

# Chapter: VIII

---

## A Farce Ploy

---

### **BPPE's Site Visit after the illegal Shutdown Order**

---



**Planners' plan** (a hidden one)

## **BPPE's Site Visit**

### **after the illegal Shutdown Order**

---

BPPE failed to provide any feedback or report on the materials that CTU's counsel provided. BPPE also diverted from its assertion of settlement. It was evident that BPPE had no intention to review any documents that CTU provided. Attorney S. Simas wrote to BPPE – Joanne Wenzel (Deputy Chief of BPPE) and Susan L. Hertle (Closed School Unit, DCA) – noting that both have been non-responsive and questioning the legal basis they had to give a shutdown order to CTU. Soon after that, on June 12, 2013, BPPE wrote that it would review CTU's information. However, we never received any report of any such review process. CTU waited, waited, and waited.



**Bureau for Private Postsecondary Education**  
2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833  
P.O. Box 980818, West Sacramento, CA 95798-0818  
P (916) 431-6959 F (916) 263-1897 [www.bppe.ca.gov](http://www.bppe.ca.gov)



June 12, 2013

Nicole Hanley  
Simas and Associates  
3835 North Freeway Boulevard, Suite 228  
Sacramento, CA 95834

RE: Request for Informal Reconsideration; California Takshila University

This letter responds to your correspondence of April 11, 2013, in which you 1) requested reconsideration of the Bureau for Private Postsecondary Education's (BPPE) decision to deny the application for approval to operate submitted by California Takshila University (CTU) and 2) provided additional information regarding CTU's application. BPPE had previously denied CTU's application in 2012 and revised that denial in February 2013, and CTU timely requested a hearing. A Statement of Issues has not been filed as of yet.

In response to your request, please be advised that BPPE will reconsider CTU's application. It will review and evaluate the information you provided, as well the information contained in CTU's application and supporting documentation, and this review will commence promptly. Please also be advised that BPPE specifically reserves the right to conduct an onsite review of CTU should the circumstances warrant.

BPPE will keep you apprised of developments in this matter.

Sincerely,

Joanne Wenzel  
Deputy Bureau Chief

Then there was a long silence. On August 2, 2013, we wrote to BPPE's legal counsel Mr. Kurt Heppler delineating how BPPE's negligence was destroying CTU.

“

On August 2, 2013, to Kurt Heppler, Staff Counsel, Department of Consumer Affairs:

Dear Mr. Heppler:

I write you today to attempt to convey a sense of urgency on behalf of California Takshila University (CTU) concerning their application before the Bureau of Private Postsecondary Education (Bureau). Specifically, CTU is continuing to suffer consequential damages as a result of the Bureau's continued failure to approve their application, originally submitted over three years ago! As a result, CTU must have a decision on their application by no later than October 20, 2013.

As you are aware, in July 2010, CTU submitted their Application for Approval to Operate an Institution Non-Accredited in California (Application) which was received by the Bureau on August 20, 2010. The Bureau first denied CTU's Application on November 29, 2012. CTU timely filed their Appeal for Denial on January 28, 2013, and requested a hearing. Later, the Bureau issued a Revised Notice of Denial on February 20, 2013. On April 11, 2013, CTU requested reconsideration of the Bureau's denial. And on June 12, 2013, CTU was notified that Bureau was reconsidering CTU's application.

I contacted you recently for a status update on reconsideration of CTU's application with the Bureau. On July 29, 2013, I received your voicemail that you spoke to the Bureau Chief Joanne Wenzel and she informed you that CTU's application was still under review. She also informed you that the Bureau was trying to

assemble a site visit team and they hope to have one out to CTU by mid- to late-September at the earliest.

While this sounds promising, our client has reached a point where it can no longer wait indefinitely for the Bureau to act.

### **Bureau's Delays Continue to Unfairly Affect CTU's Application**

At the outset of this application process, CTU had a reasonable expectation that the Bureau would comply with its obligations to review CTU's application with care and attention. Three years later, the Bureau has disrupted CTU's work and investment, forced them to expend additional amounts of capital, manpower and other resources, resulting in a number of missed business opportunities. This occurred as a result of the Bureau's direct actions and inactions, previously communicated to you, for which CTU has been unjustly handled. Nevertheless, CTU was happy to hear that you had "corralled" the Bureau and were sending the matter back to them for reconsideration.

However, when I informed CTU that they are to expect at least another two month delay for a site visit, they again voiced their concern that this was merely a re-do of the same delay tactics that the Bureau had previously engaged in. They are concerned that this will not be a mere 2-month delay for a site visit, but rather is the start of a litany of delays that they have already experienced.

CTU has already been experiencing declining rates of enrollment due to their licensing uncertainty and they fear that the continuation of this process will result in them having to take drastic measures to keep CTU viable financially. Furthermore, CTU notified me of some further significant negative consequences that appear to be due to the Bureau's ongoing delays. In April 2013, CTU communicated to the Bureau their intent to offer more programs and degrees. However, when prospective students might ask CTU its status with the Bureau, CTU must answer honestly. Obviously, CTU is still not on the Bureau's approved list on the

website and prospective students take notice of this. Students, like consumers, do not like uncertainty. Thus, continued delays are causing enrollment to decrease.

In addition, CTU's business model continues to make adjustments. This process with the Bureau is an endless cycle of reporting as CTU continues to lose money due to the Bureau's inefficiency and CTU has had to resort to subletting some of its office space. After paying rent for almost a year, CTU recently subleased out two of the suites [4633 Old Ironside Dr., Suite 160 (starting July 2013) and 4655 Old Ironside Dr., Suite 260 (4 months ago)]. And as you can see, CTU is in a never-ending reporting cycle to the Bureau about any changes it makes to its business.

The university cannot grow so long as the Bureau does not take action on CTU's application. It has been three (3) years since this process began and another four (4) months since CTU has asked for reconsideration. Given the continuing delays, we are very concerned that CTU will be irreparably damaged. And we are concerned that CTU will not be treated in a fair and equitable manner based on contradictory, arbitrary and unreasonable actions of the Bureau. CTU's viability or business model may be compromised and it is directly due to the Bureau's actions and inactions.

