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

In the Matter of the Accusation Against:

### **AMERICAN VISION UNIVERSITY**

155 N. Riverview Dr.

Anaheim Hills, CA 92808

Institution Code: 72482364

BPPE Case No.: BPPE22-121

Respondent.

# **DECISION AND ORDER**

The attached Stipulated Surrender of Approval to Operate and Order is hereby accepted and adopted by the Director of the Department of Consumer Affairs as the Decision in the above-entitled matter.

This Decision shall become effective on November 10, 2025.				
It is so ORDERED N	ovember 6	, 2025.		
	"Original Sig	gnature on File"		
	RYAN MARCROFT			
	Deputy Director			
	Legal Affairs Division			

**Department of Consumer Affairs** 

1	ROB BONTA				
2	Attorney General of California ERIN M. SUNSERI				
3	Supervising Deputy Attorney General AL MACINA				
4	Deputy Attorney General State Bar No. 233540				
5	600 West Broadway, Suite 1800 San Diego, CA 92101				
6	Telephone: (619) 738-9083 Facsimile: (916) 732-7920				
7	E-mail: al.macina@doj.ca.gov  Attorneys for Complainant				
8					
9	BEFORE THE DEPARTMENT OF CONSUMER AFFAIRS FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION				
10					
11	STATE OF	CALIFORNIA			
12	In the Matter of the Accusation against:	Case Number BPPE22-121			
13	AMERICAN VISION UNIVERSITY 155 N. Riverview Dr.	STIPULATED SURRENDER OF APPROVAL TO OPERATE AND			
14	Anaheim Hills, CA 92808	ORDER OF ENATE AND			
15	Institution Code No. 72482364				
16	Respondent	<u>'</u>			
17	IT IS HEREBY STIPULATED AND AG	REED by and between the parties to the above-			
18	entitled proceedings that the following matters a	re true:			
19	PAR	TIES			
20	Deborah Cochrane (Complainant) is the Chief of the Bureau for Private				
21	Postsecondary Education (Bureau), Department of Consumer Affairs (Department). She brough				
22	this action solely in her official capacity and is represented in this matter by Rob Bonta, Attorne				
23	General of the State of California, by Al Macina, Deputy Attorney General.				
24	2. American Vision University (Respondent) is represented in this proceeding by				
25	attorney Seth Weinstein, whose address is 3500 W. Olive Ave., Suite 300, Burbank, California				
26	91505-4647.				
27	3. On or about November 27, 2018, the	Bureau issued Approval to Operate Institution			
28	Code Number 72482364 to Respondent, owned by Olix Global, Inc. (Ahmad Alhalak). This				
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Approval to Operate was in full force and effect at all times relevant to the charges brought herein and will expire on January 9, 2030 unless renewed.

# **JURISDICTION**

4. Accusation Number BPPE22-121 was filed before the Bureau and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on April 18, 2025. Respondent timely filed its Notice of Defense contesting the Accusation. A copy of Accusation Number BPPE22-121 is attached as Exhibit A and incorporated by reference.

# **ADVISEMENT AND WAIVERS**

- 5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation Number BPPE22-121. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of Approval to Operate and Order.
- 6. Respondent is fully aware of its legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against Respondent; the right to present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

### **CULPABILITY**

- 8. Respondent understands that the charges and allegations in Accusation No. BPPE22-121, if proven at a hearing, constitute cause for imposing discipline upon its Approval to Operate Institution Code Number 72482364.
- 9. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Accusation and that those charges constitute cause for discipline.

Respondent hereby gives up its right to contest that cause for discipline exists based on those charges.

10. Respondent understands that by signing this stipulation it enables the Director to issue this order accepting the surrender of its Approval to Operate Institution Code Number 72482364 without further process.

### RESERVATION

11. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Director of the Department of Consumer Affairs, Bureau for Private Postsecondary Education or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

# **CONTINGENCY**

- 12. This stipulation shall be subject to approval by the Department's Director or the Director's designee. Respondent understands and agrees that counsel for Complainant and the staff of the Bureau for Private Postsecondary Education may communicate directly with the Director and staff regarding this stipulation and surrender, without notice to or participation by Respondent or its counsel. By signing the stipulation, Respondent understands and agrees that it may not withdraw its agreement or seek to rescind the stipulation prior to the time the Director considers and acts upon it. If the Director fails to adopt this stipulation as the Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Director and Department shall not be disqualified from further action by having considered this matter.
- 13. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of Approval to Operate and Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.
- 14. This Stipulated Surrender of Approval to Operate and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of

Approval to Operate and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

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

### <u>ORDER</u>

IT IS HEREBY ORDERED that Approval to Operate Institution Code Number 72482364, issued to Respondent American Vision University, owned by Olix Global, Inc. (Ahmad Alhalak), is surrendered and accepted by the Director of the Department of Consumer Affairs.

