



U.S. Immigration  
and Customs  
Enforcement

School Code: SFR214F02125000

Ms. Sophie Su  
Tri-Valley University  
4455 Stoneridge Drive  
Pleasanton, CA 94588

**Student and Exchange Visitor Program  
Notice of Intent to Withdraw**

**Notice**

This notice concerns the approval of your school for attendance by nonimmigrant students. Title 8 Code of Federal Regulations (8 CFR) section 214.4(a)(2) states:

*Withdrawal on Notice:* Student Exchange and Visitor Program (SEVP) certification of a school or school system for the attendance of nonimmigrant students will be withdrawn on notice if the school or school system is determined to no longer be entitled to certification for any valid and substantive reason including, but not limited to, the following:

- (i) Failure to comply with §214.3(g)(1) without a subpoena.
- (ii) Failure to comply with §214.3(g)(2).
- (v) Willful issuance by a Designated School Official (DSO) of a false statement, including wrongful certification of a statement by signature, in connection with a student's school transfer or application for employment or practical training.
- (vi) Conduct on the part of a DSO that does not comply with the regulations.
- (viii) Failure to provide SEVP paper copies of the school's Form I-17 bearing the names, titles and signatures of DSOs as required by §214.3(l)(2).
- (ix) Failure to submit statements of DSOs as required by §214.3(l)(3).
- (xi) Issuance of Forms I-20 to aliens who will not be enrolled in or carry full courses of study, as defined in §214.2(f)(6) or §214.2(m)(9).
- (xix) Failure of a DSO to notify SEVP of material changes, such as changes to the school's name, address, or curricular changes that represent material changes to the scope of institution offerings as required by §214.3(f)(1).

**Summary**

Tri-Valley University was certified by SEVP to issue Forms I-20 for F-1 visas on February 17, 2009. As of December 30, 2010, the school has 1613 Active and 966 Initial F-1 nonimmigrant students. It has been determined that Tri-Valley University has failed to comply with federal regulations for nonimmigrant students by failing to require students to attend class, properly report changes to school and student information in the Student and Exchange Visitor Information System (SEVIS), making false statement towards students' work authorization, and providing SEVIS access to school officials who are not designated as DSOs.

**Timeline**

On September 30, 2009, SEVP was made aware of a suspicion that Tri-Valley University was engaged in exclusively online courses, prompting further investigation. On November 22, 2010, the Homeland Security Investigations (HSI) Office of the Special Agent in Charge, San Francisco, delivered to SEVP information regarding the school's violations of SEVP regulations.

**Unresolved Issues**

**Issue 1: Failure to comply with 8 CFR §214.3(g)(1) without a subpoena. See 8 CFR §214.4(a)(2)(i).**

*Controlling regulation:* 8 CFR §214.4(a)(2)(i), §214.3(g)(1)(iii)

*8 CFR §214.3(g)(1) states in pertinent part:*

*The information and documents that the school must keep on each student are as follows:*

*(iii) Current address where the student and his or her dependents physically reside. In the event the student or his or her dependents cannot receive mail at such physical residence, the school must provide a mailing address in SEVIS.*

*SEVP analysis:* On June 17, 2010, HSI agents gathered Tri-Valley University's student data from SEVIS, including first and last names and date of birth, and sent the data to Consolidated Lead Evaluation and Reporting (CLEAR) for analysis. The CLEAR system ran mass reports against the data and provided current address for each student. The data results showed there were 968 nonimmigrant students who were listed as "active" in SEVIS. Of those 968 students, 553 (57%) were listed in SEVIS as residing at 555 East El Camino Real, Apartment 415, which HSI agents discovered is a single-unit, two-bedroom residence in Sunnyvale, California. HSI agents conducted interviews of the current occupants of that residence on June 15, 2010. The current occupants included four tenants, three of whom are listed on the current lease, who denied any affiliation with Tri-Valley University. The HSI agents confirmed the four tenants were indeed not students at Tri-Valley University by checking Tri-Valley's student records in SEVIS.

On May 17, 2010, HSI agents also interviewed a former Tri-Valley University employee who was also enrolled as a student. The individual stated that he was instructed by the school officials to input the 555 East El Camino Real address when processing students in SEVIS. He stated that he did this as a means to conceal the fact that most of the students live outside the state of California and do not attend their classes.

The 555 East El Camino Real, Apartment 415 address does not correspond to any Tri-Valley University nonimmigrant student. By providing an address for students which is neither the students' physical or mailing address, the school failed to properly maintain over five hundred student records. As such, the school is in violation of 8 CFR §§214.3(g)(1)(iii) and subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(i).

**Issue 2: Failure to comply with 8 CFR §214.3(g)(2).** See 8 CFR §214.4(a)(2)(ii).

*Controlling regulation:* 8 CFR §214.4(a)(2)(ii), §214.3(g)(2), §214.3(h)(3), §214.2(f)(6)(i)(G)

8 CFR §214.2(f)(6)(i)(G) states in pertinent part:

*For F-1 students enrolled in classes for credit or classroom hours, no more than the equivalent of one class or three credits per session, term, semester, trimester, or quarter may be counted toward the full course of study requirement if the class is taken on-line or through distance education and does not require the student's physical attendance for classes, examination or other purposes integral to completion of the class.*

8 CFR §214.3(g)(2) states in pertinent part:

- (i) Schools must update SEVIS with the current information within 21 days of a change in any of the information contained in paragraphs (f)(1) and (h)(3) of this section.*
- (ii) Schools are also required to report within 21 days any change of the information contained in paragraph (g)(1) or the occurrence of the following events:*
  - (A) Any student who has failed to maintain status or complete his or her program.*
  - (B) A change of the student's or dependent's legal name or U.S. address.*

8 CFR §214.3(h)(3) states in pertinent part:

- (i) SEVP will determine if out-of-cycle review is required upon receipt in SEVIS of any changes from an SEVP-certified school to its Form I-17 information. The Form I-17 information that requires out-of-cycle review when changed includes:*
  - (D) Location of the school.*
- (iii) SEVP may review a school's certification at any time to verify the school's compliance with the recordkeeping, retention, reporting and other requirements of paragraphs (f), (g), (j), (k), and (l) of this section to verify the school's continued eligibility for SEVP certification pursuant to paragraph (a)(3) of this section. SEVP may initiate remedial action with the school, as appropriate, and may initiate withdrawal proceedings against the school pursuant to 8 CFR 214.4(b) if noncompliance or ineligibility of a school is identified.*

*SEVP analysis:* On June 17, 2010, HSI agents gathered Tri-Valley University's student data from SEVIS, including first and last names and date of birth, and sent the data to Consolidated Lead Evaluation and Reporting (CLEAR) for analysis. The CLEAR system ran mass reports against the data and provided current address for each student. The data results showed there were 968 nonimmigrant students who were listed as "active" in SEVIS. Of those 968 students, 553 (57%) were listed in SEVIS as residing at 555 East El Camino Real, Apartment 415, which HSI agents discovered is a single-unit, two-bedroom residence in Sunnyvale, California. HSI agents conducted interviews of the current occupants of that residence on June 15, 2010. The current occupants included four tenants, three of whom are listed on the current lease, who denied any affiliation with Tri-Valley University. The HSI agents confirmed the four tenants were indeed not students at Tri-Valley University by checking Tri-Valley's student records in SEVIS.

