

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

In the Matter of the Citation Against:

**SEYMOUR KOBLIN, dba INTERNATIONAL SCHOOL OF HEALING ARTS**

4445 Eastgate Mall 200

San Diego, CA 92121

Citation No. 23240283

BPPE Case No.: BPPE23-0521

OAH Case No.: 2024090337

Respondent.

**DECISION AND ORDER**

The attached Proposed Decision of the Administrative Law Judge 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 April 13, 2025.

It is so ORDERED March 11, 2025.

"Original Signature on File"

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

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BUREAU FOR PRIVATE POSTSECONDARY EDUCATION  
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**In the Matter of the Citation Against:**

**SEYMOUR KOBLIN,<sup>1</sup> d.b.a. INTERNATIONAL SCHOOL OF  
HEALING ARTS, Respondent**

**Citation No. 23240283**

**OAH No. 2024090337**

**PROPOSED DECISION**

Jami A. Teagle-Burgos, Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter by videoconference on February 3, 2025.

Craig S. Menchin, Deputy Attorney General, represented complainant Elizabeth Elias, Deputy Bureau Chief of Enforcement at the Bureau of Private Postsecondary Education (BPPE or bureau), Department of Consumer Affairs, State of California.

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<sup>1</sup> Documents from the bureau list respondent's first name with multiple spellings, i.e. "Seymor," "Seymore," and "Seymour." Documents from respondent list his first name as "Seymour" and he testified "Seymour" is the spelling of his first name.

Respondent Seymour Koblin, doing business as International School of Healing Arts (ISOHA), represented himself.

Oral and documentary evidence was received. The record was closed, and the matter was submitted for decision on February 3, 2025.

## **FACTUAL FINDINGS**

### **Jurisdictional Matters and Background**

1. The bureau is the agency responsible for approving and regulating private postsecondary educational institutions.
2. On June 9, 2023, the bureau received a complaint alleging that ISOHA was operating without bureau approval. The bureau conducted an investigation and determined ISOHA was offering courses for the costs of \$200 to \$8,000 for each course and did not have bureau approval to operate or have a valid exemption.
3. On June 19, 2024, the bureau issued Citation No. 23240283 to ISOHA for violation of Education Code section 94886 due to operating without approval granted by the bureau or without a valid exemption. The bureau issued an administrative fine of \$25,000 against ISOHA, and an order of abatement that ordered ISOHA to do the following: cease to operate as a private postsecondary educational institution unless it obtains approval to operate by the bureau or qualifies for an exemption; cease unlawful advertising by discontinuing recruiting and/or enrolling students and disconnecting all telephone service numbers; provide a roster of each student currently enrolled and the amounts each student has paid; submit a statement of attestation that it has corrected the violation and complied with the order of

abatement; and it shall not enforce any loans such as notes, instruments, or other evidence of indebtedness relating to payments made by students.

4. ISOHA filed a notice of appeal with a request for an administrative hearing, and this hearing followed.

### **Testimony of Kieu Vo**

5. The following is a summary of the testimony of Kieu Vo. Ms. Vo explained that Mr. Koblin was the founder and owner of the School of Healing Arts (SOHA), which was licensed and/or eventually became licensed with the bureau. She assumed responsibility and ownership of SOHA from Mr. Koblin in approximately 2016. She assembled a new board of directors, took over SOHA's debt, paid the debt, and assumed responsibility of the salaries and expenses. Sometime later, Ms. Vo changed the name from SOHA to the International College of Holistic Studies (ICOHS) because there was a "lot of confusion" amongst the students, and there were other reasons as to why she needed to "separate from the previous college." However, Mr. Koblin continued to teach courses and simply renamed his school "ISOHA."

6. Ms. Vo testified that SOHA has been around since the 1980s. It has a long history of programs involving massage techniques and nutrition, and it was a great school. When Ms. Vo took over SOHA in 2016, there were a lot of changes that were needed regarding the organization such as aligning with the bureau, becoming accredited, and delivering a standard of education that was "up to par." Mr. Koblin was a part of and instrumental in the transition, and his "expertise of doing massage . . . was the cornerstone of the school." The school also had a component of an English language school. SOHA was lacking in financial security as there was not a lot of money to pay the bills. Ms. Vo reached out to SOHA because she believed in massages

and holistic health and was interested in purchasing it. She already had another program that she ran. She eventually assumed ownership and operation of SOHA, and the proper paperwork was done for a change in ownership and board of directors. It is a non-profit organization.

