



postsecondary activities without authorization, as well as all remedies available under Georgia law, including but not limited to, civil penalties, pursuant to O.C.G.A. § 20-3-250.21.

## **PARTIES**

2.

Plaintiff is a Georgia agency established pursuant to the Nonpublic Postsecondary Educational Institutions Act of 1990, codified in O.C.G.A. §§ 20-3-250.1 through 20-3-250.27. Plaintiff is charged with regulating nonpublic postsecondary educational institutions in Georgia.

3.

Under O.C.G.A. § 20-2-250.18(b), Plaintiff's executive director is authorized to petition for an injunction in GNPEC's name against any entity that violates the statutes, rules, regulations, or orders that regulate nonpublic postsecondary educational institutions.

4.

Defendant MCS is a Georgia domestic profit corporation having its registered office at 3300 Cumberland Boulevard, Suite 500, Atlanta, Georgia 30339. Although Defendant MCS was administratively dissolved or had its certificate of authority revoked on October 22, 2020, Defendant MCS continues to operate at its principal office address of 3330 Cumberland Boulevard, Suite 500, Atlanta, Georgia 30339.

5.

Defendant MCS's last annual registration, filed on October 11, 2017, listed Consonantia Divina, Limited, as its Registered Agent, located at 1755 The Exchange, Suite 190, Atlanta, Georgia 30339.

6.

Upon information and belief, Defendant MCS does business as Erudite Nursing Institute.

Upon information and belief, Defendant MCS transacts business in Georgia as Erudite Nursing Institute. Upon information and belief, Defendant MCS exercises control over Erudite Nursing Institute. Upon information and belief, Defendant Erudite operates at its principal office address of 3330 Cumberland Boulevard, Suite 500, Atlanta, Georgia 30339.

7.

Upon information and belief, Defendant Melody Knight does business as Erudite Nursing Institute. Upon information and belief, Defendant Knight transacts business in Georgia as Erudite Nursing Institute. Upon information and belief, Defendant Knight exercises control over Erudite Nursing Institute. Upon information and belief, Defendant Knight may be served at 100 South Ashley Lane, Suite 600, Tampa, Florida 33602.

#### **JURISDICTION AND VENUE**

8.

This Court has jurisdiction over this action and the parties pursuant to Ga. Const. Art. 6, § 4, ¶ 1, O.C.G.A. §§ 9-10-91, 15-6-8, 20-3-250.18, and 20-3-250.19.

9.

Venue is proper in Cobb County in accordance with O.C.G.A. § 9-10-93 because Defendants' principal place of business is in Cobb County.

#### **FACTS**

##### **Defendant MCS**

10.

Defendant MCS offers “offers accelerated and fast-track Allied Healthcare programs” to students who apply and are accepted. Exhibit “A.” [<https://medicalcareerspecialists.com/about/>].

11.

Defendant MCS's programming includes standard certification training courses for phlebotomy technician, Electrocardiograph/EKG technician, clinical medical assistant, medical laboratory technician/assistant, surgical technician/technologist, pharmacy technician, and physician technician, as well as "three programs that allow students to bridge into the 5-week Licensed Practical Nursing (LPN) program offered through Erudite Nursing Institute." Exhibit "A." [<https://medicalcareerspecialists.com/about/>]

12.

Defendant MCS maintains an online application and sets forth admissions requirements on its website. Exhibit "B." [<https://medicalcareerspecialists.com/register/>].

13.

Defendant MCS charges fees for its programs. Exhibit "B." [<https://medicalcareerspecialists.com/register/>].

14.

Upon information and belief, Defendant MCS issues a certificate or diploma to the student upon satisfactory completion of the student's program of choice.

*Defendant Erudite*

15.

Defendant Erudite offers programs, certifications, and degrees in nursing to students who apply and are accepted. Exhibit "C." [<https://www.eruditenursing.education/>].

16.

Defendant Erudite advertises Erudite Nursing Institute as "the most prestigious blended-learning program available – offering online fast-track coursework supplemented and solidified

by extensive hands-on training – and is certainly one of the most sought after nursing schools around.” Exhibit “D.” [<https://www.facebook.com/notes/1901890386593880/>].

17.

Defendant Erudite maintains an online application and set forth admissions requirements on its webpage. Exhibit “E.” [<https://www.eruditenursing.education/admissions/apply/>].

18.

Defendant Erudite charges fees for its courses. Exhibit “F.” [<https://www.eruditenursing.education/admissions/tuition-fees/>]

19.

Students who complete Defendant Erudite’s programming are referred to as “graduates.” Exhibit “G.” [<https://www.eruditenursing.education/medpropronto/>].

20.

Upon information and belief, Defendant Erudite issues a certificate or diploma to the student upon satisfactory completion of the student’s program of choice.

*Defendant Knight*

21.

Defendant Knight offers programs, certifications, and degrees in nursing to students who apply and are accepted. Exhibit “C.” [<https://www.eruditenursing.education/>].

22.

Defendant Knight advertises Erudite Nursing Institute as “the most prestigious blended-learning program available – offering online fast-track coursework supplemented and solidified by extensive hands-on training – and is certainly one of the most sought after nursing schools around.” Exhibit “D.” [<https://www.facebook.com/notes/1901890386593880/>].

23.

Defendant Knight maintains an online application and set forth admissions requirements on Erudite Nursing Institute's webpage. Exhibit "E."

[<https://www.eruditenursing.education/admissions/apply/>].

24.

Defendant Knight charges fees for courses at Erudite Nursing Institute. Exhibit "F."

[<https://www.eruditenursing.education/admissions/tuition-fees/>]

25.

The website for Erudite Nursing Institute refers to students who complete Defendant Knight's programming as "graduates." Exhibit "G."

[<https://www.eruditenursing.education/medpropronto/>].

26.

Upon information and belief, Defendant Knight issues a certificate or diploma to the student upon satisfactory completion of the student's program of choice.

*Notifications to Cease and Desist Activities*

27.

On May 25, 2010, Defendant MCS requested to be exempted from GNPEC authorization, based on its purported status as a test preparation provider. Exhibit "H."

28.

On June 3, 2010, GNPEC granted Defendant MCS's exemption request, pursuant to O.C.G.A. § 20-3-250(a)(9). Exhibit "I."

29.

In GNPEC's letter of June 3, 2010, granting an exemption to Defendant MCS, GNPEC

expressly advised Defendant MCS that “[s]hould Medical Career Specialists decide to expand its training for students who have to received training from another school or who are not eligible to sit for a specific examination, then Medical Career Specialists must contact NPEC immediately to begin the authorization process.” *See*, Exhibit “I.”

30.

On or about September 2012, GNPEC conducted a review of Defendant MCS’s website, based on an anonymous report GNPEC received that Defendant MCS was operating without authorization.

31.

On September 12, 2012, GNPEC sent a letter to Defendant MCS by certified mail with notification that it must cease and desist offering its “Clinical Medical Assistant[,] Patient Care Tech(nician)[,] Billing & Coding Specialist[,] Phleb(otomy)/EKG Tech(nician) (Combo)[,] Phlebotomy Tech(nician)[,] Pharmacy Tech(nician)[,] Surgical Tech(nician)[,] [and] Medical Laboratory Assistant” programs, advertising the existence of the programs in the State of Georgia, and enrolling students in the programs until a current Certificate of Authorization or Notice of Exemption was granted by GNPEC. Exhibit “J.” The letter was returned to GNPEC as undeliverable.

32.

On December 20, 2016, the Georgia Board of Nursing (“BON”) notified GNPEC that the BON had “recently [been] made aware that Erudite Nursing Institute/Medical Career Specialists is advertising registered and practical nursing education programs” and that the BON “has not approved Erudite Nursing Institute/Medical Career Specialists nor has an application for approval been submitted to the Board.” The BON requested GNPEC’s “assistance with this

issue.” Exhibit “K.”

33.

On or about January 10, 2017, GNPEC posted a “Consumer Alert” on its website concerning Medical Career Specialists and Erudite Nursing Institute, based on the referral from the BON. Exhibit “L.”

34.

On or about July 11, 2017, GNPEC received a “Notice of Intent to File Complaint with Governor Against Executive Director & Notice of Intent to Sue” (“Notice”) from “ENI by Medical Career Specialists.” Exhibit “M.” The Notice references Defendants MCS and Erudite in tandem throughout. The Notice requested that any return correspondence be addressed to “ENI Legal, Medical Career Specialists, 3330 Cumberland Blvd Suite 500, Atlanta Ga 30339.”