### **Delays Will Further Negatively Affect CTU**

CTU is a Student and Exchange Visitor Program (SVEP)/United States Immigration and Customs Enforcement (USICE) approved-school, meaning authorized to accept international students on F1 - VISA. This month, CTU received notification to submit their re-certification application. It is one of the requirements for an F1-student school. By November 10, 2013, they must submit State approval/legal to operate information with the re-certification package. As a significant majority of CTU's students are international students on F1-Visas, if CTU does not have a decision from the Bureau, they will be forced to shut down.

### **Proposed Options**

We understand that consideration of these applications take time, but the impact of the Bureau's delays on CTU is causing significant harm and we need a decision rendered on their application in the next 50 days to prevent further irreparable harm to CTU. Thus, I propose the following options to attempt to expedite this process:

1. We are willing to schedule a meeting with you, Bureau representatives, and our clients to discuss any and all compliance issues, and to schedule dates and deadlines by which CTU's application process must be completed;

2. We are willing to schedule such a meeting in Sacramento or at CTU's facilities in Santa Clara (perhaps the Bureau's inspection team could attend that day); or

3. We propose an agreement from the Bureau that a decision will be rendered no later than October 20, 2013. We are aware of the lengthy and involved process the Bureau undergoes in issuing licenses, but it already has all pertinent information from CTU and is familiar with its operations.

We would appreciate a response from you no later than August 9, 2013. If we cannot come to an agreement with the Bureau, we will pursue a petition for writ of mandate to compel the Bureau to complete the licensing process and a claim for damages this unreasonable delay has caused CTU.

Thank you for your time and consideration. We look forward to your response.

Sincerely,  
Nicole D. Hanley  
Simas & Associates, Ltd.

”



Instead of reviewing all the documents that we provided, BPPE requested a site visit on September 26-27, 2013. To recall, BPPE's dealing with CTU's application, I want to point out it had been over three years since CTU first submitted its application in July 2010. BPPE is required by law to complete an application review process within one year. Furthermore, all the deficiencies that BPPE raised had been quashed with documented pieces of evidences that had never been challenged by BPPE. At this point, BPPE's desire to do a site visit was received with grave concerns.

I found BPPE's request for a site visit as an oxymoron or a hidden ploy since BPPE forced us to virtually close down our operation by publically announcing our shut-down, posting that announcement on its website and telling students not to join CTU. At that time we did not have any students, no classes were conducted, no teacher was on contract, and we only retained a limited staff. What site visit do they want to do?

We were somewhat suspicious about BPPE's intention of its site visit. Could it be a ploy to create false narratives to issue a new denial letter to CTU?

BPPE conducted a farce site visit on September 26, 2013. We had our attorney witness the entire process.

We wondered. As previous two denial letters were proven to be illegally issued. Attorney Mr. Hein did not want to keep anything undocumented or unclear. Thus, on September 19, 2013, Attorney Hein wrote to Mr. Drew Seateune, the BPPE's Education Specialist:

“

I write you today in preparation for the upcoming site visit to be conducted by the Bureau for Private Postsecondary Education (Bureau) at California Takshila University (CTU). As you know, the site visit is currently scheduled for September 26-27, 2013. We have received the Bureau's correspondence dated August 19, 2013. In response, we have prepared six (6) sets of binders, one for each member of the visiting committee in advance of the visit.

Please review the enclosed materials and contact us to discuss any questions or concerns you may have. Please find enclosed the following documents in each of the marked binders:

”

Exhibits were: A Campus map or floor plan of the institution, Current Catalog, Institution's Organizational Chart, Program Curriculum, Faculty Teaching Assignments by Program and Course, Faculty Resumes, or curriculum vitae, List of faculty working or who have worked at the institution since January 2010, Schedule of classes from 2010 until spring 2013, current Enrollment Agreement, List of all recent graduates with the last 12 months including phone number and email, list of all recent withdraws within the last 12 months including phone number and email, List of students enrolled since January 1, 2011 including phone number and email.

Mr. Hein further asserted that the BPPE had been mishandling CTU's application process.

“

As you may be aware, in July 2010, CTU submitted their Application for Approval to Operate an Institution Non-Accredited in California (Application) which was received by the Bureau on August 20, 2010. The Bureau first denied CTU's Application on November 29, 2012. CTU timely filed their Appeal for Denial on January 28, 2013, and requested a hearing. Later, the Bureau issued a Revised Notice of Denial on February 20, 2013. On April 11, 2013, CTU requested reconsideration of the Bureau's denial.

CTU's request for reconsideration included a detailed chart of significant dates and communications with the Bureau throughout the application process. We have attached a copy of this timeline to this correspondence for your review and reference. In addition, the request for reconsideration detailed the excessive delays, failures to communicate, and failures to exercise reasonable discretion in

reviewing CTU's application and rendering a denial. Specifically, any valid reasons the Bureau had to deny CTU's application were thwarted by the Bureau's repeated failure to consider CTU's changing circumstances over the two years that their application was under review. In addition, deficiencies were not communicated clearly or in a timely fashion, resulting in requests to change materials that had long since already been updated, voluntarily, by CTU. Further and more specific examples are provided in the request for reconsideration. This confused CTU and gave it the impression that the Bureau was not providing it with a fair opportunity to gain approval.

Furthermore, while CTU was happy to hear on June 12, 2013, that the Bureau was reconsidering their application, it has come at a great cost. Three years of uncertainty forced CTU to expend additional amounts of capital, manpower, and other resources toward the application process. CTU had a reasonable expectation of a smooth application process, with the Bureau conducting its review with reasonable care and attention. When that did not occur, it resulted in significant disruption to CTU and impacted its ability to grow and attract new students.

### **Current Status of Enrollment**

Upon initial denial from the Bureau, CTU began experiencing declining rates of enrollment. In April 2013, CTU communicated to the Bureau their intent to offer more programs and degrees. However, when prospective students began asking CTU their status with the Bureau, CTU answered honestly. Obviously, CTU is still not on the Bureau's approved list on the website and prospective students took notice of this. Students, like consumers, do not like uncertainty.

As a result of the uncertainty of the Bureau process, since January 2013, CTU has had no new enrollment. Furthermore, all current students transferred to other schools. They have had several near-enrollment students for the current semester. But upon learning of CTU's uncertain status with the Bureau, these students have

enrolled in other local private schools. As a result, CTU currently has no students enrolled. Thus, you will notice CTU has not enclosed the following documents:

- I. A current schedule of classes with instructors assigned to each;
2. A list of all students by program

Although the Bureau and CTU are aware they may operate, due to the previous denial by the Bureau, students have not enrolled in CTU. Therefore, we asked that CTU's application be reviewed similar to other applicants who would also not be in operations until their application has been approved. In other words, we ask that the current non-enrollment status of CTU not be held against CTU as this is due to the current status of their application and previous denial by the Bureau.

