

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

In the Matter of the Statement of Issues Against:

MONTROSE ACADEMY, MONICA ELSA EURIDJIAN

Institution Code: 86814999

BPPE Case No.: BPPE23-0478

OAH Case No.: 2024020547

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 January 17, 2025

It is so ORDERED December 16, 2024.

"Original Signature on File"

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

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FOR THE BUREAU FOR PRIVATE POSTSECONDARY
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Respondent.

Agency Case No. BPPE23-0478

OAH No. 2024020547

PROPOSED DECISION

Nana Chin, Administrative Law Judge, Office of Administrative Hearings (OAH), State of California, heard this matter by videoconference on October 23, 2024.

Deborah Cochrane, Chief of the Bureau for Private Postsecondary Education (Bureau), Department of Consumer Affairs (Complainant) was represented by Stephanie Lee, Deputy Attorney General.

Montrose Academy (Respondent or School) appeared through its owner and institution representative, Monica Elsa Euridjian (Euridjian), and was represented by Donald B. Marks, Attorney at Law.

Documents and testimony were received into evidence. The record was closed and the matter was submitted for decision on October 23, 2024.

SUMMARY

Respondent is a private postsecondary non-accredited educational institution which was first approved to operate on March 28, 2023. Monica Euredjian became Respondent's owner and Institution Representative on September 3, 2019.

On May 26, 2020, Respondent filed an Application for Renewal of Approval to Operate and Offer Educational Programs for Non-Educational Institutions with the Bureau. After the Bureau reviewed the application, it notified Respondent of several deficiencies in the application. Although Respondent was eventually able to cure several of the deficiencies in the application process, Respondent could not demonstrate to the Bureau's satisfaction that its curriculum, educational programs, and faculty met minimum operating standards.

During the application process, the Bureau also became aware Euredjian failed to disclose her full employment history, including her professional relationship with Computer Institute of Technology, a private postsecondary institution whose approval had been revoked by the Bureau.

The burden of proof was on Respondent to establish, by a preponderance of the evidence, that it could meet minimum operating standards for private postsecondary non-accredited educational institutions. Respondent failed to meet that burden, and its application for renewal is denied.

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FACTUAL FINDINGS

Jurisdictional Matters

1. On March 28, 2003, the Bureau of Private Postsecondary and Vocational Education (BPPVE), the predecessor agency to the Bureau, granted Respondent, then called Technology Training Institute (TTI), approval to operate institution code number 86814999 (Approval). The Approval expired on May 28, 2020.

2. The BPPVE ceased operations on July 1, 2007, and from July 1, 2007 through December 31, 2009, there was no regulatory body charged with the oversight of private postsecondary schools. On January 1, 2010, the Bureau assumed BPPVE's oversight responsibilities over private postsecondary and vocational schools.

3. On September 3, 2019, the Bureau was notified that Euredjian had assumed ownership of Respondent. Euredjian also serves as Respondent's Chief Executive Officer (CEO), Chief Operations Officer (COO) and Chief Academic Officer (CAO).

4. On May 26, 2020, before the expiration of Respondent's Approval, the Bureau received Respondent's Application for Renewal of Approval to Operate and Offer Educational Programs for Non-Accredited Institutions (Application). Euredjian signed the Application under penalty of perjury.

5. On June 7, 2023, the Bureau notified Respondent that the Application was denied. Respondent requested an administrative hearing.

6. On January 29, 2024, Complainant filed a Statement of Issues in her official capacity as Chief of the Bureau, and this hearing ensued.

Application

7. The May 26, 2020 Application was Respondent's first renewal application since Euredjian assumed ownership. (Institutions are required to submit renewal applications every five years.)

8. At the time of ownership transfer, Respondent was approved to offer four non-degree programs: Accounting with Quickbooks and Advanced Microsoft Office; Diagnostic Medical Sonography; License Vocational Nurse; and Medical Office/Billing Insurance Program. The Diagnostic Medical Sonography and Licensed Vocational Nurse programs were discontinued prior to the filing of the Statement of Issues in this matter.