On May 17, 2010, HSI agents also interviewed a former Tri-Valley University employee who was also enrolled as a student. The individual stated that he was instructed by the school officials to input the 555 East El Camino Real address when processing students in SEVIS. He stated that he did this as a means to conceal the fact that most of the students live outside the state of California and do not attend their classes.

The 555 East El Camino Real, Apartment 415 address does not correspond to any Tri-Valley University nonimmigrant student. By providing an address for students which is neither the students' physical or mailing address, the school failed to properly maintain over five hundred student records, more than half the school's Active student population. As such, the school is in violation of 8 CFR §214.3(g)(2)(ii)(B), and subject to withdrawal pursuant to 8 CFR §§214.4(a)(2)(ii).

Beginning in June 2010, HSI agents observed the school's 4455 Stoneridge Drive address, as listed in SEVIS. The agents observed the property on the following dates:

- June 3, 2010, from 1:30 PM to 5:00 PM;
- June 8, 2010, 3:30 PM to 7:15 PM;
- June 23, 2010, 11:50 AM-2:50 PM;
- June 24, 2010, 12:00 PM-4:00 PM
- July 1, 2010, 12:00 PM-4:00 PM;
- July 2, 2010, 4:00 PM-8:00 PM.

During their surveillance, the agents did not record one instance of this property being utilized by Tri-Valley University or its students to conduct classes. In September 2010, HSI agents approached and interviewed David Sell, the owner of the 4455 Stoneridge Drive property. Mr. Sell told agents that the school does not currently operate out of his property. 8 CFR 214.3(g)(2) requires schools to update SEVIS with any change to information contained in paragraph (h)(3), which includes "(D) Location of the school". Failure to notify SEVP of the location change within 21 days violates §214.3(g)(2), and as such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(ii).

On July 19, 2010, Customs and Border Protection (CBP) officers interviewed Vijaya Ram Kolli (N0006887171). According to his SEVIS record, Kolli has been Active at Tri-Valley University since April 8, 2010, and his record was marked Automatically Terminated by SEVIS on November

15, 2010. According to the SEVIS record, Kolli was authorized by Tr-Valley University for Curricular Practical Training (CPT) on April 8, 2010 as a student at Tri-Valley University, and was again registered in SEVIS by the school on July 8, 2010. At the time of the interview with CBP officers, Kolli was seeking admission to the United States to resume his education at Tri-Valley University. Due to inconsistencies in his statements and lookouts placed in the Traveler Enforcement Compliance System (TECS) relating to the school, Kolli was referred to Passport Control Secondary for further questioning. During questioning, Kolli stated that he never attended any classes while enrolled at Tri-Valley University. As the student was not maintaining a full course of study, he was out of status, which according to 8 CFR 214.3(g)(2)(ii)(A), requires the school to update SEVIS to reflect the student's status within 21 days. By registering the student on July 8, 2010, though the student had never attended class, the school failed to comply with 8 CFR 214.3(g)(2), and as such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(ii).

On October 11, 2010, CBP officers interviewed Sai Rajesh Suvarnam (N0006679784). According to his SEVIS record, Suvarnam has been Active at Tri-Valley University since March 23, 2010, enrolled in a Doctorate degree level program and majoring in Electrical and Electronics Engineering. As of December 29, 2010, Suvarnam is still listed as an Active student. To date, Suvarnam was registered as Active in SEVIS three times since his initial registration. At the time of the interview, Suvarnam was seeking admission into the United States to resume his education at Tri-Valley University. Due to lookouts placed into the TECS system, Suvarnam was referred to Passport Control Secondary for further questioning. During questioning, Suvarnam stated that he has never physically attended classes at Tri-Valley University. Suvarnam told CBP officials that he took one semester of classes at the school and that all of his classes were conducted online. As per 8 CFR 214.2(f)(6)(i)(G), "no more than the equivalent of one class or three credits per session, term, semester, trimester, or quarter may be counted toward the full course of study requirement.

Page 16 of Tri-Valley University's catalog, which was submitted by the school at the time of its initial petition for SEVP certification, states the following regarding the school's "minimum requirement" for full time enrollment of graduate students:

The minimum requirement of a Full Time graduate degree enrollment status are [sic] as follows: enrolling in 9 credit units – e.g. 3 courses at 3 units/course - in each of two out of the three trimester terms throughout one year of study per 12 month period, starting from the student's first day of class attendance.

Additionally, Tri-Valley University's website (<http://trivalleyuniversity.org/int.htm>), last accessed December 29, 2010, states the following: "Student [sic] who hold F-1 visa must enroll at least 9 credit hours ( 3 courses) of graduate courses or 12 credit hours for undergraduate studies (4 courses) every trimester to keep full-time student status."

As a grad student, Suvarnam had to enroll in nine credit hours, of which no more than three could be taken online as per 8 CFR 214.2(f)(6)(i)(G). By taking exclusively online classes, Suvarnam is out of status and must be Terminated in SEVIS, as per 8 CFR 214.3(g)(2)(ii)(A). The school has failed to terminate the student, and as such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(ii).

**Issue 3: Willful issuance by a DSO of a false statement, including wrongful certification of a statement by signature, in connection with a student's school transfer or application for employment or practical training. See 8 CFR §214.4(a)(2)(v).**

*Controlling regulation:* 8 CFR §214.4(a)(2)(v), §214.2(f)(9), §214.2(f)(10)

*8 CFR §214.2(f)(10) states in pertinent part: "An eligible student may request employment authorization for practical training in a position that is directly related to his or her major area of study."*

*SEVP analysis:* After reviewing the Forms I-20 of students authorized for Curricular Practical Training (CPT) by Tri-Valley University, SEVP believes that Designated School Officials at the school have authorized students for practical training that is not directly related to students' major areas of study in violation of 8 CFR 214.2(f)(10).