### **Degrees Offered by CTU**

In the most recent correspondence from the Bureau, we noticed one of the visiting consultants, Dr. Anne-Louise Radimsky, is from the electrical engineering field. On April 4, 2013, correspondence sent to the Bureau notified them that CTU offers only three degrees: MBA and MS in Computer Science and Software Engineering. CTU no longer offers an MS in Electrical Engineering.

As of now, the university only offers MBA and MSCS programs. Therefore, we wanted to make sure this was clear and confirmed with the Bureau before the site visit on September 26-27, 2013. Specifically, we did not want the Bureau to have to enlist the assistance of Dr. Radimsky if her sole purpose was to review an electrical engineering program that no longer exists.

”

## **Preparations for the Visiting Committee**

On the day of the site visit, CTU gave the Visiting Committee with a tour of the facility. The tour was included introductions to other administrative staff, including the admissions officer, and placement officer. A campus map and floor plan have been provided in each binder as Exhibit A, which included each of these individual's locations as introductions occur and the location of records. The Visiting Committee was shown the location of student records, and accounting records, as well as classrooms, labs, and instructional equipment.

CTU also arranged for the Visiting Committee to have a private office/conference room in which to work. The Visiting Committee had access to a photocopy machine. Each faculty would either be present or reachable by phone. CTU ensured access to all institution policy and procedures; or, if electronic, had them printed. The visiting committee had access to all classrooms and laboratories. They would also had access to all student records either hardcopy or electronic, and if electronic access CTU provided access to a printer. CTU ensured access to all administrative staff and faculty.

CTU ensured the committee that it could review lesson plans, tests, texts, and other collateral classroom materials. Student records can be reviewed to determine if these records were complete and contained the required information. Admission and placement records were also reviewed. Job descriptions, personnel records, faculty handbooks, institutional policies and procedures, and financial records were made available for review. All of these documents were complete and accessible for the visiting committee on the date of the site visit.

We reminded Mr. Saeteune to review the contents of the binder.

We notified our attorney regarding the following observations and issues relating to the BPPE's site visit

- (1) Site Visit-Committee (VC) was not aware of our situation and mishandling of our application that dragged over 3 years.
- (2) The VC's questions to me were not so much to determine the minimum standard required by California Education Code of Regulation but rather to compare our program with the California State University at Sacramento (CSU Sacramento).
- (3) I asked Mr. Saeteune why he wanted to compare only with CSU Sacramento. Why not compare with Stanford University, University California, Berkeley, and other top-tier universities in the country. Furthermore, I asked why he did not compare CTU with BPPE approved private postsecondary schools. To that Mr. Saeteune remained quite.

I was surprised by the comparison. I directed a question to Mr. Saeteune, the Education Specialist for BPPE asking him if they had any outline as to what should be in a specific course –his answer was no.

- (4) It also appeared that VC's queries and questions to Prof. Ajit Renavikar, Prof. Gayathri Subramanian and me were of ranking style-in-nature. I believe BPPE does not have a scope for ranking an institution. According to the California Education Code of Regulation, BPPE is mandated to make sure every institution under its jurisdiction meets a minimum standard, not to do ranking.

Example:

Prof. Gayathri Subramanian was asked why she chose to have healthcare text to teach Business Analysis....the same question was asked to me, "why health care was chosen to teach in Business Analysis..." it was a judgmental question that did not have any relevance to the site visit. It was not about Healthcare business structure but the business model it had used, it was as an innovation on its own. This was an approach to business analysis – it was an additional reference text for a case study.

Students' learning outcomes are best measured by the end-goal of the institution. Our performance factsheets are one of the best among our league.

All our graduates are employed in the high-tech, pharmaceuticals and banking industries. Majority of them are part of the high-tech economy.

A few of our students went to establish high-tech businesses (e.g., solar and IT).

(5) Our application was from July 2010. The requirements and BPPE's instruction that we followed during our application process were of the initial stage of BPPE's inception. Our documents were oked by mid-2012 by Jennifer Juarez (BPPE Licensing Analyst).

(6). Purpose of the Site Visit- the objective of the site visit: The visiting committee was supposed to be looking at the deficiencies defined in the BPPE report and not comparing the university's instruction with other institutions. Note: if any comparison is done, it must be with BPPE standards and guidelines.

The team was not aware of the documents provided by the CTU's attorney Mr. Hien, they asked me for faculty names and qualification. I read out the list with qualification, the list was with the team but one of the visiting members asked if they could get that list. I had to inform all of them that the list was also with all of them.

This was another example that BPPE's Visiting Committee came to CTU unprepared and for other reasons than evaluating CTU's deficiencies, if any. When BPPE did not find any, they resorted to creating or picked made up stuff up from out of thin air. Also, some unknown reasons to us, BPPE's Visiting Committee shortened the site visit by 50%.

We repeatedly ask for the evaluation-reports by each individual member of the visiting committee. We never received any. Under a legal discovery request, we asked BPPE to provide all documents related to the site visit and other review processes that BPPE performed on CTU. Until today we have not received any responses to those repeated requests.

Our suspicion of BPPE's misrepresentation of the VC's report solidified when we learned that one of the subject specialists was quite impressed with our development and program. He also noted during the visit that he liked our small library. Yet, BPPE wrote in its report that we did not have a library to support students. (Note, we did not have any students when BPPE visited CTU).

During the site visit, BPPE's Education Specialist and Visiting Committee Chair, Mr. Drew Saeteune stated that CTU would receive a site visit report as early as within 30 days but no later than 45 days. As you can see from the letter below, BPPE again failed to meet its obligation and brought harm to CTU's existence.

Attorney Hein, therefore, requested that Mr. Saeteune provide the Status Update first on October 28, 2013:

“

In addition to updating you, I was hoping to receive an update on the VC's progress on its report and the overall application process. As previously communicated to you, CTU has further deadlines associated with the Student and Exchange Visitor Program (SEVP), Department of Homeland Security recertification process I that it must meet in the coming weeks. In addition, CTU is currently enrolled in the Initial Accreditation Workshop of the ACCSC2 for December 9, 2013. So any update regarding timing would be appreciated as it helps CTU meet these deadlines.

