

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

In the Matter of the Accusation Against:

**OIKOS UNIVERSITY,**

7901 Oakport Street, Suite 3000

Oakland, CA 94621

Approval to Operate an Accredited Institution Number 93159648

Respondent.

Case No. 1004881

OAH No. 2019100521

**DECISION**

The attached Stipulated Settlement and Disciplinary Order for Public Repeval is hereby adopted by the Director of the Department of Consumer Affairs as the Decision in the above entitled matter.

The Decision shall become effective "Mar 11 2020".

DATED: "February 7,2020"

"Original signature on File"

RYAN MARCROFT

Deputy Director, Legal Affairs

Department of Consumer Affairs



1 XAVIER BECERRA  
Attorney General of California  
2 JOSHUA A. ROOM  
Supervising Deputy Attorney General  
3 CARTER OTT  
Deputy Attorney General  
4 State Bar No. 221660  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 510-3485  
6 Facsimile: (415) 703-5480  
E-mail: Carter.Ott@doj.ca.gov  
7 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

14 **OIKOS UNIVERSITY**  
15 **7901 Oakport Street, Ste. 3000**  
16 **Oakland, CA 94621**  
17 **Approval to Operate Accredited Institution**  
18 **No. 93159648**

19 Respondent.

Case No. 1004881

OAH No. 2019100521

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER FOR PUBLIC  
REPROVAL**

**[Bus. & Prof. Code § 495]**

20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Dr. Michael Marion, Jr. (Complainant) is the Chief of the Bureau for Private  
23 Postsecondary Education (Bureau). He brought this action solely in his official capacity and is  
24 represented in this matter by Xavier Becerra, Attorney General of the State of California, by  
25 Carter Ott, Deputy Attorney General.

26 2. Oikos University (Respondent) is represented in this proceeding by Haeyoung Lee,  
27 Law Office of Haeyoung Lee, 1270 Arnold Avenue, San Jose, CA 95110.

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1 **JURISDICTION**

2 3. On or about May 13, 2011, the Bureau issued Respondent an Approval to Operate  
3 Non-Accredited Institution Number 93159648. Respondent’s Approval to Operate Non-  
4 Accredited Institution expired on May 12, 2016 and was superseded by an Approval to Operate  
5 Accredited Institution Number 93159648, issued by the Bureau on or about December 22, 2016.  
6 The Approval to Operate Accredited Institution was in full force and effect at all times relevant to  
7 the charges brought in First Amended Accusation No. 1004881, and will expire on May 31, 2021,  
8 unless renewed.

9 4. Accusation No. 1004881 was filed before the Director of the Department of  
10 Consumer Affairs (Director), for the Bureau for Private Postsecondary Education, and is currently  
11 pending against Respondent. The Accusation and all other statutorily required documents were  
12 properly served on Respondent on September 18, 2019. Respondent timely filed its Notice of  
13 Defense contesting the Accusation. The Director filed and served a First Amended Accusation  
14 No 1004881 on or about December 12, 2019. A copy of the First Amended Accusation No.  
15 1004881 is attached as Exhibit A and incorporated herein by reference.

16 **ADVISEMENT AND WAIVERS**

17 5. Respondent has carefully read, fully discussed with counsel, and understands the  
18 charges and allegations in First Amended Accusation No. 1004881. Respondent has also  
19 carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
20 Settlement and Disciplinary Order for Public Repeval.

21 6. Respondent is fully aware of its legal rights in this matter, including the right to a  
22 hearing on the charges and allegations in the First Amended Accusation; the right to be  
23 represented by counsel at its own expense; the right to confront and cross-examine the witnesses  
24 against them; the right to present evidence and to testify on its own behalf; the right to the  
25 issuance of subpoenas to compel the attendance of witnesses and the production of documents;  
26 the right to reconsideration and court review of an adverse decision; and all other rights accorded  
27 by the California Administrative Procedure Act and other applicable laws.



