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*Attorneys for Complainant*

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

In the Matter of the Accusation Against:  
  
**AMERICAN SPORTS UNIVERSITY**  
American Sports University,  
Owner, Non-Profit Public Benefit  
399 North D. Street  
San Bernardino, CA 92401  
  
**Institution Code 14960906**

Respondent.

Case No. 996999  
OAH No. 2015110124  
**STIPULATED SURRENDER OF  
APPROVAL TO OPERATE AND  
ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled proceedings that the following matters are true:

PARTIES

1. Joanne Wenzel (Complainant) is the Chief of the Bureau for Private Postsecondary Education (the Bureau). She brought this action solely in her official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Cristina Felix, Deputy Attorney General.
2. American Sports University (Respondent) Owner, Non-Profit Public Benefit Corporation, is represented in this proceeding by attorney James C. Stevens, Esq., whose address is 402 W. Broadway, Suite 400, San Diego, CA 92101.





CONTINGENCY

1  
2       12. This stipulation shall be subject to approval by the Director or the Director's designee.  
3 Respondent understands and agrees that counsel for Complainant and the staff of the Bureau for  
4 Private Postsecondary Education may communicate directly with the Director and staff regarding  
5 this stipulation and surrender, without notice to or participation by Respondent or his counsel. By  
6 signing the stipulation, Respondent understands and agrees that he may not withdraw his  
7 agreement or seek to rescind the stipulation prior to the time the Director considers and acts upon  
8 it. If the Director fails to adopt this stipulation as the Decision and Order, the Stipulated  
9 Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall  
10 be inadmissible in any legal action between the parties, and the Director shall not be disqualified  
11 from further action by having considered this matter.

12       13. The parties understand and agree that Portable Document Format (PDF) and facsimile  
13 copies of this Stipulated Surrender of Approval to Operate and Order, including Portable  
14 Document Format (PDF) and facsimile signatures thereto, shall have the same force and effect as  
15 the originals.

16 ~~14. This Stipulated Surrender of Approval to Operate and Order is intended by the parties~~  
17 to be an integrated writing representing the complete, final, and exclusive embodiment of their  
18 agreement. It supersedes any and all prior or contemporaneous agreements, understandings,  
19 discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of  
20 Approval to Operate and Order may not be altered, amended, modified, supplemented, or  
21 otherwise changed except by a writing executed by an authorized representative of each of the  
22 parties.

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

26 ///

27 ///





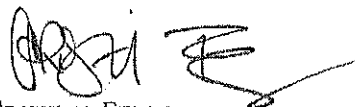
ENDORSEMENT

The foregoing Stipulated Surrender of Approval to Operate and Order is hereby respectfully submitted for consideration by the Director of the Department of Consumer Affairs.

Dated: 07/08/2016

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
THOMAS L. RINALDI  
Supervising Deputy Attorney General



CRISTINA FELIX  
Deputy Attorney General  
*Attorneys for Complainant*

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DEPARTMENT OF CONSUMER AFFAIRS  
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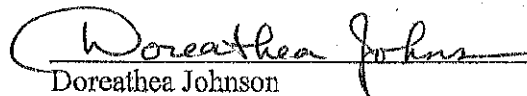
OAH No. 2015110124

**DECISION AND ORDER**

The attached Stipulated Surrender of Approval to Operate and Order is hereby adopted by the Director of the Department of Consumer Affairs and the Bureau for Private Postsecondary Education as the Decision and Order in the above entitled matter.

This Decision shall become effective on SEP 30 2016

Dated: August 26, 2016



Doreatha Johnson  
Deputy Director, Legal Affairs  
Department of Consumer Affairs