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Ryan Petty
Joe York

Commission for Independent Education

February 10, 2023 Meeting

Staff Summary and Recommendation

Institution: Techni-Pro Institute, LLC, Boca Raton (#2671)

Background:

On January 12, 2023, a member of Techni-Pro Institute's staff, Ms. Gail Russ, was indicted (Exhibit I). On February 2, 2023, an on-site visit was conducted to determine the involvement of Ms. Russ in the institution's operations (Exhibit II).

Recommendation:

Find that the institution is being operated in a manner contrary to the health, education, or welfare of the public based upon the institution's substantial noncompliance with Rule 6E, F.A.C. Specifically, failure to provide a list of student enrollments, failure to provide a list of student graduates, failure to provide a listing of faculty and staff, failure to provide an organizational chart, failure to provide student files for inspection, failure to provide faculty and administrator files for inspection, and offering programs in an unlicensed delivery method.

Order the institution to immediately cease enrolling new students and graduating current students until March 31, 2023. Order the institution to comply with the following conditions and report back to the March 2023 Commission meeting to determine further action:

1. A list of all currently enrolled students to include the student's name, address, phone number, email address, and program enrolled.
2. A list of all graduates from the institution to include the student's name, address, phone number, email address, and program enrolled.
3. A list of all current and former faculty members, administrators and staff, to include their name, address, phone number, email address and primary responsibilities or courses taught.
4. A list of all current and former NCLEX numbers for any program approved by the Florida Board of Nursing.

Order the conditions listed above to be submitted to the Commission office within 7 days of the clerked order.

Meredith L. Pelton
Executive Director

Commission for Independent Education

Exhibit I

Jan 12, 2023

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMIUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**23-60007-CR-SINGHAL/DAMIAN**
Case No. _____

18 U.S.C. § 1349

18 U.S.C. § 1343

18 U.S.C. § 2

18 U.S.C. § 981(a)(1)

UNITED STATES OF AMERICA

vs.

GAIL RUSS,
CHERYL STANLEY,
KRYSTAL LOPEZ,
RICKY RILEY,
NORBERTO LOPEZ,
DAMIAN LOPEZ,
FRANCOIS LEGAGNEUR,
REYNOSO SEIDE,
CASSANDRE JEAN,
YELVA SAINT PREUX,
EVANGELINE NAISSANT,
RONY MICHEL,
VILAIRE DUROSEAU, and
YVROSE THERMITUS,
a/k/a "Yvrose Thompson,"

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

Requirements to Become a Registered Nurse or Licensed Practical Nurse

1. The purpose of a professional nursing license was to protect the public from harm by setting minimum qualifications and competencies for safe entry-level practitioners. Nursing

was regulated because it is one of the health professions that poses a risk of harm to the public if practiced by someone who is unprepared and/or incompetent. Boards of Nursing achieved this mission by establishing the standards for safe nursing care and issuing licenses to practice nursing.

2. According to the National Council of State Boards of Nursing, components of licensure to be a Registered Nurse (RN) or a Licensed Practical/Vocational Nurse (LPN/VN) include verification of graduation from an approved pre-licensure nursing program, verification of successful completion of the National Council Licensure Examination (NCLEX) also known as “the board exam” or “the boards,” and in some states a criminal background check.

3. The Nurse Licensure Compact increased access to care while maintaining public protection at the state level. Under the Nurse Licensure Compact, nurses can practice in other Nurse Licensure Compact states, without having to obtain additional licenses. Approximately 39 states, including Florida, have enacted Nurse Licensure Compact legislation. The Nurse Licensure Compact required that every RN or LPN/VN graduate from a board-approved RN or LPN/VN prelicensure education program. Each state’s nursing board governed the approval of nursing education programs.

4. The State of Florida enacted the Nurse Practice Act to ensure that every nurse practicing in Florida meets minimum requirements for safe practice. Fla. Stat. §§ 464.001-464.027. The Florida Board of Nursing was both a regulatory board and a state government agency legally responsible for enforcing the state’s Nurse Practice Act. The Florida Board of Nursing was responsible for establishing standards for safe nursing care and issuing licenses to practice nursing. To do so, it oversaw education requirements and rules for licensure in Florida. Among these requirements was that any person desiring to be licensed as an RN or LPN/VN had to complete the requirements for graduation from an approved program, or its equivalent as determined by the

board, for the preparation of registered nurses or licensed practical nurses, whichever was applicable. For graduates of an approved program equivalent, an applicant seeking certification to take the licensure examination has to submit an official transcript or equivalent documentation which identified all courses completed that met graduation requirements.