35.

On September 13, 2017, Defendant MCS contacted GNPEC by email correspondence, with a subject line of “Assistance of Verification of Exemption Status.” Exhibit “N.” On October 11, 2017, GNPEC Deputy Executive Director Laura Vieth responded by email and provided Defendant MCS with a copy of the September 12, 2012, cease and desist letter. *See*, Exhibit “O.”

36.

On October 12, 2017, GNPEC received email correspondence from Defendant MCS pertaining to a student complaint. Exhibit “P.” The forwarded email included by Defendant MCS was from “Megan G.” on behalf of “ENI Support [and] MCS Staff” to a complainant named “Janice L.” *See*, Exhibit “P.”



37.

On October 27, 2017, GNPEC advised Defendant MCS that its programming required Defendant MCS to be authorized by GNPEC. Exhibit “Q.”

38.

On November 5, 2019, GNPEC sent another letter to Defendant Erudite by certified mail with notification that it must cease and desist postsecondary activities in the State of Georgia until a current Certificate of Authorization or Notice of Exemption was granted by GNPEC. Exhibit “R.” The letter was returned to GNPEC as undeliverable.

39.

On January 1, 2021, Defendant Erudite and Defendant Knight submitted a “Complaint” for “Harassment/Defamation/Violation of State Law & Ga. Code” to Governor Brian Kemp and GNPEC Executive Director Kirk Shook via certified mail. Exhibit “S.” The “Complaint” was received by GNPEC on January 12, 2021. *See*, Exhibit “S.”

40.

On January 26, 2021, GNPEC sent a certified letter to Defendant MCS’s Registered Agent, notifying Defendant MCS that the courses advertised on the institution’s website violated O.C.G.A. § 20-3-250.7(a) and that the institution must take down all advertisements and stop recruitment of students to avoid GNPEC seeking court intervention. Exhibit “T.” The certified mailing receipt was returned to GNPEC, indicating that the cease and desist letter was received and signed for by Defendant MCS on February 1, 2021. Exhibit “U.” However, upon information and belief, Defendant MCS, after signing the certified mailing receipt or “green card” and accepting the letter, subsequently attempted to reverse such acceptance by returning the envelope to GNPEC. Exhibit “V.”

41.

On January 26, 2021, GNPEC sent notification to Defendant Erudite and Defendant Knight by certified mail and by email at mknight@EruditeNursing.education that the courses advertised on Erudite Nursing Institute's website violated O.C.G.A. § 20-3-250.7(a) and that Defendants Erudite and Knight must take down all advertisements and stop recruitment of students to avoid GNPEC seeking court intervention. Exhibit "W." Defendant Knight acknowledged receipt of the letter by email correspondence sent the same day. Exhibit "X." The certified mailing receipt was returned to GNPEC, indicating that the cease and desist letter was received and signed for by Defendant Erudite on February 1, 2021. *See*, Exhibit "U."

42.

On February 3, 2021, GNPEC received a "Second Complaint" for "Harassment, Defamation, Deprivation of Rights Under Color of Law, Conspiracy Against Rights" made by Defendant Erudite and Defendant Knight against GNPEC, GNPEC's Executive Director, GNPEC's Deputy Executive Director, and GNPEC's legal counsel. Exhibit "Y." This "Second Complaint" was submitted in response to GNPEC's directive to Defendant Erudite and Defendant Knight to cease and desist from their unlawful activities.

43.

To date, Defendants have not submitted an application for authorization to GNPEC, do not have a current certificate of authorization to operate issued by GNPEC, and have not ceased or desisted their unauthorized postsecondary activities.

**COUNT I – VIOLATIONS OF O.C.G.A. § 20-3-250.7(a)(1)**

44.

As alleged in paragraphs 10 through 26, Defendants offer courses in medical assisting and nursing to students in Georgia.

45.

As alleged in paragraphs 27 through 43, Defendants do not hold a certificate of authorization to conduct postsecondary activities from GNPEC, have not submitted an application for authorization to GNPEC, have not been granted a current notice of exemption from GNPEC, and have not ceased or desisted postsecondary activities, despite receiving notifications from GNPEC that their activities are unauthorized.

46.

Defendants' conduct violates O.C.G.A. § 20-3-250.7(a)(1), as Defendants are conducting postsecondary activities in Georgia without being issued a current certificate of valid authorization by GNPEC.

**COUNT II – VIOLATIONS OF O.C.G.A. § 20-3-250.7(a)(3)**

47.

As alleged in paragraphs 10 through 26, Defendants provide prospective students with information regarding the courses they offer and an application for prospective students to submit for admission to Defendants' programs through Defendants' websites.

48.

As alleged in paragraphs 27 through 43, Defendants do not hold a certificate of authorization to conduct postsecondary activities from GNPEC, have not submitted an application for authorization to GNPEC, have not been granted a current notice of exemption

from GNPEC, and have not ceased or desisted postsecondary activities, despite receiving multiple notifications from GNPEC that the activities are unauthorized.

49.

Defendants' conduct in soliciting prospective students without being authorized by GNPEC's Executive Director to do so violates O.C.G.A. § 20-3-250.7(a)(3).

**COUNT III – VIOLATIONS OF O.C.G.A. § 20-3-250.7(a)(9)**

50.

As alleged in paragraph 10 through 26, upon information and belief, Defendants award certificates and/or degrees to students who complete courses of study at Defendants' respective institutions.

51.

As alleged in paragraphs 27 through 43, Defendants do not hold a certificate of authorization to conduct postsecondary activities from GNPEC, have not submitted an application for authorization to GNPEC, have not been granted a current notice of exemption from GNPEC, and have not ceased or desisted postsecondary activities, despite receiving multiple notifications from GNPEC that the activities are unauthorized.

52.

Defendants' conduct in awarding certificates and/or degrees to students without being authorized by GNPEC violates O.C.G.A. § 20-3-250.7(a)(9).

**COUNT IV – VIOLATIONS OF O.C.G.A. § 20-3-250.8**

53.

As alleged in paragraphs 10 through 26, Defendants offer courses in medical assisting and nursing to students in Georgia.

54.

As alleged in paragraphs 27 through 43, Defendants do not hold a certificate of authorization to conduct postsecondary activities from GNPEC, have not submitted an application for authorization to GNPEC, have not been granted a current notice of exemption from GNPEC, and have not ceased or desisted postsecondary activities, despite receiving multiple notifications from GNPEC that the activities are unauthorized.

55.

Defendants violated O.C.G.A. § 20-3-250.8 by failing to make application to the Commission for authorization to operate and/or to conduct its postsecondary activities.

#### **REQUESTED RELIEF**

56.

Pursuant to O.C.G.A. § 20-3-250.18(b), GNPEC is entitled to obtain an injunction through a court order to ensure compliance with the applicable Code sections. O.C.G.A. § 20-3-250.18(b) provides that GNPEC shall not be required to allege or prove that it has no adequate remedy at law in order to obtain an injunction.

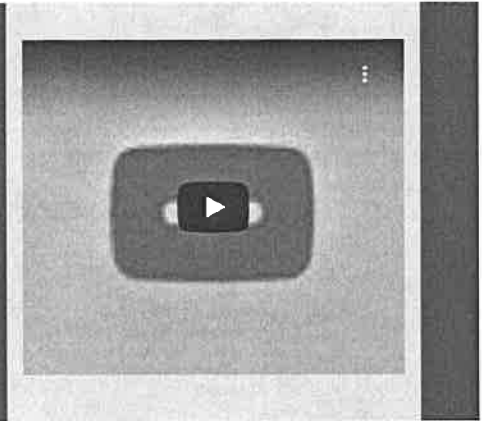
57.

O.C.G.A. § 20-3-250.21 provides for a civil penalty up to \$1,000.00 for each violation of O.C.G.A. § 20-3-250.7 or O.C.G.A. § 20-3-250.8. O.C.G.A. § 20-3-250.21 specifically states that “[e]ach day’s failure to comply with such Code sections shall be a separate violation.” O.C.G.A. § 20-3-250.21. GNPEC is entitled to obtain an award against Defendants for civil penalties, due to Defendants’ violations of O.C.G.A. § 20-3-250.7 and O.C.G.A. § 20-3-250.8.



