

Administrative Office of the Courts



INVESTIGATION SUMMARY, DETERMINATION, PROBABLE CAUSE REVIEW, AND RECOMMENDATION REPORT

Complaint No. 23-D034

School No. [REDACTED]

August 5, 2025

Certification and Licensing Division

**ARIZONA SUPREME COURT
ADMINISTRATIVE OFFICE OF THE COURTS
INVESTIGATION SUMMARY, DETERMINATION, PROBABLE
CAUSE REVIEW, AND RECOMMENDATION REPORT**

<i>CERTIFICATE HOLDER INFORMATION</i>	Business Name:	GoToTrafficSchool.com
	School Number:	School No [REDACTED]
	Type of Certificate:	Defensive Driving School
<i>COMPLAINANT</i>	Name:	Karen Rushing
<i>INVESTIGATION INFORMATION</i>	Complaint Number:	23-D034
	Investigator:	Jared Arthur Pasquale Fontana
Complaint Received:		November 9, 2023
Complaint Forwarded to the Certificate Holder:		December 26, 2023
Certificate Holder Received Complaint:		January 4, 2024
Response From Certificate Holder:		January 12, 2024
Period of Active Certification:		December 19, 2007
Status of Certification:		Active
Availability of Certificate Holder:		Available
Availability of Complainant:		Unavailable
Report Date:		August 5, 2025

ALLEGATIONS:

1. GoToTrafficSchool.com is not in compliance with the interactive format in ACJA §7-205.

ADDITIONAL FINDINGS:

2. GoToTrafficSchool.com does not require students to correctly answer substantive questions after each segment before students can proceed to the next segment, in violation of ACJA §7-205(F)(24)(d)(5)(n).

SUMMARY OF INVESTIGATIVE PROCEDURE:

- Written complaint and documentation submitted by complainant, Karen Rushing (“Rushing”)
- Written response and documentation submitted by Sharon Ourian (“Ourian”), owner of GoToTrafficSchool.com (“the School”) and administrative staff, Cynthia Greenleaf (“Greenleaf”)
- Review of applicable Certification and Licensing Division (“Division”) records

- Review of applicable sections of Arizona Revised Statutes (“A.R.S.”), Arizona Codes of Judicial Administration (“ACJA”) § 7-201 and § 7-205, and Arizona Supreme Court Rules

INTERVIEWS:

1. Cynthia Greenleaf

SUMMARY OF FACTUAL FINDINGS OF INVESTIGATION:

Complainant is a defensive driving school owner. Complainant did not take a defensive driving course through the School. Complainant’s allegation is based on a review of the School’s website.

Complainant was unwilling to be interviewed by the Division.

The Division did not substantiate Allegation 1. The Division’s investigation included a substantiated Additional Finding, identified as Allegation 2, which involves the School not operating in accordance with ACJA §7-205(F)(24)(d)(5)(n) by not requiring students to correctly answer substantive questions after each segment before students can proceed to the next segment, as detailed in this Investigation Summary.

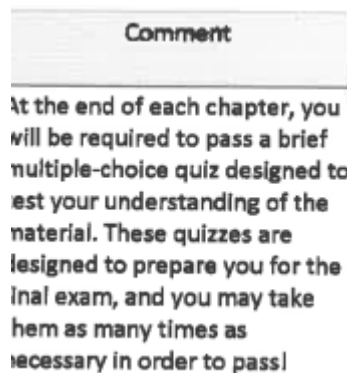
Complaint

In her complaint, Rushing alleged the School was not in compliance with ACJA §7-205 regarding interactive format. Rushing pointed to specific language found in the "About the Quizzes" section of the School’s website, which stated,

“At the end of each chapter, you will be required to pass a brief multiple-choice quiz designed to test your understanding of the material. These quizzes are designed to prepare you for the final exam, and you may take them as many times as necessary in order to pass!”

About The Quizzes

At the end of each chapter, you will be required to pass a brief multiple-choice quiz designed to test your understanding of the material. These quizzes are designed to prepare you for the final exam, and you may take them as many times as necessary in order to pass!



