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

13 In the Matter of the Second Amended  
14 Accusation Against:

15 **SAINT JOSEPH'S SCHOOL OF**  
16 **NURSING**  
622 W. Lancaster Blvd.  
Lancaster, CA 93534

17 Institution Code No. 42097062

18 Respondent.

Case No. 1006701

**SECOND AMENDED ACCUSATION**

19  
20 **PARTIES**

21 1. Deborah Cochrane (Complainant) brings this Accusation solely in her official  
22 capacity as the Chief of the Bureau for Private Postsecondary Education (Bureau), Department of  
23 Consumer Affairs.

24 2. On or about August 30, 2012, the Bureau issued Approval to Operate Institution Code  
25 Number 42097062 to Saint Joseph's School of Nursing, owned by Excel Nursing School, Inc.  
26 (Respondent). The Approval to Operate was in full force and effect at all times relevant to the  
27 charges herein, and will expire on June 27, 2023, unless renewed.

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**JURISDICTION**

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2           3.     This Second Amended Accusation is brought before the Director of the Department  
3 of Consumer Affairs (Director) for the Bureau, under the authority of the following laws. All  
4 section references are to the Education Code (Code) unless otherwise indicated.

5           4.     Business and Professions Code section 118, subdivision (b), provides that the  
6 suspension, expiration, surrender, or cancellation of a license shall not deprive the Bureau of  
7 jurisdiction to proceed with a disciplinary action during the period within which the license may  
8 be renewed, restored, reissued or reinstated.

9           5.     Code section 94875 provides that the Bureau shall regulate private postsecondary  
10 educational institutions.

11          6.     Code section 94877 states, in relevant part, that:

12               (a) The bureau shall adopt and shall enforce regulations to implement this chapter  
13 pursuant to the Administrative Procedure Act (Chapter 3.5 (commencing with Section  
11340) of Part 1 of Division 3 of Title 2 of the Government Code).

14               (b) The bureau shall develop and implement an enforcement program, pursuant to  
15 Article 18 (commencing with Section 94932) to implement this chapter . . .

16          7.     Code section 94932 states that:

17               The bureau shall determine an institution’s compliance with the requirements of  
18 this chapter. The bureau shall have the power to require reports that institutions shall  
19 file with the bureau in addition to the annual report, to send staff to an institution’s  
20 sites, and to require documents and responses from an institution to monitor  
21 compliance. When the bureau has reason to believe that an institution may be out of  
22 compliance, it shall conduct an investigation of the institution. If the bureau  
23 determines, after completing an investigation, that an institution has violated any  
24 applicable law or regulation, the bureau shall take appropriate action pursuant to this  
25 article.

26          8.     Code section 94937 states that:

27               (a) As a consequence of an investigation, which may incorporate any materials  
28 obtained or produced in connection with a compliance inspection, and upon a finding that  
an institution has committed a violation, the bureau may place an institution on probation or  
may suspend or revoke an institution’s approval to operate for:

                  (1) Obtaining an approval to operate by fraud.

                  (2) A material violation or repeated violations of this chapter or regulations  
adopted pursuant to this chapter that have resulted in harm to students. For purposes  
of this paragraph, “material violation” includes, but is not limited to,  
misrepresentation, fraud in the inducement of a contract, and false or misleading

1 claims or advertising, upon which a student reasonably relied in executing an  
2 enrollment agreement and that resulted in harm to the student.

3 (c) The bureau may seek reimbursement pursuant to Section 125.3 of the Business  
4 and Professions Code.

5 (d) An institution shall not be required to pay the cost of investigation to more than  
6 one agency.

### 7 STATUTORY PROVISIONS

8 9. Code section 94936 states:

9 (a) As a consequence of an investigation, which may incorporate any materials  
10 obtained or produced in connection with a compliance inspection, and upon a finding that  
11 the institution has committed a violation of this chapter or that the institution has failed to  
12 comply with a notice to comply pursuant to Section 94935, the bureau shall issue a citation  
13 to an institution for violation of this chapter, or regulations adopted pursuant to this chapter.

14 (b) The citation may contain any of the following:

15 (1) An order of abatement that may require an institution to demonstrate how  
16 future compliance with this chapter or regulations adopted pursuant to this chapter  
17 will be accomplished.