Student Bachu Srikanth (N0005418609) enrolled in a Master's program with the major of Health/Health Care Administration/Management as listed on the student's SEVIS record. The student was authorized by Tri-Valley University for full-time CPT from June 28, 2010 to June 1, 2011, with Techwave Consulting Inc. Techwave Consulting Inc describes itself on its web site (<http://www.techwavenet.com>), last accessed December 22, 2010, as a computer/technology business:

TECHWAVE Consulting was formed in 2004 by ex Big 4 ERP consultants, with head quarters in Exton, PA and offices across USA. We are a leading provider of consulting services specializing ERP (SAP & Oracle) and Business Intelligence (SAP Netweaver, SAP BPC, Cognos, Hyperion, Microstrategy, SAS, Data Stage and Informatica) space. Our clients include a combination of Fortune 1000 companies located in USA as well as across the globe.

Because the student's major area of study is Health/Health Care Administration/Management and the employment the school authorized was in the computer science field, it appears that Tri-Valley University authorized this student for practical training not directly related to the student's major area of study in violation of 8 CFR 214.2(f)(10).

Student Naga Siva Prasad Bezawada's (N0007411591) major area of study is Computer Science. He is authorized for CPT at "Economy Dollar INC" at 5801 Duke St, Ste#C100, Alexandria, VA 22304. Tri-Valley remarks that the "student working for Economy Dollar INC meets the research requirement of the graduate degree." Economy Dollar, Inc. is actually a discount retail store located in the Landmark Mall in Alexandria, VA, according to Landmark Mall's website (<http://www.landmarkmall.com/directory>), last accessed December 22, 2010. The student's retail position at Economy Dollar, Inc. appears not to directly relate to the student's major area of study, Computer Science, and therefore violates 8 CFR 214.2(f)(10).

Student Challa Thrinath (N0007464667) has been authorized for full time CPT at "High Life" at 2002 N Fry Road, Suite 114 in Houston, TX from October 1, 2010 to March 1, 2011. According to Houston.com (<http://www.houston.com/tobacco-cigar-shops/business-directory/3>), last accessed

December 27, 2010, and MerchantCircle.com

(<http://www.merchantcircle.com/business/High.Life.281-829-9393>), last accessed December 27, 2010, High Life is a tobacco shop. The student is a Master's degree level student whose major area of study, according to the SEVIS record, is Business Administration and Management, General. The student's retail employment at a tobacco shop is not directly related to the student's major area of study and therefore violates 8 CFR 214.2(f)(10).

Student Challa Krishnaveni (N0006653363) is a Master's degree level student whose major area of study, according to the SEVIS record, is Business Administration, Management and Operations, Other . She is authorized for full-time CPT from March 1, 2010 to February 28, 2011, at "Houston Harris Division Patrol Inc" at 6420 Richmond Ave, Ste 520, Houston, TX 77057. According to the SEVIS record, the Employment Remarks relating to the student's CPT states: "Student's CPT with Houston Harris Division Patrol Inc approved by the Dept. of Computer Science and Engineering at Tri-Valley University." Additionally, the Relevance Text in the student's CPT authorization in SEVIS states, "Student's employment with Houston Harris Division Patrol Inc fulfills the research requirement if [sic] the Degree program." The student's SEVIS record states the student was authorized for CPT by the school's Department of Computer Science and Engineering, but the record also states the student's employment fulfills a degree program requirement. According to the school's catalog, submitted with its initial Form I-17 petition, the Business Administration program falls under the school's School of Business, which is separate from the School of Engineering which encompasses the Computer Science and Engineering programs. As the student is majoring in Business Administration, the student cannot fulfill a degree requirement for any degree in the Department of Computer Science and Engineering. As the school attests the Department of Computer Science and Engineering authorized the student's CPT, the student cannot possibly fulfill degree requirements of a program in a department in which they are not enrolled. Therefore, the school wrongfully certified the student for practical training.

Student Tejal Mukesh PATEL (N0004818893) is a doctoral student at Tri-Valley University whose major area of study is Health/Health Care Administration/Management. However, he has been authorized for full-time CPT at "7- ELEVEN FRANCHISEE" at RT. 22 & Westervelt Ave, North Plainfield, NJ 07060 from February 25, 2010 to February 10, 2011. 7-Eleven is a convenience store and employment at a 7-Eleven is clearly not directly related to the student's major area of study, Health/Health Care Administration/Management. In authorizing this student for CPT at 7-Eleven, the school has violated 8 CFR 214.2(f)(10).

Student Venkata Durga Prathyusha Gogineni (N0004491124) has been authorized by Tri-Valley University for full-time CPT at "V Square Infotech" at 555 US1S High Way, Suite 330, Iselin, NJ 08830 from September 23, 2010 to August 30, 2011. According to the SEVIS record, the student is enrolled at the school in a Doctorate degree level program and majoring in Health/Health Care Administration/Management. V Square Infotech's website (<http://www.vforceinfotech.com>), last accessed December 27, 2010, describes the business as follows:

Vforce Infotech is one of the fastest growing minority-owned, USA based organization specializing in IT consulting and business services for mid to large organizations. Our Team has been providing consulting and professional services to our clients in a timely and cost effective manner.

The employer's describes itself as an IT consulting business, which is a Computer Science field. As the student is majoring in Health/Health Care Administration/Management, the student's employment at Vforce Infotech is not directly related to the student's major area of study and the school's authorization of this CPT therefore violates 8 CFR 214.2(f)(10).

Student Pauline Kack-Kack's (N0003874582) is enrolled at the school as a Doctoral degree level student with a major area of study is Health/Health Care Administration/Management. However, she has been authorized by Tri-Valley University for full-time CPT from February 26, 2010 to February 14, 2011 at "Dillard's Inc." at Fashion Place, 6191 S.State #100, Murray, UT 84107. Dillard's Inc is a retail employer. As the student is majoring in Health/Health Care Administration/Management, employment at a retailer appears not directly related to the student's major area of study. The school's authorization of this student's CPT therefore violates 8 CFR 214.2(f)(10).

Because Tri-Valley University has authorized students for practical training that is not directly related to the students' major areas of study, the school is in violation of 8 CFR §214.2(f)(10) and subject to withdrawal pursuant to §214.4(a)(2)(v).