5. According to Florida's Nurse Practice Act, an approved pre-licensure program's curriculum must consist of:

a. At least fifty percent clinical training for a practical nursing education program, an associate degree professional nursing program, or a professional diploma nursing education program.

b. The professional or practical nursing curriculum plan must document clinical experience and theoretical instruction in medical, surgical, obstetric, pediatric, and geriatric nursing. A professional nursing curriculum plan shall also document clinical experience and theoretical instruction in psychiatric nursing. Each curriculum plan must document clinical training experience in appropriate settings that include, but are not limited to, acute care, long-term care, and community settings.

c. The professional or practical nursing education program provides theoretical instruction and clinical application in personal, family, and community health concepts; nutrition; human growth and development throughout the life span; body structure and function; interpersonal relationship skills; mental health concepts; pharmacology and administration of medications; and legal aspects of practice. A professional nursing education program must also provide theoretical instruction and clinical application in interpersonal relationships and leadership skills; professional role and function; and health teaching and counseling skills.

Defendants and Related Individuals and Entities

6. Med-Life Institute WPB, LLC (Med-Life) was a Florida limited liability company licensed by the Florida Board of Education to provide a nursing education program.

7. Palm Beach School of Nursing, LLC (Palm Beach School of Nursing) was a Florida limited liability company located in Palm Beach County, Florida. Palm Beach School of Nursing operated under the license that was issued to Med-Life and transferred to Palm Beach School of Nursing. According to Palm Beach School of Nursing's Program Outline, it offered an Associate in Science degree, and the objective of the program was to "prepare the student to meet the requirements of the Florida Department of Health and the Florida Board of Nursing for Registered Nurse Education and meet eligibility for licensing exam (NCLEX-RN) in order to work as a Registered Nurse in a variety of settings in a safe and effective manner."

8. Quisqueya School of Nursing LLC, d/b/a Sunshine Academy (Sunshine Academy) was a Florida limited liability company located in Palm Beach County, Florida. Sunshine Academy was licensed by the Florida Board of Education to provide a nursing education program. According to Sunshine Academy's Program Outline, it offered a practical nursing program, and the objective of the program was to "prepare student[s] to provide nursing care to clients in hospitals, nursing homes, home healthcare agencies, and other areas in healthcare. Upon satisfactory completion of the program the graduate is eligible to apply to sit for the National Council Licensure Examination for Practical Nursing."

9. Quisqueya Health Care Academy, LLC (Quisqueya) was a Florida limited liability company located in Palm Beach County, Florida. Quisqueya operated under the same license that had been previously issued to Sunshine Academy. According to Quisqueya's Program Outline, it offered a practical nursing program, and the objective of the program was to "prepare student[s]

to provide nursing care to clients in hospitals, nursing homes, home healthcare agencies, and other areas in healthcare. Upon satisfactory completion of the program the graduate is eligible to apply to sit for the National Council Licensure Examination for Practical Nursing.”

10. Florida College of Health LLC (Florida College of Health) was a Florida limited liability company licensed by the Florida Board of Education to provide a nursing education program.

11. Nursing Education Agency, LLC (Nursing Education Agency) was a Florida limited liability company located in Palm Beach County, Florida.

12. EDUconnect LLC (EDUconnect) was a Florida limited liability company located in Palm Beach County, Florida.

13. Unparalleled Review Services, LLC (Unparalleled Review) was a New York limited liability company located in Jamaica, New York.

14. Unity Health Care Training & Employment LLC (Unity Health Care Training) was a New Jersey limited liability company located in Maplewood, New Jersey.

15. Success Review International Services, Inc (Success Review) was a ^{New York m.w} ~~New Jersey~~ company located in Brooklyn, New York.

16. New Era Professional Prep Services LLC (New Era) was a New York limited liability company located in Baldwin, New York.

17. Jemeron Tutoring Healthcare Services LLC (Jemeron) was a New Jersey limited liability company located in Colts Neck, New Jersey.

18. Center for Advanced Training & Studies Inc (Center for Advanced Training) was a New Jersey company located in Orange, New Jersey.

19. PowerfulU Healthcare Services LLC (PowerfulU) was a Florida limited liability company located in Broward County, Florida.

20. Defendant **GAIL RUSS**, a resident of Broward County, Florida, was the Director of Student Services and the Registrar of Palm Beach School of Nursing.

21. Defendant **CHERYL STANLEY**, a resident of Collier County, Florida, was a partner in Palm Beach School of Nursing and Florida College of Health, and the Campus Director of both schools.

22. Defendant **KRYSTAL LOPEZ**, a resident of Palm Beach County, Florida, was the Director of Finance of Palm Beach School of Nursing.

23. Defendant **RICKY RILEY**, a resident of Broward County, Florida, was the Director of Nursing for Quisqueya and Palm Beach School of Nursing.