18 (2) Notwithstanding Section 125.9 of the Business and Professions Code, an  
19 administrative fine not to exceed five thousand dollars (\$5,000) for each violation.  
20 The bureau shall base its assessment of the administrative fine on:

21 (A) The nature and seriousness of the violation.

22 (B) The persistence of the violation.

23 (C) The good faith of the institution.

24 (D) The history of previous violations.

25 (E) The purposes of this chapter.

26 (F) The potential harm to students.

27 (3) An order to compensate students for harm, including a refund of moneys  
28 paid to the institution by or on behalf of the student, as determined by the bureau.

(c) (1) The citation shall be in writing and describe the nature of the violation and  
the specific provision of law or regulation that is alleged to have been violated.

(2) The citation shall inform the institution of its right to request a hearing in  
writing within 30 days from service of the citation.

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1 (3) If a hearing is requested, the bureau shall select an informal hearing  
2 pursuant to Article 10 (commencing with Section 11445.10) of Chapter 4.5 of Part 1  
3 of Division 3 of Title 2 of the Government Code or a formal hearing pursuant to  
4 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the  
5 Government Code.

6 (4) If a hearing is not requested, payment of the administrative fine is due 30  
7 days from the date of service, and shall not constitute an admission of the violation  
8 charged.

9 (5) If a hearing is conducted and payment of an administrative fine is ordered,  
10 the administrative fine is due 30 days from when the final order is entered.

11 (6) The bureau may enforce the administrative fine as if it were a money  
12 judgment pursuant to Title 9 (commencing with Section 680.010) of Part 2 of the  
13 Code of Civil Procedure.

14 (d) All administrative fines shall be deposited in the Private Postsecondary  
15 Education Administration Fund.

### 16 REGULATORY PROVISIONS

17 10. California Code of Regulations, title 5, section 75020 states:

18 (a) The Bureau Chief, or his or her designee, or the Director's designee, is authorized  
19 to issue citations containing orders of abatement and/or administrative fines pursuant to  
20 section 94936 of the Code against approved private, postsecondary institutions that have  
21 committed any acts or omissions that are in violation of the Act or any regulation adopted  
22 pursuant thereto.

23 (b) The Bureau Chief, or his or her designee, or the Director's designee, is authorized  
24 to issue citations containing orders of abatement and administrative fines not to exceed  
25 \$100,000 pursuant to section 94944 of the Code against persons who are without proper  
26 approval to operate a private, postsecondary institution. In addition, the citation may  
27 contain an order of abatement pursuant to section 149 of the Business and Professions Code  
28 that requires the unapproved person to cease any unlawful advertising and to notify the  
telephone company furnishing services to the cited person: (1) to disconnect the telephone  
services furnished to any telephone number contained in the unlawful advertising, and (2)  
that subsequent calls to that number shall not be referred by the telephone company to any  
new number obtained by that person. The provisions of section 75040 shall apply to this  
subsection.

(c) In addition to the requirements of section 94936 of the Code, each citation shall  
inform the cited institution or person that:

(1) if a hearing pursuant to the Administrative Procedure Act (APA) is not  
requested, payment of the administrative fine is due 30 days from the date of service,  
and shall not constitute an admission of the violation charged.

(2) if a hearing pursuant to the APA is conducted and payment of an  
administrative fine is ordered, the administrative fine is due 30 days from when the  
order is effective;

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1 (3) if the cited institution or person desires an informal conference to contest the  
2 finding of a violation prior to an APA hearing, the informal conference shall be  
requested by written notice to the Bureau within 30 days from service of the citation;

3 (4) failure to comply with any order of abatement within the time set forth in the  
4 citation, unless the citation is being appealed, may result in disciplinary action being  
taken by the Bureau; and

5 (5) the Bureau may enforce the administrative fine as if it were a money  
6 judgment pursuant to the California Code of Civil Procedure (beginning with section  
680.010).

7 (d) Each citation shall be served on the cited institution or person, in person, or by  
8 certified and regular mail at the address of record on file with the Bureau. Citations  
served by certified and regular mail shall be deemed “served” on the date of mailing.

9 (e) The sanction authorized under this section shall be separate from, and in addition  
10 to, any civil, criminal, or other administrative remedies.