1 supplemented, or otherwise changed except by a writing executed by an authorized representative  
2 of each of the parties.

3 13. In consideration of the foregoing admissions and stipulations, the parties agree that  
4 the Director may, without further notice or formal proceeding, issue and enter the following  
5 Disciplinary Order:

6 **DISCIPLINARY ORDER**

7 IT IS HEREBY ORDERED that Approval to Operate Accredited Institution No. 93159648,  
8 issued to Respondent, Oikos University, shall be publicly reprovved by the Bureau for Private  
9 Postsecondary Education (“Bureau”) under Business and Professions Code section 495 in  
10 resolution of First Amended Accusation No. 1004881, attached as Exhibit A.

11 **Reimbursement.** On or before January 25, 2020, Respondent shall pay \$86,618.55 to the  
12 Bureau to reimburse the Student Tuition Recovery Fund. Failure to timely pay this amount to the  
13 Bureau shall be considered unprofessional conduct and shall subject Respondent’s Approval to  
14 Operate Accredited Institution to further disciplinary action. In addition, if Respondent fails to  
15 timely pay the Bureau this reimbursement amount, Respondent shall not be allowed to renew its  
16 Approval to Operate Accredited Institution until Respondent provides payment in full.

17 **Student Roster.** On or before January 25, 2020, Respondent shall provide the Bureau with  
18 a roster of all students enrolled 120 days prior to the discontinuation of Respondent’s Associate of  
19 Science in Nursing (LVN) program. The roster must include the name of the student, their  
20 contact information (including phone number, email address, and physical address), the date of  
21 enrollment, the amount paid for the program, and the amount the student was refunded. Failure to  
22 timely provide to the Bureau the roster shall be considered unprofessional conduct and shall  
23 subject Respondent’s Approval to Operate Accredited Institution to further disciplinary action. In  
24 addition, if Respondent fails to provide the roster timely, Respondent shall not be allowed to  
25 renew its Approval to Operate Accredited Institution until Respondent provides the roster.

26 **Cost Recovery.** Respondent shall pay \$10,805.00 to the Bureau for its costs associated  
27 with the investigation and enforcement of this matter within 30 days of the effective date of this  
28 Order. Respondent shall be permitted to pay these costs in a payment plan approved by the

1 Bureau. If Respondent fails to pay the Bureau costs as ordered, Respondent shall not be allowed  
2 to renew its Approval to Operate Accredited Institution until Respondent pays costs in full.

3 **ACCEPTANCE**

4 I have carefully read the above Stipulated Settlement and Disciplinary Order for Public  
5 Reapproval and have fully discussed it with my attorney, Haeyoung Lee. I understand the  
6 stipulation and the effect it will have on my Approval to Operate Accredited Institution. I enter  
7 into this Stipulated Settlement and Disciplinary Order for Public Reapproval voluntarily,  
8 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Director of  
9 the Department of Consumer Affairs.

10  
11 DATED: "12/23/2019" "Original signature on file"  
12 \_\_\_\_\_  
13 Jongin Kim, Chief Executive Officer  
14 OIKOS UNIVERSITY  
15 Respondent

16 I have read and fully discussed with Respondent, Oikos University, the terms and  
17 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order  
18 for Public Reapproval. I approve its form and content.

19 DATED: "12/23/2019" "Original signature on file"  
20 \_\_\_\_\_  
21 Haeyoung Lee  
22 Attorney for Respondent

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**ENDORSEMENT**

The foregoing Stipulated Settlement and Disciplinary Order for Public Reapproval is hereby respectfully submitted for consideration by the Director of the Department of Consumer Affairs.

DATED: "1/6/2020"

Respectfully submitted,  
  
XAVIER BECERRA  
Attorney General of California  
JOSHUA A. ROOM  
Supervising Deputy Attorney General

CARTER OTT  
Deputy Attorney General  
*Attorneys for Complainant*

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