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

In the Matter of the Accusation Against:

## CYBER INSURANCE GROUP CORP.,

**Owner of Business and Insurance School** 

150 Paularino, Building #D, Suite D-176

Costa Mesa, CA 92626

Approval to Operate No.: 64494378

Case No. 1004332

Respondent.

#### DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Reproval is hereby

adopted by the Director of the Department of Consumer Affairs and the Bureau for Private

Postsecondary Education as the Decision in the above entitled matter.

This Decision shall become effective on OCT 2 5 2020 , 2020.

It is so ORDERED 2020.

RYAN MARCROFT DEPUTY DIRECTOR, LEGAL AFFAIRS DIVISION DEPARTMENT OF CONSUMER AFFAIRS

1	XAVIER BECERRA			
2	Attorney General of California MARICHELLE S. TAHIMIC			
3	Supervising Deputy Attorney General DIONNE MOCHON			
4	Deputy Attorney General State Bar No. 203092			
5	600 West Broadway, Suite 1800 San Diego, CA 92101			
6	P.O. Box 85266 San Diego, CA 92186-5266			
7	Telephone: (619) 738-9012 Facsimile: (619) 645-2061			
-8	Attorneys for Complainant			
9	BEFORE THE			
10	DEPARTMENT OF CONSUMER AFFAIRS FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION			
11	STATE OF CALIFORNIA			
12				
<sup></sup> 13	In the Matter of the Accusation Against:	Case No. 1004332		
14	CYBER INSURANCE GROUP CORP., Owner of Business and Insurance School	STIPULATED SETTLEMENT AND DISCIPLINARY ORDER FOR PUBLIC		
15	owner of pushess and insurance benoor	REPROVAL		
16	150 Paularino, Building #D, Suite D-176 Costa Mesa, CA 92626	[Bus. & Prof. Code § 495]		
17				
18	Approval to Operate Number. 64494378			
19	Respondent.			
20				
21	IT IS HEREBY STIPULATED AND AGR	EED by and between the parties to the above-		
22	entitled proceedings that the following matters are true:			
23	PARTIES			
24	1. Dr. Michael Marion, Jr. (Complainant) is the Chief of the Bureau for Private			
25	Postsecondary Education (Bureau). He brought this action solely in his official capacity and is			
26	represented in this matter by Xavier Becerra, Attorney General of the State of California, by			
27	Dionne Mochon, Deputy Attorney General.			
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	STIP SETTLEMENT &	DISC ORDER FOR PUBLIC REPROVAL (1004332)		

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2. Respondent Cyber Insurance Group Corp., Owner of Business and Insurance School (Respondent) is representing itself in this proceeding and has chosen not to exercise its right to be represented by counsel.

### JURISDICTION

On or about January 20, 2016, the Bureau issued an Approval to Operate a Non Accredited Institution Number 64494378 to Respondent. The Approval to Operate a Non Accredited Institution was in full force and effect at all times relevant to the charges brought in
 Accusation No. 1004332 and will expire on January 19, 2021, unless renewed.

4. Accusation Number 1004332 was filed before the Director of Department of
Consumer Affairs (Director), for the Bureau for Private Postsecondary Education (Bureau), and is
currently pending against Respondent. The Accusation and all other statutorily required
documents were properly served on Respondent on June 23, 2020. Respondent timely filed its
Notice of Defense contesting the Accusation. A copy of Accusation Number 1004332 is attached
as Exhibit A and incorporated herein by reference.

## **ADVISEMENT AND WAIVERS**

S. Respondent has carefully read, and understands the charges and allegations in
 Accusation No. 1004332. Respondent has also carefully read, and understands the effects of this
 Stipulated Settlement and Disciplinary Order for Public Reproval.

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 be represented by counsel at
 its own expense; the right to confront and cross-examine the witnesses against them; 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.

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7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
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every right set forth above.

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1	CULPABILITY
2	8. Respondent admits the truth of each and every charge and allegation in Accusation
3	Number 1004332.
4	9. Respondent agrees that its Approval to Operate a Non-Accredited Institution is
5	subject to discipline and they agree to be bound by the Disciplinary Order below.
6	CONTINGENCY
7	10. This stipulation shall be subject to approval by the Director of the Department of
8	Consumer Affairs or the Director's designee. Respondent understands and agrees that counsel for
9	Complainant and the staff of the Bureau for Private Postsecondary Education may communicate
10	directly with the Director and staff of the Department of Consumer Affairs regarding this
11	stipulation and settlement, without notice to or participation by Respondent. By signing the
12	stipulation, Respondent understands and agrees that it may not withdraw its agreement or seek to
13	rescind the stipulation prior to the time the Director considers and acts upon it. If the Director
14	fails to adopt this stipulation as the Decision and Order, the Stipulated Settlement and
15	Disciplinary Order for Public Reproval shall be of no force or effect, except for this paragraph, it
16	shall be inadmissible in any legal action between the parties, and the Director shall not be
17	disqualified from further action by having considered this matter.
18	11. The parties understand and agree that Portable Document Format (PDF) and facsimile
19	copies of this Stipulated Settlement and Disciplinary Order for Public Reproval, including PDF
20	and facsimile signatures thereto, shall have the same force and effect as the originals.
21	12. This Stipulated Settlement and Disciplinary Order for Public Reproval is intended by
22	the parties to be an integrated writing representing the complete, final, and exclusive embodiment
23	of their agreement. It supersedes any and all prior or contemporaneous agreements,
24	understandings, discussions, negotiations, and commitments (written or oral). This Stipulated
25	Settlement and Disciplinary Order for Public Reproval may not be altered, amended, modified,
26	supplemented, or otherwise changed except by a writing executed by an authorized representative
27	of each of the parties.
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13. In consideration of the foregoing admissions and stipulations, the parties agree that 1 the Director may, without further notice or formal proceeding, issue and enter the following 2 **Disciplinary Order:** 3