24. Defendant **NORBERTO LOPEZ**, a resident of Palm Beach County, Florida, owned and operated Nursing Education Agency.

25. Defendant **DAMIAN LOPEZ**, a resident of Palm Beach County, Florida, owned and operated EDUconnect.

26. Defendant **FRANCOIS LEGAGNEUR**, a resident of Nassau County, New York, owned and operated Unparalleled Review.

27. Defendant **REYNOSO SEIDE** was a resident of Union County, New Jersey.

28. Defendant **CASSANDRE JEAN**, a resident of Palm Beach County, Florida, owned and operated Success Review.

29. Defendant **YELVA SAINT PREUX**, a resident of Suffolk County, New York, owned and operated New Era.

30. Defendant **EVANGELINE NAISSANT**, a resident of Nassau County, New York, operated New Era.

31. Defendant **RONY MICHEL**, a resident of Monmouth County, New Jersey, owned and operated Jemeron.

32. Defendant **VILAIRE DUROSEAU**, a resident of Essex County, New Jersey, owned and operated Center for Advanced Training.

33. **YVROSE THERMITUS**, a/k/a "Yvrose Thompson," a resident of Union County, New Jersey, owned and operated Unity Health Care Training.

34. Johanah Napoleon, a resident of Palm Beach County, Florida, owned Med-Life, Palm Beach School of Nursing, Sunshine Academy, Quisqueya, and Florida College of Health.

35. Geralda Adrien, a resident of Broward County, Florida, was the owner and Manager of PowerfulU.

36. Co-conspirator 1 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

37. Co-conspirator 2 obtained a diploma and transcript issued by Quisqueya purporting to show that he/she attended Quisqueya and completed the necessary courses and/or clinicals to obtain an LPN diploma.

38. Co-conspirator 3 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

39. Co-conspirator 4 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

40. Co-conspirator 5 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

41. Co-conspirator 6 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

42. Co-conspirator 7 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

43. Health Care Provider-1 (HCP-1) was a Skilled Nursing Facility located in Ohio that employed licensed nurses to care for patients, including Medicare and Medicaid patients.

44. Health Care Provider-2 (HCP-2) was a rehabilitation facility located in New York that employed licensed nurses to care for homebound pediatric patients, including Medicare patients.

45. Health Care Provider-3 (HCP-3) was an Assisted Living Facility located in New Jersey that employed licensed nurses to care for elderly patients, including Medicare and Medicaid patients.

46. Health Care Provider-4 (HCP-4) was a Veterans Affairs (VA) Medical Center located in New York that employed licensed nurses to care for patients eligible for VA Health Care.

47. Health Care Provider-5 (HCP-5) was a home health facility located in Massachusetts that employed licensed nurses to care for homebound pediatric patients, including Medicare and Medicaid patients.

48. Health Care Provider-6 (HCP-6) was a skilled nursing care facility located in New Jersey that employed licensed nurses to care for elderly patients, including Medicare patients.

49. Health Care Provider-7 (HCP-7) was a skilled nursing care facility located in New York that employed licensed nurses to care for elderly patients, including Medicare and Medicaid patients.

COUNT 1
Conspiracy to Commit Wire Fraud
(18 U.S.C. § 1349)

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as if fully set forth herein.

2. From at least as early as in or around April of 2016, and continuing through in or around July of 2021, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

**GAIL RUSS,
CHERYL STANLEY,
KRYSTAL LOPEZ,
RICKY RILEY,
NORBERTO LOPEZ,
DAMIAN LOPEZ,
FRANCOIS LEGAGNEUR,
REYNOSO SEIDE,
CASSANDRE JEAN,
YELVA SAINT PREUX,
EVANGELINE NAISSANT,
RONY MICHEL,
VILAIRE DUROSEAU, and
YVROSE THERMITUS,
a/k/a "Yvrose Thompson,"**

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other, and with Johannah Napoleon, Geralda Adrien, co-conspirators 1-7, and others known and unknown to the Grand Jury, to commit wire fraud, that is, to knowingly and with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

Purpose of the Conspiracy

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) soliciting and recruiting co-conspirators, via interstate wire communications, seeking nursing credentials to obtain employment as an RN or LPN/VN in the health care field; (b) creating and distributing, via interstate wire communications, false and fraudulent diplomas and transcripts for co-conspirators seeking RN or LPN/VN licensure and employment in the health care field; (c) using the false and fraudulent documents to obtain employment, pay, and other benefits in the health care field; (d) concealing the use of fraudulent documents used to obtain employment in the health care field; and (e) using proceeds of the conspiracy for their personal use and benefit, and the use and benefit of others, and to further the conspiracy.

