

1 ROB BONTA
Attorney General of California
2 JOSHUA A. ROOM
Supervising Deputy Attorney General
3 CARTER OTT
Deputy Attorney General
4 State Bar Number 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**
DEPARTMENT OF CONSUMER AFFAIRS
10 **FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION**
11 **STATE OF CALIFORNIA**

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13 In the Matter of the Accusation Against:

Case Number BPPE24-0258

14 **CALIFORNIA COLLEGE OF EARLY**
CHILDHOOD EDUCATION
15 1670 S. Amphlett Blvd., Suite 214-38
San Mateo, CA 94402

OAH Number 2025020617

16 **Institution Code No. 4102781**

FIRST AMENDED ACCUSATION

17 Respondent.
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19 **PARTIES**

20 1. Deborah Cochrane (Complainant) brings this First Amended Accusation solely in her
21 official capacity as the Chief of the Bureau for Private Postsecondary Education, Department of
22 Consumer Affairs.

23 2. On or about July 17, 2002, the Bureau for Private Postsecondary Education issued
24 Approval to Operate Institution Code Number 4102781 to California College of Early Childhood
25 Education (Respondent). California College of Early Childhood Education is owned by Ethel R.
26 Alandy. The Institution Code was in full force and effect at all times relevant to the charges
27 brought herein and will expire on August 27, 2025, unless renewed.

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JURISDICTION

3. This First Amended Accusation is brought before the Director of the Department of Consumer Affairs (Director) for the Bureau for Private Postsecondary Education (Bureau), under the authority of the following laws. All section references are to the Education Code unless otherwise indicated.

4. Section 94875 states, in part:

“ . . . The bureau shall regulate private postsecondary educational institutions through the powers granted, and duties imposed, by this chapter. . . .”

5. Section 94876 states, in part:

“(a) The powers and duties set forth in this chapter are vested in the Director of Consumer Affairs, who may delegate them to a bureau chief, subject to the provisions of this section. The bureau chief shall work in collaboration with the director. The director is responsible for the implementation of this chapter and he or she shall ensure that the protection of the public is the bureau's highest priority.

. . .

“(c) Each power granted to, or duty imposed upon, the bureau under this chapter shall be exercised and performed in the name of the bureau, subject to any conditions and limitations the director may prescribe. The bureau chief may delegate any powers or duties to a designee.

. . . .”

6. Section 94885, subdivision (a)(9) states:

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

. . .

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

7. Section 94932 states:

“The bureau shall determine an institution's compliance with the requirements of this chapter. The bureau shall have the power to require reports that institutions shall file with the

bureau in addition to the annual report, to send staff to an institution's sites, and to require documents and responses from an institution to monitor compliance. When the bureau has reason to believe that an institution may be out of compliance, it shall conduct an investigation of the institution. If the bureau determines, after completing a compliance inspection or investigation, that an institution has violated any applicable law or regulation, the bureau shall take appropriate action pursuant to this article.”

STATUTORY AND REGULATORY PROVISIONS

8. Section 94937, subdivision (b):

“(b) The bureau shall adopt regulations, within one year of the enactment of this chapter, governing probation and suspension of an approval to operate.”

9. California Code of Regulations, title 5, subdivision (b):

“(b) Failure of an applicant or institution issued an approval to operate to abate the violation or to pay the fine within the time allowed is a ground for denial or discipline of an approval to operate.”

COST RECOVERY

10. Section 94937, subdivision (a) states that the “[B]ureau may seek reimbursement pursuant to Section 125.3 of the Business and Professions Code.”

11. Business and Professions Code section 125.3 provides, in part, that the Bureau may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

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FACTUAL BACKGROUND

Citation Number 2324006

12. On or about July 17, 2023, the Bureau issued to Respondent Citation Number 2324006, which included an administrative fine and order of abatement. Respondent did not appeal the citation, and the citation is now final and incorporated by reference herein.

13. Respondent failed to timely comply with the citation, including payment of the administrative fine and order of abatement.

Citation Number 2324082

14. On or about September 29, 2023, the Bureau issued to Respondent Citation Number 2324082, which included an administrative fine and order of abatement. Respondent did not appeal the citation, and the citation is now final and incorporated by reference herein.

15. Respondent failed to timely comply with this citation's order of abatement.

Citation Number 23240302

16. On or about June 6, 2024, the Bureau issued to Respondent Citation Number 23240302, which included an administrative fine and order of abatement. Respondent did not appeal the citation, and the citation is now final and incorporated by reference herein.

17. Respondent failed to timely comply with the citation, including payment of the administrative fine and order of abatement.

Citation Number 24250155

18. On or about November 12, 2024, the Bureau issued to Respondent Citation Number 24250155, which included an administrative fine and order of abatement. Respondent did not appeal the citation, and the citation is now final and incorporated by reference herein.

19. Respondent failed to timely comply with the citation, including payment of the administrative fine and order of abatement.

Citation Number 24250235

20. On or about February 25, 2025, the Bureau issued to Respondent Citation Number 24250235, which included an administrative fine and order of abatement. Respondent did not appeal the citation, and the citation is now final and incorporated by reference herein.

21. Respondent failed to timely comply with the citation, including payment of the administrative fine and order of abatement.

Citation Number 24250283

22. On or about March 12, 2025, the Bureau issued to Respondent Citation Number 24250283, which included an administrative fine and order of abatement. Respondent did not appeal the citation, and the citation is now final and incorporated by reference herein.

23. Respondent failed to timely comply with the citation, including payment of the administrative fine and order of abatement.

CAUSE FOR DISCIPLINE

(Failure to Comply with Citation)

24. Respondent subjected its Approval to Operate Institution Code Number 4102781 to discipline for failing to timely abate a cited violation or pay the fine set forth in a citation. (Educ. Code § 94937, subd. (b) and Cal. Code Regs., title 5, § 75050, subd. (b).) The circumstances are set forth in paragraphs 12 through 23, above.

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. Revoking or suspending Approval to Operate Institution Code Number 4102781, issued to California College of Early Childhood Education, owned by Ethel R. Alandy;

2. Ordering California College of Early Childhood Education to pay the Bureau for Private Postsecondary Education for the reasonable costs of the investigation and enforcement of

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1 this case, pursuant to Section 94937, subdivision (c) and Business and Professions Code Section
2 125.3; and

3 3. Taking such other and further action as deemed necessary and proper.
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6 DATED: 5/19/2025

"Original Signature on File"

DEBORAH COCHRANE

Chief

Bureau for Private Postsecondary
Education

Department of Consumer Affairs
State of California

Complainant

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