(emphasis in original)

Response to Complaint

In the initial response to the complaint, Ourian, for the School, said the School is compliant and meets the definition of interactive format. She said the School's course is "meticulously" crafted with five 45-minute chapters. According to Ourian, the School's program uses a mandatory five-minute timer for each section, "fostering focused engagement and fulfilling the four-hour completion requirement." She said participants actively absorb information during these timed intervals and must use a mouse-click to advance to the next section.

Ourian said the School's curriculum ensures interactive quizzes at fifteen-minute intervals, adhering to the interactive format outlined in ACJA §7-205. She said students are required to read through multiple choice or true/false questions and mouse-click their choice of answers. Ourian stated that six of fifteen quizzes feature larger question pools, with three questions randomly selected for each participant. She said each participant encounters a

unique sequence of quiz questions when taking the course individually, ensuring no two experiences are the same.

In closing, Ourian emphasized that the School's curriculum includes a comprehensive final exam while also requires participants to engage with the course at scheduled intervals through interactive elements, such as mouse-click actions in quiz formats. She said, "By strategically incorporating quizzes, introducing variability and randomness, and ensuring each participant encounters a unique sequence, we not only fulfill regulatory requirements but also provide a truly interactive and dynamic learning experience."

Allegation 1: GoToTrafficSchool.com is not in compliance with the interactive format in ACJA §7-205.

ACJA §7-205(A) defines interactive active format:

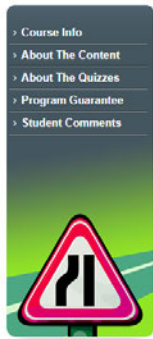
“Interactive format” means a format in which the student is required to interact and engage materially with the content, using methods such as a requested keystroke, “drag and drop” of an item, or a mouse-click on a designated portion of the content, which shall occur randomly, in no more than fifteen-minute increments.

The complainant did not take a defensive driving course with the School. Complainant did not provide evidence that the School failed to provide an interactive format in the course delivery. The Division did not find evidence that the School is not providing an interactive format. Students are required to provide multiple choice answers to various questions engaging, reviewing, and using mouse clicks.

Allegation 1 is not substantiated.

Allegation 2: GoToTrafficSchool.com does not require students to correctly answer substantive questions after each segment before students can proceed to the next segment, in violation of ACJA §7-205(F)(24)(d)(5)(n).

The Division captured a screenshot regarding the quizzes on the School’s website, see below.



About The Quizzes

At the end of each chapter, you will be required to pass a brief multiple-choice quiz designed to test your understanding of the material. These quizzes are designed to prepare you for the final exam, and you may take them as many times as necessary in order to pass!

Course Validation

1. What is the purpose of high beams?
 - ☐ A. To signal other drivers to move a turn
 - ☐ B. To illuminate a longer portion of the roadway
 - ☐ C. To warn other drivers that you are slowing down
 - ☐ D. To make your vehicle more visible to others in the day
2. When two vehicles collide, in which direction do the vehicle's occupants move?
 - ☐ A. in the same direction as the force
 - ☐ B. in the opposite direction of the force
 - ☐ C. Perpendicular to the front of the vehicle
 - ☐ D. Perpendicular to the rear of the vehicle
3. Which body parts are most protected by the head restraint in a vehicle?
 - ☐ A. Head, hands, and feet
 - ☐ B. Head, arms, and torso
 - ☐ C. Head, torso, and shoulders
 - ☐ D. Arms, shoulders, and torso
4. Which of these describes the acronym SPIDE, which can be helpful for drivers?
 - ☐ A. Search, Locate, Protect, Determine, Evacuate
 - ☐ B. Stop, Identify, Protect, Locate, Assess
 - ☐ C. Stop, Imagine, Predict, Observe, Assess
 - ☐ D. Stop, Imagine, Plan, Discuss, Drive
5. Who has the right of way in an uncontrolled intersection?
 - ☐ A. Last driver to reach the intersection
 - ☐ B. First driver to reach the intersection
 - ☐ C. Vehicle carrying the heaviest load
 - ☐ D. Vehicle traveling at the highest speed

Warning:
You cannot change the answers to questions once the answers have been submitted.