**Issue 4: Conduct on the part of a DSO that does not comply with the regulations. See 8 CFR §214.4(a)(2)(vi).**

*Controlling Regulations:* 8 CFR §214.4(a)(2)(vi), §214.2(f)(9)(i), §214.3(l)(1)

*8 CFR §214.2(f)(9)(i), On-campus employment, states in pertinent part:*

*On-campus employment must either be performed on the school's premises, (including on-location commercial firms which provide services for students on campus, such as the school bookstore or cafeteria), or at an off-campus location which is educationally affiliated with the school. In the case of off-campus locations, the educational affiliation must be associated with the school's established curriculum or related to contractually funded research projects at the post-graduate level. In any event, the employment must be an integral part of the student's educational program.*

*8 CFR §214.3(l)(1) states in pertinent part:*

*Meaning of term Designated Official. As used in §§214.1(b), 214.2(b), 214.2(f), 214.2(m), and 214.4, a Designated Official, Designated School Official (DSO), or Principal Designated School Official (PDSO), means a regularly employed member of the school administration whose office is located at the school and whose compensation does not come from commissions for recruitment of foreign students. An individual whose principal obligation to the school is to recruit foreign students for compensation does not qualify as a designated official. The PDSO and any other DSO must be named by the president, owner, or head of a school or school system. The PDSO and DSO may not delegate this designation to any other person.*

SEVP believes that Tri-Valley University is employing F-1 students as faculty members in violation of 8 CFR §8 CFR §214.2(f)(9)(i). The school's online list of courses (<http://trivalleyuniversity.org/TVU/>), last accessed January 13, 2011, provides a listing of courses and teachers. The following F-1 students are listed on the school's website as teachers. Their employment by the school appears to violate 8 CFR §214.2(f)(9)(i).

Balakumaran Murugesan (N0007424770) has been authorized by the school for full time CPT from November 11, 2010 to October 20, 2011 at "Thinc Systems Inc" in Farmington Hills [sic], MI. Murugesan is listed on the school's website as the teacher for "EE350 Nanotechnology" and "ME311A Computer-Aided-Design with AutoCAD I." However, because the student is employed full-time in Michigan, it appears that the teaching employment is not being performed on the school's premises or at an off-campus location which is educationally affiliated with the school in violation of 8 CFR §214.2(f)(9)(i).

Krishnan Iyer (N0006770792) has been authorized by the school for full time CPT at "Hallmark Global technologies Inc." in Newark, DE from June 15, 2010 to June 5, 2011. Iyer is listed on the school's website as the teacher for "CS314A Programming in C++." However, because the student is employed full-time in Delaware, it appears that the teaching employment is not being performed on the school's premises or at an off-campus location which is educationally affiliated with the school in violation of 8 CFR §214.2(f)(9)(i).

Satya Teja Adusumalli (N0006902990) has been authorized by the school for full time CPT from May 12, 2010 to May 5, 2011, at "Kaplan University" in Urbandale, IA. Adusumalli is listed on the school's website as the teacher for "CS300 Computer Architecture." However, because the student is employed full-time in Iowa, it appears that the teaching employment is not being performed on the school's premises or at an off-campus location which is educationally affiliated with the school in violation of 8 CFR §214.2(f)(9)(i).

Satya Ponnappalli (N0004574967) is authorized for full time CPT at "The University of Utah" in Salt Lake City, Utah from August 9, 2010 to February 3, 2011. She is listed on the school's website as the teacher for "PM306 Pharmacy and the Health Care System," "PM304 Pharmacy Law," "HN311/PM310 Pharmacotherapeutics," and "HN350 Medical Law and Ethics." However, because the student is employed full-time in Utah, it appears that the teaching employment is not being performed on the school's premises or at an off-campus location which is educationally affiliated with the school in violation of 8 CFR §214.2(f)(9)(i).

Gaurav Bhatia (N0003846530) has been authorized by the school for full time CPT from January 1, 2011 to October 20, 2011 at "eClinical Works" in Westborough, MA. He is listed on the school's website as the teacher for "BA310 Fundamental [sic] of Accounting." However, because the student is employed full-time in Massachusetts, it appears that the teaching employment is not being performed on the school's premises or at an off-campus location which is educationally affiliated with the school in violation of 8 CFR §214.2(f)(9)(i).

Santosh Gonae (N0004752023) is authorized by the school for full time CPT at "Medcity Rehab" in Highland Park, MI from January 10, 2011 to November 30, 2011. He is listed on the school's website as teacher for "HN/PM361 Pharmacology in Rehabilitation." However, because the student

is employed full-time in Michigan, it appears that the teaching employment is not being performed on the school's premises or at an off-campus location which is educationally affiliated with the school in violation of 8 CFR §214.2(f)(9)(i).

Krishna Sowmya Morusupalli (N0004600281) has been authorized by the school for full time CPT at "Aclat, Inc." in Arlington Heights, IL. She is listed on the school's website as the teacher for "HN321 Health Care Management" and "HN323 Leadership and Management Skills." However, because the student is employed full-time in Illinois, it appears that the teaching employment is not being performed on the school's premises or at an off-campus location which is educationally affiliated with the school in violation of 8 CFR §214.2(f)(9)(i).

SEVP believes that Tri-Valley University has employed F-1 students as teaching faculty who are employed full time in other states and whose on-campus employment therefore appears as if it is not being performed on the school's premises or at an off-campus location which is educationally affiliated with the school in violation of 8 CFR §214.2(f)(9)(i). Therefore, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(vi).

Additionally, SEVP believes the school violated 8 CFR 214.3(l)(1) which states, "The PDSO and DSO may not delegate this designation to any other person." On December 23, 2008, the school submitted a Form I-17A, Record of Designated School Officials, including the signatures of PDSO Sophie Su and DSOs Susan Su and Wenchao (Vince) Wang. The Form I-17A was signed by the school's president, Susan Su, thus designating the three school officials as DSOs. Their designations continued through SEVP's certification of the school on February 17, 2009, and the school's Form I-17A, as of December 28, 2010, still lists Sophie Su, Susan Su, and Wenchao Wang. Since the school was certified on February 17, 2009, no statements have been submitted to SEVP to designate additional DSOs and no evidence of any such additional statements appear in the school's file.

On May 17, 2010, HSI agents interviewed a former Tri-Valley University employee who stated that he regularly accessed the SEVIS database utilizing the account and login information of Tri-Valley University Designated School Officials Susan Su, Sophie Su, and Wenchao Wang. The employee also stated that his responsibilities included processing applications for prospective students and creating Forms I-20 in SEVIS for these individuals. The employee received no training on the relevant SEVIS regulations, nor was he approved by HQ-SEVP to act as DSOs.

By providing the uncertified school employees with access to SEVIS and bestowing them with the responsibility of issuing Forms I-20, the DSOs delegated the role of the DSOs to uncertified school officials, and thus, violated the stipulations of 8 CFR §214.3(l)(1). As such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(vi).