11 11. California Code of Regulations, title 5, section 75030 states:

12 Where citations pursuant to section 94936 of the Code and section 75020, subsection  
13 (a) include an assessment of an administrative fine, the fine shall be not less than \$50 or  
14 exceed \$5,000 for each violation. Each violation shall be classified according to the nature  
of the violation and shall indicate the classification on the face thereof as follows:

15 (a) A “Class A” violation shall not be less than \$2,501 nor more than \$5,000. A  
16 Class A violation is one that the Bureau has, in its discretion, determined to be more serious  
17 in nature, deserving the maximum fine. A Class A violation may, in the Bureau’s  
discretion, be issued to an institution that has committed one or more prior separate Class B  
violations.

18 (b) A “Class B” violation shall not be less than \$1,001 nor more than \$2,500. A  
19 Class B violation is one that the Bureau has, in its discretion, determined to be less serious  
20 in nature and may include, but is not limited to, a violation that could have resulted in  
student harm. Typically some degree of mitigation will exist. A Class B violation may be  
issued to an institution that has committed one or more prior separate Class C violations.

21 (c) A “Class C” violation shall not be less than \$501 nor more than \$1,000. A Class  
22 C violation is one that the Bureau has, in its discretion, determined to be a minor or  
technical violation, which may be directly or potentially detrimental to students or  
potentially impacts their education.

23 (d) A “Class D” violation shall not be less than \$50 nor more than \$500. A Class D  
24 violation is one that the Bureau has, in its discretion, determined to be a minor or technical  
violation, which is neither directly or potentially detrimental to students nor potentially  
25 impacts their education.

26 12. California Code of Regulations, title 5, section 75040 states in relevant part:

27 (a) Pursuant to section 94936(c)(2) of the Code, a cited institution or person may,  
28 within 30 days of service of the citation, request a hearing in writing to the Bureau, or it is  
waived. In addition to contesting a citation by requesting a hearing, the cited institution or

1 person may, within the same 30 days, submit a written request to the Bureau for an informal  
2 conference.

3 (b) The Bureau Chief, or his or her designee, or the Director, or his or her designee,  
4 shall within 30 days from the Bureau's receipt of a written request for an informal  
5 conference, hold an informal conference with the cited institution or person. The 30-day  
6 period may be extended by the Bureau Chief or the Director for good cause. The informal  
7 conference may be, by telephone.

8 (c) Following the informal conference, the Bureau Chief, or his or her designee, or  
9 the Director, or his or her designee, will affirm, modify, or dismiss the citation, including  
10 any fine assessed and/or order of abatement issued. A written order affirming, modifying,  
11 or dismissing the original citation shall be served on the cited institution or person within 30  
12 days from the informal conference. If the order affirms or modifies the original citation,  
13 said order shall fix a reasonable period of time for abatement of the violation and/or  
14 payment of the fine of not more than 30 days.

15 (d) If the informal conference results in the modification of the findings of  
16 violation(s), the amount of the fine and/or the order of abatement, the citation shall be  
17 considered modified, but not withdrawn. Unless waived, a cited institution or person is  
18 entitled to a hearing to contest the modified citation if the institution or person filed a timely  
19 request, but is not entitled to an informal conference to contest an affirmed or modified  
20 citation. If a timely request for a hearing was not filed, the decision on the affirmed or  
21 modified citation shall be considered final.

22 ...

23 (g) If a written request for a hearing pursuant to section 94936(c)(2) of the Code, or  
24 for an informal conference as provided in subsection (a), or both, is not submitted to the  
25 Bureau within 30 days from service of the citation, the cited institution or person is deemed  
26 to have waived the right to an informal conference and/or administrative hearing.

27 13. California Code of Regulations, title 5, section 75050 states in relevant part:

28 ...

(b) Failure of an applicant or institution issued an approval to operate to abate the  
violation or to pay the fine within the time allowed is a ground for denial or discipline of an  
approval to operate.

...

14. California Code of Regulations, title 5, section 75100 provides that the Bureau may  
suspend, revoke or place on probation with terms and conditions an approval to operate.

### **COST RECOVERY**

15. Code section 94937, subdivision (c), provides that the Bureau may seek  
reimbursement for its costs of investigation and enforcement pursuant Business and Professions  
Code section 125.3.