Manner and Means of the Conspiracy

The manner and means by which the defendants and their co-conspirators sought to

accomplish the object and purpose of the conspiracy included, among others, the following:

4. **DAMIAN LOPEZ, NORBERTO LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** and others, via interstate wire communications, solicited and recruited co-conspirators, including co-conspirators 1-7, and others, seeking nursing credentials and employment as an RN or LPN/VN in the health care field.

5. **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** Johanah Napoleon, Geralda Adrien, and others sent and caused others to send, via interstate wire communications, information used to create false and fraudulent official transcripts and diplomas from Palm Beach School of Nursing, Quisqueya, and Florida College of Health.

6. **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** Johanah Napoleon, Geralda Adrien, and others, created and distributed, and caused to be created and distributed, via interstate wire communications, false and fraudulent transcripts and diplomas to co-conspirators, including co-conspirators 1-7, and others falsely and fraudulently representing that the co-conspirators attended Palm Beach School of Nursing, Quisqueya, or Florida College of Health in Florida and completed the necessary courses and/or clinicals to obtain

RN or LPN/VN diplomas, when in fact the co-conspirators had never actually completed the necessary courses and/or clinicals.

7. In furtherance of the conspiracy, co-conspirators including co-conspirators 1-7 and others, used the false and fraudulent diplomas and transcripts and other records created and distributed, and caused to be created and distributed, by **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson," Johana Napoleon, Geralda Adrien, and others, to obtain licensure as an RN or LPN/VN in various states including Ohio, New York, New Jersey, and Massachusetts.**

8. Co-conspirators, including co-conspirators 1-7, and others, used the false and fraudulent diplomas, transcripts and other documents created and distributed, and caused to be created and distributed, by **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson," Johanah Napoleon, Geralda Adrien, and others, to fraudulently obtain employment and benefits as an RN or LPN/VN at various unwitting health care providers throughout the country, including at HCP-1-7. Those health care providers hired and paid salaries, wages, and other benefits to the RNs and LPN/VNs based on their fraudulent credentials.**

9. **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO**

SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a “Yvrose Thompson,” Johana Napoleon, and Geralda Adrien; together with co-conspirators 1-7 and others, used the proceeds of the conspiracy for their personal use and benefit, and to further the conspiracy.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-25
Wire Fraud
(18 U.S.C. § 1343)

1. The General Allegations section of this Indictment is realleged and incorporated by reference as if fully set forth herein.

2. From at least as early as in or around April of 2016, and continuing through in or around July of 2021, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

**GAIL RUSS,
CHERYL STANLEY,
KRYSTAL LOPEZ,
RICKY RILEY,
NORBERTO LOPEZ,
DAMIAN LOPEZ,
FRANCOIS LEGAGNEUR,
REYNOSO SEIDE,
CASSANDRE JEAN,
YELVA SAINT PREUX,
EVANGELINE NAISSANT,
RONY MICHEL,
VILAIRE DUROSEAU, and
YVROSE THERMITUS,
a/k/a “Yvrose Thompson,”**

did knowingly, and with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing the pretenses, representations, and promises

were false and fraudulent when made, and for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

Purpose of the Scheme and Artifice

3. It was a purpose of the scheme and artifice for the defendants and their accomplices to unlawfully enrich themselves by, among other things: (a) soliciting and recruiting accomplices, via interstate wire communications, seeking nursing credentials to obtain employment as an RN or LPN/VN in the health care field; (b) creating and distributing, via interstate wire communications, false and fraudulent diplomas and transcripts for accomplices seeking RN and LPN/VN licensure and employment in the health care field; (c) using the false and fraudulent documents to obtain employment, pay, and other benefits in the health care field; (d) concealing the use of fraudulent documents used to obtain employment in the health care field; and (e) using the proceeds of the fraud for their personal use and benefit, and the use and benefit of others, and to further the fraud.

The Scheme and Artifice

4. Paragraphs 4 through 9 of the Manner and Means section of Count 1 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

Use of the Wires

5. On or about the dates set forth below, in the Southern District of Florida, and elsewhere, the defendants, as specified below, for the purposes of executing the above-described scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of

wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds as described below:

Count	Defendant(s)	Approx. Date	Description of Wire Transmission
2	DAMIAN LOPEZ	1/26/2018	Text message via interstate wire from DAMIAN LOPEZ to Johanah Napoleon in the Southern District of Florida with an attachment containing nursing accomplice payment information.
3	GAIL RUSS, YELVA SAINT PREUX and EVANGELINE NAISSANT	3/6/2018	Email via interstate wire from EVANGELINE NAISSANT to GAIL RUSS in the Southern District of Florida providing the address of New Era Professional Prep and the name of its director YELVA SAINT PREUX
4	GAIL RUSS, CHERYL STANLEY, and FRANCOIS LEGAGNEUR	5/10/2018	Deposit via interstate wire of check number 1352 in the amount of \$1,360 drawn on the Palm Beach School of Nursing LLC account as payment to FRANCOIS LEGAGNEUR directed by CHERYL STANLEY
5	GAIL RUSS, CHERYL STANLEY, and FRANCOIS LEGAGNEUR	5/22/2018	Deposit via interstate wire of check number 1373 in the amount of \$1,360 drawn on the Palm Beach School of Nursing LLC account as payment to FRANCOIS LEGAGNEUR directed by CHERYL STANLEY
6	GAIL RUSS and CHERYL STANLEY	6/21/2018	Email via interstate wire from CHERYL STANLEY to Johanah Napoleon in the Southern District of Florida forwarding a message from the New York State Education Department stating that Florida College of Health "has no legal authority" to offer a Nursing program in New York State
7	NORBERTO LOPEZ	8/8/2018	Email via interstate wire from Johanah Napoleon in the Southern District of Florida to NORBERTO LOPEZ containing blank templates for Palm Beach School of Nursing diplomas and transcripts
8	KRYSTAL LOPEZ and REYNOSO SEIDE	12/03/2018	Email via interstate wire from REYNOSO SEIDE to KRYSTAL LOPEZ in the Southern District of Florida containing information for nursing accomplices recruited in New Jersey
9	RONY MICHEL	4/14/2019	Text message via interstate wire from RONY MICHEL to Johanah Napoleon in the Southern District of Florida in which they discuss fees for his students

Count	Defendant(s)	Approx. Date	Description of Wire Transmission
10	VILAIRE DUROSEAU and RICKY RILEY	7/9/2019	Johanah Napoleon in the Southern District of Florida forwarded an email via interstate wire from VILAIRE DUROSEAU to RICKY RILEY containing information about nursing accomplices traveling to Florida to complete registrations and background checks
11	RICKY RILEY	10/31/2019	RICKY RILEY via interstate wire forwarded an email to Johanah Napoleon in the Southern District of Florida from the Florida Board of Nursing in which RICKY RILEY acknowledged that Palm Beach School of Nursing was terminated by the Florida Board of Nursing in 2017 and was in Teach Out status
12	GAIL RUSS, RICKY RILEY and CASSANDRE JEAN	3/9/2020	Email via interstate wire from RICKY RILEY in the Southern District of Florida to CASSANDRE JEAN, GAIL RUSS, and Johanah Napoleon discussing clinical rotations for accomplice nursing applicants
13	GAIL RUSS	4/13/2020	Email via interstate wire from GAIL RUSS in the Southern District of Florida to nursing applicant R.C. in which RUSS states she will speak to R.C.'s recruiter to get the dates for R.C.'s transcript
14	GAIL RUSS and VILAIRE DUROSEAU	5/11/2020	Email via interstate wire from VILAIRE DUROSEAU to GAIL RUSS in the Southern District of Florida listing names and grades of accomplice nursing applicants seeking to obtain Palm Beach School of Nursing diplomas and transcripts
15	GAIL RUSS and FRANCOIS LEGAGNEUR	7/17/2020	Email via interstate wire from FRANCOIS LEGAGNEUR to GAIL RUSS in the Southern District of Florida containing a transcript picture and requesting that GAIL RUSS modify a graduation date for an accomplice nursing applicant
16	GAIL RUSS and FRANCOIS LEGAGNEUR	7/17/2020	Email via interstate wire from FRANCOIS LEGAGNEUR to GAIL RUSS in the Southern District of Florida requesting that RUSS modify dates on nursing accomplice diplomas and transcripts
17	GAIL RUSS and CASSANDRE JEAN	9/21/2020	Email via interstate wire from CASSANDRE JEAN to GAIL RUSS in the Southern District of Florida requesting that RUSS produce official transcripts and diplomas for the nursing applicants whose information is contained in the attachments