**Issue 5: Failure to provide SEVP paper copies of the school's Form I-17 bearing the names, titles and signatures of DSOs as required by §214.3(l)(2). See 8 CFR §214.4(a)(2)(vii).**

*Controlling regulation:* 8 CFR §214.4(a)(2)(viii), §214.3(l)(2)

8 CFR §214.3(l)(2) states in pertinent part:

*Name, title, and sample signature. Petitions for SEVP certification, review and recertification must include the names, titles, and sample signatures of designated officials. An SEVP-certified school must update SEVIS upon any changes to the persons who are principal or designated officials, and furnish the name, title and e-mail address of any new official within 21 days of the change. Any changes to the PDSO or DSO must be made by the PDSO within 21 days of the change. DHS may, at its discretion, reject the submission of any individual as a DSO or withdraw a previous submission by a school of an individual.*

*SEVP analysis:* On December 23, 2008, the school submitted a Form I-17A, Record of Designated School Officials, including the signatures of PDSO Sophie Su and DSOs Susan Su and Wenchao (Vince) Wang. The Form I-17A was signed by the school's president, Susan Su, thus designating the three school officials as DSOs. Their designations continued through SEVP's certification of the school on February 17, 2009, and the school's Form I-17A, as of December 28, 2010, still lists Sophie Su, Susan Su, and Wenchao Wang. Since the school was certified on February 17, 2009, no statements have been submitted to SEVP to designate additional DSOs and no evidence of any such additional statements appear in the school's file.

On May 17, 2010, HSI agents interviewed a former Tri-Valley University employee who stated that he regularly accessed the SEVIS database utilizing the account and login information of Tri-Valley University Designated School Officials Susan Su, Sophie Su, and Wenchao Wang. The employee also stated that his responsibilities included processing applications for prospective students and creating Forms I-20 in SEVIS for these individuals. The school did not to provide SEVP with paper copies of the school's Form I-17 bearing the names, titles, and signatures of any school officials other than those of Susan Su, Sophie Su, and Wenchao Wang. Therefore, Tri-Valley University violated the stipulations of 8 CFR §214.3(l)(2) which stipulates the school must submit the Form I-17 of all DSOs. As such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(viii).

**Issue 6: Failure to submit statements of DSOs as required by 8 CFR §214.3(l)(3). See 8 CFR §214.4(a)(2)(ix).**

*Controlling regulation:* 8 CFR §214.4(a)(2)(ix), §214.3(l)(3)

8 CFR §214.3(l)(3) states in pertinent part:

*A petition for school approval must include a statement by each designated official certifying that the official is familiar with the Service regulations relating to the requirements for admission and maintenance of status of nonimmigrant students, change of nonimmigrant status under part 248 of this chapter, and school approval under §§214.3 and 214.4, and affirming the official's intent to comply with these regulations. At the time a new designated official is added, the designated official must make the same certification.*

*SEVP analysis:* Since the school was certified to issue Forms I-20 by SEVP on February 17, 2009, Tri-Valley University's Form I-17A, Record of Designated School Officials, has listed PDSO

Sophie Su and DSOs Susan Su and Wenchao (Vince) Wang as DSOs. No statements from any additional school officials have been submitted to SEVP to certify that they are familiar with and will abide by the regulations governing nonimmigrant students.

On May 17, 2010, HSI agents interviewed a former Tri-Valley University employee who stated that he regularly accessed the SEVIS database utilizing the account and login information of Tri-Valley University Designated School Officials Susan Su, Sophie Su, and Wenchao Wang. The employee also stated that his responsibilities included processing applications for prospective students and creating Forms I-20 in SEVIS for these individuals. The employee received no training on the relevant SEVIS regulations, nor was he approved by HQ-SEVP to act as DSOs.

As no certifying statements were submitted by any other school officials than Sophie Su, Susan Su, and Wenchao Wang, the issuance of Forms I-20 and performance of other duties reserved exclusively for DSOs by other Tri-Valley University school officials is inappropriate and a violation of 8 CFR 214.3(l)(3). As such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(ix).

**Issue 7: Issuance of Forms I-20 to aliens who will not be enrolled in or carry full courses of study, as defined in 8 CFR §214.2(f)(6). See 8 CFR §214.4(a)(2)(xi).**

*Controlling regulations:* 8 CFR §214.4(a)(2)(xi), §214.2(f)(6)

*8 CFR §214.2(f)(6)(i) states in pertinent part:*

*Successful completion of the full course of study must lead to the attainment of a specific educational or professional objective. A course of study at an institution not approved for attendance by foreign students as provided in §214.3(a)(3) does not satisfy this requirement. A "full course of study" as required by section 101(a)(15)(F)(i) of the Act means:*

*(A) Postgraduate study or postdoctoral study at a college or university, or undergraduate or postgraduate study at a conservatory or religious seminary, certified by a DSO as a full course of study;*

*(B) Undergraduate study at a college or university, certified by a school official to consist of at least twelve semester or quarter hours of instruction per academic term in those institutions using standard semester, trimester, or quarter hour systems, where all undergraduate students who are enrolled for a minimum of twelve semester or quarter hours are charged full-time tuition or are considered full-time for other administrative purposes, or its equivalent (as determined by the district director in the school approval process), except when the student needs a lesser course load to complete the course of study during the current term;*

*(G) For F-1 students enrolled in classes for credit or classroom hours, no more than the equivalent of one class or three credits per session, term, semester, trimester, or quarter may be counted toward the full course of study requirement if the class is taken on-line or through distance education and does not require the student's physical attendance for classes, examination or other purposes integral to completion of the class. An on-line or distance education course is a course that is*

*offered principally through the use of television, audio, or computer transmission including open broadcast, closed circuit, cable, microwave, or satellite, audio conferencing, or computer conferencing. If the F-1 student's course of study is in a language study program, no on-line or distance education classes may be considered to count toward a student's full course of study requirement.*

*SEVP analysis:* SEVP believes a vast majority of nonimmigrant students enrolled at Tri-Valley University are not enrolled for full courses of study. Beginning in June 2010, HSI agents began to periodically observe the property and have not recorded one instance of this property being utilized by Tri-Valley University or its students to conduct classes. During September 2010, HSI agents approached and interviewed David Sell, the owner of the 4455 Stoneridge Drive property. Mr. Sell told agents that the school does not currently operate out of his property. Furthermore, the HSI agents interviewed several former students relating to their studies at the school over the following dates in 2010: May 12, 14 and 28; June 2 and 23; July 1; September 8 and 16; and October 7 and 14. None of the students interviewed stated they physically attended class at the school. They stated the school offers online instruction, but also stated they are not required to participate in the online instruction.