1 16. Business and Professions Code section 125.3 provides, in pertinent part, that the  
2 Bureau may request the administrative law judge to direct a licentiate found to have committed a  
3 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the  
4 investigation and enforcement of the case. If a case settles, recovery of investigation and  
5 enforcement costs may be included in a stipulated settlement.

6 **FACTUAL ALLEGATIONS**

7 **Citation Number 1920166**

8 17. On December 23, 2019, the Bureau issued Citation No. 1920166 to Respondent for  
9 failure to submit Student Tuition Recovery Fund (STRF) Assessment Reporting Forms for the 4th  
10 quarter of 2015 and the 3rd quarter of 2019, and for Respondent's failure to submit its Annual  
11 Fee for the calendar year 2019. Citation No. 1920166 ordered Respondent to submit the  
12 delinquent STRF Assessment Reporting Forms and pay the delinquent Annual Fee. Citation No.  
13 1920166 also assessed an administrative fine of \$50.00 for the violations.

14 18. On February 4, 2020, the Bureau mailed a letter to Respondent demanding that  
15 Respondent pay the administrative fine, and comply with the Orders of Abatement to submit the  
16 delinquent STRF Assessment Reporting Forms and pay the delinquent Annual Fee, as set forth in  
17 Citation No. 1920166.

18 19. On February 25, 2020, the Bureau received Respondent's \$50.00 payment of the fine  
19 in connection with Citation No. 1920166.

20 20. On March 10, 2020, the Bureau mailed a letter to Respondent explaining that the  
21 Bureau's previous letter to Respondent mailed on February 4, 2020 had erroneously stated that  
22 Respondent's \$50.00 fine payment had been received by the Bureau and applied to Citation No.  
23 1920206 - instead of Citation No. 1920166 - as intended by Respondent. The Bureau's March 10,  
24 2020 letter therefore confirmed that Respondent's \$50.00 payment of the fine for Citation No.  
25 1920166 had been received by the Bureau, and requested that Respondent comply with the Orders  
26 of Abatement as set forth in Citation No. 1920166 by March 24, 2020.

27 21. Thereafter, on April 22, 2020, May 27, 2020, and June 24, 2020, the Bureau mailed  
28 three subsequent letters to Respondent demanding that Respondent comply with the Orders of

1 Abatement to submit the delinquent STRF Assessment Reporting Forms and pay the delinquent  
2 Annual Fee, as set forth in Citation No. 1920166.

3 22. Respondent failed to timely comply with the Orders of Abatement to submit the  
4 delinquent STRF Assessment Reporting Forms and pay the delinquent Annual Fee, as set forth in  
5 Citation No. 1920166. Respondent ultimately submitted its overdue 2015 STRF form for the 3<sup>rd</sup>  
6 quarter (which was due by October 31, 2015) to the Bureau on January 4, 2016; but did not  
7 submit its overdue 2015 STRF form for the 4<sup>th</sup> quarter (which was due by January 25, 2016) to  
8 the Bureau until January 10, 2022. Respondent still owes a delinquency fee balance of \$50.00 in  
9 connection with its original failure to timely pay its 2019 Annual Fees.

10 **Citation Number 1920206**

11 23. On February 4, 2020, the Bureau issued Citation No. 1920206 to Respondent for  
12 failure to submit its 2017 Annual Report. Citation No. 1920206 to ordered Respondent to  
13 complete and submit its 2017 Annual Report through the Bureau's online portal, to submit a copy  
14 of Respondent's financial statements for the year ending in 2017 by mail to the Bureau. Citation  
15 No. 1920206 also assessed an administrative fine of \$5,000.00 for the violation.

16 24. On February 25, 2020, the Bureau received a Request for Informal Conference  
17 regarding Citation No. 1920206 from Respondent, along with Respondent's \$50.00 payment of  
18 the fine in connection with the previously issued Citation No. 1920166. Respondent did not  
19 appeal or otherwise request a formal administrative hearing contesting Citation No. 1920206 at  
20 such time.

21 25. On February 28, 2020, the Bureau mailed a letter to Respondent erroneously  
22 confirming that Respondent's \$50.00 payment of the fine for Citation No. 1920206 was received,  
23 when in fact such \$50.00 payment had been intended by Respondent to satisfy payment of the  
24 fine in connection with Citation No. 1920166. The Bureau's February 28, 2020 letter to  
25 Respondent also requested evidence of Respondent's compliance with the Order of Abatement as  
26 set forth in Citation No. 1920206.