#### **DISCIPLINARY ORDER**

IT IS HEREBY ORDERED that Approval to Operate a Non-Accredited Institution Number 5 64494378 issued to Respondent Cyber Insurance Group Corp., Owner of Business and Insurance 6 School (Respondent) shall be publicly reproved by the Bureau for Private Postsecondary 7 Education under Business and Professions Code section 495 in resolution of Accusation Number 8 1004332, attached as Exhibit A. 9

10 Submission of Annual Fees: Respondent shall pay the past annual fees due for the period 2017 through 2019, calculated to be \$2,500.00 for each year due and totaling \$7,500.00. 11 Respondent shall pay accrued late fees for each year of \$850.00 totaling \$2,550.00. Payment in 12 full of the past annual fees and accrued late fees in the sum of \$10,050.00 shall be received by the 13 Bureau on or before December 31, 2020. 14

15 **Cost Recovery**. Respondent shall pay \$1,000.00 to the Bureau for its costs associated with the investigation and enforcement of this matter. Respondent shall be permitted to pay these 16 17 costs in a payment plan approved by the Bureau. If Respondent fails to pay the Bureau costs as ordered, Respondent shall not be allowed to renew its Approval to Operate until Respondent pays 18 costs in full. 19

Full Compliance. As a resolution of the charges in Accusation No. 1004332, this 20 21 stipulated settlement is contingent upon Respondent's full compliance with all conditions of this Order. If Respondent fails to satisfy any of these conditions, such failure to comply constitutes 22 cause for discipline, including outright revocation, of Respondent's Approval to Operate No. 23 64494378. 24

STIP SETTLEMENT & DISC ORDER FOR PUBLIC REPROVAL (1004332)

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1	ACCEPTANCE		
2	I have carefully read the Stipulated Settlement and Disciplinary Order for Public Reproval.		
3	I understand the stipulation and the effect it will have on my Approval to Operate. I enter into		
4	this Stipulated Settlement and Disciplinary Order for Public Reproval voluntarily, knowingly, and		
5	intelligently, and agree to be bound by the Decision and Order of the Director of the Department		
6	of Consumer Affairs.		
7	$\mathcal{H} \rightarrow \mathcal{O}$		
8	DATED: August 27,2020 Alogon Brie B, Trustice Drog Killichtich		
9	Authorized agent for CYBER INSURANCE GROUP CORP., OWNER		
10	OF BUSINESS AND INSURANCE SCHOOL Respondent		
11	<i><i>Cosponie Cosponie Cosponie</i></i>		
12	ENDORSEMENT		
13	The foregoing Stipulated Settlement and Disciplinary Order for Public Reproval is hereby		
14	respectfully submitted for consideration by the Director of the Department of Consumer Affairs.		
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16	DATED: Respectfully submitted,		
17	XAVIER BECERRA Attorney General of California		
18	MARICHELLE S. TAHIMIC Supervising Deputy Attorney General		
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20	DIONNE MOCHON		
21	Deputy Attorney General Attorneys for Complainant		
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	5 STIP SETTLEMENT & DISC ORDER FOR PUBLIC REPROVAL (1004332)		

1	ACCEPTANCE		
2	I have carefully read the Stipulated Settlement and Disciplinary Order for Public Re		
		he effect it will have on my Approval to Operate. I enter into	
4	this Stipulated Settlement and Disciplinary Order for Public Reproval voluntarily, knowingly, an		
5	intelligently, and agree to be bound by the Decision and Order of the Director of the Departmer		
6	of Consumer Affairs.		
7			
8	DATED:		
9 10 11	1	Authorized agent for CYBER INSURANCE GROUP CORP., OWNER OF BUSINESS AND INSURANCE SCHOOL Respondent	
12		ENDORSEMENT	
13	The foregoing Stipulated So	The foregoing Stipulated Settlement and Disciplinary Order for Public Reproval is hereby	
14		eration by the Director of the Department of Consumer Affairs.	
15	· · ·		
16	DATED: September 3, 2020	Respectfully submitted,	
17		XAVIER BECERRA Attorney General of California MARICHELLE S. TAHIMIC	
18 19		Supervising Deputy Attorney General	
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21		() No intervention	
22		Deputy Attorney General Attorneys for Complainant	
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