Thank you for your continued assistance in this matter. Please feel free to contact me if you require anything further.



”

And, again on November 18, 2013

“

Dear Mr. Saeteune:

I write today to follow up on the status of the above-mentioned application. It has now been fifty-two (52) days since the committee completed the site visit to California Takshila University (CTU). It has been forty-seven (47) days since we submitted the requested supplementary documentation and three (3) weeks have now passed since we submitted the enrollment information and graduate employer recommendation on October 28, 2013. Our October 28, 2013 correspondence also contained information regarding several upcoming deadlines CTU is facing and stressed the need for resolution of this matter prior to those deadlines. As of this date, we have not received any responsive communication or update on the CTU's application status.

Please contact my office at your earliest convenience and let us know where things are and if there is anything else we need to do on our end to expedite this matter. We look forward to hearing from you.

Sincerely,  
Justin D. Hein.

”



Steven L. Simas  
Justin D. Hein  
Nicole D. Hanley

—OF Counsel—  
Richard K. Turner



November 18, 2013

TELEPHONE  
916.791.9500

FACSIMILE  
916.791.9521

SACRAMENTO  
SAN LUIS OBISPO

VIA U.S. MAIL AND EMAIL  
drew.saeune@doe.ca.gov

Drew Saeune  
Education Specialist  
Bureau for Private Postsecondary Education  
2535 Capitol Oaks Drive, Suite 400  
Sacramento, CA 95833

Re: *California Takshila University*  
Application Number 2269

Dear Mr. Saeune:

I write today to follow up on the status of the above-referenced application. It has now been fifty-two (52) days since the committee completed the site visit to California Takshila University ("CTU"). It has been forty-seven (47) days since we submitted the requested supplementary documentation and three (3) weeks have now passed since we submitted the enrollment information and graduate employer recommendations on October 28, 2013. Our October 28, 2013 correspondence also contained information regarding several upcoming deadlines CTU is facing and stressed the need for resolution of this matter prior to those deadlines. As of this date, we have not received any responsive communication or update on CTU's application status.

Please contact my office at your earliest convenience and let us know where things are and if there is anything else we need to do on our end to expedite this matter. We look forward to hearing from you.

Sincerely,

  
Justin D. Hein  
Simas & Associates, Ltd.

JDH:ja

cc: Narayan Baidya (via email)  
Kurt Hepler, Counsel for Department of Consumer Affairs (via email)  
Steven L. Simas, Esq. (via email)  
Nicole D. Hanley, Esq. (via email)

North Pointe Business Centre  
2831 North Broadway Blvd., Ste. 229, Sacramento, CA 95834  
www.simasgavlaw.com

November 18, 2013

916.789.9801

SACRAMENTO  
SAN LUIS OBISPO

VIA U.S. MAIL AND EMAIL  
drew.saeteune@dca.ca.gov

Drew Saeteune  
Education Specialist  
Bureau for Private Postsecondary Education  
2535 Capitol Oaks Drive, Suite 400  
Sacramento, CA 95833

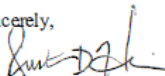
Re: *California Takshila University*  
*Application Number 2269*

Dear Mr. Saeteune:

I write today to follow up on the status of the above-referenced application. It has now been fifty-two (52) days since the committee completed the site visit to California Takshila University ("CTU"). It has been forty-seven (47) days since we submitted the requested supplementary documentation and three (3) weeks have now passed since we submitted the enrollment information and graduate employer recommendations on October 28, 2013. Our October 28, 2013 correspondence also contained information regarding several upcoming deadlines CTU is facing and stressed the need for resolution of this matter prior to those deadlines. As of this date, we have not received any responsive communication or update on CTU's application status.

Please contact my office at your earliest convenience and let us know where things are and if there is anything else we need to do on our end to expedite this matter. We look forward to hearing from you.

Sincerely,



Justin D. Hein

We received visiting committee's review report on December 30, 2013, during the year-end holiday break. This report was mostly misleading and erroneous. On January 14, 2014, Attorney Mr. Steven Simas sent a rebuttal to report to Ms. Joanne Wenzel (BPPE):

“

I write to you today on behalf of our client Narayan Baidya, Ph.D. and California Takshila University (CTU). Please take notice that this shall be considered CTU's Response to the Visiting Committee's Onsite Review Report (Response), dated December 24, 2013. A copy of the Visiting Committee's Onsite Review Report (Report or VCR) enclosed as Exhibit A. It was received by my office on December 30, 2013. As you will recall, on that date you confirmed via email correspondence that CTU's Response would be considered timely filed if received by you no later than January 14, 2014.

In its Report, the Visiting Committee ultimately recommends that CTU's application be denied. Its recommendation is based upon the following:

1. The Visiting Committee's findings regarding CTU's compliance with the California Private Postsecondary Education Act of 2009 and Title 5 of the California Code of Regulations.
2. The Visiting Committee's assessment of CTU's ability to meet stated objectives of each educational program.
3. The Visiting Committee's assessment of CTU's ability to implement its mission.

Each of the above sections had various subsections and sub-subsections on how the Visiting Committee rendered its findings and reached its assessment of CTU. Ultimately, the Visiting Committee found that CTU was "out of compliance" or "deficient" in thirteen (13) specified areas:

1. VCR§ 1(a)(1) -Minimum Operating Standards for the Educational Programs
2. VCR § 1 (a)(3) -Minimum Operating Standards for the Faculty
3. VCR§ 1(a)(6) Minimum Operating Standards for the Library and Other Learning Resources
4. VCR§ 1(a)(7) Minimum Operating Standards for the Financial Resources
5. VCR§ 1(a)(8) -Minimum Operating Standards for the Withdraws and Refunds
6. VCR§ 1(a)(9) Minimum Operating Standards for the Self-Monitoring Procedures
7. VCR § 1 (b )(1) Admissions and Academic Achievement Standards: Admission Standards and Transfer Credit Policy
8. VCR§ 1(b)(2) -Admissions and Academic Achievement Standards: Enrollment Agreement
9. VCR§ 1(b)(3) Admissions and Academic Achievement Standards: Catalog

10. VCR§ 1(b)(4)-Admissions and Academic Achievement Standards: Minimum Educational Requirements to Award a Graduate Degree
11. VCR § 1 (c)-Maintenance and Production of Records
12. VCR§ 2 Assessment to Meet the Stated Objectives of Each Program
13. VCR§ 3 -Assessment of Ability to Implement its Mission
14. VCR § 4 -Recommendation -Deny Application

In rendering these findings, the Visiting Committee made no mention of CTU's peculiar status under the law and history with the Bureau for Private Postsecondary Education ("BPPE").

