondent is subject to disciplinary action under Education Code section 94937, subdivision (a)(2) and California Code of Regulations, title 5, sections 71920, subdivision (a), 71930, subdivision (e), and 75100, subdivision (a) in that the Institute failed to make student records available for inspection and copying by a Bureau representative and an investigator from the Division of Investigation. This conduct resulted in harm to students. The circumstances of Respondent's conduct are as follows:

71. On or about December 7, 2011, Sunil met with an investigator from the Division of Investigation and a Bureau enforcement analyst. During this meeting, the investigator asked to inspect student records. Sunil informed the investigator that the student records were available but he refused to release them unless the investigator or the enforcement analyst agreed in writing that the Institute was exempt from Bureau regulation during a specific time period. Sunil did not allow the investigator or the enforcement analyst to review the requested student records.

NINTH CAUSE FOR DISCIPLINE

(Failure to Pay Annual Institutional Fee)

72. Respondent is subject to disciplinary action under Education Code section 94930.5, subdivision (d)(1)(A) and California Code of Regulations, title 5, sections 74000, subdivisions (a) and (e)(1), and 75100, subdivision (a) in that the Institute (1) failed to remit the correct annual fee to the Bureau for 2010 and (2) failed to remit the required annual fee to the Bureau for 2011. This conduct resulted in harm to students.

TENTH CAUSE FOR DISCIPLINE

(Failure to Collect and Remit Student Tuition Recovery Fund Assessments)

73. Respondent is subject to disciplinary action under Education Code section 94937,

1 subdivision (a)(2) and California Code of Regulations, title 5, sections 76120, subdivision (a),
2 76130, subdivisions (a) and (b), and 75100, subdivision (a) in that in 2010 and 2011 the Institute
3 failed to collect Student Tuition Recovery Fund assessments from its students and remit those
4 assessments to the Bureau. This conduct resulted in harm to students.

5 **ELEVENTH CAUSE FOR DISCIPLINE**

6 **(Failure to Notify Bureau of Educational Program Closure)**

7 74. Respondent is subject to disciplinary action under Education Code section 94937,
8 subdivision (a)(2) and California Code of Regulations, title 5, sections 74200 and 75100,
9 subdivision (a) in that the Institute failed to notify the Bureau in writing before closing its Dental
10 Hygiene program. This conduct resulted in harm to students. The circumstances of Respondent's
11 conduct are as follows:
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13 75. On or about February 3, 2012, Sunil sent a letter to the Institute's Dental Hygiene
14 program students in which he stated the following: "In light of the recent change in accreditation
15 status, IME is no longer financially viable. As a result, we are sorry to inform you of the change
16 to the IME Dental Hygiene Program. This letter serves as notice that the Institute of Medical
17 Education Dental Hygiene program will be closing on February 03, 2012."
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19 76. On or about February 6, 2012, Sunil sent a follow-up letter to the Institute's Dental
20 Hygiene program students in which he stated the following: "To clarify, the letter dated on
21 February 3, 2012, regarding the closure of the Dental Hygiene program at IME, pertains to only
22 the Junior Class of 2013 (Batch 2). However, the Senior Class of 2012 (Batch 1), will continue
23 classes and clinic until graduation, with the expected date being the 15th of March, 2012."
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25 77. At no point before February 3, 2012, did the Institute notify the Bureau in writing that
26 it would be closing its Dental Hygiene program.

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PRAYER

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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. Revoking or suspending the Approval to Operate the Institute of Medical Education, Bindu Baburajan, Owner (Institution Code No. 69608217 and School Code No. 81701347) (Respondent);

2. Ordering Respondent to pay the Bureau the reasonable costs of the investigation and enforcement of this case pursuant to Education Code section 94937, subdivision (c) and Business and Professions Code section 125.3;

3. Ordering Respondent to provide appropriate restitution to its students and former students;

4. Taking such other and further action as deemed necessary and proper.

DATED: 2/23/12



JOANNE WENZEL
Deputy Bureau Chief
Bureau for Private Postsecondary Education
Department of Consumer Affairs
State of California
Complainant