Please serve:

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### About Us

Medical Career Specialists (MCS) is the Nation's premier choice for professional healthcare training services.

We provide professional educational and training services to healthcare organizations, facility personnel, and individuals. Our goal is to help improve the efficacy and precision in healthcare by providing top-quality training services.

Over the years our objective has remained the same: to provide innovative, accurate, effective services that produce results, backed by excellent customer support.

With countless years of combined experience, MCS has the ability, skills, and wherewithal to take you to the next level in professional endeavors.

### What We Do

Medical Career Specialists offers accelerated and fast-track Allied Healthcare programs, designed to allow medical professionals to advance their career. In addition to our standard certification training courses, we now offer three programs that allow students to bridge into the 5-week Licensed Practical Nursing (LPN) program offered through Erudite Nursing Institute.

### Nationally Accredited



Medical Career Specialists is nationally accredited by the National Healthcare Credentialing Institute—enabling students to challenge national certification examinations to become licensed and then work anywhere in the USA, Canada, or Mexico.

Accreditation ID #: 739476501099

(Click here to verify accreditation through Federated Credentialing Verification System/FCVS)



### CONTACT

Email: [info@MedicalCareerSpecialists.com](mailto:info@MedicalCareerSpecialists.com)  
Telephone: 1(800) 595-6275  
Address: 3330 Cumberland Blvd  
Ste 500, Atlanta, Ga 30339 USA

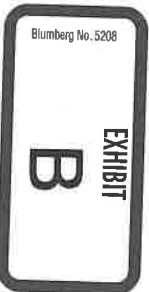




<https://medicalcareerspecialists.com/register/>

A. PROGRAMS SUMMARY

	TUITION	DURATION	LOCATION
Phlebotomy Technician	\$999	2 weeks	Online E-campus
EKG Technician	\$999	2 weeks	Online E-campus
Medical Lab. Technician	\$2,399	3 weeks	Online E-campus
Dialysis Technician	\$2,399	3 weeks	Online E-campus
Health Information Technologist	\$2,399	3 weeks	Online E-campus
Surgical Technician	\$2,799	5 weeks	Online E-campus
Clinical Medical Assistant	\$2,799	5 weeks	Online E-campus
Patient Care Technician	\$2,799	5 weeks	Online E-campus
Physician Technician®	\$5,999	7 weeks	Online E-campus



## B. QUALIFICATION GUIDELINES

Our programs are generally designed for those who have a prior background in healthcare by way of experience, schooling, and/or job training. The following are general prerequisites for enrollment; however, each individual training program and/or Product may have additional prerequisites (as indicated) and Student is responsible for ensuring compliance as necessary. Please contact us before enrolling if help is needed with ensuring compliance.

### i. General Prerequisites for Enrollment

Certified Nurse Aide (CNA), Certified Medical Assistant (CMA), Patient Care Technician/Associate/Nurse, (PCT/PCA/NT), Registered, Licensed Practical/Vocational Nurse (RN, LPN, LVN), Medical Doctor (MD), Emergency Medical Tech (EMT), Phlebotomy Tech (PT), IV Tech, Medical Lab Tech/Assistant (MLT/MLA), Medical Office Assistant (MOA), Dialysis Tech (DT), Home Health Aid, Physician Assistant, Physical Therapist, Rehabilitation Specialist, Health Information Technologist, Health

Records Specialist, Diagnostic Medical Sonographer (DMS), Dental Hygienist, student of allied health or all medical (pre-nursing pre-medical) or Natural Science Majors (Biology, Chemistry). In addition, consideration is given for medical work experience and/or schooling that meets certain criteria. You may still meet the Pre-requisites for Program Participation if you are a current or past Healthcare professional, whether or not your profession is listed above.

\* **By enrolling in MCS training programs and partaking of MCS Product or other service(s), Student hereby attests that he/she has a qualifying background in Healthcare by way of training, schooling, and/or experience as delineated above, except if Student is qualifying by way of Supplementary Compliance. Student understands that forging qualification documents is strictly prohibited and agrees not to do so. Student assumes all responsibility and liability for knowingly enrolling in MCS programs without properly meeting the aforementioned qualification guidelines.**

*Note! Some programs, such as Surgical Technician, Medical Laboratory Assistant/Technician, etc. have prerequisites in addition to the qualification guidelines specified above. Please be sure to thoroughly read the program details and description of the program you are interested in before enrolling, to ensure that you meet all prerequisites.*

ii. **Supplementary Compliance Overview**

**[This section is ONLY for those who do not meet the '(General) Qualification Guidelines'. If you meet those guidelines, please disregard this section. If not, continue reading to determine enrollment eligibility.]**

Federal regulations require that students meet certain educational and practical standards to participate in fast-track accelerated medical training programs, such as those offered through Medical Career Specialists. The most simple and direct method of qualification for most programs is to meet one or more of the pre-approved '(General) Qualification Guidelines'. If you do not fit those criteria, you may still be eligible to enroll by way of Supplementary Compliance, but will need to be pre-approved by the Education Director **BEFORE** registering.

Supplementary Compliance Standards (SCS) require additional training materials and supplies be administered in order to supplement that which is already included with our programs for the purpose of helping students meet program prerequisites. SCS also involves assurance of certification testing eligibility to enable students who would be otherwise non-compliant with qualification guidelines to test for certification and licensing upon program completion.

Supplementary Compliance materials may include, but not be limited to content involving: basic human anatomy and physiology, basic medical terminology, HIPAA compliance (including patients' rights and privacy), infection control and the chain of infection, etc. These materials can be accessed directly via a student account through the Medical Career Specialists E-campus. It generally takes between 1-3 additional weeks of studying and preparation using the Supplementary Compliance materials in order for interested candidates to then qualify for enrollment and completion of one of our standard programs.

The various educational programs offered through Medical Career Specialists have different levels of difficulty and thus require different levels of advanced preparation and varying prerequisites. Accordingly, the exact content of Supplementary Compliance materials will also vary, as it is determined based upon the professional background and skillset of each individual candidate, as well as the desired program of enrollment.

All candidates qualifying for enrollment by way of Supplementary Compliance must be granted approval to do so BEFORE enrolling.

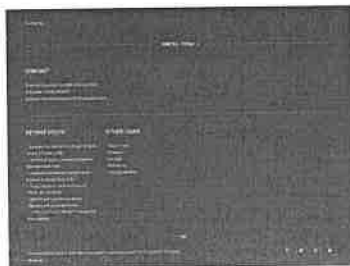
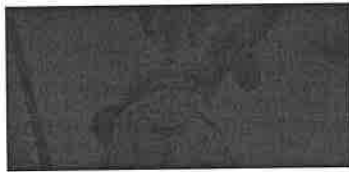
*a. Supplementary Compliance Fees\**

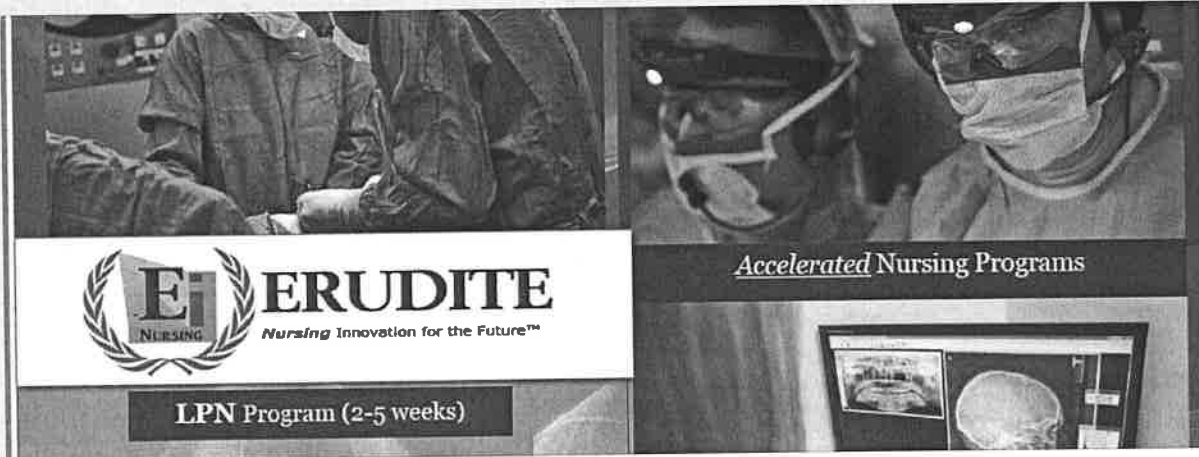
**[This section is ONLY for those who do not meet the '(General) Qualification Guidelines'.]**

The fees below apply, in addition to program tuitions, for those qualifying for program enrollment by way of Supplementary Compliance. The exact Supplementary Compliance fee varies dependent upon the applicant's respective background, skills, and knowledge, which determine the precise length of advance study and additional preparation materials needed for program participation. Supplementary Compliance may add anywhere from 1-3 additional weeks of study time onto standard program lengths; and may require anywhere from basic to intense levels of advance preparation. Contact us before enrolling to determine what may be required of you.