9. The Application stated Respondent intends to continue offering Medical Office/Billing Insurance and Diagnostic Medical Sonography programs and will be introducing a new program, Computer Office Administrator. (See, Application Sections 13 and 14). However, no instructor information was provided for either the Computer Office Administrator or Medical Office/Billing Insurance programs. The Application did list the instructors for some of the courses Respondent offers: Jorge Alarcon as the Medical Assistant program instructor, Moraima Negrete, R.N. as the Medical Sonography program instructor, and Moises Ayala as the Office Software program instructor. (Application Sections 6 and 17).

Bureau's Initial Review

10. On June 25, 2020, after reviewing Respondent's Application, Bureau licensing analyst Houa Her sent Respondent a deficiency letter outlining several issues requiring resolution before the Bureau could approve the Application. The deficiencies included: missing signatures and contact information; an incomplete description of the

programs being offered; conflicting or missing statements regarding its policies; failure to disclose Respondent's use of internet and social media advertising to solicit students; and submission of financial statements prepared by an individual falsely identified as a certified public accountant (CPA). Her's letter instructed Respondent to submit corrections by July 30, 2020.

11. When no response was received by the deadline, Her sent a follow-up email on August 25, 2020. Euredjian replied the same day, explaining that she had been unable to complete the corrections due to personal challenges, including her mother's pancreatic cancer diagnosis and her husband's hospitalization with "the virus." (Exh. 6, p. A659.) In response, Her extended the deadline for corrections to September 28, 2020.

12. On September 28, 2020, the Bureau received Respondent's response to the deficiency letter. The submission resolved some of the deficiencies and updated the faculty information to reflect that Alarcon was the instructor for the Medical Office/Billing Insurance program, Carlos Arbulu was the instructor for the Computerized Office Administrator program, and Ayala was the instructor for the Diagnostic Medical Sonography program.

13. After reviewing the submission, Her identified remaining issues and sent Euredjian an email with additional instructions for corrections, followed by a formal deficiency letter on October 15, 2020. Respondent submitted additional corrections on October 18, 2020, but several issues persisted.

14. On November 12, 2020, Her sent a third deficiency letter providing Respondent with another opportunity to provide further corrections. Respondent submitted additional corrections on April 27, 2021, and May 5, 2021. After reviewing

these submissions, on May 20, 2021, Her forwarded the Application to the Bureau's Education Specialist Unit for its review of Respondent's educational programs as set out on the Application.

Bureau's Quality of Education Deficiency Review

15. Dianne Arechiga, an Education Specialist with the Bureau's Quality of Education Unit (QEU) conducted a QEU review of Respondent's Application. A QEU review includes reviewing an applicant's program content, syllabi, curriculum, facilities, and other content that are associated with vocational and degree programs.

FIRST QEU LETTER

16. During the first review, Arechiga identified several deficiencies in the Application. While the School had changed its name, moved location, and made changes to its staff, these changes were not reflected in the Application (Sections 1, 2, 4, 5, 6, 9 and 23). In addition, the Application failed to adequately explain the educational programs being offered (Sections 13 and 14) and was missing critical documentation (Sections 18, 19, 21 and 22) including exemplars of student agreements (Section 10), an updated catalog (Section 21 23), and proof that each of the faculty members held the required qualifications (Section 17).

17. On July 22, 2022, Arechiga sent Euredjian a letter (First QEU Letter) identifying areas of non-compliance and gave Respondent until August 22, 2022, to revise the Application.

18. On August 9, 2022, Arechiga visited Respondent with another Bureau representative, Brian Brisco. During the visit, Arechiga wanted to observe an online class. Respondent arranged for the Bureau representatives to observe a mock online

class taught by Jeanette Garcia, the instructor for the Accounting with Quickbooks and Advanced Microsoft Office program. Though Arechiga requested Garcia present the class as she normally would, Garcia did not teach the class and only described the course to Arechiga leading Arechiga to conclude Garcia did not have a curriculum to follow.

19. On August 15, 2022, Euredjian submitted an updated Application that addressed some of the deficiencies outlined in the First QEU Letter.