A large portion of the school's nonimmigrant student population has been authorized for CPT, often in other states and locations far outside commuting distance to the school. The data analysis from the CLEAR system has shown of the approximately 1555 students Active at the school, only 53 (3.4%) live within commuting distance of Tri-Valley University. For example, student Challa Krishnaveni (N0006653363) is authorized for full-time CPT from March 1, 2010 to February 28, 2011, at "Houston Harris Division Patrol Inc" at 6420 Richmond Ave, Ste 520, Houston, TX 77057. Houston Harris Division Patrol, Inc's website (<http://www.hhdpi.com>), last accessed December 27, 2010, states:

Since its establishment in 1995, Houston Harris Division Patrol, Inc. has been providing cost-effective, professional and comprehensive security officers across Texas with offices in Dallas, Austin and our headquarters in Houston.

According to the student's SEVIS record, Krishnaveni is enrolled in a Master's degree level program majoring in Business Administration, and the CPT employment Relevance Text states, "Student's employment with Houston Harris Division Patrol Inc fullfills [sic] the research requirement of the Degree program." Page 90 of the school's catalog states the following regarding the research requirement for the Master of Business Administration program: "The MBA program requires a total of 36 semester units of graduate course and research work within which a maximum of 6 units can be research credits." The MBA research course, which is listed on page 109 of the school's catalog, is "BA399 Graduate Research in Business Administration" which is worth 3 units and can therefore only be taken twice in order to fulfill the school's 6 units maximum of research credits for the MBA degree. However, the school has authorized its F-1 Master of Business Administration students for more than two semesters (or trimesters) of Curricular Practical Training. The student has been in Active status with the school since January 3, 2010. According to the school's current catalog, the school scheduled three trimesters as of December 29, 2010 since the student enrolled. The maximum number of credits the student could have possible enrolled as research is six units, thus, over three trimesters, the student would have to be enrolled in an

additional 21 units to be considered enrolled in a full course of study. Even if the student enrolled in online courses, the maximum number of credits or units Krishnaveni would be able to enroll in online courses is nine over three trimesters. The student would have to enroll in at least twelve additional credits or units over three trimesters. As the website clearly indicates the company operates exclusively in Texas, the student would not be able to attend a full course of study as the school is located in California. Therefore, the school issued a Form I-20 to a student who would not be enrolled in a full course of study. As such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(xi).

Additionally, the July 18 and October 11 interviews of Vijaya Ram Kolli and Sai Rajesh Suvarnam by CBP officers resulted in statements by both students that they were never enrolled for full courses of study at Tri-Valley University. Kolli stated he never took classes at the school, and Suvarnam stated he never physically attended classes and the only classes he did take were all online. As per 8 CFR 214.2(f)(6)(i)(G), which states a student may only take one class or three credits delivered online per term, Suvarnam, by not physically attending any classes, was not enrolled in a full course of study. Considering Kolli took no classes at the school and Suvarnam was not sufficiently enrolled for a full course of study, the school clearly issued Forms I-20 to student who were not going to be enrolled in full courses of study, as per as per 8 CFR 214.2(f)(6). As such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(xi).

**Issue 8: Failure of a DSO to notify SEVP of material changes, such as changes to the school's name, address, or curricular changes that represent material changes to the scope of institution offerings as required by 8 CFR §214.3(f)(1). See 8 CFR §214.4(a)(2)(xix).**

*Controlling regulations:* 8 CFR §214.4(a)(2)(xix), §214.3(f)(1), §214.3(g)(2)(i), §214.3(h)(3)

*8 CFR §214.3(f)(1) states in pertinent part:*

*The school is required to immediately report through SEVIS any change to its school information upon approval of a petition for SEVP certification or recertification. Modifications to school information listed in paragraph (h)(3) of this section will require a determination of continued eligibility for certification.*

*8 CFR §214.3(g)(2)(i) states in pertinent part: "Schools must update SEVIS with the current information within 21 days of a change in any of the information contained in paragraphs (f)(1) and (h)(3) of this section."*

*8 CFR §214.3(h)(3) states in pertinent part:*

*(iii) SEVP may review a school's certification at any time to verify the school's compliance with the recordkeeping, retention, reporting and other requirements of paragraphs (f), (g), (j), (k), and (l) of this section to verify the school's continued eligibility for SEVP certification pursuant to paragraph (a)(3) of this section. SEVP may initiate remedial action with the school, as appropriate, and may initiate withdrawal proceedings against the school pursuant to 8 CFR 214.4(b) if noncompliance or ineligibility of a school is identified.*

*SEVP analysis:* On October 14, 2008, SEVP conducted a site visit for the school's initial certification at 4455 Stoneridge Drive, Pleasanton, CA 94588. When the school was certified by SEVP on February 17, 2009, the school's Form I-17 as well as the school's catalog which was submitted at the time of filing listed the 4455 Stoneridge Drive address under the location address field.

As of December 22, 2010, the school's location address still lists the 4455 Stoneridge Drive address. However, the school's website, <http://www.trivalleyuniversity.org/>, accessed December 22, 2010, provides the school's location address as 405 Boulder Court, Pleasanton, CA. Additionally, the school's updated 2010-2012 catalog, last accessed from the school's website on December 27, 2010, states:

From 03/2008-09/2009, Tri-Valley University shared the facility of North California Bible College at:

4455 Stoneridge Drive  
Pleasanton, CA 94588, USA

As per 8 CFR 214.3(g)(2)(i), the school has 21 days from the date of the change to report the change as required by 8 CFR 214.3(h)(3) including "Location of the school", to update SEVIS accordingly. According to the school's current catalog, the change of location occurred in September 2009. The school failed to immediately submit an update to the school's Form I-17 in SEVIS to reflect the change in location, as per 8 CFR 214(f)(1). As such, the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(xix).

Additionally, SEVP has learned Tri-Valley University has issued Forms I-20 to nonimmigrant students to enroll in programs under Tri-Valley University's School of Medicine. The school's catalog submitted at the time of its initial certification application stated the following:

TUV [sic] offers graduate degree program including Master Degree and Doctor of Philosophy Degree in Electrical Engineering, Computer Science & Engineering and Mechanical Engineering, Business Administration and Ministry as well as non degree program in these fields.