27 26. Thereafter, on March 10, 2020, the Bureau mailed a letter to Respondent clarifying  
28 that the \$50.00 payment Respondent tendered to the Bureau on February 28, 2020 was actually



1 applied to previous Citation No. 1920166. The Bureau's March 10, 2020 letter to Respondent  
2 also acknowledged that the Bureau received Respondent's Request for Informal Conference as to  
3 Citation No. 1920206, and that Citation No. 1920206 was therefore still open and pending.

4 27. On April 2, 2020, the Bureau conducted an Informal Conference with Respondent  
5 regarding Citation No. 1920206. As a result of the Informal Conference, the Bureau issued a  
6 Modified Citation on April 29, 2020. The Modified Citation stated that the original  
7 administrative fine was reduced from \$5,000.00 to \$2,500.00, based on new substantive facts  
8 presented by Respondent during the Informal Conference. The original Order of Abatement  
9 remained the same in Modified Citation No. 1920206.

10 28. Thereafter, on June 10, 2020, July 22, 2020, and September 17, 2020, the Bureau  
11 mailed three subsequent letters to Respondent demanding that Respondent submit payment of the  
12 outstanding administrative fine of \$2,500.00, and comply with the Order of Abatement to  
13 complete and submit its 2017 Annual Report through the Bureau's online portal and submit a  
14 copy of Respondent's financial statements for the year ending in 2017 by mail to the Bureau, as  
15 set forth in Modified Citation No. 1920206.

16 29. On October 20, 2020, the Bureau received Respondent's \$2,500.00 payment in full of  
17 the administrative fine in connection with Modified Citation No. 1920206.

18 30. On October 22, 2020, the Bureau mailed a letter to Respondent confirming that it had  
19 received Respondent's \$2,500.00 payment of the fine, and requested Respondent's compliance  
20 with the Order of Abatement as set forth in Modified Citation No. 1920206 by November 5,  
21 2020.

22 31. On December 29, 2020, the Bureau mailed another letter to Respondent demanding  
23 that Respondent submit proof of its compliance with the Order of Abatement as set forth in  
24 Modified Citation No. 1920206.

25 32. Respondent did not submit its 2017 Annual Report and/or a copy of its financial  
26 statements for the year ending in 2017 to the Bureau until on or about March 15, 2022.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 (Failure to Comply with Citation)

3 33. Respondent is subject to disciplinary action under Code section 94936 and California  
4 Code of Regulations, title 5, section 75050 in that Respondent failed to fully comply with the  
5 Orders of Abatement in Citation Number 1920166. Respondent ultimately submitted its overdue  
6 2015 STRF form for the 3<sup>rd</sup> quarter (which was due by October 31, 2015) to the Bureau on  
7 January 4, 2016; but then did not submit its overdue 2015 STRF form for the 4<sup>th</sup> quarter (which  
8 was due by January 25, 2016) to the Bureau until January 10, 2022. Respondent still owes a  
9 delinquency fee balance in the amount of \$50.00 in connection with its original failure to timely  
10 pay its 2019 Annual Fees. Complainant hereby incorporates paragraphs 17 through 22 above as  
11 though set forth in full herein.

12 **SECOND CAUSE FOR DISCIPLINE**

13 (Failure to Comply with Citation)

14 34. Respondent is subject to disciplinary action under Code section 94936 and California  
15 Code of Regulations, title 5, section 75050 in that Respondent failed to fully comply with the  
16 Order of Abatement in Modified Citation Number 1920206 until March 15, 2022. Complainant  
17 hereby incorporates paragraphs 23 through 32 above as though set forth in full herein.

18 **THIRD CAUSE FOR DISCIPLINE**

19 (Repeated Failure to Timely Submit Annual Reports, Student Tuition Recovery Fund (STRF)  
20 Assessment Reporting Forms, and Required Fees)

21 35. Respondent is subject to disciplinary action under Code sections 94932 and 94937,  
22 and California Code of Regulations, title 5, section 75050, in that Respondent has repeatedly  
23 failed to submit completed Annual Reports, Student Tuition Recovery Fund (STRF) Assessment  
24 Reporting Forms, and required fees in a timely manner, as follows:

25 a. **2018 Annual Report.** Respondent's Annual Report for the year 2018 was due on or  
26 before December 1, 2019. Respondent did not submit this report until March 15, 2022. In so  
27 doing, Respondent has since failed to make specific corrections to the report as directed by the  
28 Bureau.