- 1. The surrender of Respondent's Approval to Operate and the acceptance of the surrendered Approval to Operate by the Director shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's licensing history with the Bureau.
- Respondent shall lose all rights and privileges as a Bureau approved private postsecondary educational institution in California as of the effective date of the Decision and Order.
- 3. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Bureau shall treat it as a new application for Approval to Operate. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered Approval to Operate in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation Number BPPE22-121 shall be deemed to be true, correct and admitted by Respondent when the Director determines whether to grant or deny the petition. The Bureau will not consider a new application for Approval to Operate or Verification of Exempt Status from Respondent or any of its owners until at least one (1) year has passed from the effective date of this decision.
- 4. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$11,603.59 prior to issuance of a new or reinstated Approval to Operate or Verification

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If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other licensing agency in the State of California, all of the charges and allegations contained in Accusation, Number BPPE22-121 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any

### **ACCEPTANCE**

I, Ahmad Alhalak, as Officer of Olix Global, Inc., owner of Respondent American Vision University, am the authorized to act on behalf of and to bind Respondent. I have carefully read the above Stipulated Surrender of Approval to Operate and Order and have fully discussed it with my attorney Seth Weinstein. I understand the stipulation and the effect it will have on Respondent's Approval to Operate. I enter into this Stipulated Surrender of Approval to Operate and Order voluntarily, knowingly, and intelligently, and agree that Respondent is to be bound by the Decision and Order of the Director of the Department of Consumer Affairs.

> Authorized signatory for AMERICAN VISION UNIVERSITY Respondent

Printed Name: Ahmood Alhalak

I have read and fully discussed with the authorized signatory for Respondent American Vision University the terms and conditions and other matters contained in this Stipulated Surrender of Approval to Operate and Order. I approve its form and content.

> SETH WEINSTEIN Attorney for Respondent

1	ENDORS	SEMENT		
2	The foregoing Stipulated Surrender of Approval to Operate and Order is hereby respectfully			
3	submitted for consideration by the Director of the	submitted for consideration by the Director of the Department of Consumer Affairs.		
4	DATED: Sept. 24, 2025	Respectfully submitted,		
5		ROB BONTA		
6		Attorney General of California ERIN M. SUNSERI		
7		Supervising Deputy Attorney General		
8		Deputy Attorney General		
9		Deputy Attorney General Attorneys for Complainant		
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# Exhibit A

Accusation Number BPPE22-121

	II			
1	ROB BONTA			
2	Attorney General of California MARICHELLE S. TAHIMIC			
3	Supervising Deputy Attorney General DIANE VON DER AHE			
	Deputy Attorney General			
4	State Bar No. 294767 600 West Broadway, Suite 1800			
5	San Diego, CA 92101 P.O. Box 85266			
6	San Diego, CA 92186-5266			
7	Telephone: (619) 738-9463 Facsimile: (619) 645-2012			
8	E-mail: Diane.VonDerAhe@doj.ca.gov  Attorneys for Complainant			
9		e Ture		
	BEFORE THE DIRECTOR OF THE DEPARTMENT OF CONSUMER AFFAIRS			
10	FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION STATE OF CALIFORNIA			
11		ALIFORNIA		
12	In the Matter of the Accusation Against:	Case No. BPPE22-121		
13	AMERICAN VISION UNIVERSITY 155 N. Riverview Dr.	ACCUSATION		
14	Anaheim Hills, CA 92808			
15	Institution Code No. 72482364,			
16	Respondent.			
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20	<u>PART</u>	<u>TIES</u>		
21	Deborah Cochrane (Complainant) brings this Accusation solely in her official			
22	capacity as the Chief of the Bureau for Private Postsecondary Education, Department of			
23	Consumer Affairs.			
24	2. On or about November 27, 2018, the Bureau for Private Postsecondary Education			
25	(Bureau) issued Approval to Operate Number Institution Code No. 72482364 to American Vision			
26	University (Respondent), owned by Olix Global, Inc. This Approval to Operate was in full force			
27	and effect at all times relevant to the charges brought herein and will expire on January 9, 2030,			
28	unless renewed.			
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(AMERICAN VISION UNIVERSITY) ACCUSATION

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

4. Code section 118, subdivision (b), provides that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

5. Section 94932 of the Code 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 an investigation, that an institution has violated any applicable law or regulation, the bureau shall take appropriate action pursuant to this article.