7. After Ms. Vo purchased SOHA, the school began to get a "lot of calls from students" asking for their transcripts. For the former students of SOHA, Ms. Vo was able to retrieve their records because Mr. Koblin had given her those records in the transfer of ownership. However, Mr. Koblin was "going back and forth from Prague," and he "had other plans with his life." Ms. Vo really needed "someone here to teach [at SOHA], and [she] could no longer pay him." Mr. Koblin began teaching his own new students in a setting outside of SOHA, and his new students would call SOHA and ask Ms. Vo for their transcripts, but SOHA did not have them. This concerned Ms. Vo because she was being contacted by Mr. Koblin's new students from his "new unaccredited program," who were asking her for their transcripts. There was also an incident when she hired an instructor from out of state. The instructor got a call from someone asking if she needed help with housing, and the instructor was adamant that the person who called her was Mr. Koblin. Ms. Vo felt this was unusual. When the instructor arrived at SOHA, the instructor was also confused and under the impression that SOHA was still Mr. Koblin's school. Ms. Vo felt that Mr. Koblin had not "separated" himself from SOHA. This was causing a lot of problems because she could not provide Mr. Koblin's new students with their transcripts, and he was also offering similar or the same "programming" of massage courses that SOHA offered.

8. Because of these problems and their effect of "bringing down our reputation," Ms. Vo changed SOHA's name to ICOHS in 2019 and 2020 to "have a very clear separation" with Mr. Koblin and the former SOHA when it was run by him. She

had to go through accreditation and the bureau for the name change. She worked with an attorney to inform Mr. Koblin there could be no similarities between ICOHS and SOHA when it was run by Mr. Koblin, and there needed to be a "clear separation." Nonetheless, the problems persisted, and Ms. Vo more recently spoke with five students who called ICOHS's registrar's office, and ICOHS did not have their transcripts because they are newer students of Mr. Koblin and ISOHA. And, Mr. Koblin named his "new school" ISOHA which also contains the word "international." All of this confused Ms. Vo and ICOHS's students. Mr. Vo ultimately filed a complaint with the bureau.

### **Testimony of Investigator Aleta Prudhomme**

9. The following is a summary of the testimony of Aleta Prudhomme, an investigator for the bureau. Ms. Prudhomme's testimony is consistent with the findings in her investigative report and the documents submitted into evidence by complainant. Investigator Prudhomme has worked for the bureau since May 2022. She began as a special investigator and became a supervising special investigator in 2024. She previously worked as an investigator for the Dental Board from 2018 to 2020 and for the Department of Public Health from 2017 to 2018. She has conducted approximately more than 100 investigations during her work as an investigator, and about 50 of those investigations have been for the bureau.

10. Investigator Prudhomme was assigned to conduct the investigation of a complaint that was filed alleging ISOHA was operating without approval by the bureau. She reviewed the bureau's database and found ISOHA was not an approved school with the bureau; ISOHA had no application on file with the bureau; and ISOHA did not have an exemption or an application for an exemption with the bureau.

11. Investigator Prudhomme conducted an unannounced site visit to ISOHA's San Diego address on December 15, 2023, which is in a large corporate building. The location was a WeWork<sup>2</sup> station, and she learned that ISOHA only received mail at that location. Investigator Prudhomme left the WeWork station and went to her car. She called Mr. Koblin, who remarked the WeWork station was only an "administrative location" and ISOHA had locations in Pacific Beach and Carlsbad, California. However, he said there were no classes at those locations, and ISOHA's classes were mostly online. Mr. Koblin indicated that he went back and forth from Prague in the Czech Republic, and he offered private teachings when he was in California, for which students received "certificates" when they completed his programs.