Specifically, the Report fails to note any of CTU's prior history or interactions with the BPPE. A copy of the chronological events concerning CTU's BPPE application is enclosed as Exhibit B. As you know, CTU had come into operation in the state of California in 2008, during a time period in which the Bureau for Private Postsecondary Education (BPPE) did not yet exist and its predecessor had been abolished. Furthermore, that CTU had timely filed for approval in July 2010 with the BPPE but were initially incorrectly notified that it was operating without proper approval in April 2011. After two years of working with the BPPE, and receiving mixed signals as to whether its programs, enrollment agreement, and catalog, among other items, met the requirements, CTU was informed that its application was going to be denied, without a right to hearing, on November 28, 2012 and that it must immediately shutdown, by no later than January 28, 2013.

As you know, CTU timely filed an appeal on January 28, 2013, and demanded a pre-deprivation hearing. Thereafter, BPPE revised its denial on February 20, 2013, by removing the request to immediately shutdown. On April 11, 2013, CTU filed a Request for Reconsideration of the denial of its application, which was accepted by BPPE on June 12, 2013. This then resulted in the on-site visit at CTU being scheduled for September 26, 2013; over three (3) years

after CTU submitted its original application and five (5) years after CTU had come into operation.

However, none of the above is mentioned in the Visiting Committee Report.

In addition, the Visiting Committee analyzed CTU's purported Master of Science in Software Engineering (MSSE) Program throughout its report. However, CTU does not offer an MSSE program. BPPE was notified that CTU no longer offered an MSSE program prior to the September 26, 2013 visit. Specifically, BPPE was notified on September 19, 2013 that CTU would no longer be offering and would no longer be seeking approval for an MSSE program. A copy of that correspondence is enclosed as Exhibit C.

### **CTU Response to Report**

Below, please find a breakdown of all the findings and assessments rendered by the Visiting Committee in the Report. In addition, please find CTU's response to these findings and assessments. Please note that CTU's response may include refutations and explanations for purported deficiencies, evidence of cured purported deficiencies, or a plan to cure purported deficiencies in an expedited and reasonable timeframe.

### **1. VCR§ 1(a)(1) - Minimum Operating Standards for the Educational Programs**

This section of the Report is based upon the Visiting Committee's purported review and application of Title 5 of the California Code of Regulations (5 CCR) section("§") 71710. In finding CTU out of compliance regarding the Minimum Operating Standards for the Educational Programs, the Visiting Committee rendered the following findings:

- Masters of Business Administration (MBA) Program
  - o 13 of 38 course syllabi were missing.

- o The course "Industrial Organization and Business Strategy" was missing a course number and was not in the course catalog.
  - o The mid-term exam for the course "Financial Management and Accounting" was not robust and difficult enough.
  - o The course "Green Business and Ethics" was missing a course number.
  - o The course "Clean Technology and Management" was missing a course number, descriptive title, length of course, frequency and sequence of lessons, and a detailed outline of the subject matter.
  - o The course "BA 512 Global Business Marketing" was missing a description and course objective
  - o The course "BA 511 Financial Management" was not in the course catalog
  - o The course "BA 542" was missing a course title, instructor identity, length of program, and instructional mode/method.
- MSCS
    - o 15 of 49 courses syllabi were missing.
    - o Review of total curriculum indicates it to be the equivalent of an undergraduate degree program.
    - o Majority of courses offered contain no prerequisites.

However, **assessing CTU as out of compliance is not supported by the evidence.** CTU first brings to your attention that syllabi were only provided for the courses actually taught in both the MBA and MSCS Program. The courses indicated as having missing syllabi were never taught or even offered, and were only prospective courses. These future courses will have syllabi developed by the instructors. As a result, the vast majority of these future courses have been removed from CTU's course offering in each program. A copy of the current course curriculum, containing a list of actual course offerings for both programs, and template syllabus for courses is enclosed as Exhibit D.



Within the MBA program, the specified courses with de minimis missing information (i.e. course numbers, etc.) have been corrected or removed, if their status was only that of a future course. Furthermore, CTU is working with current faculty to further develop more rigorous courses with prerequisites. This will be an organic process, but it is anticipated that significant progress will be made for offering during the Fall 2014 semester.

Within the MSCS program, CTU is working with the current faculty to further develop more rigorous courses with prerequisites. It will conduct an audit and ensure that its program expectations are in-line with competing programs. It will also work to identify and retain a more diverse faculty. Nevertheless, CTU does not agree that the program's courses are the equivalent of an undergraduate degree and points to the consistent and exemplary employment of its graduates. Copies of letters from local businesses (enclosed as Exhibit E) demonstrate that CTU's program is consistently producing graduates who meet the expectations of a graduate-level education.

Furthermore, these letters were provided to the Visiting Committee on October 28, 2013. That the Visiting Committee Report does not address these letters demonstrates that they failed to consider and address all relevant evidence, including that evidence that cut against their overall assessment.

Finally, CTU does not offer an MSSE program. This was communicated to BPPE and the Visiting Committee. That the Visiting Committee Report nonetheless considered the MSSE program in rendering findings, calls into question their overall assessment of finding CTU out of compliance for this minimum operating standard.

## **2. VCR§ 1(a)(3) Minimum Operating Standards for the Faculty**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR § 71720. In finding CTU

out of compliance regarding the Minimum Operating Standards for the Faculty, the Visiting Committee rendered the following findings:

- Missing academic transcripts of the faculty.
- Missing contracts or work agreements for faculty.
- The faculty teaches courses for which they are not qualified

However, assessing CTU as out of compliance is not supported by the evidence. CTU retained and maintained, "*records documenting that each faculty member is duly qualified and was qualified to perform the duties to which the faculty member was assigned*" as specified in the underlying regulation. (5 CCR§ 71720.) The relevant regulation does not mention the word "academic transcript." Rather, CTU obtained, retained, and maintained degree verification and a copy of the diploma certificate from its faculty members. Nevertheless, CTU is now gathering academic transcripts for its current faculty members and will maintain them for all current and future faculty moving forward.