Neither in the school's catalog nor on the school's Form I-17 at the time of the school's initial SEVP certification, did the school indicate that it offered programs in the Health Science field. According to the school's current catalog (<http://trivalleyuniversity.org/Catalog.pdf>), last accessed December 29, 2010, the School of Medicine offers Bachelor of Science in Nurse [sic], Master of Science in Nurse [sic], Master of Science in Health Care, Ph.D. in Health Care and Nurse [sic], Nurse Certificate, and Doctor of Pharmacy degree programs. None of the degree programs under the School of Medicine are listed on Tri-Valley University's Form I-17, and since the school's initial SEVP certification, the school has not notified SEVP of the addition of any programs from the School of Medicine.

A report of Tri-Valley's Active students in SEVIS, compiled on December 22, 2010, shows the school has issued Forms I-20 to nonimmigrant students to enroll in programs under the School of Medicine. According to the report, the school has 29 Active students enrolled in Doctorate level programs majoring in "Pharmacy (PharmD [USA] PharmD, BS/BPharm [Canada]); 95 Active students enrolled in Master's level programs and 47 Doctorate level programs majoring in "Health/Health Care Administration/Management"; and 7 Active students enrolled in Bachelor level programs majoring in "Nursing, Other". The school also has one Doctorate level student majoring in "Hospital and Health Care Facilities Administration/Management". None of the programs for which the 178 students were issued Forms I-20 are certified by SEVP. For the Master's and Doctorate degree programs, Forms I-20 have been issued since September 2009, and for the Bachelor's degree program, Forms I-20 have been issued since January 11, 2010. As the school has failed to immediately notify SEVP of the addition of the programs, the school failed to notify SEVP of material changes under 8 CFR 214.3(f)(1) and 214.3 (h)(3)(iii). Additionally, by failing to notify SEVP within 21 days of the date the changes were made, the school violated 8 CFR 214.3(g)(2), and as stated above, is subject to withdrawal under 8 CFR §214.4(a)(2)(ii). As such, in conjunction with the school's notification of withdrawal under 8 CFR §214.4(a)(2)(ii), the school is subject to withdrawal pursuant to 8 CFR §214.4(a)(2)(xix).

The school also failed to notify SEVP of material changes to its curriculum regarding its research requirements, degree completion requirements, and Curricular Practical Training. At the time of Tri-Valley University's petition for initial SEVP certification, the school provided a school catalog to SEVP. Page 9 of the catalog states: "on-site research facility fulfills the in-depth research requirement in Graduate Degree Program." However, since obtaining SEVP certification, the school has modified the research requirement for its graduate degree programs significantly: rather than having students engage in on-site research, Tri-Valley University is authorizing F-1 nonimmigrant graduate level students for Curricular Practical Training employment for months at a time, in other states in order to fulfill the research requirements of the school's graduate degree programs.

In addition to changing the on-site requirement for research, the school has changed the amount of time that students can engage in this required research. Page 59 of the school's catalog states the following regarding the research requirement for the Master of Science in Computer Science (MSCS):

The total units required for MSCS degree are 36 semester units of graduate courses and research work beyond the bachelor degree including 30 units of course work and 6 units of research work...The 6 units of graduate research include two semester 3-unit graduate research work with the guidance of a faculty member leading to an approved M.S. thesis.

However, Tri-Valley University has authorized its F-1 Master of Science in Computer Science students for CPT in order to fulfill their graduate degree's research requirement beyond two semesters (or trimesters, since this is the calendar system on which the school operates).

Page 90 of the school's catalog states the following regarding the research requirement for the Master of Business Administration program: "The MBA program requires a total of 36 semester units of graduate course and research work within which a maximum of 6 units can be research

credits.” The MBA research course, which is listed on page 109 of the school’s catalog, is “BA399 Graduate Research in Business Administration” which is worth 3 credits. As is the case with the Master of Science in Computer Science research requirement, the research course can only be taken twice in order to fulfill the school’s 6 unit maximum of research credits for the MBA degree. However, the school has authorized its F-1 nonimmigrant Master of Business Administration students for more than two semesters (or trimesters) of Curricular Practical Training.

According to page 14 of the school’s catalog, each trimester is comprised of 15 weeks. For the 2010 school year, the catalog lists the following dates as its terms: “Spring Term 1/11/10 – 4/25/10,” “Summer Term (5/10-8/22/10)” and “Fall Term (9/7-12/19/10).” On Tri-Valley University’s website (<http://trivalleyuniversity.org/calendar.htm>), last accessed December 29, 2010, the “Academic Year 2011” calendar lists the following terms: “Spring Term (1/11/11-4/25/11),” “Summer Term (5/09-8/21/11),” and “Fall Term (9/5-12/18/11).”

Student Mohana Krishna Lachannagari (N0003230683) is a master’s student whose major area of study is Computer Science. The student has been authorized by Tri-Valley University for full-time CPT at “Nth Talent” in Irving, Texas from October 29, 2010 to October 19, 2011. The Relevance Text section of the student’s CPT employment authorization as inputted by the school in SEVIS states: “Student working for Nth Talent meets the research requirement of the graduate degree.” Prior to the “Nth Talent” employment, the student, whose program start date was January 11, 2010, was authorized by the school for CPT employment at “Oberon IT, INC,” also in Irving, Texas, from January 21, 2010 to October 27, 2010. According to the school’s academic calendar provided to SEVP at the time of its initial certification, this student’s CPT employment will span nearly 6 full trimesters as opposed to the two semesters of research the school indicated was required in its catalog submitted to SEVP.

Student Mangyarkkarasi Kuppusamy (N0007033271) is a master’s student whose major area of study is Business Administration and Management, General. She has been authorized by the school for full-time CPT from September 22, 2010 to August 30, 2011 at “JMAR & Associates” in Addison, Texas. The Relevance Text for the student’s CPT employment as inputted by the school in SEVIS states: “Student working for JMAR & Associates meets the research requirement of the graduate program.” This student’s CPT to fulfill the school’s research requirement will span approximately 3 semesters.

Student Venkatarjun Madishetty (N0003787870) is a master’s student whose major area of study is Business Administration, Management and Operations, Other. He has been authorized by the school for full-time CPT at “ICSA Inc.” in Chantilly, Virginia from September 28, 2010 to August 27, 2011. The Relevance Text states “Student working for ICSA Inc. meets the research requirement of the graduate program.” This student’s currently authorized CPT employment to meet the research requirement for his graduate program will span 3 trimesters. However, in addition to the currently authorized CPT employment, this student was also previously authorized by the school for CPT at the same business in Chantilly, VA, “ICSA Inc.,” from October 10, 2009 to September 27, 2010. The Fall 2009 term at the school, according to page 13 of the catalog the school provided to SEVP, was from “9/7-12/19/09.” Taking into account the

student's previous CPT employment, the student will have been authorized by the school for CPT spanning approximately 6 trimesters.