12. Investigator Prudhomme asked Mr. Koblin about ISOHA's course offerings on ISOHA's website. She took screenshots of ISOHA's website. The following courses/programs were listed on ISOHA's website:

- A "Zen-Touch™ Shiatsu/Thai Certification" course for \$8,000 that described practitioners learning skills taught by Mr. Koblin.
- A "Zen-Thai Touch Practitioner 25-500 Hours" course for \$200 to \$8,000.
- A "Whole Foods Nutrition & Herbology Consultant" course for \$8,000.
- An "All Sections: 500 Hours" course indicating the program was divided into three sections where students learned to make "recommendations with actual clients under the "supervision" of Mr. Koblin, and a final section

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<sup>2</sup> WeWork is a company that leases shared work space.

consisting of a "50 Hour Thesis" where "students provide counseling and monitor progress of 5 clients for 5 weekly sessions."

- A "Knowledge/Physical 200 Hours" course and "Chi and Nei Kung" alignment exercises to teach students how to alleviate body pain of "future clients."
- A "Wisdom/Emotional – 100 Hours: Client Communication and Counseling" course where students learn to communicate with "clients."
- An "Art of Speaking 15 Hours" course where students learn to speak to both "clients and groups" and included "internship/mentorship" for coaching with public speaking.
- A "Holistic Business Practices 20 Hours" course that focused on a holistic approach to "marketing your business" using web pages, social marketing, articles/post writing, and public speaking skills. It included becoming a "team member of ISOHA's promotion of holistic nutrition as well as being a certified coach for others."
- A note titled "Description" discussed that "practitioners" already familiar with Western massage, Thai, Shiatsu or Tui Na massage may require less training than beginners.

13. Investigator Prudhomme testified that several of the courses offered by ISOHA were charging more than \$2,500, which meant ISOHA needed to be approved by the bureau.

14. In addition, Investigator Prudhomme indicated the courses offered by ISOHA were vocational in nature rather than avocational, which would be for personal entertainment or recreational purposes. She came to this determination because the

course descriptions mentioned ISOHA students working with "clients" indicating the courses were not for recreational purposes. The words "clients," "marketing," and "internships/mentorship" indicated the courses were assisting in employment and business purposes, whereby the courses taught students and/or current practitioners to work with clients. The "thesis" course referenced students would monitor clients over a period indicating that students were working towards a vocation. Moreover, the reference of "becoming a team member of ISOHA" indicated that ISOHA and Mr. Koblin were offering some type of employment.

15. On cross examination, Investigator Prudhomme was asked if the word "client" was changed to "participant" would that change her assessment. She replied that the courses on ISOHA's website referenced teaching students to work with clients, and there was no reference to "participants."

16. Moreover, Investigator Prudhomme testified that when she spoke to Mr. Koblin, he never mentioned that ISOHA was offering any type of religious education. She was asked on cross examination if the course pricing was a "donation," would that be different than "vocational" training. She replied there was "nothing on the website that this was a religious institution and it wasn't brought up during the interview, so it was not a religious organization."

17. Investigator Prudhomme concluded that ISOHA was operating without bureau approval and an exemption, pursuant to Education Code section 94886.

### **Testimony of Seymour Koblin**

18. The following is a summary of the testimony of Seymour Koblin, and the documents he offered into evidence.

19. In 2015 and 2016, Mr. Koblin was working with Ms. Vo at ICOHS, formerly SOHA. She fired him. Before Ms. Vo fired him, she asked him to create a new name for his own program so there would be a "separation" and "no confusion" between the two schools. On January 10, 2016, Mr. Koblin created articles of incorporation for "International SOUL of Healing Arts" (ISHA), which indicated it was a "religious corporation." On April 15, 2016, Mr. Koblin filed documentation with the Franchise Tax Board (FTB) indicating ISHA was a "religious" corporation. On July 12, 2016, Mr. Koblin registered a non-profit organization called ISHA with the United States Department of the Treasury (DOT) under Internal Revenue Code section 170, subdivision (b)(1)(A)(i), as a "church or a convention of association of churches." On November 28, 2016, Mr. Koblin filed a "fictitious business name" of "International School of Healing Arts" (ISOHA) under ISHA Inc. with the County of San Diego (County). Mr. Koblin argued ISOHA is exempt from requiring bureau approval because it is a religious institution, and he argued that he was offering "intuitive advanced-spiritual training."