CTU has contract appointment documents. They were not maintained in the faculty personnel file but in the Accounting Department. These will be copied and maintained in the faculty personnel file as well, moving forward.

In order to ensure that faculty personnel files have all required documents, CTU has developed a checklist. A copy of the checklist is enclosed as Exhibit F.

As part of its review and audit of its two program-offerings, CTU will work to identify and retain a more diverse faculty. Nevertheless, CTU does not agree that its faculty is not qualified to teach within its programs and points to the consistent and exemplary employment of its graduates (see Exhibit E). That the Visiting Committee Report does not address these letters when making its assessment of the competence of the faculty demonstrates that they failed to consider and address all relevant

evidence, including that evidence that cut against their overall assessment.

Finally, CTU does not offer an MSSE program. This was communicated to BPPE and the Visiting Committee. That the Visiting Committee Report nonetheless considered the MSSE program in rendering findings, calls into question their overall assessment of finding CTU out of compliance for this minimum operating standard.

### **3. VCR§ 1(a)(6) - Minimum Operating Standards for the Library and Other Learning Resources**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR§ 71740. In finding CTU out of compliance regarding the Minimum Operating Standards for the Library and Other Learning Resources, the Visiting Committee rendered the following findings:

- The library does not contain a copy of each required text for its courses.
- Majority of the library consists of trade publications.
- No qualified librarian present.
- No written instructions provided to access online library.

However, assessing CTU as out of compliance is not supported by the evidence. CTU's library is primarily online. CTU uses Safari Online Library as well as another open source library system. All students are provided instruction for how to use the library during their orientation and in-class by the instructors. A copy of those written instructions is enclosed as Exhibit G.

Notwithstanding CTU's primary reliance on a virtual library, CTU has a physical library. It is currently maintained by a school administrator, as CTU is in the process of finding an information specialist. CTU is in the process of acquiring physical versions of all required texts to store in its physical library.

#### **4. VCR§ 1(a)(7) - Minimum Operating Standards for the Financial Resources**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR§ 71 745(a)(6). In finding CTU out of compliance regarding the Minimum Operating Standards for the Financial Resources, the Visiting Committee rendered the following findings:

- As of December 31, 2010, the Asset-to-Liability Ratio of CTU was 0.25 to 1.

However, assessing CTU as out of compliance is not supported by the evidence. The Visiting Committee Report only reviewed an old version of CTU's financial statement. CTU's financial statement has since been updated twice, with the first updated version having been received, reviewed, and approved by BPPE on or around May 2012.

Enclosed as Exhibit H, please find CTU's Financial Statement as of December 31, 2011. Enclosed as Exhibit I, please find CTU's Financial Statement as of December 31, 2012. Both demonstrate that CTU's Asset-to-Liability Ratio exceeds 1.25-to-1, as required by regulation.

#### **5. VCR§ 1(a)(8)-Minimum Operating Standards for the Withdraws and Refunds**

This section of the Report is based on the Visiting Committee's purported

- No compliant withdrawal list was provided.
- Student records identified as "withdrawn" did not have required documents: enrollment agreement, refund calculation, withdrawal document.

However, assessing CTU as out of compliance is not supported by the evidence. The list of students provided to the Visiting Committee had not withdrawn from their respective programs in

the middle of a semester. Rather, they had completed their semester, and then left the program:

- Student V. - completed fall semester 2012. Did not register or return to the program in spring semester 2013, as the student had taken a job elsewhere. CTU was notified through his SEVIS record (F1 student record).
- Student K. P. - completed fall semester 2012. Transferred to another school thereafter. CTU retained transfer request and transfer record with the SEVIS file.
- Student S. V.- completed fall semester 2012. Did not register or return to the program in spring semester 2013. CTU made multiple attempts to contact, via telephone, mail, and email correspondence, without success.

As a result, there is no applicable refund to calculate, record, or maintain.

## **6. VCR§ 1(a)(9)-Minimum Operating Standards for the Self-Monitoring Procedures**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR§ 71760. In finding CTU out of compliance regarding the Minimum Operating Standards for the Self-Monitoring Procedures, the Visiting Committee rendered the following findings

- The absence of any self-monitoring procedures.

However, assessing CTU as out of compliance is not supported by the evidence. The Visiting Committee was provided extensive procedures for self-monitoring. This was provided in the supplemental materials on October 2, 2013, and is enclosed as Exhibit J. It included a description of process and procedures used, data collected, tools used, course evaluations, graduate survey, as well as student demographics, goals, and achievement. It also included work-in-progress monitoring such as annual course

audits and weekly reports. It also made reference to the self-monitoring standards it wished to implement that emulated that of the Accrediting Commission of Career Schools and Colleges (ACCSC).

Furthermore, CTU provided the procedures in its original application, filed in July 2010. It was Exhibit 23. Yet, the Visiting Committee Report fails to mention hundreds of pages of documentation and determines the program to be non-existent.

## **7. VCR§ 1(b)(1)-Admissions and Academic Achievement Standards: Admission Standards and Transferred Credit Policy**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR§ 71770. In finding CTU out of compliance regarding the Admission Standards and Transferred Credit Policy, the Visiting Committee rendered the following findings:

- MBA
  - GRE test required for admission.
  - No process for evaluating foreign credits implemented.
  - Catalog permits President/Committee to contravene the underlying regulation.
  - Permitted students with over 20% transfer credits to graduate.
- MSCS
  - Students without a background in computer science (i.e. undergraduate degree) permitted into the program.
  - No course prerequisites for admission into program.
  - Foundation should be achieved prior to admittance, not in a masters-level program

However, assessing CTU as being out of compliance is not supported by the evidence. CTU has operated in compliance with the underlying regulation. Admittedly, how it communicates that

compliance through its underlying Catalog and Enrollment Agreement is not clear. And as a result, it has updated both documents to better reflect its compliance.

Specifically, the GRE test has only been a preferred mechanism for admittance when other achievement parameters have not been established or are clearly insufficient. However, CTU will now clearly indicate that it is "preferred".