- Phlebotomy Tech or EKG Tech...\$350-\$650
- All other programs (except Physician Technician\*)...\$1,050-\$2,050
- Physician Technician...\$2,550-\$3,050

\*The exact Supplementary Compliance fee for each Student is to be determined by the Program Director BEFORE enrollment.





# Nontraditional, Accelerated Nursing Education.

ERUDITE NURSING INSTITUTE · WEDNESDAY, NOVEMBER 21, 2018

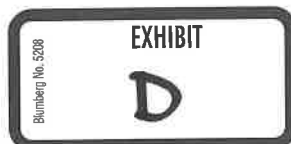
Have you ever wondered what life would be like if you were able to achieve your educational goals in the nursing field online? Imagine studying at your own pace, maintaining your home life and managing your everyday duties from the comfort of your own home or workplace.

Erudite Nursing Institute™ is arguably the most prestigious blended-learning program available—offering online fast-track coursework supplemented and solidified by extensive hands-on training—and is certainly one of the most sought after nursing schools around\*. Why?

To learn more, visit: <https://www.eruditenursing.education/eni-and-i-benefits-of-an-online-nursing-school/>

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Apply Now

Apply Now

To complete this three page application, you will need approximately 30 minutes and the following:

- Valid, current, state-issued photo ID (must be clearly legible and readable. This document cannot be scanned or photographed and used as proof of ID or as a substitute for the original ID.)
- Proof of residency (any document acceptable to the state or county of residence, such as a utility bill, voter registration card, or a deed to real estate.)

After you have completed the application, you will need to print out the application form (print application - 30.1 KB) and bring it to the admissions office for review and processing. Application fee: \$50.00 (non-refundable).

Apply Now

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- Admission Office Hours
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- Beyond Nursing: Understanding Us
- Pharmacology and Technology

EVENTS

**ERUDITE**  
Nursing Innovation for the Future™

**ENI Application for Admission**

Enter your admission information below. There is a non-refundable \$50 application fee due at the time of submission.

If you have not done so already, please read the General Program Information section for the Student Registration Guidelines to ensure you are able to qualify for program participation, or the alert that you are not eligible for admission to complete. Current application information is available before applying if you need assistance. Please note that there is a non-refundable \$50 application fee due at the time of submission. Your application will not be processed without payment of the application fee. Application fee will not be refunded for any reason.

**First Name \***

**Last Name \***

**Birth Date \***

**Last 4 of SSN or Tax ID# \***

**Email Address \***

**Phone \***

**Home Phone \***

**Mobile Address \***

**Street Address \***

**City \***

**State \***

**ZIP \***

**Country \***

**Identifying Verifications**

In order to prevent fraud, proper identification is required for each application. Please submit items (1) forms of ID (photo, Real ID, or a photo ID. The second form of ID may be a second photo ID or State's Secretary Card, Driver Card, Permit, Birth Certificate, or National ID Card. The third form of ID may be a Mortgage, Current Utility Bill, Car Registration Title or any of the documents listed under the first (primary) and second (secondary) forms of ID categories that has not been used. THREE (3) DIFFERENT FORMS OF ID MUST BE PROVIDED.

**Primary ID \***

**Secondary ID \***

**Tertiary ID \***

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**CONTACT**

Erudite Learning Institute  
10000 North 10th Street  
Alaska, Alaska 99507

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- Registration for Summer 2024
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- Admission Office Hours
- Admission Office Hours

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## Tuition & Fees

Send Voicemail

### Erudite Nursing Institute™, 2017-2018 Estimated Cost of Attendance\*

Based on average undergraduate student matriculation in accordance with standard program timeframes. Subject to change.

#### Tuition

(Cost per credit hour.....\$268)

- Licensed Practical/Vocational Nurse.....60 credit hours
  - 60 Cred hr X \$268/Cred hr= Approx. \$16,080 LPN Diploma Program
- Registered Nurse..... 90 credit hours
  - 90 Cred hr X \$268/Cred hr= approx. \$24,120 RN Diploma Program
- Bachelor of Science in Nursing..... 120 credit hours
  - 120 Cred hr X \$268/Cred hr= Approx. \$32,160 BSN Diploma Program

#### Fees

- Textbooks & Supplies.....\$0 (Included with tuition)
- Technology fee.....\$0 (Included with tuition)
- Exam Delivery & Testing..... \$0 (Included with tuition)

#### TOTALS:

- LPN.....\$16,080
- RN.....\$24,120
- BSN.....\$32,160

\*The above are estimates only that account for program costs associated with completion of specified program within specified standard timeframe allotted (i.e. RN 7 weeks, BSN 9 weeks, etc.) and does not account for program extensions, changes, or alterations of any kind. Any program extensions will be calculated on a weekly basis, based upon the program total and length (i.e. LPN \$3,216/week; RN \$3,445.70/week; BSN \$3,573.33/week).

\*\*Board examinations and associated fees are not included or in contemplation in the above

#### RECENT POSTS

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- Remdesivir Shows Promise in Largest of Several Clinical Trials
- Moderna's Coronavirus Vaccine Spurs Immune Response: Early Data

#### COURSES



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Beyond Nursing Fundamentals



Pharmacology and Toxicology

#### EVENTS

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#### CONTACT

Email: [admissions@EruditeNursing.edu](mailto:admissions@EruditeNursing.edu)  
 Telephone: 1(800) 595-8270  
 Address: 3330 Cumberland Blvd, Atlanta, Ga 30339

#### RECENT POSTS

- Receptors for SARS-CoV-2 Present in Wide Variety of Human Cells
- Remdesivir Shows Promise in Largest of Several Clinical Trials
- Moderna's Coronavirus Vaccine Spurs Immune Response: Early Data
- It's So Hard to Know Where Typing of COVID-19— and When
- SARS-CoV-2 Spike Protein Shares Sequence with a Human Protein
- COVID-19 Is "Very Different" in Young Kids Versus Adults

#### OTHER LINKS

- Terms of Use
- History
- Projects
- Professors
- Job Opportunities

Blumberg No. 5208

EXHIBIT  
F





<https://www.eruditenursing.education/medpropronto/>

Note: The posted jobs through the Erudite Job Club™ have been offered by employers to Erudite Nursing Institute™ students and graduates specifically. However, others may apply to the positions upon acceptance into the Erudite Job Club™.



Dr. Crews,

Please find the letter requesting exemption on behalf of Medical Career Specialists attached.

Kind Regards,

Tamah Wallace, Operations Manager  
(202)422-6707



# Medical Career Specialists

"Working Hard Today to Help You Become the Health Care Leaders of Tomorrow"

May 25, 2010

Dr. William Crews, Executive Director  
Nonpublic Postsecondary Education Commission  
2082 East Exchange Place, Suite 220  
Tucker, GA 30084

Dear Dr. Crews:

Medical Career Specialists is a mobile consultant providing review/refresher training workshops to Health Care professionals who wish to receive further preparation before challenging Health Care certification examinations.

Their qualification for program participation is based upon their prior verifiable job experience and/or schooling in the field of Health Care, in accordance with each Certification Examination agency's rules and stipulations. Thus, our students would still otherwise qualify for the examinations without our review/refresher workshops. I believe this training program to be legal, but would just like to verify with the appropriate authorities to be certain.