Student Geridhar Tamiri (N0006099392) is a master's student whose major area of study is Business Administration, Management and Operations, Other. He is authorized by the school for full-time CPT from October 13, 2010 to September 20, 2011 at "Manpower,Inc." in Minneapolis, Minnesota. The Relevance Text states: "Student's employment with Manpower,Inc. meets the research requirement." This currently authorized CPT employment will span approximately 3.5 trimesters. However, in addition to the currently authorized CPT, the school previously authorized the student for CPT at "Tekyard LLC" in Burnsville, Minnesota from November 9, 2009 to October 30, 2010. This student will therefore have been authorized by the school for CPT spanning approximately 6 trimesters.

Student Srikanth Somuri (N0006610325) is a master's student whose major area of study is Business Administration, Management and Operations, Other. The student has been authorized by the school for full-time CPT at "IT America Inc." in Edison, New Jersey from December 23, 2010 to December 13, 2011. This spans approximately 3 trimesters. The Relevance Text states: "Student's employment with IT America Inc. meets the research requirement of the graduate degree program." However, in addition to the CPT for which the student is currently authorized, the school also previously authorized the student for CPT with the same employer, "IT America Inc." in Edison, New Jersey from January 15, 2010 to December 22, 2010. The student has therefore been authorized for CPT by the school for nearly two years, or approximately 6 trimesters.

Student Kamala Maganti (N0006808881) is a master's student whose major area of study is Computer Science. She has been authorized by the school for full-time CPT at "Magnum Technologies inc" in Somerset, New Jersey from May 7, 2010 to April 20, 2011. The Relevance Text states: "Student's employment with Magnum Technologies inc meets [sic] the research requirement of the graduate degree." This student's CPT employment to fulfill the degree program's research requirement will span approximately 3 semesters.

Student Vinutha Mahadev (N0006652711) is a master's student whose major area of study is Computer Science. She has been authorized for full-time CPT by the school from May 21, 2010 to April 10, 2011, at "SOFTTHINK SOLUTION INC" in Herndon, Virginia. The Relevance Text states: "Student working for SOFTTHINK SOLUTION INC meets the research requirement of the graduate degree." This employment will span approximately 3 trimesters.

Student Arunkumar Mutyala (N0007040045) is a master's student whose major area of study is Computer Science. He has been authorized for full-time CPT from October 30, 2010 to October 15, 2011 at "Saiana Technologies Inc" in Edison, New Jersey. The Relevance Text states: "Student working for Saiana Technologies Inc meets the research requirement of the graduate degree." This employment will span approximately 3.5 trimesters.

Student Anjith Kumar Paila (N0006614839) is a master's student whose major area of study is Computer Science. He has been authorized by the school for full-time CPT from September 16, 2010 to June 30, 2011, at "COMSYS Services LLC" in Birmingham, Alabama. The Relevance

Text states: "Student working for COMSYS Services LLC meets the research requirement of the graduate degree." This employment will span approximately 2.5 trimesters.

These curricular changes represent a material change in Tri-Valley University's curriculum. To date, Tri-Valley University has not notified SEVP of these changes and is therefore in violation of 8 CFR 214.3(f)(1) and subject to withdrawal per 8 CFR 214.4(a)(2)(xix).

### **Conclusion**

1. SEVP believes the school has improperly maintained hundreds of student records by providing the same address at which none of the students live, thus failing to comply with 8 CFR §214.3(g)(1).
2. SEVP believes the school has not terminated students who have fallen out of status and thus failed to notify SEVP of changes in student records, as per 8 CFR §214.3(g)(2).
3. SEVP believes the school has authorized Curricular Practical Training for students outside of their major area of study, thus willfully issuing false certifications for work authorization and violating 8 CFR §214.2(f)(10).
4. SEVP believes the school did not comply with regulations 8 CFR §214.2(f)(9)(i) by allowing students to work as school instructors at non-educationally affiliated sites. SEVP also believes the school did not comply with 8 CFR §214.3(l)(1) by delegating the duties of the DSOs to school officials who were not certified as DSOs.
5. SEVP believes the school did not submit the school's Form I-17 bearing the names, titles and signatures of the DSOs, as per the requirements of 8 CFR §214.3(l)(2).
6. SEVP believes the school did not submit statements of DSOs as required by 8 CFR §214.3(l)(3) for school employees.
7. SEVP believes the school has issued Forms I-20 to student who would not be enrolled in full courses of study, as per 8 CFR §214.2(f)(6).
8. SEVP believes the school failed to notify of material changes to its curriculum, including the school's location, degrees available, and research requirements, violating 8 CFR §214.3(f)(1).

### **Action to be Taken**

At this time, pursuant to 8 CFR 214.4(i)(4), your school's Active status nonimmigrant students have been terminated in SEVIS and your school's Initial status nonimmigrant students have been canceled in SEVIS. Additionally, your school's PDSO and DSOs' SEVIS access has been hereby terminated.

Your school has 33 calendar days, from the date of this letter, to submit written representations under oath supported by documentary evidence setting forth reasons why SEVP should not withdraw your school's approval. If your school wishes, at the time of filing the answer, they may request an interview with SEVP, in writing. Your school also may be assisted by legal counsel of its choice, at no expense to the Government. **If your school fails to answer this Notice of Intent to Withdraw within the time allotted, we will proceed with a Withdrawal on Notice and your school will not be eligible to file an I-17 petition for one year and will**

**waive its right to file an appeal.** If further information or discussion on this issue is needed, please do not hesitate to contact the School Certification Branch at (703) 603-3591 or by email at schoolcert.sevis@dhs.gov.

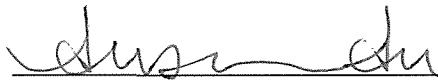
Sincerely,



Dianne Currie  
School Certification Branch Chief  
Student and Exchange Visitor Program

Signed for Dianne Currie by USICE Adjudicator Jason Kanno on January 19, 2011

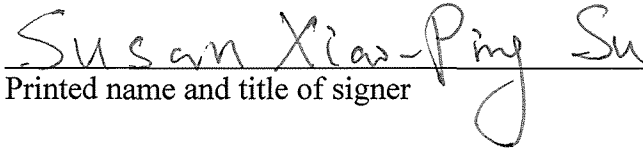
I certify receipt of this notice via hand delivery:



School Designated Official signature

01/19/2011

Date



Printed name and title of signer

Prepared by: JIK/SEJ  
Enclosure

cc: Susan Su  
3518 Ovella Way  
Pleasanton, CA 94566