CTU has always abided by the less-than-or-equal-to 20% transfer credit rule. However, in the past, it had interpreted 5 CCR§ 71770(b)(2) and 71770(c)(7)(C) and (D) to permit experiential training in addition to transfer credits, not as part of the transfer credits. Thus, two (2) students are believed to have been permitted to exceed the 20% threshold where the experiential training is included as part of the transfer credit calculation. CTU will now include the experiential training as being within the 20% transfer credit rule.

In the past, CTU has relied upon assessments of foreign student competence by its faculty. Most are qualified to assess the performance of the students in both the U.S. and Indian systems of education. In addition, most foreign students had already attained an undergraduate or graduate-level education at another U.S.-based educational institution, prior to enrollment at CTU. Nevertheless, going forward, CTU will work with a third-party accreditation facility for its foreign transfers.

Within the MSCS program, CTU is working with the current faculty to further develop more rigorous courses with prerequisites. It will conduct an audit and ensure that its program expectations are in-line with competing programs. Students unable to meet prerequisites will be required to take undergraduate courses from local colleges or online to fulfill those requirements. And any student found deficient in remedial skills will be offered tutoring and one-on-one training to bring foundational knowledge

to a level it needs to be from which graduate-level training can be built upon.

#### **8. VCR§ 1(b)(2) Admissions and Academic Achievement Standards: Enrollment Agreement**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR§ 71800. In finding CTU out of compliance regarding the Enrollment Agreement, the Visiting Committee rendered the following findings:

- Defects found in the following sections within the Enrollment Agreement: 5(a), 5(b), 5(d), 6(e)(2), 6(e)(3), 6(e)(8), 6(e)(9), 6(e)(10), 6(e)(11), 7, 8, 9, 10(2), 13, 15, 17, 18.

However, assessing CTU as out of compliance is not supported by the evidence. These were merely de minimis errors in the Enrollment Agreement. A corrected copy of the Enrollment Agreement is enclosed as Exhibit K.

The determined-to-be defective Enrollment Agreement had previously been provided to and approved by the BPPE in or around September 2011 and then May 2012. As there were many miscommunication and delay by the BPPE throughout CTU's application process, it is quite possible that both CTU and BPPE were responsible for the identified deficiencies. However, the Visiting Committee Report does not mention that prior review and approval.

#### **9. VCR§ 1(b)(3)-Admissions and Academic Achievement Standards: Catalog**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR § 71810. In finding CTU out of compliance regarding the Catalog, the Visiting Committee rendered the following findings:

- Defects found on the following pages within the Catalog: 10, 11, 12, 16, 18, 21, 22, 23, 24.



However, assessing CTU as out of compliance is not supported by the evidence. These were merely de minimis errors in the Catalog. A corrected copy of the Catalog is enclosed as Exhibit L.

The determined-to-be defective Catalog had previously been provided to and approved by the BPPE in or around September 2011 and then May 2012. As there was much miscommunication and delay by the BPPE throughout CTU's application process, it is quite possible that both CTU and BPPE were responsible for the identified deficiencies. However, the Visiting Committee Report does not mention that prior review and approval.

#### **10. VCR§ 1(b)(4) Admissions and Academic Achievement Standards: Minimum Educational Requirements to Award a Graduate Degree**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR § 71865. In finding CTU out of compliance regarding the Minimum Educational Requirements to Award a Graduate Degree, the Visiting Committee rendered the following findings:

- MBA
  - The prior student received MBA with only twelve (12) business-related semester credits.
  - Several courses are not suitable for graduate education:
    - BA 500 Organizational Management
    - BA 501 -Accounting Managerial
    - BA 505 Managerial Economics - Micro and Macro
    - BA 510 - Marketing - Fundamentals and Principles
    - BA 552 - Financial Management
  - Textbook for the course "Marketing - Fundamental and Principles" does not contain content covering marketing.
  - No prerequisites for courses.
- MSCS
  - Several courses are not suitable for graduate education:

- MSCS 547 - Data Structures and Computer Architecture
- MSC S 513 - Advanced Programming Languages
- The final exam for the course "Intermediate Programming" contained questions typical for a lower level programming course.
- Prior students repeated courses from undergraduate level to attain credits needed to obtain a graduate degree.
- Senior Theses were more of a final project; no research and no contribution to the field of study was found.

However, assessing CTU as out of compliance is not supported by the evidence. The programs offered are consistent with numerous, graduate-level examples. The syllabi for these courses were, in fact, based upon a review of the corresponding syllabi of this competing institution.

CTU does not agree that its programs are not graduate-level. As proof, it points to the consistent and exemplary employment of its graduates (see Exhibit E). That the Visiting Committee Report does not address these letters when making its assessment demonstrates that they failed to consider and address all relevant evidence, including that evidence that cut against their overall assessment. Nevertheless, CTU is engaging with faculty in both programs to audit them and develop a more rigorous program. It is developing prerequisites for a number of its courses. Furthermore, it is working to identify new, more diverse faculty to teach a number of its offerings. Through conducting this audit, CTU aims to develop a more difficult curriculum and testing requirements.

#### **11. VCR§ 1(c)-Maintenance and Production of Records**

This section of the Report is based upon the Visiting Committee's purported review and application of 5 CCR § 71920, 71930. In addition, the Visiting Committee purportedly reviewed and applied California Education Code (CEC) section ("§") 94900, 94900.5. In finding CTU out of compliance regarding the

Maintenance and Production of Records, the Visiting Committee rendered the following findings:

- Student records were deficient; failed to maintain enrollment agreements, evaluation of undergraduate degree, copies of completed theses or senior projects.
- Faculty records were deficient; failed to maintain transcripts and agreements.

However, **assessing CTU as out of compliance is not supported by the evidence.** CTU maintained all student records; however, they were not always in the individual student record file. CTU will work with its administration to ensure that copies of all relevant documents are duplicated and accessible in a centralized, student file. Furthermore, CTU obtained and maintained all faculty records. As referenced above, CTU was unaware that the regulation specified retention of academic transcripts. CTU will work with its administration to ensure that copies of all other relevant faculty documents are duplicated and accessible in a centralized, faculty file.

