



CITATION ORDER

Citation Issued To: First Lady Permanente, LLC Education Center 901 Geer Road Turlock, CA 95380 Institution Code: 27053651	Citation Number: 26270083
	Total Fine Amount: \$10,002.00
	Order of Abatement Included: Yes

Elizabeth Elias issues this citation in her official capacity as Bureau Chief at the Bureau for Private Postsecondary Education, California Department of Consumer Affairs (hereinafter referred to as the "Bureau").

LICENSING HISTORY

- On or about August 29, 2022, the Bureau renewed an Approval to Operate a Private Postsecondary Institution, Institution Code 27053651, to First Lady Permanente, LLC Education Center, hereinafter referred to as the "Institution." This Approval to Operate will expire on or about August 29, 2027, unless renewed.

DISCIPLINE HISTORY

- The Institution has the following discipline history:
 - [Citation No. 24250244, issued on June 27, 2025](#)
 - Evidence of compliance; citation satisfied August 7, 2025

CITATION JURISDICTION

- This administrative citation is issued to the Institution pursuant to California Education Code (CEC) section 94936; and Title 5 of the California Code of Regulations (5 CCR) section 75020 et seq. for the violation(s) described below.

CAUSE FOR CITATION & ASSESSMENT OF FINE AND/OR ORDER OF ABATEMENT

- The Institution is in violation of the following Bureau laws and regulations:

Citation Number: 26270083

Institution: First Lady Permanente, LLC Education Center

Institution Code: 27053651

Violation #1:

CEC section 94920(b) - Mandatory Cancellation, Withdrawal and Refund Policies

Cause for Citation: On or about August 11, 2026, the Bureau completed an investigation based on multiple complaints filed against the Institution. Through the course of the investigation, it was determined that the Institution failed to refund one student, B.M., who withdrew prior to the first-class session, 100 percent of the amount paid for institutional charges, less a reasonable deposit or application fee not to exceed two hundred fifty dollars pursuant to CEC section 94920(b).

Administrative Fine: Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of \$5,000.00.

Order of Abatement: Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to submit a statement of attestation confirming it will issue refunds in accordance with CEC section 94920. The statement of attestation must be dated and signed by an authorized representative of the Institution.

Additionally, the Institution shall perform a corrected calculation for the full refund owed to Student File B.M. and submit proof of the corrected calculation to the Bureau. The Institution shall contact the Bureau to obtain the identifying information for Student File B.M. so the corrected refund may be accurately processed.

Violation #2:

CEC section 94909(a)(8)(B) – Minimum Requirements for School Catalog, CEC section 94920(b) - Mandatory Cancellation, Withdrawal, and Refund Policies, and CEC section 94897(j) - Prohibited Business Practices

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Cause for Citation: On or about August 11, 2026, the Bureau completed an investigation based on multiple complaints filed against the Institution. Through the course of the investigation, it was determined that the Institution's cancellation, withdrawal, and refund policy listed in its School Catalog for 2023, 2024, and 2025 is not compliant with CEC section 94909(a)(8)(B). The Institutions policy inaccurately states that students are allowed to cancel enrollment until the first day of class, rather than through attendance at the first-class session, as required by law. Therefore, the Bureau also determined the Institution made an untrue or misleading statement related to cancellation, withdrawal, and refunds.

Administrative Fine: Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of \$2,501.00.

Order of Abatement: Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to correct the violation by revising its policy on cancellation, withdrawal, and refunds in its School Catalog to ensure it complies with CEC sections 94909 and 94920. In addition, the Institution must submit a statement of attestation that it has corrected the violation and submit a copy of the revised policy to the Bureau. The statement of attestation must be dated and signed by an authorized representative of the Institution.

Violation #3:

5 CCR section 71710(a)(6)- Educational Program and CEC section 94897(u) – Prohibited Business Practices

Cause for Citation: On or about August 11, 2026, the Bureau completed an investigation based on multiple complaints filed against the Institution. Through the course of the investigation, Bureau staff found an Externship Skills Verification form in a student file that had initials that did not belong to assigned faculty for the Phlebotomy Technician Program (CPT). The School Catalog specifies that CPT evaluations must be conducted by qualified faculty.