20. It is noted, the first time Mr. Koblin informed complainant, counsel for complainant, and Investigator Prudhomme about ISOHA's articles of incorporation and FTB filing as a religious corporation, DOT filing as a "church," and County filing of a fictitious business name, was one business day (a Friday) before the hearing (a Monday).

21. Mr. Koblin submitted into evidence a declaration by Janice Bauzon, dated January 30, 2025, which was not notarized or otherwise authenticated. Ms. Bauzon's declaration indicated she took an ISOHA course in 2014 for "self-interest purposes" and as a mentorship, but not for vocational training. An "agreement" signed by Mr. Koblin, indicated Ms. Bauzon agreed to pay "tuition" in the amount of \$1,800 for the ISOHA course. Mr. Koblin asserted in testimony that Ms. Bauzon had an option on the

website to "donate" various amounts, and she paid a "donation" by selecting a lesser amount than \$1,800, and he was okay with that amount. On the agreement, Ms. Bauzon's name was written by hand on November 8, 2023, and again on January 8, 2025, even though it was for a course she took in 2014. The agreement had a footnote indicating that ISOHA is a "non-secular interfaith religious organization . . . a personal growth organization," and that students who complete ISOHA courses are eligible for "certification" at a "national massage board." The footnote also indicated ISOHA's educational titles are not for occupational/vocational training, and such training required attendance at a bureau-approved vocational school. Mr. Koblin submitted a similar agreement between ISOHA and a student, Christopher Alexander, for a course with the "tuition" amount of \$840.

22. Mr. Koblin testified ISOHA had only four students since 2016, and the most he has ever charged was \$1,800, which is less than \$2,500 and should make it exempt from bureau approval. He remarked the administrative fine of \$25,000 sounded "really, really off" because ISOHA has only taught four students. He spends time in Prague, where he is the chief executive officer of a school with the same name. He argued ISOHA's courses are offered on a "donation" basis, and he has "never even used the courses on the screenshots that the Investigator took." He told Investigator Prudhomme that he did not realize the website had courses with \$8,000 prices, and ISOHA never "used them or offered them." He stated, "We don't do big programs." He took those courses off the website because he used to charge those prices at the "old school" (SOHA), and ISOHA has not charged those prices since it changed from SOHA. He asserted that he was "scared" and "confused" when Investigator Prudhomme called him on December 15, 2023, which is why he did not tell her that the payments made by students were "donations," and that he had not taught the courses on the website since 2016.

23. Concerning the transcripts of students, Mr. Koblin stated that only students from the original institution, SOHA, would ask Ms. Vo for their transcripts, and he referred them to her because she became the "agent of service" and "agent of records." He could see how she was "confused" because the records for SOHA went back to 1997, and she had the database of all those students since he gave it to her.

24. Concerning ISOHA's offering of a national-based certification, Mr. Koblin quoted a line from the television show "Seinfeld" by indicating his program at ISOHA was "a show about nothing." He stated, "As soon as you put a diploma on it, stop, I am not in that business. I teach people incredible exercises . . . their pains go away immediately."

## LEGAL CONCLUSIONS

1. The bureau operates pursuant to the California Private Postsecondary Education Act of 2009 (Act) (Ed. Code, § 94800, et seq.) and its regulations (Cal. Code Regs., tit. 5, § 71100, et seq.).

2. Complainant has the burden of proving, by a preponderance of the evidence, all facts necessary to support the citation. (*Owen v. Sands* (2009) 176 Cal.App.4th 985, 992.)

3. California Code of Regulations, title 5, section 75020, authorizes the bureau to issue citations, administrative fines, and orders of abatement for violations of the statutes and regulations governing private postsecondary institutions.

4. Education Code section 94944 provides that, notwithstanding any other law, the bureau shall cite any person, and that person shall be subject to a fine not to

exceed one hundred thousand dollars (\$100,000), for operating an institution without proper approval to operate issued by the bureau. The maximum fine for unlicensed activity is separate and not inclusive of fines for other violations or refunds ordered.