## **12. VCR § 2 – Assessment to Meet the Stated Objectives of Each Program**

This section of the Report is based upon the Visiting Committee's purported review of CTU's stated objectives for both education programs. In assessing CTU out of compliance regarding its ability to Meet the Stated Objectives of Each Program, the Visiting Committee rendered the following findings:

- MBA
  - A limited number of faculty.
  - Faculty does not have sufficient experience for courses being taught.
  - Missing syllabus for each course makes it difficult to assess the overall program.
- MSCS

- A limited number of faculty.
- Faculty does not have sufficient experience for courses being taught.
- The program is the equivalent of an undergraduate program.

However, assessing CTU as out of compliance is not supported by the evidence. As previously indicated herein, CTU stands by its track record of graduating students who are able to not only function in the real world but excel. This has only occurred because CTU is preparing the students for their actual work. And this has been accomplished, in large part, due to the programs and faculty in place.

That stated, CTU will not be blinded by its pride. As previously indicated herein, CTU is actively reassessing both programs and working with its current faculty to develop a more rigorous MBA and MSCS programs. This will include expanding and diversifying the faculty, developing new prerequisites for courses, developing new courses, and increasing the difficulty of exams. The intent of engaging in this organic process is to address the perceived shortcomings in the programs while still maintaining the foundational elements that have made them successful.

### **13. VCR § 3 - Assessment of Ability to Implement its Mission**

This section of the Report is based upon the Visiting Committee's purported review of CTU's stated mission statement for the educational institution. In assessing CTU out of compliance regarding its Ability to Implement its Mission, the Visiting Committee rendered the following findings:

- Mission is attainable.
- Programs are more suitable as undergraduate programs

However, assessing CTU as out of compliance is not supported by the evidence. As previously indicated herein, CTU stands by its

track record of graduating students who are sought by employers and perform well in their positions.

Despite all of the adversity CTU has faced and is facing, its offerings are still being sought by students. Four (4) students completed the Fall 2013 semester. And seven (7) students will be enrolled for the spring 2014 semester.

#### **14. VCR§ 4 - Recommendation to Deny**

Given the totality of the purported deficiencies, the Visiting Committee recommended that the BPPE should deny CTU's application. However, in rendering the recommendation, they gave no consideration to the ease of curing the vast majority of the perceived administrative deficiencies. As indicated above, CTU has cured almost all of the actual deficiencies identified in fifteen (15) days.

As to perceived substantive deficiencies, CTU points to its track record. CTU's graduates secure employment and perform well in their positions. This is not an opinion, but a fact established by evidence provided to the BPPE and Visiting Committee but ignored. Attached and incorporated as Exhibit E, please review the letters from businesses that employ graduates of CTU. If CTU's program was not rigorous enough to confer actual, graduate-level education, why is there so much support from those members of their local community regarding how prepared and trained CTU's graduates are for work in the real business world? The fact that not a single graduate has had his or her credentials functionally stressed as the Visiting Committee would have you to assume, calls into question the Visiting Committee's ability to properly assess educational programs as meeting the rigors of graduate-level education.

#### **Conclusion**

As you can see, CTU has provided much information to the Visiting Committee and to the BPPE that the Visiting Committee overlooked or did not consider during the onsite review or within

the Report. In addition, the Visiting Committee assessed minor, immediately curable deficiencies as terminal. Furthermore, assessing CTU without consideration of its unique history and relationship with the BPPE permits the BPPE to absolve itself of any responsibility for the protracted delay in rendering a decision, miscommunication of standards and assessment of compliance, and CTU's tenuous present position in terms of an ability to attract students, faculty, and resources. Mind you, this is despite CTU having an extensive and proven track record of transforming students into the desired commodity for businesses within CTU's immediate community.

Given the above, at worst, CTU should be provided tentative approval pending confirmation that it addresses those remaining deficiencies in the matter as described above. CTU has every reason to believe that the remaining deficiencies can be addressed in no more than ninety (90) days.

However, in the event that BPPE accepts the Visiting Committee's recommendation and denies CTU's application, again, please be on notice that CTU will appeal the denial. Furthermore, CTU will request the pre-deprivation hearing to which it is entitled. Thank you for your attention to this matter. If you have any questions or concerns, please contact me at your convenience.

Sincerely  
Steven L. Simas  
Simas & Associates,

”

BPPE again went silent for months without responding or giving any feedback to CTU. When asked, BPPE's legal counsel wrote: *"CTU's application for approval to operate remains denied, and the matter will proceed to the requested administrative hearing."*

**That was not true.** Immediately CTU's counsel Mr. Hein wrote to Mr. Heppler (April 8, 2014)

“

I write today regarding your recent correspondence dated April 3, 2014, a copy of which is enclosed for your reference. In it, you indicate:

The Bureau [for Private Postsecondary Education] initially denied CTU's

*[California Takshila University] application for approval to operate and CTU requested a hearing to contest that decision. It was then suggested that the Bureau empanel a visiting committee (committee) to conduct a site visit and assess CTU, which was done. The committee prepared a report, which has been provided to you, and in fact, you have commented on the report. At this time, CTU's application for approval to operate remains denied, and the matter will proceed to the requested administrative hearing.*

The statement is inaccurate in a number of respects:

1. CTU requested and was granted reconsideration of the denial of its application by Joanne Wenzel, Deputy Bureau Chief, on June 12, 2013. A copy of that correspondence is attached for your reference.
2. There was no suggestion by CTU of empanelling the Visiting Committee. Rather, the Bureau requested a site visit for September 26-27, 2013, which CTU provided.
3. The "report" you reference was, in fact, the Visiting Committee Onsite Review Report for CTU, which was issued on December 24, 2013. This report is required by 5 CCR§ 71465.
4. The "comments on the report" you reference are CTU's Response to the Visiting Committee's Onsite Review Report, which was filed on January 14, 2014. The responses are authorized by 5 CCR§ 71465(b).
5. Finally, you indicate that CTU's application "remains denied" and that "the matter will proceed to an administrative hearing." Unfortunately, CTU has not been given Notification of a Denial, including a statement of reasons for the denial, post-

reconsideration and Visiting Committee, as required by California Education Code section 9488(b). Surely the Bureau does not intend to move to a hearing based upon the Notification of Denial dated November 29, 2012. Furthermore, the Visiting Committee Onsite Review Report cannot serve that function as it was neither issued by the Bureau nor accounts for CTU's response.

Please take the above into consideration as you and the Bureau proceed with handling this matter.

”

\*\*\*\*\*