SECOND QEU LETTER

20. After reviewing the August 15, 2022 submission, Arechiga found several deficiencies identified in the First QEU Letter had not been addressed: (1) errors in the job descriptions and organizational chart had not been corrected (Section 6); (2) the submitted student enrollment agreements did not comply with statutory and regulatory requirements (Section 10); (3) documentation adequately explaining the School's educational programs and providing facility and equipment information was still missing (Sections 13, 14, 18 and 19); (4) the documents submitted for faculty members Jeanette Garcia, Jorge Alarcon, and Garabet Yaloubian were missing information that could validate the required experience requirements (Section 17); and (5) the catalog did not comply with applicable Bureau regulations (Section 21).

21. On September 21, 2022, Arechiga issued a second letter (Second QEU Letter) detailing the continuing areas of non-compliance and gave Respondent until October 22, 2022, to revise the Application. On October 12, 2022, Euredjian submitted an updated Application which addressed some of the deficiencies outlined in the Second QEU Letter.

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THIRD QEU LETTER

22. On November 23, 2022, Arechiga issued a third letter (Third QEU Letter) stating the Application still lacked documents adequately explaining the School's programs (Sections 13 and 14); lacked proof the faculty members had the qualifications to teach in their subject areas (Section 17), and lacked descriptions of facilities and equipment available for student use (Section 18).

23. Respondent was given until December 23, 2022, to revise the Application. On December 12, 2022, Euredjian submitted an updated Application in response to the Third QEU Letter.

FOURTH QEU DEFICIENCY LETTER

24. After reviewing Euredjian's December 12, 2022 submission, Arechiga found that key deficiencies identified in the Third QEU letter persisted (Sections 14, 17, and 18) and issued a fourth letter of deficiency on January 6, 2023 (Fourth QEU Letter), which gave Respondent until February 6, 2023 to correct the deficiencies. Euredjian submitted additional documents on January 12, 2023, and January 20, 2023.

Computer Institute of Technology

25. Computer Institute of Technology (CIT), which was also known as CIT Nursing College, was a private postsecondary school approved by the Bureau or its predecessor agencies between 1998 and 2023. CIT's main location was in North Hollywood with branch locations in Los Angeles, Bell, Whittier, and Tujunga.

26. Rene Aguero was CIT's owner and Institution Representative. Euredjian was married to Aguero from 2016 until 2023.

27. Complainant, in her official capacity as Bureau Chief, filed an Accusation alleging CIT: (1) engaged in prohibited business practices by falsifying enrollment agreements (Bus. & Prof, § 94897, subd. (k)); (2) failed to reimburse voucher funds (Bus. & Prof, § 94920, sub. (e)); (3) failed to comply with general enrollment requirements (Bus. & Prof, § 94902, subd. (a)); (4) collected tuition for students who did not attend CIT and failed to refund payments (Bus. & Prof, § 94899.5, subd. (e)); and (5) violated the Bureau's rules and regulations in the operation of CIT (Bus. & Prof, § 74112, subd. (m), 94912, 94902, subds (b)(1) & (b)(3), and 71920, subd. (b)(1)(A).)

28. Following an administrative hearing that took place on September 28, and December 5 through 7, 2022, the Bureau revoked CIT's approval effective March 11, 2023.

29. While CIT was in operation, it submitted several renewal applications. Arechiga was the Bureau representative assigned to review the last renewal application CIT filed before the revocation of its license. In reviewing the Application, Arechiga recognized three faculty members who had been employed by CIT: (1) Jorge Alarcon, CIT's Corporate Director of Admissions and a Program Director for its North Hollywood location; (2) Moises Ayala, a General Education Instructor for CIT's locations in North Hollywood and Bell and Computer Instructor for its location in Tujunga; and (3) Carlos Arbulu, CIT's Program Director and Instructor North Hollywood location. This spurred Arechiga to re-review CIT's renewal application.

30. After her review, Arechiga found that Euredjian was mentioned in several documents included in CIT's renewal application. These documents included: (1) CIT's Catalog for September 2011 to September 2012 listing Euredjian as CIT's registrar; (2) CIT's Catalog for December 2013-December 2014 listing Euredjian as an instructor for CIT's Bell branch and Campus Director of CIT's Tujunga branch; (3) a copy of

Euredjian's resume; and (4) a "New Personnel Form" indicating Euredjian had been hired as the Campus Director for CIT's Tujunga location.

Bureau's Denial

31. On June 7, 2023, the Bureau issued a letter denying Respondent's Application and listing areas of deficiency, which were detailed under sections entitled: (1) instruction; (2) educational programs; (3) faculty; (4) prohibited business practices; (5) denial of application; (6) granting approval to operate; and (7) required institutional records.