5. Education Code section 94936 provides that the bureau may issue a citation for violations of the Act. The citation may include an order of abatement, and an administrative fine not to exceed \$5,000 for each violation. The fine shall be based on the nature and seriousness of the violation, the persistence of the violation, the good faith of the institution, the history of previous violations, the potential harm to students, and the purposes of the Act. (Ed. Code, § 94936, subd. (b).)

6. Education Code section 94858 defines a private postsecondary educational institution as "a private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge."

7. Education Code section 94886 requires that private postsecondary educational institutions in California that seek to offer educational programs to the public must get prior approval to operate.

8. Education Code section 94868 defines "to offer to the public" as "to advertise, publicize, solicit, or recruit."

9. Education Code section 94817.5 defines "approval to operate" as having authorization to offer postsecondary education programs to the public.

10. Education Code section 94874 provides exemptions to the bureau's requirement for approval. These include: (a) an institution that offers solely recreational or avocational courses; (b)(2)(A) an institution that offers pre-apprenticeship programs; (e) an institution owned and operated by a religious

organization lawfully operating as a nonprofit religious organization whose instruction is limited to the principles of the religious organization and offering degrees/diplomas only in the beliefs and practices of the church, religious denomination, or religious organization; and (f) an institution that does not offer awards or degrees, but solely provides educational programs for total charges of \$2,500 or less.

11. The California Private Postsecondary Education Act of 2009 defines an institution as a postsecondary educational institution that offers programs to the public for a fee.

12. Business and Professions Code section 149 gives the bureau authority to issue an order of abatement, which may include an order to cease operation or provide a period of time to obtain approval.

## **Evaluation**

13. The bureau protects students and consumers through its oversight of California's private postsecondary educational institutions. The bureau does not have to prove actual harm, as potential for harm is the guiding principle. The bureau's investigation determined that Mr. Koblin, doing business as ISOHA, posed a potential for harm as ISOHA's programs are not regulated by anyone.

14. Here, ISOHA was not granted approval by the bureau, and it did not apply for nor was it approved for any exemptions by the bureau. Mr. Koblin's contention that ISOHA should be exempt because it charged students less than \$2,500 as he never charged more than \$1,800 for its courses or programs since 2016 is not credible. He presented declarations and/or agreements from two students that were dated after the citation at issue herein. One student never signed the agreement and only wrote her name in 2024 and 2025 on the agreement that apparently was from

2014. In addition, Mr. Koblin argued the amounts paid by the students were "donations" and not "tuition," and therefore they should not be considered as amounts charged to students for taking his courses. However, the agreements that Mr. Koblin submitted use the word "tuition" throughout and not "donation." In addition, the screenshots taken from ISOHA's website also show the words "tuition" in amounts up to \$8,000. No where do the agreements and/or website reference "donations." As such, Mr. Koblin was charging tuition and not receiving donations, and the amounts he was charging was upwards of \$8,000 as shown by ISOHA's advertising of Mr. Koblin's services of teaching courses/programs to students. In consideration of his efforts to correct this violation, it is noted that, after the citation was issued, the testimony reflects that Mr. Koblin edited ISOHA's website by indicating that only donations are accepted and for amounts less than \$2,500.

15. Next, Mr. Koblin's argued that ISOHA was not providing a vocational program but rather an avocational or recreational program, and it therefore should be exempt from bureau approval. However, this argument is not credible. Throughout ISOHA's screenshots of the courses offered, there is description after description of the courses teaching students to work with their "clients" and enhance their "business." These words certainly to not connote a recreational program, rather they show that Mr. Koblin through ISOHA was offering students courses on how to increase their own skills for their clientele and business. In consideration of his efforts to correct this violation, the testimony reflects that, after the citation was issued, Mr. Koblin modified ISOHA's website by eliminating the words tuition and clients.