As per Code Section 20-3-250.3 (paragraph 9) of Senate Bill 425 enacted by the Georgia General Assembly, pertaining to educational institutions that are *exempt* from the "Nonpublic Postsecondary Educational Institutions Act of 1990" exemption can be granted to:

**"A school where the sole purpose of the instructional program is review or preparation for a specific occupational examination recognized by a government agency or bona fide trade, business, or fraternal organization and where the student's occupational training received from another school already makes the student eligible to sit for the examination;"**.

As such, I would like to *formally* request permission from the Nonpublic Postsecondary Education Commission to legally offer refresher training workshops in the State of Georgia without obtaining a Certificate of Authorization. Thank you kindly for your time and consideration.

Respectfully,

Tamah Wallace, Operations Manager

PO BOX 90543 ATLANTA GA 30364

[www.MedicalCareerSpecialists.com](http://www.MedicalCareerSpecialists.com)  
888.545.9135

PH: 888.545.9511 FX:



## Nonpublic Postsecondary Education Commission

2082 East Exchange Place, Suite 220

Tucker, Georgia 30084-5305

(770) 414-3300

Fax (770) 414-3309

Sonny Perdue  
GOVERNOR

William C. Crews  
EXECUTIVE DIRECTOR

June 3, 2010

Ms. Tamah Wallace  
Operations Manager  
Medical Career Specialists  
P.O. Box 90543  
Atlanta, GA 30364

Dear Ms. Wallace:

Pursuant to your letter of May 25, 2010, **Medical Career Specialists** would be exempt from regulation by the Nonpublic Postsecondary Education Commission (NPEC). This exemption is based on Georgia Code 20-3-250.3(a)(9) which reads:

*A school where the sole purpose of the instructional program is review or preparation for a specific occupational examination recognized by a government agency or bona fide trade, business, or fraternal organization and where the student's occupational training received from another school already makes the student eligible to sit for the examination.*

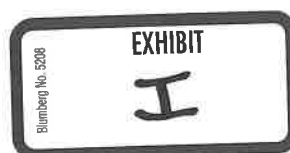
Should **Medical Career Specialists** decide to expand its training for students who have not received training from another school or who are not eligible to sit for a specific examination, then **Medical Career Specialists** must contact NPEC immediately to begin the authorization process.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Crews".

William C. Crews, Ph.D.





**Nonpublic Postsecondary Education Commission**

**2082 East Exchange Place, Suite 220**

**Tucker, Georgia 30084-5305**

**(770) 414-3300**

**Fax (770) 414-3309**

**Nathan Deal**

Governor

September 12, 2012

**William C. Crews**

Executive Director

President/Director  
Medical Career Specialists

Copies of this letter were delivered to the following addresses:

400 Galleria Parkway  
Suite 1500  
Atlanta, Georgia 30339

2762 Cobb Parkway SE  
Atlanta, Georgia 30339

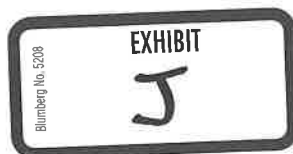
3040 Holcomb Bridge Road  
Norcross, Georgia 30071

Dear Sir and/or Madam:

Under the provisions of the Official Code of Georgia Annotated (O.C.G.A.) 20-3-250 ff, you are hereby directed to Cease and Desist offering programs under the name "Medical Career Specialists" described as:

Clinical Medical Assistant	Phlebotomy Tech(nician)
Patient Care Tech(nician)	Pharmacy Tech(nician)
Billing & Coding Specialist	Surgical Tech(nician)
Phleb(otomy)/EKG Tech(nician) (Combo)	Medical Laboratory Assistant

You are further directed to Cease and Desist advertising the existence of these programs via the URL specifically identified as [www.medicalcareerspecialists.com](http://www.medicalcareerspecialists.com) and through any other means of advertising and media which originate in the State of Georgia.



Medical Career Specials

Page Two

You are finally directed to Cease and Desist enrolling students from the State of Georgia into any and all of the above identified programs at any of the above identified locations.

Any and all actions necessary on your part to comply with these directives must be accomplished by not later than ten (10) business days subsequent to the delivery of this letter. Should said actions not be accomplished by the end of this time period, you will be considered to be in violation of the cited Georgia Code and be subject to penalties prescribed under Code.

Such penalties may include the levying of a fine in the maximum amount of \$1000 per day per infraction of said Code. As this letter is being written, the separate infractions of Georgia Code that have been identified are listed below.

- advertising a non-authorized school—one (1)
- advertising a non-authorized program—eight (8)
- utilizing a Georgia address for such advertising—three (3)
- soliciting students—one (1)

A total minimum fine of \$13,000 per day can currently be substantiated and will be recommended to the Attorney General's Office for each day of infraction that occurs beyond the ten (10) business day period referenced above.

Should you have any question, please feel free to contact me at the above address, at [ccam@npec.state.ga.us](mailto:ccam@npec.state.ga.us) , or at 770-414-3208.

Respectfully yours,



Carl G. Camann, Ph.D.  
Deputy Director





## GEORGIA BOARD OF NURSING

Janice Izlar, RN, CRNA, DNAP, President  
Brenda Rowe, RN, MN, JD, Immediate Past President  
Nancy Barton, RN, MSN  
Tracey Blalock, RN, MSN, MBA, NEA-BC  
Tina Fletcher, LPN  
Linda Floyd, RN, EdD, PMHNP-BC  
Merry Fort, RN

Amy Hooper, LPN, Vice President  
Kellie Lockwood, RN, MSN, Immediate Past Vice President  
K. Andrea Phipps, LPN  
Dellarie Shilling, RN, DNP, FNP-BC  
Blair Train, Consumer Member  
Julia Worthy, RN, MSN

December 20, 2016

Corinna M. Robinson, Executive Director  
Georgia Nonpublic Postsecondary Education Commission  
2082 East Exchange Place  
Suite 220  
Tucker, Georgia 30084

Dear Ms. Robinson:

The Georgia Board of Nursing (Board) was recently made aware that Erudite Nursing Institute/Medical Career Specialists is advertising registered and practical nursing education programs. O.C.G.A. §§ 43-26-10(7) and 43-26-42(7) state that it is a misdemeanor for an entity to conduct a nursing education program preparing persons to practice nursing as registered professional nurses or licensed practical nurses unless the program has been approved by the Board. The Board obtained the following contact information for the program:

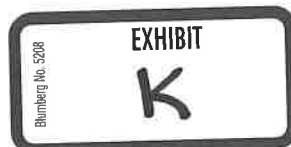
Erudite Nursing Institute/Medical Career Specialists  
<http://www.eruditenursing.education/>  
School of Nursing  
Medical Career Specialists  
3330 Cumberland Blvd Ste 500  
Atlanta, GA 30339

The Board has not approved Erudite Nursing Institute/Medical Career Specialists nor has an application for approval been submitted to the Board. We are respectfully seeking your assistance with this issue.

If you have any questions please contact me at 478-207-1648

Sincerely,

Jim Cleghorn  
Executive Director



## CONSUMER ALERT

### ERUDITE NURSING INSTITUTE/MEDICAL CAREER SPECIALISTS

The Georgia Nonpublic Postsecondary Education Commission (the Commission) and the Georgia Board of Nursing (the Board) were recently made aware that Erudite Nursing Institute/Medical Career Specialists is advertising registered and practical nursing education programs. O.C.G.A. Sections 43-26-10(7) and 43-26-42(7) state that it is a misdemeanor for an entity to conduct a nursing education program preparing persons to practice nursing as registered professional nurses or licensed practical nurses unless the program has been approved by the Board. O.C.G.A. Section 20-3-250.7 states that postsecondary activities such as these must be authorized by the Executive Director of the Commission subject to fines being levied. The following contact information for these programs has been identified

:

Erudite Nursing Institute/Medical Career Specialists  
<http://www.eruditenursing.education/>  
School of Nursing  
Medical Career Specialists  
3330 Cumberland Blvd Ste. 500  
Atlanta, GA 30339

The Board has not approved Erudite Nursing Institute/Medical Career Specialists nor has an application for approval been submitted. The Commission has not authorized Erudite Nursing Institute nor has an application for authorization been submitted.

Consumers are cautioned not to apply to these entities.