Ourian initially declined to be interviewed by the Division. When the Division followed up with her during the investigation, she stated that she was overseas and authorized Greenleaf to speak on the School's behalf.

During her initial interview with the Division on January 31, 2025, Greenleaf was asked about the course's identity verification question process and the curriculum, specifically regarding the final exam. According to Greenleaf, the final exam is not predicated on pass/fail but is instead a comprehensive review for the student.

The Division asked Greenleaf to provide screenshots depicting identity verification questions, course and final exam outlines. On February 3, 2025, Greenleaf provided screenshots.

The Division reviewed the documentation. A heading titled "The Course," provides the student an outline of how the course is set up and explains that quizzes and a final exam are part of the format. The Division had concerns with the following sentence contained in the section: **"You are not required to answer all three questions correctly to move on to the next lesson or chapter"** (emphasis added) because it appeared to be inconsistent with the requirements of ACJA §7-205(F)(24)(d)(5)(n) that requires students to correctly answer three substantive questions regarding each segment before the student can proceed to the next segment:

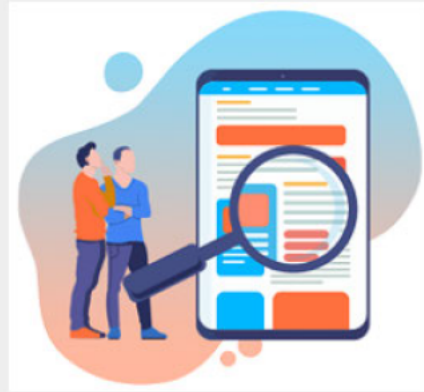
Divide the ADM course into segments of various lengths not to exceed 15 minutes and require the student to answer three substantive questions concerning the segment just completed correctly before the student can proceed to the next segment.

Below is a screenshot provided by the School:

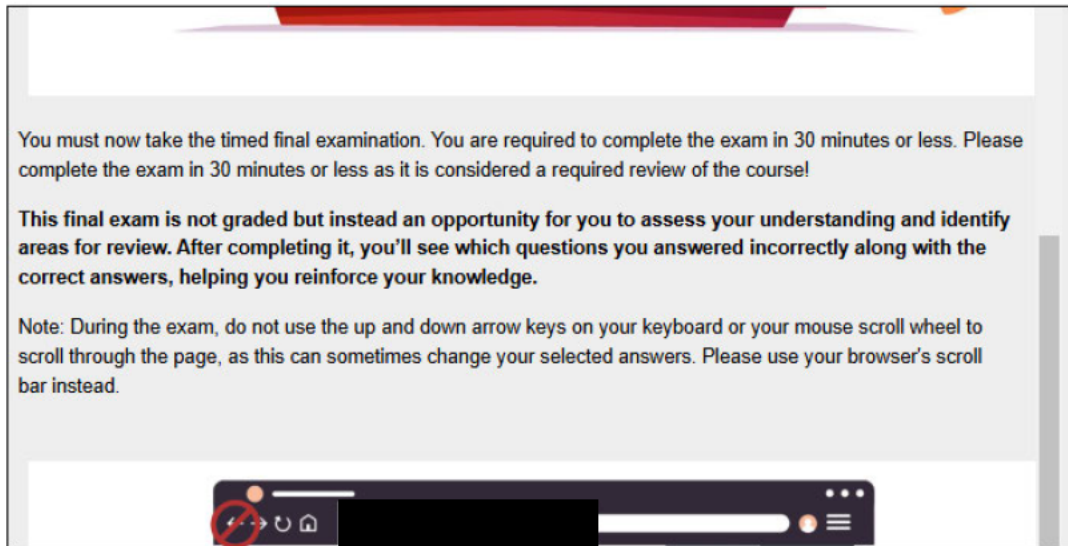
The Course

This course is divided into five 45-minute chapters. Each chapter is further divided into 5-minute lesson pages. At the end of each 15-minute lesson session, you'll take a short quiz to review what you've learned. Each quiz consists of three multiple-choice questions that highlight key points from the chapter and help prepare you for the final exam. You are not required to answer all three questions correctly to move on to the next lesson or chapter. These quizzes are simply for review, and the correct answers will be provided afterward to reinforce your understanding.