1           b.     **2019 Annual Report.** Respondent’s Annual Report for the year 2019 was due on or  
2 before December 1, 2020. Respondent did not submit this report until March 15, 2022. In so  
3 doing, Respondent has since failed to make specific corrections to the report as requested by the  
4 Bureau.

5           c.     **2020 Annual Report.** Respondent’s Annual Report for the year 2020 was due on or  
6 before December 1, 2021. Respondent did not submit this report until March 15, 2022. In so  
7 doing, Respondent has since failed to make specific corrections to the report as requested by the  
8 Bureau.

9           d.     **2020 First Quarter STRF Assessment Reporting Form.** Respondent’s First  
10 Quarter STRF Assessment Reporting Form for the year 2020 was due on or before May 4, 2020.  
11 Respondent did not submit this required form until August 20, 2021.

12           e.     **2020 Second Quarter STRF Assessment Reporting Form.** Respondent’s Second  
13 Quarter STRF Assessment Reporting Form for the year 2020 was due on or before July 28, 2020.  
14 Respondent did not submit this required form until August 20, 2021.

15           f.     **2020 Third Quarter STRF Assessment Reporting Form.** Respondent’s Third  
16 Quarter STRF Assessment Reporting Form for the year 2020 was due on or before October 28,  
17 2020. Respondent did not submit this required form until August 20, 2021.

18           g.     **2020 Fourth Quarter STRF Assessment Reporting Form.** Respondent’s Fourth  
19 Quarter STRF Assessment Reporting Form for the year 2020 was due on or before January 25,  
20 2021. Respondent did not submit this required form until August 20, 2021.

21           h.     **2021 First Quarter STRF Assessment Reporting Form.** Respondent’s First  
22 Quarter STRF Assessment Reporting Form for the year 2021 was due on or before May 3, 2021.  
23 Respondent did not submit this required form until January 13, 2022.

24           i.     **2021 Second Quarter STRF Assessment Reporting Form.** Respondent’s Second  
25 Quarter STRF Assessment Reporting Form for the year 2021 was due on or before August 2,  
26 2021. Respondent did not submit this required form until January 13, 2022.

27           j.     **2020 Annual Fees.** Respondent’s Annual Fees for the year 2020 in the amount of  
28 \$2,500.00 was due on or before August 1, 2020. Respondent failed to submit such fees until

1 August 19, 2021. However, in so doing, Respondent failed to also submit the delinquency  
2 penalty fee in the amount of \$875.00 that had been assessed and demanded by the Bureau, until  
3 she tendered \$825.00 of that delinquency penalty fee on January 13, 2022, leaving an outstanding  
4 balance of \$50.00 that is still owed by Respondent in connection therewith.

5 k. **2021 Annual Fees.** Respondent's Annual Fees for the year 2021 in the amount of  
6 \$2,500.00 was due on or before August 1, 2021. Respondent failed to submit such fees and the  
7 \$875.00 delinquency penalty fee that had been assessed by the Bureau in connection therewith  
8 until September 29, 2021.

9 **PRAYER**

10 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this  
11 Second Amended Accusation, and that following the hearing, the Director of the Department of  
12 Consumer Affairs issue a decision:

- 13 1. Revoking or suspending Approval to Operate Institution Code Number 42097062,  
14 issued to Saint Joseph's School of Nursing;
- 15 2. Ordering Saint Joseph's School of Nursing to pay the Bureau for Private  
16 Postsecondary Education the reasonable costs of the investigation and enforcement of this case,  
17 pursuant to Business and Professions Code section 125.3; and,
- 18 3. Taking such other and further action as deemed necessary and proper.

19  
20 DATED: “8/10/2022”

20 “Original signature on file”  
21 DEBORAH COCHRANE  
22 Chief  
23 Bureau for Private Postsecondary  
24 Education  
25 Department of Consumer Affairs  
26 State of California  
27 *Complainant*  
28