16. Finally, Mr. Koblin's argument that ISOHA should be exempt from bureau approval because it is a religious organization is flawed and not credible. This exemption explicitly states that the organization must be owned and operated by a

religious organization lawfully operating as a nonprofit religious organization, whose instruction is limited to the principles of the religious organization and offering degrees/diplomas only in the beliefs and practices of the church, religious denomination, or religious organization. In this case, it must be noted that during the entire investigation period and citation issued in June 2024 and time leading up to the hearing in February 2025, Mr. Koblin never revealed to Investigator Prudhomme, anyone at the bureau, and/or complainant's counsel, that ISOHA had any filings as a religious organization with any government entity. Then, suddenly, the Friday before the Monday hearing, Mr. Koblin provides such documentation to complainant's counsel. He had ample time and opportunity to reveal this information prior to the hearing, but he did not do so. His conduct substantially affects his credibility.

17. Even if ISOHA's religious organization documentation had been provided in a timely manner to the bureau and/or complainant's counsel, it does not meet the requirements set forth in the bureau's statute. The statute sets forth that ISOHA must be lawfully operating as a nonprofit religious organization with limited instruction of the principles of the religious organization and offering degrees/diplomas only in the beliefs/practices of the religious. This is not what is happening with ISOHA. There is no reflection within the course descriptions on the screenshots from its website or in the student agreements submitted by Mr. Koblin that ISOHA was functioning lawfully as a religious organization that is teaching religious content. The website only references courses in massage techniques, nutrition, and business techniques and mentorship in the massage/nutrition industry. There is absolutely no discussion of religion and/or religious content within the courses of study. In addition, under the United States Internal Revenue Code section 501(c)(3), as cited in the letter from the Internal Revenue Service to ISOHA, this federal tax-exempt status is applicable when "donors" deduct "contributions." Again, ISOHA's website, the student agreements, and Mr.

Koblin's interview with Investigator Prudhomme contained no references whatsoever about "donations," and there were only references to payment of "tuition." Moreover, Mr. Koblin's testimony that he was offering an "intuitive advanced-spiritual training" which was religious in nature, is not credible, because again, there is no mention of religious teachings on the screenshots from ISOHA's website nor did he offer this excuse when he spoke with Investigator Prudhomme. There is no other way to interpret the evidence here that demonstrates Mr. Koblin, through ISOHA, was charging tuition and not asking for "donations." He is only now calling the tuition, "donations," because he wants to apply this exemption to avoid bureau approval. However, this cannot be done because ISOHA did not meet the bureau's statutory requirements for this religious exemption, nor was it receiving "donations" within the federal government's statutory requirements for tax-exempt status as a religious organization. In consideration of his efforts to correct this violation, it is noted the student agreements submitted by Mr. Koblin had some names handwritten after the date of the citation and a footnote indicating that ISOHA is a religious institution. It is unknown if Mr. Koblin has modified ISOHA's website to reflect the same.

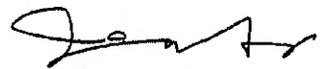
18. Finally, Mr. Koblin's testimony quoting Seinfeld that what he was teaching through ISOHA was "a show about nothing" is simply not accurate. Mr. Koblin himself gave detailed testimony about his trademarked massage technique, nutrition methodology, and business tips, and how his students learned so much from him. He may not believe that he was "teaching" in a vocational setting, but he certainly was doing just that and to the extent that bureau approval was required and there are no exemptions that apply.

19. Based on all the above, the allegation that Mr. Koblin doing business as ISOHA, violated Education Code section 94886 has been substantiated.

## ORDER

1. The appeal of respondent Seymour Koblin, doing business as International School of Healing Arts (ISOHA), is denied.
2. Citation No. 23240283 issued to respondent Seymour Koblin, doing business as International School of Healing Arts (ISOHA), is affirmed.
3. The administrative fine of \$25,000 issued to respondent Seymour Koblin, doing business as International School of Healing Arts (ISOHA), is affirmed and shall be paid in full within 180 days following the effective date of this decision.
4. The Order of Abatement issued to respondent Seymour Koblin, doing business as International School of Healing Arts (ISOHA), is affirmed.

DATE: March 05, 2025



JAMI A. TEAGLE-BURGOS  
Administrative Law Judge  
Office of Administrative Hearings