32. Arechiga testified at hearing and explained the Bureau's denial of Respondent's Application as follows:

A. The Bureau denied the Application based on instruction and educational program deficiencies (Items 1 and 2) because a curriculum needs to meet minimal operational standards, by including clear and measurable goals for student learning, details regarding the topics that will be covered and the instruction materials that will be used, information on the course's instructional methods (such as if the course will be taught with lectures, labs, or group work), information on the assessment and evaluation criteria being used to measure student progress, program structure, documentation of instructor qualifications, and information on guidelines for attendance and grading. The curriculum Respondent submitted, however, was merely an outline of the course topics and did not include this information.

B. The Bureau denied the Application based on faculty deficiencies in that an institution is required to employ administrative personnel who have the expertise to ensure the achievement of the institution's mission and objective and the operation of the educational programs. Euredjian, as the CAO, is responsible for

managing the development, implementation, and evaluation of the academic and quality of the Training Programs. The incomplete curriculum submitted by Euredjian indicated to the Bureau that she is not a qualified CAO.

Additionally, an institution is required to employ instructors with the academic, experiential, and professional qualifications to teach, including a minimum of three years of experience, education, and training in the current practices of the subject area. The documentation for Garcia, one of Respondent's three instructors, did not demonstrate that she had the required three-year experience in Microsoft Office Suite or Quickbooks.

C. The remaining reasons for the denial were due to Euredjian's failure to disclose her employment history CIT on her resume.

Respondent's Testimony and Contentions

33. Euredjian testified at hearing. Euredjian received her Bachelor of Arts in Psychology in March 2013, from Capella University, and her Master of Social Work from the University of Southern California in May 2016. From 2008 until she purchased Respondent, Euredjian supported herself and her two children by working as a Spanish teacher for Vahan & Anoush Chamlian Armenian School.

34. Euredjian stated that she purchased Respondent only after she confirmed it was operating in compliance with Bureau regulations. She stated Respondent's previous owner assisted her in preparing the Application and claimed that much of the information remained unchanged from the time of her purchase.

35. Euredjian described the Bureau's observation process, during which Arechiga and another representative, Brisco, visited Respondent. According to

Euredjian, Arechiga stated she wanted to observe a sample class as a student, stating she “wanted to see what the students see.” Euredjian created a student name and address for the Bureau representatives to use so they could log into Google Classroom. They then observed a two-hour lesson conducted by Jeannette Garcia. Euredjian claimed that after the observation, Arechiga and Brisco “highly, highly” praised Garcia’s teaching skills. Euredjian claimed that Garcia used a curriculum for the class and stated that if Arechiga had been admitted as an instructor, she would have been able to view the curriculum, which specifies what the instructors must teach, as well as the assignments and exams they are required to provide.

36. Euredjian also testified extensively about the qualifications and abilities of Respondent’s instructors and denied any involvement with CIT. Although she was married to Agüero during CIT’s disciplinary proceedings, Euredjian denied she had any knowledge of CIT’s operations, the administrative hearing, or the revocation of its approval. She denied she was ever employed by CIT, granting permission for her name to be listed in CIT catalogs, or signing any documents for CIT.

Evaluation

RESPONDENT’S CURRICULUM

37. Euredjian argued that the Bureau should have found that Respondent’s curriculum complied with minimum operating standards and approved the Application because the curriculum had met operating standards under the prior owner and the prior owner helped her complete the renewal application. This argument is without merit, especially given the significant changes Euredjian made to Respondent’s structure and educational programs after she acquired the institution.

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38. Additionally, Euredjian's assertion that Respondent had a curriculum that met operating standards and that it had been used during Garcia's mock lesson is also not credited. Respondent was required to submit a curriculum that has clear objectives, structured courses, qualified instructors, appropriate learning material, and methods for assessing student progress (minimum operating standards). (See Cal.Code Regs., tit. 5, § 71710, subd. (a).) If a complete curriculum had been available, it should have been to be submitted to the Bureau along with the Application. Despite the Bureau's multiple requests for a complete curriculum, however, Euredjian, as Respondent's COA, failed to submit such a curriculum.