Sent 7/11/2017 via Facsimile and FedEx Overnight Delivery ®  
Tracking#:

7796 0125 3807

From:

ENI by Medical Career Specialists  
c/o Mrs. Tamah Jada Clark  
6901-1 A N. 9th Ave #429  
Pensacola, Fla [32504]

Ph: 1(888)256-6692  
Fax: 1(888)288-6412  
[tclark@commonlawoffice.com](mailto:tclark@commonlawoffice.com)



To:

Corinna M. Robinson, Executive  
Director  
State of Georgia  
NONPUBLIC POSTSECONDARY  
EDUCATION COMMISSION  
2082 EAST EXCHANGE PLACE  
SUITE 220  
TUCKER, GEORGIA 30084-5305  
Office: (770) 414-3300  
Fax: (770) 414-3309 (FAX)



Please address correspondence to Attn: ENI Legal, Medical Career Specialists, 3330 Cumberland  
Blvd Suite 500, Atlanta Ga [30339]; Fax: (678) 487-8818; [Legal@MedicalCareerSpecialists.com](mailto:Legal@MedicalCareerSpecialists.com)

Tuesday, July 11, 2017

**NOTICE OF INTENT TO FILE COMPLAINT WITH GOVERNOR AGAINST EXECUTIVE DIRECTOR &  
NOTICE OF INTENT TO SUE**

**Re: On-going harassment, as well as libelous accusations & false statements injurious to  
reputation, by DEPUTY DIRECTOR CARL G. CAMANN, in violation of the Laws of Georgia**

Dear Executive Director Robinson,

It was recently brought to our attention that Mr. Carl G. Camann has authored and is circulating a false "consumer alert" about Erudite Nursing Institute and Medical Career Specialists on the GNPEC website. (See [Attachment #1](#)). The so-called "alert" constitutes the publication of a false and malicious defamation, libelous, and injurious to reputation for which suit may be brought, pursuant **O.C.G.A § 51-5-1(a)**:

"A libel is a false and malicious defamation of another, expressed in print, writing, pictures, or signs, tending to injure the reputation of the person and exposing him to public hatred, contempt, or ridicule." (O.C.G.A. §51-5-1(a)).

Both Erudite Nursing Institute and Medical Career Specialists, (hereinafter "Institutions"), are EXEMPT from GNPEC regulation, as provided for in **O.C.G.A. §20-3-250.3(10)**, which plainly states as follows:

"Subject to the requirements of subsection (c) of Code Section 20-3-250.6, any nonpublic, nonprofit college or university granting baccalaureate degrees whose principal office and campus are located in this state and its related graduate and professional programs, which have been in existence ten or more years as a nonpublic, nonprofit college or university and is accredited by a national or regional accrediting agency recognized by the United States Department of Education; provided, however, that such nonpublic, nonprofit college or

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university shall be subject to the provisions of Code Section 20-3-250.14 for the purposes of satisfying the requirements of 34 C.F.R. Section 668.43(b) and shall designate the commission as the recipient of complaints from students of such nonpublic, nonprofit college or university as a prerequisite for such nonpublic, nonprofit college's or university's acceptance of federal student financial aid funds; and provided, further, that the designation provided for under this paragraph shall be provided solely to the extent necessary for institutional compliance of such nonpublic, nonprofit college or university with the laws and regulations governing federal student financial aid and shall not affect, rescind, or supersede any preexisting authorizations, charters, or recognition".

Erudite Nursing Institute and Medical Career Specialists, whose principal office are located in Georgia, have both been in existence since 2000—for nearly 18 years!

Furthermore, both Institutions are and have been continuously nationally accredited, as required by law. In addition to accreditation with the Better Business Bureau (where an A+ rating has been obtained and maintained), both institutions are accredited by the *National Healthcare Credentialing Institute* (NHCI) under the *Federal Board of Medical Services* (FBMS). The accreditation ID number (39478501099) is prominently displayed at <http://eruditenursing.education/accreditation/> and is verifiable by any person.

The only grant of regulation authority by the GNPEC over Erudite Nursing Institute and Medical Career Specialists would be the exceptions to the exemption in **O.C.G.A. §20-3-250.3(10)**, which themselves do not apply, because neither Institution is subject to **34 C.F.R. Section 668.43(b)**, as the Institutions do not accept any federal funds. This fact is plainly stated to the public and can be verified in the following locations:

- <http://support.eruditenursing.education/f-a-q-s/>
- <http://support.eruditenursing.education/wp-content/uploads/2016/06/ENI-Program-Catalogue-2016-2017.pdf>

The source of authority for **34 C.F.R. Section 668.43(b)** comes from **20 U.S.C. §1092**, which at (a)(1) of that section states as follows:

"Each eligible institution PARTICIPATING IN ANY PROGRAM UNDER THIS SUBCHAPTER shall carry out information dissemination activities for prospective and enrolled students (including those attending or planning to attend less than full time) regarding the institution and all financial assistance under this subchapter." (20 U.S.C. §1092(a)(1)).

Neither Erudite Nursing Institute nor Medical Career Specialists participates in any program under the above-mentioned subchapter, not subject to the requirements of **34 C.F.R. Section 668.43(b)**, and thus not subject to even **O.C.G.A. § 20-3-250.14** under the regulation of the GNPEC.

Therefore, Erudite Nursing Institute and Medical Career Specialists are *entirely* EXEMPT from GNPEC regulation and Mr. Carl G. Camann's false, malicious, and libelous statements subject himself and the GNPEC to legal action for defamation. According to **O.C.G.A. §9-3-33**, a person has one year to bring suit for injuries to reputation. This gives until January 11, 2018 to bring suit, as this was the date the defamatory "consumer alert" was authored by Carl G. Camann. (See [Attachment #2](#)).

Furthermore, the false statements in Mr. Camann's illegal "consumer alert" allege that Erudite Nursing Institute and Medical Career Specialists are illegally operating outside of the Georgia Board of Nursing's approval. However, neither Institution is subject to the Georgia Board of Nursing's regulation and authority. (See [Attachment #3](#)).

Because the illegal "consumer alert" against Erudite Nursing Institute and Medical Career Specialists has been viewed by hundreds—if not thousands of potential students—an official letter of retraction from the GNPEC is now required to avoid legal action. **O.C.G.A. §51-5-11(a)** says:

"In any civil action for libel which charges the publication of an erroneous statement alleged to be libelous, it shall be relevant and competent evidence for either party to prove that the plaintiff requested retraction in writing at least seven days prior to the filing of the action or omitted to request retraction in this manner." (O.C.G.A. §51-5-11(a)).

For the past 7 years, Mr. Camann has harbored a personal vendetta against Erudite Nursing Institute and Medical Career Specialists, for which he has already been reprimanded by past GNPEC

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Executive Directors. (See Attachments # 4&5). As can be seen from those Attachments, this is not the first time complaints have had to be filed against Mr. Camann for making false and malicious statements that are severely injurious to reputation. But this is the last time an attempt will be made to address Mr. Camann's illegal actions and behavior before pursuing legal action and contacting the Governor directly to file a complaint against the GNPEC Executive Director.

As the Executive Director, having full knowledge of the situation, you will be the person ultimately held responsible for Mr. Camann's behavior and actions, should you fail to immediately enforce his compliance with the law. **O.C.G.A. § 20-3-250.5(c)** indicates that:

"The executive director of the Nonpublic Postsecondary Education Commission shall be appointed by the Governor." (O.C.G.A. § 20-3-250.5(c)).

According to **O.C.G.A. § 20-3-250.5(c)(1)**, it is the Executive Director's responsibility:

"To employ such personnel as may be necessary to carry out the provisions of this part and in connection therewith to develop job descriptions for such personnel [...]" (O.C.G.A. § 20-3-250.5(c)(1)).

Many students have called in concerned about or making harassing and discouraging statements, and false accusations based upon the "consumer alert" illegally authored and disseminated by Mr. Carl G. Camann on behalf of yourself and the Georgia Nonpublic Postsecondary Education Commission. As the Executive Director, having full knowledge of the situation, you will be the person ultimately held responsible for Mr. Camann's behavior and actions, should you fail to immediately enforce his compliance with the law.

Please IMMEDIATELY remove the "consumer alert" from the GNPEC website and issue an official letter of retraction containing a written apology for the injury caused Erudite Nursing Institute and Medical Career Specialists in name and reputation, and clearly stating that the allegations made in the "alert" are false.