Section 22 of the Business and Professions Code states:

"Board" as used in any provisions of this code, refers to the board in which the administration of the provision is vested, and unless otherwise expressly provided, shall include "bureau," "commission," "committee," "department," "division," "examining committee," "program," and "agency."

- 7. Business and Professions Code section 23.7 states, "Unless otherwise expressly provided, "license" means license, certificate, registration, or other means to engage in a business or profession regulated by this code or referred to in Section 1000 or 3600."
  - 8. Section 94937 of the Code states:
  - (a) As a consequence of an investigation, which may incorporate any materials obtained or produced in connection with a compliance inspection, and upon a finding that an institution has committed a violation, the bureau may place an institution on probation or may suspend or revoke an institution's approval to operate for:

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

Section 94910. Each of these items in the School Performance Fact Sheet shall include a line for the student to initial and shall be initialed and dated by the student.

(b) A student shall receive a copy of the signed enrollment agreement, in writing or electronically, regardless of whether total charges are paid by the student.

# 11. Section 94910 of the Education Code states:

Prior to enrollment, an institution shall provide a prospective student with a School Performance Fact Sheet containing, at a minimum, the following information, as it relates to the educational program:

- (a) Completion rates, as calculated pursuant to Article 16 (commencing with Section 94928).
- (b) Placement rates, as calculated pursuant to Article 16 (commencing with Section 94928), if the educational program is designed to lead to, or the institution makes any express or implied claim related to preparing students for, a particular career, occupation, vocation, job, or job title.
- (c) License examination passage rates for programs leading to employment for which passage of a state licensing examination is required, as calculated pursuant to Article 16 (commencing with Section 94928).
- (d) (1) Salary or wage information, as calculated pursuant to Article 16 (commencing with Section 94928), if the institution or a representative of the institution makes any express or implied claim about the salary that may be earned after completing the educational program.
- (2) Additionally, each institution that offers an educational program designed to lead to a particular career, occupation, vocation, trade, job, or job title shall disclose the wage and salary data for the particular career, occupation, trade, job, or job title, as provided by the Employment Development Department's Occupational Employment Statistics, if that data is available.
- (e) If a program is too new to provide data for any of the categories listed in this subdivision, the institution shall state on its fact sheet: This program is new. Therefore, the number of students who graduate, the number of students who are placed, or the starting salary you can earn after finishing the educational program are unknown at this time. Information regarding general salary and placement statistics may be available from government sources or from the institution, but is not equivalent to actual performance data.

# (f) All of the following:

- (1) A description of the manner in which the figures described in subdivisions (a) to (d), inclusive, are calculated or a statement informing the reader of where he or she may obtain a description of the manner in which the figures described in subdivisions (a) to (d), inclusive, are calculated.
- (2) A statement informing the reader of where he or she may obtain from the institution a list of the employment positions determined to be within the field for which a student received education and training for the calculation of

,	job placement rates as required by subdivision (b).	
2	(3) A statement informing the reader of where he or she may obtain from the institution a list of the objective sources of information used to substantiate the salary disclosure as required by subdivision (d).	
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4	(g) The following statements:	
5	(1) This fact sheet is filed with the Bureau for Private Postsecondary  Education. Regardless of any information you may have relating to completion rates, placement rates, starting salaries, or license exam passage rates, this fact	
6	sheet contains the information as calculated pursuant to state law.	
7	(2) Any questions a student may have regarding this fact sheet that have not been satisfactorily answered by the institution may be directed to the	
8	Bureau for Private Postsecondary Education at (address), Sacramento, CA (ZIP Code), (Internet Web site address), (telephone and fax numbers).	
10	12. Section 94912 of the Education Code states:	
11	Prior to the execution of an enrollment agreement, the information required to	
12	be disclosed pursuant to subdivisions (a) to (d), inclusive, of Section 94910 shall be signed and dated by the institution and the student. Each of these items shall also be initialed and dated by the student.	
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14	REGULATORY PROVISIONS	
15	13. Title 16 of the California Code of Regulations, section 71715 (Regulation 71715)	
16	states:	
17 18	(b) The institution shall document that the instruction offered leads to the achievement of the learning objectives of each course.	
19	•••	
20	(d) Distance education as defined in section 94834 of the Code, does not require the	
21	physical presence of students and faculty at the same location but provides for interaction between students and faculty by such means as telecommunication, correspondence,	
22	electronic and computer augmented educational services, postal service, and facsimile transmission. In addition to the other requirements of this chapter and the Act, an institution	
23	offering distance education shall:	
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25	(3) ensure that the materials and programs are current, well organized,	
26	designed by faculty competent in distance education techniques and delivered using	
27	readily available, reliable technology;	
28	7.11	
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	(AMERICAN VISION UNIVERSITY) ACCUSATION	

