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8 **BEFORE THE**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 999788

13 **ADVANCED PRO NURSING INSTITUTE**  
14 **2505 Technology Drive**  
15 **Hayward, CA 94545**

OAH Case No. 2015100949

16 **Institution Code No. 88680341**

**STIPULATED SURRENDER OF  
APPROVAL TO OPERATE AND  
ORDER**

Respondent.

17  
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
19 entitled proceedings that the following matters are true:

20 PARTIES

21 1. Joanne Wenzel (Complainant) is the Chief of the Bureau for Private Postsecondary  
22 Education. She brought this action solely in her official capacity and is represented in this matter  
23 by Kamala D. Harris, Attorney General of the State of California, by Nicholas Tsukamaki,  
24 Deputy Attorney General.

25 2. Advanced Pro Nursing Institute (Respondent) is represented in this proceeding by  
26 attorney Michelle E. Jorden, Esq., whose address is: 597 Monterey Pass Road, Monterey Park,  
27 CA 91754.

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1 Respondent; the right to present evidence and to testify on Respondent's own behalf; the right to  
2 the issuance of subpoenas to compel the attendance of witnesses and the production of  
3 documents; the right to reconsideration and court review of an adverse decision; and all other  
4 rights accorded by the California Administrative Procedure Act and other applicable laws.

5 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
6 every right set forth above.

#### 7 CULPABILITY

8 9. Respondent admits the truth of each and every charge and allegation in Accusation  
9 No. 999788, agrees that cause exists for discipline, and hereby surrenders Respondent's approval  
10 to operate for the Bureau's formal acceptance.

11 10. Respondent understands that by signing this stipulation Respondent enables the  
12 Director to issue his order accepting the surrender of Respondent's approval to operate without  
13 further process.

#### 14 CONTINGENCY

15 11. This stipulation shall be subject to approval by the Director or the Director's  
16 designee. Respondent understands and agrees that counsel for Complainant and the staff of the  
17 Bureau may communicate directly with the Director and staff regarding this stipulation and  
18 surrender without notice to or participation by Respondent or Respondent's counsel. By signing  
19 the stipulation, Respondent understands and agrees that Respondent may not withdraw this  
20 agreement or seek to rescind the stipulation prior to the time the Director considers and acts upon  
21 it. If the Director fails to adopt this stipulation as the Decision and Order, the Stipulated  
22 Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall  
23 be inadmissible in any legal action between the parties, and the Director shall not be disqualified  
24 from further action by having considered this matter.

25 12. The parties understand and agree that Portable Document Format (PDF) and facsimile  
26 copies of this Stipulated Surrender of Approval to Operate and Order, including Portable  
27 Document Format (PDF) and facsimile signatures thereto, shall have the same force and effect as  
28 the originals.





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ENDORSEMENT

The foregoing Stipulated Surrender of Approval to Operate and Order is hereby respectfully submitted for consideration by the Director of the Department of Consumer Affairs.

Dated: February 10, 2016

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
JOSHUA A. ROOM  
Supervising Deputy Attorney General



NICHOLAS TSUKAMAKI  
Deputy Attorney General  
*Attorneys for Complainant*

SF2015401267

**BEFORE THE DIRECTOR  
BUREAU FOR PRIVATE POSTSECONDARY EDUCATION  
DEPARTMENT OF CONSUMER AFFAIRS  
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In the Matter of the Accusation Against:

**ADVANCED PRO NURSING INSTITUTE  
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**Institution Code No.: 88680341**

Respondent.

Case No. 999788

OAH No. 2015100949

**ORDER OF DECISION**

**DECISION AND ORDER**

The attached Stipulated Surrender of Approval to Operate and Order is hereby accepted and adopted by the Director of the Department of Consumer Affairs as the Decision and Order in the above entitled matter.

The Decision shall become effective on APR 14 2016.

DATED: MAR 08 2016



**DOREATHEA JOHNSON**  
Deputy Director, Legal Affairs  
Department of Consumer Affairs