Sincerely,



Mrs. Tamah Jada Clark

*Enclosures:*

*Attachments #s 1-5*

Please address correspondence to Attn: ENI Legal, Medical Career Specialists, 3330 Cumberland Blvd Suite 500, Atlanta Ga [30339]; Fax: (678) 487-8818; [Legal@MedicalCareerSpecialists.com](mailto:Legal@MedicalCareerSpecialists.com)

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# Attachment # 1



## CONSUMER ALERT

### ERUDITE NURSING INSTITUTE/MEDICAL CAREER SPECIALISTS

The Georgia Nonpublic Postsecondary Education Commission (the Commission) and the Georgia Board of Nursing (the Board) were recently made aware that Erudite Nursing Institute/Medical Career Specialists is advertising registered and practical nursing education programs. O.C.G.A. Sections 43-26-10(7) and 43-26-42(7) state that it is a misdemeanor for an entity to conduct a nursing education program preparing persons to practice nursing as registered professional nurses or licensed practical nurses unless the program has been approved by the Board. O.C.G.A. Section 20-3-250.7 states that postsecondary activities such as these must be authorized by the Executive Director of the Commission subject to fines being levied. The following contact information for these programs has been identified

:

Erudite Nursing Institute/Medical Career Specialists  
<http://www.eruditenursing.education/>  
School of Nursing  
Medical Career Specialists  
3330 Cumberland Blvd Ste. 500  
Atlanta, GA 30339

The Board has not approved Erudite Nursing Institute/Medical Career Specialists nor has an application for approval been submitted. The Commission has not authorized Erudite Nursing Institute nor has an application for authorization been submitted.

Consumers are cautioned not to apply to these entities.

## Summary of Comments on CONSUMER-ALERT-ERUDITE.pdf

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Page: 1

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Number: 1 Author: Username Subject: Sticky Note Date: 6/16/2017 10:46:33 AM  
<https://sdj0t1pqh49322a533ut60x1-wpengine.netdna-ssl.com/wp-content/uploads/sites/8/2016/02/CONSUMER-ALERT-ERUDITE.pdf>

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Attachment #2

# ERUDITE NURSING INSTITUTE

The Georgia Nonpublic Postsecondary Education Board of Nursing (the Board) were re Institute/Medical Career Specialists is advertising programs. O.C.G.A. Sections 43-26-10(7) and entity to conduct a nursing education program professional nurses or licensed practical nurse Board. O.C.G.A. Section 20-3-250.7 states that authorized by the Executive Director of the Commission following contact information for these programs:

Erudite Nursing Institute/Medical Career Specialists  
<http://www.eruditennursing.education/>  
School of Nursing

**Document Properties**

Description Security Fonts Custom Advanced

**Description**

File: CONSUMER-ALERT-ERUDITE

Title:

Author: Carl Canianh

Subject:

Keywords:

Created: 1/11/2017 9:04:09 AM

Modified: 1/11/2017 9:04:09 AM

Application: Microsoft® Word 2013

**Advanced**

PDF Producer: Microsoft® Word 2013

PDF Version: 1.5 (Acrobat 6.x)

Location: C:\Users\Username\OneDrive\Erudite Nursing Institute\

File Size: 5.26 KB (5,387 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 1

Tagged PDF: Yes

Fast Web View: No

OK Cancel



Attachment #3

Sent 2/1/2017 via Facsimile and FedEx Overnight Delivery®  
Tracking#:

7783 236A 1897

From:

ENI by Medical Career Specialists  
c/o Mrs. Tamah Jada Clark  
6901-1 A N. 9th Ave #429  
Pensacola, Fla [32504]

Ph: 1(888)256-6692  
[tclark@commonlawoffice.com](mailto:tclark@commonlawoffice.com)



To:

Barry E. Morgan  
Cobb County Solicitor General  
10 East Park Square, Ste 500  
Marietta, Ga 30090

Ph: (770) 528-8500  
Fx: (770) 528-8590

Please address correspondence to Attn: ENI Legal, Medical Career Specialists, 3330 Cumberland  
Blvd Suite 500, Atlanta Ga [30339]; Fax: (678) 487-8818

Tuesday, February 1, 2017

**RE: Erudite Nursing Institute**

**Erudite's Exemption from Regulation by the Georgia Board of Nursing/Ga BON False and Slanderous Claims, as well as False Accusations of "Scam" and "Fraud" by Cobb County Solicitor's Office**

Mr. Morgan,

Jim Cleghorn, Executive Director, Georgia Board of Nursing (Ga BON) has inaccurately stated that Erudite comes within his purview, and that he has the authority to maliciously and prejudicially prevent Erudite's students from obtaining licensure in Georgia. Additionally, the Cobb County Solicitor's Office has made several allegations of "fraud" and "scam", as well as threatened to bring charges against Erudite and its employees.

The present communication is to address the absurdity of the foregoing claims and request that the above-named persons conduct themselves in a more Lawful, professional manner.

At O.C.G.A. § 43-1-24 (Chapter 1 of Title 43), under which Title the Georgia Nurse Practice Act (Chapter 26) falls, there is specification as to whom Title 43 applies.

As will be shown, Title 43 does not universally apply to all persons, *ipso facto*. Licensed professionals subject to regulation by professional licensing boards include:

Any person licensed by a professional licensing board and who practices a "profession," as defined in Chapter 7 of Title 14, the "Georgia Professional Corporation Act," or who renders "professional services," as defined in Chapter 10 of Title 14, "The Georgia Professional Association Act," whether such person is practicing or rendering services as a proprietorship, partnership, professional corporation, professional association, other corporation, limited liability company, or any other business entity

O.C.G.A. § 14-7-2(3)—Chapter 7 of Title 14—of the "Georgia Professional Corporation Act", defines a "professional corporation" as: *a corporation, whether domestic or foreign, organized under Chapter 2 of this title which has elected to become subject to this chapter*. Erudite was not organized under Chapter 2, has not elected to become subject to Chapter 7, and is not a "professional corporation".

Furthermore, Erudite does not render "professional services" (O.C.G.A. § 14-7-4) within the meaning of Chapter 7, defined as the practice of a profession through officers, employees, and agents.

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Erudite is not a corporation of any kind, does not render “professional services” as heretofore defined, and does not come within the purview of Chapter 7 of Title 14, the Georgia Professional Corporation Act.

In addition, Erudite is not a “professional association”, as defined at O.C.G.A. § 14-10-2(1) as “an unincorporated association, as distinguished from a partnership, organized under this chapter for the purpose of rendering one type of professional service.” And Erudite does not render “professional services”, as defined in Chapter 10 of Title 14.

O.C.G.A. § 14-10-2—Chapter 10 of Title 14—of The Georgia Professional Association Act”, states that “professional service”:

means the personal services rendered by attorneys at law and any type of professional service which may be legally performed only pursuant to a license from a board pursuant to Title 43, for example, the personal services rendered by certified public accountants, chiropractors, dentists, osteopaths, physicians and surgeons, and podiatrists (chiroprodists).

Moreover, with regards to the rendering of “professional services”, O.C.G.A. § 14-10-6 recognizes that the term “employee” as used in that Code section “**does not include [...] nurses or other individuals who are not usually and ordinarily considered by custom and practice to be rendering professional services for which a license or other legal authorization is required in connection with the profession practiced by a particular professional association**”. (Emphasis added).

Erudite is not a “professional association”, does not render “professional services”, and does not come within the purview of Chapter 10 of Title 14, The Georgia Professional Association Act. Nor does Erudite inherently come within the purview of Mr. Cleghorn or the Ga BON.

Erudite’s students are and have been eligible for licensure by examination or endorsement in the State of Florida, from whence Erudite hails. This is because “graduation on or after July 1, 2009, from an accredited program” suffices as the educational requirements for licensure by examination. (See Fla. Stat. 464.008(1)(c)3). Additionally, Fla. Stat. 464.009 provides for licensure by endorsement once students have “completed a state, regional, or national examination which is substantially equivalent to or more stringent than the examination given by the department”.

This is the reason Erudite students do not always elect to challenge the NCLEX-RN or NLCEX-PN through the National Council of State Boards of Nursing (NCSBN), but may complete examination through the National Medical Licensing Association (NMLA) under the Federal Board of Medical Services or other acceptable credentialing body. Students may then obtain licensure by endorsement in the State of Georgia (from Florida), by law.