The final examination consists of 20 multiple-choice questions covering all five chapters. It serves as a comprehensive review rather than a pass-or-fail test, so there's no need to worry. This exam is a great opportunity to assess your understanding and identify areas for review. After completing it, you'll see which questions you answered incorrectly along with the correct answers, helping you reinforce your knowledge. Once you complete the final examination, your certificate of completion will be sent directly to you, according to the delivery method you selected during registration. If you decide that you need to upgrade to an expedited delivery method, you may call us at [REDACTED] to do so. We will also notify your court of your successful course completion.



In addition, the final exam pages indicate that students are required to complete the exam in 30 minutes or less and that, “This final exam is not graded but instead an opportunity to assess your understanding and identify areas for review. After completing it, you’ll see which questions you answered incorrectly along with the correct answers, helping you reinforce your knowledge.” See below:



Based on the information reviewed, the School is not requiring students to correctly answer substantive questions before advancing to the next segment because there is a final exam but the final exam is not graded. Therefore, students may complete defensive driving courses without correctly answering some or any of the questions in the curriculum.

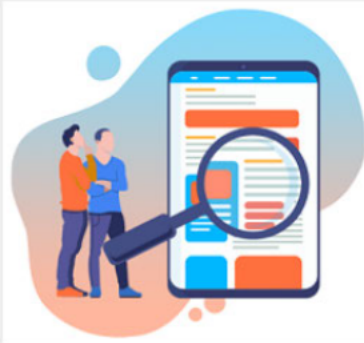
The Division conducted a follow-up interview with Greenleaf to clarify differences regarding the quiz format and website that were presented in the original response shared by Ourian on January 5, 2024, and what was provided to the Division, via screenshot, by Greenleaf on February 3, 2025. During the follow-up interview on February 6, 2025, Greenleaf stated that the School's defensive driving course does not require students to answer each chapter's quiz questions correctly before proceeding to the next chapter. Greenleaf said because the final exam did not require that students to pass the final exam, she assumed that was also the case with the chapter quizzes.

During the interview, Greenleaf asked the Division if the quizzes needed to be answered correctly in order to continue through the course. The Division referenced ACJA §7-205(F)(24)(d)(5)(n), which requires students to answer three substantive questions correctly before the student can proceed to the next segment. Greenleaf then informed the Division that the School will correct the language on the course outline and she provided the following screenshot later that day (February 6, 2025). This reflected changes that stated, "You are required to answer all three questions correctly to move on to the next lesson or chapter." The Division notes that the final exam terms regarding pass/fail remained the same as the previous version. See below:

The Course

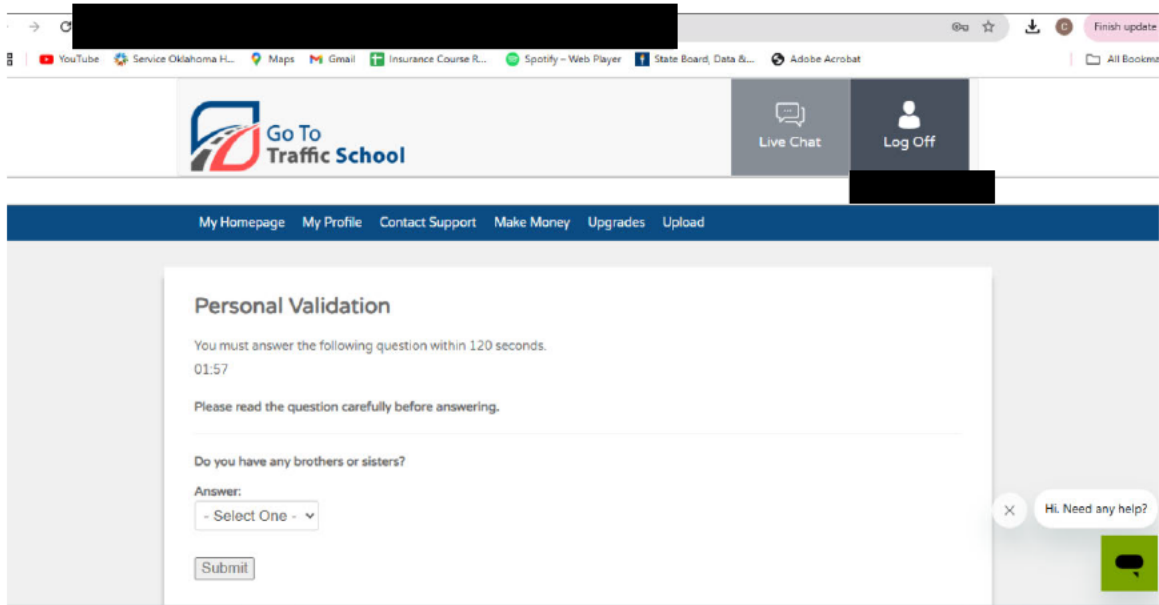
This course is divided into five 45-minute chapters. Each chapter is further divided into 5-minute lesson pages. At the end of each 15-minute lesson session, you'll take a short quiz to review what you've learned. Each quiz consists of three multiple-choice questions that highlight key points from the chapter and help prepare you for the final exam. You are required to answer all three questions correctly to move on to the next lesson or chapter. These quizzes are for review but also to show your understanding of the material. However, there is no limit to the number of times you may take the quiz!

The final examination consists of 20 multiple-choice questions covering all five chapters. It serves as a comprehensive review rather than a pass-or-fail test, so there's no need to worry. This exam is a great opportunity to assess your understanding and identify areas for review. After completing it, you'll see which questions you answered incorrectly along with the correct answers, helping you reinforce your knowledge. Once you complete the final examination, your certificate of completion will be sent directly to you, according to the delivery method you selected during registration. If you decide that you need to upgrade to an expedited delivery method, you may call us at [REDACTED] to do so. We will also notify your court of your successful course completion.



Regarding identity verification questions, Greenleaf said during registration, students set up ten 10 security questions, from which a question is randomly selected. She said that identity verification questions are presented at multiple stages: upon login, before quizzes, and before the final exam. Students have two minutes to respond to each of the security questions. If a student answers three questions incorrectly, the student must contact customer service to unlock the account. Examples of the School's security questions include:

A screenshot of a web browser displaying a 'Personal Validation' form. The browser's address bar shows a URL starting with 'https://'. The page has a blue header with navigation links: 'My Homepage', 'My Profile', 'Contact Support', 'Make Money', 'Upgrades', and 'Upload'. The main content area is titled 'Personal Validation' and contains the following text: 'You must answer the following question within 120 seconds.', a timer '01:36', and 'Please read the question carefully before answering.' The question is 'Is your car blue?'. Below the question is an 'Answer:' label and a dropdown menu currently showing '- Select One -'. A 'Submit' button is located below the dropdown. In the bottom right corner, there is a chat bubble that says 'Hi. Need any help?' and a green speech bubble icon.



On March 28, 2025, the Division sent the School an Additional Allegation letter notifying that during the investigation of complaint number 23-D034, the Division became aware of information or conduct that may constitute a violation or misconduct. The letter informed that the additional allegation was not part of the original complaint submitted to the Division and that if the additional allegation is substantiated, it would be included in the Additional Findings section of the Investigation Summary.