(AMERICAN VISION UNIVERSITY) ACCUSATION

renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

# **FACTUAL ALLEGATIONS**

- 16. On or about February 23, 2022, the Bureau received a complaint from a former faculty member at Respondent's institution alleging that a graduate level course being offered by Respondent was not adequate for graduate level. The Bureau initiated an investigation on the complaint. Pursuant to that investigation, a Bureau representative obtained student files for seven students of the school: L.A., M.M.M., M.Y.M., M.A., S.M., E.D., and I.A. The allegations in the initial complaint were not substantiated, but a review of the student records revealed two issues with respect to quality of education, and numerous deficiencies in the record-keeping of the school.
- 17. The Quality of Education Unit (QEU) of the Bureau examined the school's distance education learning platform and observed inconsistencies between the instructors' recorded evaluations of final assignments and student E.D.'s recorded assignment grades. QEU thus opined that Respondent made untrue or misleading changes student E.D.'s grades. This occurred in three different courses, and each time meant the difference between passing and not passing the course. No explanation was provided in the student record for this, though there should have been. Examples of this include:
  - a. On or about June 20, 2023, eleven days after the Final Assignment grade in a course called "Management of International Business" was recorded by the instructor, it was changed from a 47%, to a 60%, then to 87%, not by the instructor, but with the login credentials "AVU."
  - b. On or about June 20, 2023, fifteen days after the Final Assignment Grade in a course called "Leadership" was recorded by the instructor, it was changed from a 47% to 77%, not by the instructor, but with the login credentials "AVU."
  - c. On or about March 21, 2023, eight days after the Final Assignment Grade in a course called "Fundamentals of Accounting and Financial Management" was recorded by the instructor, it was changed from 50% to 76% to 83%, not by the

instructor, but with the login credentials "AVU." The midterm assignment was also changed from 0% to 60%, not by the instructor, but with the login credentials "AVU."

- 18. QEU further found that the graded quiz settings across the educational program could not reliably measure student learning, and does not lead to the achievement of the learning objectives of each course, because graded quizzes are consistently configured to allow students to access the correct answers prior to an unlimited number of attempts to resubmit their work. These settings for graded quizzes indicate that Respondent does not ensure that the materials and programs are well-organized.
- 19. None of the seven student files contained: examination scores purportedly used for admission purposes, and/or pre-admission assessment of the students' skills and competencies to succeed in a distance education environment; transcripts showing courses completed and/or attempted or the dates of completion/withdrawal; or, documentation showing the total amount of money the school received from or on behalf of each student.
- 20. Additionally, the records for students S.M., E.D., and I.A. did not contain copies of their enrollment agreements or signed copies of the School Performance Facts Sheet.

### FIRST CAUSE FOR DISCIPLINE

# (Prohibited Business Practices)

21. Respondent is subject to disciplinary action under Code section 94897(j) in that Respondent made untrue or misleading changes to student E.D.'s grades, as more fully set forth above.

# SECOND CAUSE FOR DISCIPLINE

# (Instruction)

22. Respondent is subject to disciplinary action under Code section Regulation 71715(b) and (d)(3) in that graded quizzes are consistently configured to allow students to access the correct answers prior to an unlimited number of attempts to resubmit their answers, as set forth above.

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# **SEVENTH CAUSE FOR DISCIPLINE**

# (Failure to Maintain Financial Documentation)

26. Respondent is subject to disciplinary action under Regulation 71920(b)(9) in that in that none of the seven student files obtained and reviewed by the Bureau contained documentation showing the total amount of money received from or on behalf of the student, as set forth above.

# **DISCIPLINE CONSIDERATIONS**

27. To determine the degree of discipline, if any, to be imposed on Respondent, Complainant alleges that on or about May 3, 2024, in Case No. BPPE24-0077, the Bureau issued a Decision affirming the Order Suspending Approval to Operate Degree Granting Programs originally issued February 26, 2024. The Bureau determined that Respondent was subject to automatic suspension of its degree programs for failing to submit evidence to the Bureau of having achieved accreditation status by November 27, 2023. That decision is now final.

# **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:

- Revoking or suspending Approval to Operate Number 72482364 issued to American
   Vision University;
- 2. Ordering American Vision University to pay the Bureau for Private Postsecondary Education the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,
  - 3. Taking such other and further action as deemed necessary and proper.

DATED: 4/14/2025	Deborah Cochrane	
	DEBORAH COCHRANE	
	Chief	

Bureau for Private Postsecondary Education Department of Consumer Affairs

State of California
Complainant

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