Count	Defendant(s)	Approx. Date	Description of Wire Transmission
18	GAIL RUSS and RONY MICHEL	1/3/2021	Email via interstate wire from RONY MICHEL to GAIL RUSS in the Southern District of Florida requesting that RUSS prepare transcripts for his students and send their information to the New York Board of Nursing and the New Jersey Board of Nursing
19	GAIL RUSS and RICKY RILEY	5/11/2021	Email via interstate wire from RICKY RILEY in the Southern District of Florida to the New York State Education Department, Office of Professional Licensing, requesting that New York allow nursing applicants to obtain licensure
20	GAIL RUSS and CASSANDRE JEAN	5/18/2021	Email via interstate wire from CASSANDRE JEAN to GAIL RUSS requesting that RUSS produce official transcripts and diplomas for the accomplice nursing applicants whose information is contained in the attachments
21	GAIL RUSS and YVROSE THERMITUS	6/1/2021	Email via interstate wire from YVROSE THERMITUS to GAIL RUSS requesting that RUSS edit a nursing accomplice transcript prior to sending it to Florida Board of Nursing
22	GAIL RUSS and RONY MICHEL	6/2/2021	Email via interstate wire from RONY MICHEL to GAIL RUSS requesting that RUSS send transcripts on behalf of his students to the Florida Board of Nursing
23	VILAIRE DUROSEAU	6/2/2021	Proponent Federal Credit Union wire payment via interstate wire in the amount of \$30,000 from VILAIRE DUROSEAU to Johanah Napoleon for Palm Beach School of Nursing diplomas and transcripts
24	GAIL RUSS and YVROSE THERMITUS	6/17/2021	YVROSE THERMITUS via interstate wire forwarded an email to GAIL RUSS from a nursing accomplice requesting that RUSS send information to the Florida Board of Nursing on behalf of the accomplice
25	GAIL RUSS and CASSANDRE JEAN	6/18/2021	Email via interstate wire from CASSANDRE JEAN to GAIL RUSS requesting that RUSS produce official transcripts and diplomas for nursing applicants whose information is contained in the attachments

In violation of Title 18, United States Code, Sections 1343 and 2.

FORFEITURE
(18 U.S.C. § 981(a)(1))

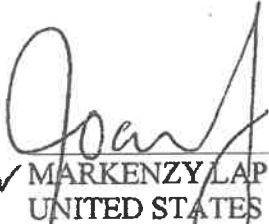
1. The allegations contained in this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which any of the defendants, **GAIL RUSS, CHERYL STANLEY, KRYSTAL LOPEZ, RICKY RILEY, NORBERTO LOPEZ, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU,** and **YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** have an interest.

2. Upon conviction of a violation, or conspiracy to commit a violation, of Title 18, United States Code, Section 1343, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and the procedures set forth at Title 21, United States Code, Section 853, as made applicable by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

for 
MARKENZY LAPOINTE
UNITED STATES ATTORNEY


CHRISTOPHER J. CLARK
ASSISTANT UNITED STATES ATTORNEY

Exhibit II



Tom Grady, *Chair*
Ben Gibson, *Vice Chair*
Members
Monesia Brown
Esther Byrd
Grazie Pozo Christie
Ryan Petty
Joe York

MEMORANDUM

TO: Commission for Independent Education

FROM: Meredith Pelton, Executive Director
Joey Smith, Operations and Program Manager

DATE: February 8, 2023

SUBJECT: Unannounced On-site Visit to Techni-Pro Institute, LLC (#2671)

On February 2, 2023 we conducted an unannounced on-site visit to Techni-Pro Institute, LLC (#2671). Upon arrival, the security guard and receptionist greeted us. The receptionist informed Mr. Gilbert Hyppolite of our arrival and he proceeded to give a tour of the facility. We were also accompanied by the new Provost, Ms. Linda Simunek. No students were observed on-site during the tour.

After the tour, we met with Mr. Hyppolite and Ms. Simunek. Ms. Simunek provided us with the program outlines for each of their programs. The outline stated that the programs were offered online (See attached). The Practical Nursing program is not approved by the Commission to be offered online. The Nursing (AS) program is only approved for the general education courses to be offered online. We asked for a list of currently enrolled students and a list of graduates. Neither list was provided while we were on-site and a list was not sent via email despite Commission staff sending a follow-up email requesting the documents (See attached).

On February 3, 2023, Techni-Pro Institute sent a letter to students notifying them of the immediate temporary cessation of operations (See attached). Techni-pro did not notify Commission staff of the cessation. Numerous students contacted the Commission office beginning on Monday, February 6, 2023. These students notified Commission staff about the cessation and provided a copy of the notice sent to students.

Meredith L. Pelton
Executive Director

Commission for Independent Education

PRACTICAL NURSING (PN) OUTLINE

Program Objective

The Practical Nursing program prepares the student to acquire knowledge, skills, and attitudes reflective of the standards and competencies associated with the expanding role of Licensed Practical Nurses. Graduates of the program will be able to function with other members of the health care team, in any health care setting, within the limits of his/her educational preparation and experience-- in promoting and maintaining health, preventing disease and disability, caring for and rehabilitating individuals experiencing altered health states, and contributing to the ultimate quality of life until death.

Program Length

The PN program is a total of 1350 clock hours. Full-time students complete the program in 48 weeks. Part-time students complete the program within 96 weeks.

