

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 Repeval 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 25 2020, 2020.

It is so ORDERED September 17, 2020.



RYAN MARCROFT

DEPUTY DIRECTOR, LEGAL AFFAIRS DIVISION
DEPARTMENT OF CONSUMER AFFAIRS

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Attorney General of California
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Attorneys for Complainant
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10 **BEFORE THE**
DEPARTMENT OF CONSUMER AFFAIRS
11 **FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION**
STATE OF CALIFORNIA
12

13 In the Matter of the Accusation Against:

Case No. 1004332

14 **CYBER INSURANCE GROUP CORP.,**
15 **Owner of Business and Insurance School**

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPROVAL

16 **150 Paularino, Building #D, Suite D-176**
17 **Costa Mesa, CA 92626**

[Bus. & Prof. Code § 495]

18 **Approval to Operate Number. 64494378**

19 Respondent.
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21 IT IS HEREBY STIPULATED AND AGREED 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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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 Repeval 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 Repeval, 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 Repeval 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 Repeval 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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ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order for Public Repeval. I understand the stipulation and the effect it will have on my Approval to Operate. I enter into this Stipulated Settlement and Disciplinary Order for Public Repeval voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Director of the Department of Consumer Affairs.

DATED: August 27, 2020 *James Briggs, Trustee Dir of Education*
Authorized agent for
CYBER INSURANCE GROUP CORP., OWNER
OF BUSINESS AND INSURANCE SCHOOL
Respondent

ENDORSEMENT

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

DATED: _____

Respectfully submitted,
XAVIER BECERRA
Attorney General of California
MARICHELLE S. TAHIMIC
Supervising Deputy Attorney General

DIONNE MOCHON
Deputy Attorney General
Attorneys for Complainant

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ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order for Public Repraval. I understand the stipulation and the effect it will have on my Approval to Operate. I enter into this Stipulated Settlement and Disciplinary Order for Public Repraval voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Director of the Department of Consumer Affairs.

DATED: _____

Authorized agent for
CYBER INSURANCE GROUP CORP., OWNER
OF BUSINESS AND INSURANCE SCHOOL
Respondent

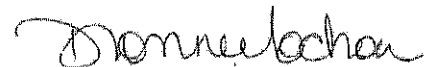
ENDORSEMENT

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

DATED: September 3, 2020

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
MARICHELLE S. TAHIMIC
Supervising Deputy Attorney General



Deputy Attorney General
Attorneys for Complainant

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