RESPONDENT'S FACULTY

39. During her testimony, Euredjian maintained Respondent's faculty were qualified to teach the programs they are assigned to teach.

40. During the application process, Respondent submitted evidence that Respondent's other instructors had the necessary qualifications to teach their respective programs. Respondent, however, failed to submit evidence, other than Euredjian's testimony that Garcia had the necessary three years of experience required to teach Quickbooks and Microsoft Office.

EUREDJIAN'S ASSOCIATION WITH CIT

41. Euredjian's denial of any association with CIT was undermined and discredited by her signature appearing in a form CIT submitted with its renewal application. Under Evidence Code section 1417, the trier of fact may determine the genuineness of handwriting by comparing the questioned handwriting with verified samples. A review of the documents show that the distinctive signature on the

personnel form matched Euredjian's verified signature on the Application and related submissions she signed.

42. In addition, when Euredjian was asked about her activities during the years the CIT documents reflect she was working there, Euredjian represented she was employed as a Spanish teacher at Vahan & Anoush Chamlian Armenian School and completing her clinical hours for her graduate degree. However, she failed to present any copies of pay stubs, employer letters or testimony, or other evidence to corroborate her representation.

LEGAL CONCLUSIONS

Standard and Burden of Proof

1. Respondent bears the burden of proving that it meets all prerequisites necessary to hold an Approval to Operate. (Ed. Code §§ 94887, 94891, subd. (b).) The standard of proof is a preponderance of the evidence. (Evid. Code § 115; *Mann v. Department of Motor Vehicles* (1999) 76 Cal.App.4th 312, 322-323.) "Preponderance of the evidence means evidence that has more convincing force than that opposed to it." [citations.] . . . The sole focus of the legal definition of 'preponderance' in the phrase 'preponderance of the evidence' is on the *quality* of the evidence. The *quantity* of evidence presented by each side is irrelevant. [citation.]" (*Glage v. Hawes Firearms Company* (1990) 226 Cal.App.3d 314, 324-325 [italics in original].) To meet the burden of proof by a preponderance of the evidence, an applicant "must produce substantial evidence, contradicted or uncontradicted, which will support the conclusion reached by the trier of fact." [citation.]" (*In re Shelley J.* (1998) 68 Cal.App.4th 322, 329.)

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Applicable Law

2. Pursuant to Education Code section 94887:

An approval to operate shall be granted only after an applicant has presented sufficient evidence to the bureau, and the bureau has independently verified the information provided by the applicant through site visits or other methods deemed appropriate by the bureau, that the applicant has the capacity to satisfy the minimum operating standards. The bureau shall deny an application for an approval to operate if the application does not satisfy those standards. The bureau may deny an application for an approval to operate institutions that would be owned by, have persons in control of, or employ institution managers that had knowledge of, should have known, or knowingly participated in any conduct that was the cause for revocation or unmitigated discipline at another institution

3. "To be granted an approval to operate, the institution shall demonstrate its continued capacity to meet the minimum operating standards." (Ed. § 94891, subd. (b).)

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Causes for Denial of Respondent's Application

FIRST CAUSE FOR DENIAL - FAILURE TO PROVIDE OR DEMONSTRATE INSTRUCTION THAT MEETS MINIMUM OPERATIONAL STANDARDS

4. California Code of Regulations, title 5, (CCR) section 71715 provides, in relevant part, that "(a) Instruction shall be the central focus of the resources and services of the institution. [¶] (b) The institution shall document that the instruction offered leads to the achievement of the learning objectives of each course."

5. Respondent's Application is subject to denial under Education Code sections 94887 and 95891 and CCR section 71715, subs. (a) and(b) because Respondent failed to provide or demonstrate a complete curriculum where instruction is the central focus of Respondent's resources and services as set forth in Factual Findings 37 and 38.

SECOND CAUSE FOR DENIAL- FAILURE TO PROVIDE OR DEMONSTRATE EDUCATIONAL PROGRAMS THAT MEET MINIMUM OPERATIONAL STANDARDS

6. CCR section 71710, subd. (a) requires that an institution's educational program must be comprised of a curriculum that has clear objectives, structured courses, qualified instructors, appropriate learning material, and methods for assessing student progress (minimum operating standards).