The Division requested a written response, within 15 days, to the following allegation:

GoToTrafficSchool.com does not require students to correctly answer substantive questions after each segment before students can proceed to the next segment, in violation of ACJA §7-205(F)(24)(d)(5)(n).

The Division does not have record of a response from the School.

The evidence demonstrates that the School is not operating its defensive driving course in accordance with ACJA §7-205(F)(24)(d)(5)(n), which “require the student to answer three substantive questions concerning the segment just completed before the student can proceed to the next segment.” The School allows students to advance regardless of their answers. The School believed that it was not required to comply because it offered a final exam at the end of the course even though the final exam is also not graded. A final exam is not required by code .

Students taking a defensive driving course with the School would advance to each segment/chapter of the curriculum despite not correctly answering questions related to each segment. And, after completing an unnecessary and not graded final exam at the end of the course, students are issued a certificate of completion. Although the School may have corrected the language in The Course to identify that students must correctly answer questions related to the segment completed before the student can advance, it is evident

that the School was conducting its defensive driving courses contrary to Arizona's requirements, as mandated in the code.

ACJA §7-201(F)(1):

1. Code of Conduct. Each individual certificate holder shall adhere to the code of conduct or standards of conduct, subsection (J) in the applicable section of the ACJA.

ACJA §7-201(H)(6)(a):

6. Grounds for Discipline. A certificate holder is subject to disciplinary action if the board finds the certificate holder has engaged in one or more of the following:

a. Failed to perform any duty to discharge any obligation in the course of the certificate holder's responsibilities as required by law, court rules, this section or the applicable section of the ACJA;

ACJA §7-205(F)(1):

F. Role and Responsibilities of Certificate Holders. In addition to the requirements of ACJA § 7 201(F), each school must:

1. Adhere to the standards in the code of conduct in subsection (J).

ACJA §7-205(J)(1):

J. Codes of Conduct.

1. Schools. This code of conduct is adopted by the supreme court to apply to all schools certified by the Arizona Supreme Court, pursuant to A.R.S. § 28-3395. The purpose of this code of conduct is to establish minimum standards of performance for schools.

ACJA §7-205 (F)(24)(d)(5)(n):

(n) Divide the ADM course into segments of various lengths not to exceed 15 minutes and require the student to answer three substantive questions concerning the segment just completed correctly before the student can proceed to the next segment.

Allegation 2 is substantiated.

DISCIPLINARY HISTORY:

Complaint No. 08-D009

Date of Board Decision: June 11, 2009

Board Decision: Letter of Concern

Substantiated Allegations:

1. School failed to timely remit court diversion fees
2. School failed to timely submit a written response to complaint.

Complaint No. 10-D005

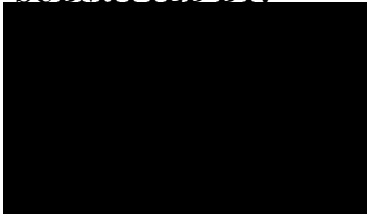
Date of Board Decision: June 20, 2012

Board Decision: Letter of Concern

Substantiated Allegation:

1. GoToTrafficSchool.com did not timely submit the completion report and fees for two students, resulting in defaults being entered and the Motor Vehicle Department ("MVD" being notified to suspend the student's licenses.

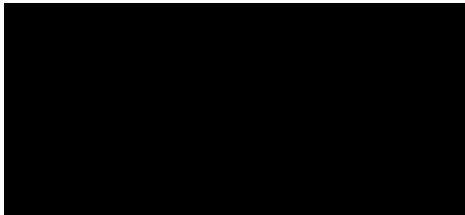
SUBMITTED BY:



Pasquale Fontana for Jared Arthur, Investigator
Certification and Licensing Division

August 5, 2025
Date

REVIEWED BY:



Abigail Raddatz, Director
Certification and Licensing Division Date

August 5, 2025

**ARIZONA SUPREME COURT
ADMINISTRATIVE OFFICE OF THE COURTS
REVIEW AND DECISION OF THE PROBABLE CAUSE
EVALUATOR**

REVIEW AND DECISION OF THE PROBABLE CAUSE EVALUATOR:

Under ACJA § 7-201(H)(5)(a), the deputy director, serving in the capacity of probable cause evaluator under ACJA § 7-201(D)(3)(a), having conducted an independent review of the facts and evidence gathered during the course of the investigation of complaint number 23-D034

- ☐ Directs division staff to investigate further.
- ☒ Determines probable cause does not exist demonstrating the certificate holder has committed any acts of misconduct or violations of the statutes, court rules, this section, or the applicable section of the ACJA and enters a written finding to that effect as to Allegation(s):

1

- ☒ Determines probable cause exists demonstrating the certificate holder has committed one or more acts of misconduct or violations of the statutes, court rules, this section, or the applicable section of the ACJA and enters a written finding to that effect as to Allegation(s):

2



Jeffrey Schrade
Probable Cause Evaluator

8/7/2025
Date

**ARIZONA SUPREME COURT
ADMINISTRATIVE OFFICE OF THE COURTS
RECOMMENDATION TO THE BOARD**

<i>CERTIFICATE HOLDER INFORMATION</i>	Business Name: School Number: Type of Certificate:	GoToTrafficSchool.com School No. [REDACTED] Defensive Driving School
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RECOMMENDATION TO THE DEFENSIVE DRIVING BOARD (“BOARD”):

It is recommended that the Board accept the finding of the Probable Cause Evaluator and enter a finding **GoToTrafficSchool.com, School No. [REDACTED]** has not committed the alleged act(s) of misconduct in Allegation 1, as detailed in the Investigation Summary, Determination, Probable Cause Review, and Recommendation Report in complaint number 23-D034.

It is further recommended that the Board dismiss Allegation 1, with prejudice.

It is recommended that the Board accept the finding of the Probable Cause Evaluator and enter a finding **GoToTrafficSchool.com, School No. [REDACTED]** has committed the alleged act(s) of misconduct in Allegation 2, as detailed in the Investigation Summary, Determination, Probable Cause Review, and Recommendation Report in complaint number 23-D034.

It is further recommended that the Board enter a finding grounds for informal disciplinary action exists under Arizona Code of Judicial Administration (“ACJA”) § 7-201(H)(6) for act(s) of misconduct involving ACJA §§7-201(F)(1), 7-201(H)(6)(a); ACJA §§7-205(F)(1), 7-205(J)(1), and 7-205(F)(24)(d)(5)(n).

Mitigating factors under ACJA § 7-201(H)(22)(b)(1):

- ☐ The absence of a prior disciplinary record;
- ☒ The absence of a dishonest motive;
- ☒ The absence of a selfish motive;
- ☐ Personal or emotional problems;
- ☒ A timely good faith effort to make restitution or to rectify consequences of misconduct;
- ☒ Full and free disclosure to the division staff, the board or the hearing officer;
- ☒ A cooperative attitude toward any proceedings;
- ☐ Inexperience in the practice of the profession or occupation;
- ☐ Character or reputation;
- ☐ Physical or mental disability;
- ☐ Physical or mental impairment;
- ☐ Delays in the disciplinary proceedings;
- ☐ Interim rehabilitation;
- ☐ Imposition of other penalties or sanctions;
- ☐ Remorse;
- ☒ The remoteness of prior offenses;

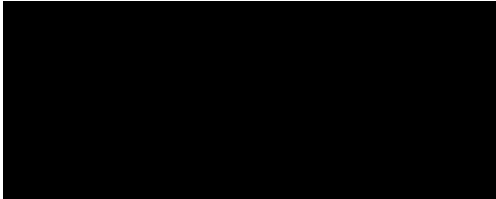
☐ Other: _____

Aggravating factors under ACJA § 7-201(H)(22)(b)(2):