Curriculum Outline

Codes	Course Title	Clock Hours	Lab/Clinical/Simulation
PN101	Medical Terminology (Online)	45	
PN102	Introduction to Nursing (Online)	50	
PN102L	Introduction to Nursing Lab (Campus)		35 L / 18 S
PN103	Core Healthcare Course (Campus)	75	
PN103L	Core Healthcare Course Lab (Campus)		45 L / 23 S
PN104	Anatomy & Physiology (Online)	90	
PN105	Fundamentals of Nursing (Campus)	80	
PN105C	Fundamentals of Nursing Clinical (Campus)		80 CL / 40 S
PN106	Pharmacology & Intravenous Therapy (Campus)	40	
PN106L	Pharmacology & Intravenous Therapy Lab (Campus)		50 L / 25 S
PN107	Medical Surgical Nursing I (Campus)	90	
PN107C	Medical Surgical Nursing I Clinical (Campus)		140 CL / 70 S
PN108	Medical Surgical Nursing II (Campus)	90	
PN108C	Medical Surgical Nursing II Clinical (Campus)		140 CL / 70 S
PN109	Maternal & Newborn Nursing (Campus)	30	
PN109C	Maternal & Newborn Nursing Clinical (Campus)		45 CL / 22 S
PN110	Pediatric Nursing (Campus)	30	
PN110C	Pediatric Nursing Clinical (Campus)		45 CL / 22 S
PN111	Mental Health Concept (Campus)	20	
PN111C	Mental Health Concept Clinical (Campus)		50 CL / 25 S
PN112	Community Health (Campus)	10	
PN112C	Community Health Clinical (Campus)		20 CL / 10 S
PN113	Transition to Practice (Campus)	20	
PN113C	Transition to Practice Clinical (on-ground)		30 CL / 15 S
TCLCSH	Total Clock/Lab/Clinical/Sim Hours	1350	130 L / 550 CL / 340 S

Class Schedule

All classes for the Practical Nursing Program will be held online, EXCEPT lab and clinical, until further notice.

Graduates are eligible to take the NCLEX-PN state board examination to become licensed Practical Nursing

ASSOCIATE OF SCIENCE IN NURSING (ASN) OVERVIEW

Program Objective

The ASN program is designed to provide a well-rounded education for aspiring ASN professionals. The ASN foundation courses will expose students to a broad range of subjects, such as communication, social sciences, and natural sciences. Students will learn to demonstrate behaviors that comply with the Nurse Practice Act of the State of Florida, apply nursing principles to meet the daily physical, social and psychological needs of the patient, and perform nursing measures with accuracy, safety, and efficiency, consistent with current nursing concepts and practices in different health care settings. Additionally, students will learn to function as a responsible member of a nursing team concerned with basic therapeutic, rehabilitative, and preventative care for persons of all ages and diverse cultures.

Program Length

The ASN program is a total of 83 credit hours. Students can expect to complete the program within two years.

Curriculum Outline

Codes	Course Title	Course Type	Credits	Clin./Sim.
CPT101	Introduction to Philosophy/Ethics (online)	G. Ed.	3	
ALM100	American Literature (online)	G. Ed.	3	
ENC101	English Composition I (online)	G. Ed.	3	
MAT101	College Algebra (online)	G. Ed.	3	
PSY101	General Psychology (online)	G. Ed.	3	
DEV104	Lifespan Development (on-ground)	Core	3	
ANP101	Human Anatomy & Physiology I (on-ground)	Core	3	
ANP101L	Human Anatomy & Physiology I Lab (on-ground)	Core	1	15 C
AAP201	Advanced Human Anatomy & Physiology (on-ground)	Core	3	
AAP201L	Advanced Human Anatomy & Physiology Lab (on-ground)	Core	1	15 C
MCB201	Microbiology (on-ground)	Core	3	
MCB201L	Microbiology Lab (on-ground)	Core	1	15 C
NUR102	Fundamentals of Nursing (on-ground)	Core	3	
NUR102L	Fundamentals of Nursing Lab (on-ground)	Core	1	15 C
NUR102C	Fundamentals of Nursing Clinical (on-ground)	Core	2	30 C/15 S
NUR114	Nursing Pharmacology (on-ground)	Core	3	
NUR122	Medical Surgical Nursing (on-grounds)	Core	4	
NUR122L	Medical Surgical Nursing Lab (on-ground)	Core	1	15 C
NUR122C	Medical Surgical Nursing Clinical (on-ground)	Core	4	60 C/30 S
NUR223	Advanced Medical Surgical Nursing (on-ground)	Core	3	
NUR223L	Advanced Medical Surgical Nursing Lab (on-ground)	Core	1	15 C
NUR223C	Advanced Medical Surgical Nursing Clinical (on-ground)	Core	3	45 C/22 S
NUR225	Maternal-Child Nursing (on-ground)	Core	3	
NUR225L	Maternal-Child Nursing Lab (on-ground)	Core	1	15 C
NUR225C	Maternal-Child Nursing Clinical (on-ground)	Core	3	45 C/22 S
NUR226	Pediatric Nursing (on-ground)	Core	3	
NUR226L	Pediatric Nursing Lab (on-ground)	Core	1	15 C
NUR226C	Pediatric Nursing Clinical (on-ground)	Core	3	45 C/22 S
NUR260	Mental Health Nursing (on-ground)	Core	3	
NUR260C	Mental Health Clinical (on-ground)	Core	2	30 C/15 S
NUR 265	Leadership & Management (on-ground)	Core	3	
NUR 265C	Leadership & Management Clinical (on-ground)	Core	3	45 C/22 S
NUR 270	NCLEX-RN Exit Requirement (on-ground)	Core	3	
TCH	Total Credit/Cln/Sim Hours		83	420 C/148 S