7. Respondent's Application is subject to denial under Education Code sections 94887 and 95891 and CCR section 71710, subdivision (a) because Respondent failed to provide or demonstrate that its educational programs meet minimum operating standards as set forth in Factual Findings 37 and 38.

**THIRD CAUSE FOR DENIAL – FAILURE TO PROVIDE OR DEMONSTRATE
FACULTY THAT MEETS MINIMUM OPERATIONAL STANDARDS**

8. CCR section 71720, subdivision (b)(1), requires an institution offering an educational program leading to a degree to employ duly qualified faculty. Such faculty includes administrative personnel who have the expertise to ensure the achievement of the institution's mission and objectives and the operation of the educational programs. (CCR, § 71730, subd. (f).)

9. Respondent's Application is subject to denial under Education Code sections 94887 and 94891 and CCR sections 71720, subdivision (b)(1) and 71730, subdivision (f), in that Respondent's owner and Chief Academic Officer, Monica Euredjian, was unable to submit a complete curriculum that satisfied minimum operating standards as set forth in Factual Findings 39 and 40.

**FOURTH CAUSE FOR DENIAL - WILLFUL FALSIFICATION, DESTRUCTION, OR
CONCEALMENT OF ANY DOCUMENT OF RECORD REQUIRED TO BE
MAINTAINED BY AN INSTITUTION**

10. Education Code section 94897, subdivision (k), prohibits an institution from willfully falsifying, destroying, or concealing any document of record while that document of record is required to be maintained.

11. Complainant alleges Euredjian, Respondent's owner and CAO, was previously employed as CIT's registrar from 2011 to 2012, Campus Director from 2013-2014, and Compliance Director from 2014 to 2015. It is further alleged that the resume Euredjian submitted with the Application did not include her employment history with CIT. However, no evidence was presented to establish that Euredjian was CIT's

Compliance Director. Additionally, Euredjian's failure to disclose her employment reflects concealment rather than willful falsification and is therefore not grounds to deny Respondent's Application under Education Code sections 94887, 94891, and 94897, subdivision (k).

FIFTH CAUSE FOR DENIAL - FALSE OR MISLEADING INFORMATION OR INTENTIONAL OR NEGLIGENT OMISSION ON BUREAU APPLICATION

12. CCR section 71400.5, subdivision (a) prohibits the inclusion of false or misleading information, or the intentional or negligent omission of pertinent information on any application.

13. Respondent's Application is subject to denial under Education Code sections 94887 and 94891 and CCR section 71400.5, subdivision (a) in that Euredjian omitted pertinent information by failing to disclose her connection to CIT in her resume and communications with the Bureau as set forth in Factual Findings 41 and 42.

SIXTH CAUSE FOR DENIAL –FAILURE TO MAINTAIN COMPLETE AND ACCURATE RECORDS

14. An institution is required to maintain, for a period of five years, at its principal place of business in this state, complete and accurate records including the curriculum for each of the educational programs offered by the institution. (Ed. Code, § 94900.5.)

15. Respondent's Application is subject to denial under Education Code sections 94887, 94891, and 94900.5 in that Respondent did not maintain records of curriculum for each educational program it offered in that Respondent did not have a

curriculum for its educational programs that met minimum operating standards as set forth in Factual Findings 37 and 38.

Discussion


16. The deficiencies established by Complainant are significant and relate directly to the Bureau's mandate to protect students from substandard educational programs. Respondent was unable to counter these serious deficiencies and demonstrate it meets the required standards for accreditation. Denial of the Application is therefore warranted and in the public interest.

ORDER

The application of Respondent Montrose Academy, Monica Elsa Euredjian for a Renewal of Approval to Operate and Offer Educational Programs for Non-Accredited Institutions, is denied.

Within 30 days of service of this Decision and Order, or by the set effective date of this Decision and Order, whichever is sooner, Montrose Academy, Monica Elsa Euredjian shall cease operating a private postsecondary institution in California and shall not resume operation in California unless and until it is approved to do so by the Bureau for Private Postsecondary Education.

DATE: **11/22/2024**


Nana Chin (Nov 22, 2024 16:50 PST)

NANA CHIN

Administrative Law Judge

Office of Administrative Hearings