- ☒ A prior disciplinary record;
- ☐ A dishonest motive;
- ☐ A selfish motive;
- ☐ Multiple offenses;
- ☐ Bad faith obstruction of the disciplinary proceedings by intentionally failing to comply with this section, the applicable section of ACJA, court rules or orders of the hearing officer; (Failure to respond to Division requests sent to a valid point of contact reflects an uncooperative attitude toward the investigation)
- ☐ Submission of false evidence, false statements or other deceptive practices during the discipline process;
- ☐ Refusal to acknowledge wrongful nature of the conduct;
- ☐ Vulnerability of the victim;
- ☐ Substantial experience in the profession or occupation;
- ☐ Indifference to making restitution;
- ☐ Other: _____

It is further recommended that the Board direct the Division to issue a Letter of Concern to GoToTrafficSchool.com (School No. [REDACTED])

SUBMITTED BY:



August 7, 2025

Abigail Raddatz, Director Date
Certification and Licensing Division

**ARIZONA SUPREME COURT
ADMINISTRATIVE OFFICE OF THE COURTS
DECISION AND ORDER OF THE BOARD**

DECISION AND ORDER:

The Board having reviewed the above Investigation Summary, Determination, Probable Cause Review, and Recommendation Report, regarding complaint number 23-D034 and GoToTrafficSchool.com, School Number [REDACTED], makes a finding of facts and this decision, based on the facts, evidence, and analysis as presented and:

- ☐ Request division staff to conduct further investigation;
- ☐ Refer the complaint to another entity with jurisdiction;

Referral to: _____

- ☐ Determine no violation exists and dismiss the complaint

☐ with prejudice

☐ without prejudice

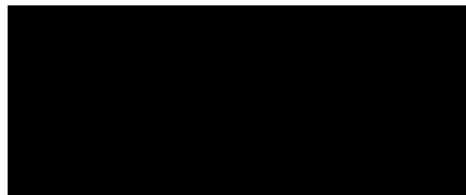
- ☐ Determine no acts of misconduct or violation occurred and no discipline is warranted; however the certificate holder's actions need modification or elimination and issue an advisory letter pursuant to subsection (D)(5)(c)(1)(g);

- ☐ Enter a finding the certificate holder has violated any provisions of the statutes, court rules, this section, or the applicable ACJA specific sections or subsection (H)(6) and order an emergency summary suspension, pursuant to subsection (H)(9)(d);

- ☒ Enter a finding the certificate holder has violated any of the provisions of the statutes, court rules, this section, the applicable ACJA sections or subsection (H)(6) and issue an order imposing any or a combination of the following information or formal disciplinary sanctions:

- ☒ Issue a letter of concern
- ☐ Issue a censure
- ☐ Resolve any found acts of misconduct or violations by consent order or other negotiated settlement
- ☐ Place specific restrictions on a certificate
- ☐ Place the certificate holder on probation or a set period of time under specified conditions
- ☐ Mandate additional training for the certificate holder
- ☐ Issue a cease and desist order pursuant to subsection (E)96)

- ☐ Order suspension of a certificate for a set period of time with specific conditions for reinstatement
 - ☐ Order revocation of a certificate with specific conditions for reinstatement
 - ☐ Assess costs associated with the investigation and disciplinary proceedings; or
 - ☐ Impose civil penalties associated with the investigation and disciplinary proceedings.
- ☒ Order the preparation of documents necessary for informal or formal disciplinary actions under subsection (H)(7)(b), (H)(8)(b) or (H)(9)(b)
- ☐ Request the license holder appear before the Board to participate in a Formal Interview, pursuant to ACJA § 7-201(H)(8).
- ☐ Enter a finding the public health, safety or welfare is at risk, requires emergency action, and orders the immediate emergency suspension of the license and sets an expedited hearing for:
- Date, Time, and Location: _____
- ☐ Order the filing of Notice of Formal Charges, pursuant to ACJA § 7-201(H)(10).
- ☒ Adopts the recommendations of the Division Director.
- ☐ Does not adopt the recommendations of the Division Director and orders:



Johnny Tse, Chair
 Defensive Driving Board

09/17/2025
 Date