Class Schedule

All classes for the ASN program will be held online, EXCEPT clinical, until further notice

Students successfully meeting all educational and institutional requirements for the Associate of Science Degree in Professional Nursing are eligible to have their names submitted to the Florida Board of Nursing for candidate consideration for the NCLEX-RN licensure examination

REGISTERED NURSE → BACHELOR'S IN NURSING (RN-BSN) OVERVIEW

Program Objective

The RN to BSN program objective is to provide focused education that gives its students the ability to listen and think critically, as well as, use suitable modes of inquiry and judgment to propose solutions to complex problems. Throughout the RN to BSN program, students can expect to learn how to combine professional and/or ethical nursing framework into their overall nursing application. Students will establish, maintain, and appropriately conclude therapeutic relationships, serve in roles designed to meet the needs of a variety of populations in a changing society, and stay current in published research related to efficacy and effectiveness in nursing.

Program Length

The RN to BSN program is a total of 120 credit hours. Techni-Pro Institute transfers up to 72 credit hours for the RN to BSN program.

Curriculum Outline

Codes	Course Title	Course Type	Credits	Hours
ENC102*	English Composition II	Gen. Ed.	3	45
SN301	Nurse Baccalaureate Transition	Core	3	45
HUN121*	Principles of Nutrition	Gen. Ed.	3	45
STAT223*	Statistics	Gen. Ed.	3	45
SPC111*	Introduction to Public Speaking	Gen. Ed.	3	45
MED217	Medicine and Disease	Core	3	45
NUR319	Nursing Theorists and Principles of Nursing Practice	Core	3	45
NUR417	Healthcare Issues Policies and Economics	Core	3	45
NUR423	Legal and Ethical Issues in Nursing	Core	3	45
NUR369	Advanced Health Assessment	Core	3	45
NUR325	Advanced Pathophysiology	Core	3	45
NUR455	Cultural and Spiritual Aspects of Nursing Care	Core	3	45
NUR487	Transformational Leadership in Nursing	Core	3	45
NUR466	Community Health Nursing	Core	3	45
NUR364	Nursing Informatics	Core	3	45
NUR487	Nursing Research and Evidence Based Practice	Core	3	45

Class Schedule

Due to Covid-19, all classes for the RN to BSN program will be held online until further notice.



TECHNI-PRO INSTITUTE, LLC

Scientia Divitiæ Est.

RN to BSN, Hemodialysis, Home Health Aide, Accounting & Medical Office, PN, RN, Accounting Technology

414 NW 35th Street, Boca Raton, FL 33431. Telephone: (561) 395-1444. Fax: (561) 409-4648

E-mail: technipro@techniproedu.com . www.techniproedu.com

February 3, 2023

TECHNI-PRO INSTITUTE, LLC
414 NW 35th Street
Boca Raton, Florida 33431

Re: TECHNI-PRO INSTITUTE OPERATIONS

Dearest Students:

In light of the turmoil surrounding Education Programs within the State, TECHNI-PRO INSTITUTE is taking precautionary measures in an effort to continue our compliance with State and Federal Regulations and Guidelines.

To this end, as many of you are aware, TECHNI-PRO INSTITUTE has been conducting an internal audit.

In an effort to expand our audit, we will be implementing a temporary cessation of our operation.

Effective February 6, 2023, TECHNI-PRO INSTITUTE will be closed for in-person and virtual classes and clinicals.

TECHNI-PRO INSTITUTE will be posting any and all updates to the website and we will be initiating messages to our valued students via email.

President Gilbert Hyppolite,
TECHNI-PRO INSTITUTE