

1 KAMALA D. HARRIS  
Attorney General of California  
2 JOSHUA A. ROOM  
Supervising Deputy Attorney General  
3 NICHOLAS TSUKAMAKI  
Deputy Attorney General  
4 State Bar No. 253959  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 703-1188  
6 Facsimile: (415) 703-5480  
E-mail: Nicholas.Tsukamaki@doj.ca.gov  
7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. 999788

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

OAH Case No. 2015100949

15 **Institution Code No. 88680341**

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

16 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.

28 ///



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.

1 13. This Stipulated Surrender of Approval to Operate and Order is intended by the parties  
2 to be an integrated writing representing the complete, final, and exclusive embodiment of their  
3 agreement. It supersedes any and all prior or contemporaneous agreements, understandings,  
4 discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of  
5 Approval to Operate and Order may not be altered, amended, modified, supplemented, or  
6 otherwise changed except by a writing executed by an authorized representative of each of the  
7 parties.

8 14. In consideration of the foregoing admissions and stipulations, the parties agree that  
9 the Director may, without further notice or formal proceeding, issue and enter the following  
10 Order:

11 **ORDER**

12 IT IS HEREBY ORDERED that the approval to operate issued to Respondent Advanced  
13 Pro Nursing Institute (Respondent) is surrendered and accepted by the Director of the Department  
14 of Consumer Affairs.

15 1. The surrender of Respondent's approval to operate and the acceptance of the  
16 surrendered approval to operate by the Bureau for Private Postsecondary Education (Bureau)  
17 shall constitute the imposition of discipline against Respondent. This stipulation constitutes a  
18 record of the discipline and shall become a part of Respondent's license history with the Bureau.

19 2. Respondent shall lose all rights and privileges as a private postsecondary institution in  
20 California as of the effective date of the Director's Decision and Order.

21 3. Within thirty (30) days of the effective date of the Decision and Order, Respondent  
22 shall pay the Bureau costs associated with its investigation and enforcement pursuant to Business  
23 and Professions Code section 125.3 in the amount of \$12,195.71.

24 4. Within thirty (30) days of the effective date of the Decision and Order, Respondent  
25 shall pay the Bureau partial restitution in the amount of \$5,534.00. Respondent shall pay the  
26 remaining amount of restitution (\$280,968.45, as set forth in Exhibit B, attached hereto) prior to  
27 the issuance of an approval to operate by the Bureau to Respondent.

28 ///

1           5.       Within thirty (30) days of the effective date of the Decision and Order, Respondent  
2 shall provide official transcripts to all of the students listed in Exhibits B and C, attached hereto.  
3 Respondent shall provide proof to the Bureau that Respondent has provided transcripts to those  
4 students.

5           6.       Respondent shall comply with the required school closure procedures as set forth in  
6 Exhibit D, attached hereto.


7           7.       Respondent and any individuals currently or formerly affiliated with Respondent,  
8 including Hooi Hoon Yeap and William A.P. Wang, shall not apply for an approval to operate  
9 with the Bureau for five (5) years from the effective date of the Decision and Order. An approval  
10 to operate will not be issued by the Bureau until Respondent has paid the Bureau the full amount  
11 of costs and restitution as set forth in Paragraphs 3 and 4 of this Order.

12  
13                               ACCEPTANCE

14           I have carefully read the above Stipulated Surrender of Approval to Operate and Order and  
15 have fully discussed it with my attorney, Michelle E. Jordan. I understand the stipulation and the  
16 effect it will have on my approval to operate. I enter into this Stipulated Surrender of Approval to  
17 Operate and Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
18 Decision and Order of the Director of the Department of Consumer Affairs.

19  
20 DATED: \_\_\_\_\_

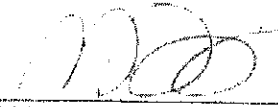
2/10/2016

21   
22 HOOI HOON YEAP for  
ADVANCED PRO NURSING INSTITUTE  
Respondent

23           I have read and fully discussed with Hooi Hoon Yeap the terms and conditions and other  
24 matters contained in this Stipulated Surrender of Approval to Operate and Order. I approve its  
25 form and content.

26 DATED: \_\_\_\_\_

2/10/16

27   
28 MICHELLE E. JORDEN  
Attorney for Respondent

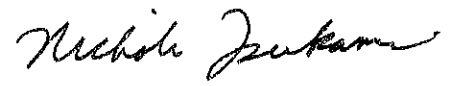
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

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

**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