Therefore, the Bureau determined that the Institution failed to adhere to the Institution's policy as the evaluation reviewed was not signed by the designated CPT faculty, as verified by the faculty roster.

Administrative Fine: Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of \$2,501.00.

Order of Abatement: Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to submit a statement of attestation ensuring that it will adhere to its own stated policies in compliance with CEC section 94897(u) and learning outcome evaluations pursuant to 5 CCR section 71710(a)(6). The statement of attestation must be dated and signed by an authorized representative of the Institution.

COMPLIANCE WITH ORDER OF ABATEMENT

5. In accordance with the provisions of CEC section 94936 and 5 CCR section 75020, the Bureau issues the order(s) of abatement described above. Evidence of compliance with the order of abatement must be submitted to the Bureau within 30 days from the date of issuance of this citation. Evidence of compliance with the order of abatement may be sent by mail or email to:

- Mail: Bureau for Private Postsecondary Education
Attn: Discipline Unit – Aurzella Izmarai-Karimi
1747 North Market, Blvd., Suite 225
Sacramento, CA 95834
- Email: bppe.discipline@dca.ca.gov
 - In the subject line, please include the Institution name and citation number.

COMPLIANCE WITH ASSESSMENT OF FINE

6. In accordance with the provisions of CEC section 94936, and 5 CCR sections 75020 and 75030, the Bureau hereby orders this assessment of fines in the total amount of \$10,002.00 for the violations described above. Payment of the fines must be made to the Bureau within 30 days from the

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date of service of this citation unless an informal conference or hearing is requested. To assist the Bureau in processing the payment of fines, please submit the enclosed *Payment of Fine – Waiver of Appeal* form.

Payment must be sent to the Bureau by mail at:

- Bureau for Private Postsecondary Education
Attn: Discipline Unit – Aurzella Izmarai-Karimi
1747 North Market, Blvd., Suite 225
Sacramento, CA 95834

NOTICE OF APPEAL RIGHTS

7. You have the right to contest this citation through an informal conference with the Bureau pursuant to 5 CCR section 75020 and/or through an administrative hearing in accordance with Chapter 5 (Commencing with section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

If you wish to contest this citation, the Bureau must receive a written request within 30 days from the date of issuance of this citation asking for an informal conference and/or administrative hearing or you may also submit the enclosed *Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing* form.

The written request may be sent by email or mail to the addresses below:

- Mail: Bureau for Private Postsecondary Education
Attn: Discipline Unit – Aurzella Izmarai-Karimi
1747 North Market, Blvd., Suite 225
Sacramento, CA 95834
- Email: bppe.discipline@dca.ca.gov
 - In the subject line, please include the Institution name and citation number.

Failure to submit a written request for an informal conference and/or administrative hearing within 30 days from the date of issuance of this citation will forfeit your ability to appeal the citation.

If a hearing is requested, you are not required to comply with this citation until a final order is entered against you.

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COMPLIANCE WITH FINE AND/OR ORDER OR ABATEMENT DISCLOSURE

8. Pursuant to BPC section 125.9 and 5 CCR section 75050, payment of fine and/or compliance with any order of abatement does not constitute an admission of the violation charged and shall be represented as satisfactory resolution of the matter for the purposes of public disclosure.

Pursuant to 5 CCR section 75050, failure to comply with this citation order, its order of abatement, and/or administrative fine by the required due date is grounds for denial or discipline of an approval to operate. Where a citation is not contested and fine is not paid, the full amount of the assessed fine shall be added to the fee for renewal of the approval to operate. An approval to operate shall not be renewed without payment of the renewal fee and fine.

BUREAU CONTACT INFORMATION

9. If you have any questions regarding this Citation, please contact Aurzella Izmarai-Karimi, Citation Analyst by email at Aurzella.Izmarai@dca.ca.gov or by phone at (916) 574-7344.

"Original Signature on File"

8/31/2026

Elizabeth Elias
Bureau Chief

Citation Date of Issuance

Enclosures:

- Notice of Appeal of Citation: Request for Informal Conference and/or Administrative Hearing
- Payment of Fine – Waiver of Appeal
- Declaration of Service by Certified and First-Class Mail