However, in 2015, a representative of the NCSBN, named Augustus, informed Erudite that students could lawfully and directly challenge either the NCLEX-RN or NCLEX-PN in the State of Georgia using the “equivalency” code for nontraditional programs, as follows: “US05909900”. And he further stated that all of the 50 united states has its own equivalency code in this manner.

Thus, shortly thereafter, in 2015, Erudite proceeded to make contact with the Ga BON to verify students’ eligibility for State-issued nursing examination and licensure in the State of Georgia, under nontraditional programs, and was informed as follows:

1. Erudite’s students are eligible for licensure by examination in Georgia under O.C.G.A. § 43-26-7; but,
2. Some students may be required to complete additional clinical/preceptorship hours before testing in the event that it is determined that such further training is needed prior to examination (on a case-by-case basis).

Erudite strives to always be in absolute compliance with the Law and special care is taken to ensure this. For this reason, it came as a complete shock when there were (slandorous) allegations and false accusations of “scam” and “fraud” being loosely, carelessly, unjustifiably, and unlawfully thrown around. Erudite has never scammed or defrauded anyone.

All program information and Student Enrollment Terms are provided in thorough, lengthy, written Agreements; in order to ensure complete transparency, mutual understanding, and absolute legitimacy. And every student is immediately furnished a copy of every Agreement they sign.

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As has been demonstrated, Erudite has and shall continue to observe the Law, at all times, without exception. And has made every good faith effort to ensure continued compliance with the Law. Because previous contact had been made with the Ga BON as specified above, it was a surprise to inadvertently, on last week, —through a series of e-mails between a former Erudite student, Mr. Newkirk, Mr. Cleghorn, and various other public servants—learn that Mr. Cleghorn and Mr. Newkirk have been spreading rumors to current and future students.

If the Ga BON has stray from its position of eligibility for licensure of Erudite's student under nontraditional programs, without any form of notice, Erudite would have no way of knowing this and could hardly be held responsible for the lack of communication on the part of Ga BON. Furthermore, O.C.G.A. §16-3-5 makes provision for "mistake of fact", as follows:

A person shall not be found guilty of a crime if the act or omission to act constituting the crime was induced by a misapprehension of fact which, if true, would have justified the act or omission.

Erudite has been under the impression of continued licensure (by examination) eligibility for current and future students in the State of Georgia. And has not had reason, before last week, to believe these facts to have possibly changed.

Thus, on last Friday, January 27, 2017, when Mr. Jimmy Newkirk of the Cobb County Solicitor's Office called Erudite threatening to bring criminal charges against everyone there (during a recorded phone call), it was quite shocking. Yet, it was even more appalling when Mr. Newkirk condescendingly referenced two employees by their sex and ethnicity in a derogatory manner, before finally outright calling them liars (so I am told).

How there could be a pending investigation and pending prosecution, per Mr. Newkirk, without prior communication with Erudite, is somewhat of a mystery. In addition, unlawful threats, "name calling", slander, false accusations of theft, fraud, scam, etc. are not appropriate—especially in the absence of probable cause. There are better ways to go about communication. Harassment, unprofessionalism, verbal assault, etc. hardly seem necessary.

I sincerely hope this sort of behavior is not what the people are funding through their hard-earned tax dollars. To the best of knowledge, Erudite was, is, and shall continue to be in absolute compliance with the Laws of Georgia.

Kind Regards,



Mrs. Tamah Jada Clark

Please address correspondence to Attn: ENI Legal, Medical Career Specialists, 3330 Cumberland Blvd Suite 500, Atlanta Ga [30339]; Fax: (678) 487-8818

CC:

Jim Cleghorn, Executive Director  
Georgia Board of Nursing  
237 Coliseum Drive  
Macon, GA 31217-3858

Ph: 478.207.2440

Fx: 877.371.5712

7016 2710 0001 0501 1059

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Attachment #4



**Nonpublic Postsecondary Education Commission**

2082 East Exchange Place, Suite 220  
Ducker, Georgia 30084-5309  
(770) 414-3300  
Fax (770) 414-3309

**Sonny Perdue**  
GOVERNOR

**William C. Crews**  
EXECUTIVE DIRECTOR

June 3, 2010

[Redacted]  
Operations Manager  
Medical Career Specialists  
[Redacted]  
Atlanta, GA 30364

Dear [Redacted]:

Pursuant to your letter of May 25, 2010, *Medical Career Specialists* would be exempt from regulation by the Nonpublic Postsecondary Education Commission (NPEC). This exemption is based on Georgia Code 20-3-250.3(a)(9) which reads:

*A school where the sole purpose of the instructional program is review or preparation for a specific occupational examination recognized by a government agency or bona fide trade, business, or fraternal organization and where the student's occupational training received from another school already makes the student eligible to sit for the examination.*

Should *Medical Career Specialists* decide to expand its training for students who have not received training from another school or who are not eligible to sit for a specific examination, then *Medical Career Specialists* must contact NPEC immediately to begin the authorization process.

Thank you.

Sincerely,

William C. Crews, Ph.D.



Attachment #5

**Nonpublic Postsecondary Education Commission**

2082 East Exchange Place, Suite 220

Cucker, Georgia 30084-3305

(770) 414-3300

Fax (770) 414-3309

**Nancy Verdine**  
GOVERNOR

**William C. Crews**  
EXECUTIVE DIRECTOR

March 15, 2011

Ms. [REDACTED]  
Medical Career Specialists

Dear Ms. [REDACTED]

I am in receipt of your complaint send via e-mail regarding Dr. Carl Camann, Deputy Director.

The Nonpublic Postsecondary Education Commission (NPEC) takes any complaint most seriously. I will discuss your concerns with Dr. Camann and take appropriate action as is necessary.

Thank you.

Sincerely,

William C. Crews, Ph.D.

C: Dr. Carl Camann

From: Brandy Smith [mailto:[bsmith@medicalcareerspecialists.com](mailto:bsmith@medicalcareerspecialists.com)]  
Sent: Wednesday, September 13, 2017 11:13 PM  
To: Pat Neri <[patn@gnpec.org](mailto:patn@gnpec.org)>  
Cc: [fred@atlanta.bbb.org](mailto:fred@atlanta.bbb.org)  
Subject: Assistance with Verification of Exemption Status

Dear Ms. Neri,

On 09/13/17 a consumer alert issued by the GNPEC was brought to my attention. The alert states that our organization is involved in illegal activity and has not applied to GNPEC for authorizations and/or approvals.

Prior to the alert being brought to our attention, we were under the impression that we are exempt from the "Nonpublic Postsecondary Educational Institutions Act of 1990.", under O.C.G.A. 20-3-250.3(10), pursuant to Georgia Law. This is the very first I am hearing of any potential problems, as no one has reached out to communicate that there may be an issue of any kind.

Our organization has been in existence and operation in Georgia since 2000 and has never engaged in any illegal activity at all whatsoever, and does not intend to begin doing so now.

I would like to open the channels of communication at this time to be given the opportunity to address any potential problems. As it is of the utmost importance to us that our business partners and the public know that we only engage in both fair and lawful business practices, and we would like to demonstrate this fact.

Please provide any information and instructions needed to begin the process of verification of "Exemption Status" or any other lawful processes that may be needed to clear our good name. Thank you in advance for your time and consideration.

Sincerely,

Brandy Smith, AOM  
MCS Staff

Medical Career Specialists  
[www.MedicalCareerSpecialists.com](http://www.MedicalCareerSpecialists.com)  
Ph: 1 (800) 595-6276  
Fx: (678) 487-8818  
3330 Cumberland Blvd Ste 500  
Atlanta, GA 30339

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**From:** Laura Vieth  
**To:** [lvnieth@medicalcareerspecialists.com](mailto:lvnieth@medicalcareerspecialists.com)  
**Subject:** RE: Assistance with Verification of Exemption Status  
**Date:** Wednesday, October 11, 2017 1:48:00 PM  
**Attachments:** [Medical Career Specialists \(Cease and Desist\).PDF](#)

Ms. Smith,

I apologize for the Commission's delayed response to your below email. Given the July 2017 Notice of Intent to Sue sent by Ms. Tamah Jade Clark, on behalf of Medical Career Specialists, further research and communication with state counterpart agencies, including the Attorney General and Board of Nursing, is still needed relative to your case.

That being said, I can provide you with more information regarding the institution's previous exemption under code section 20-3-250.3(a)(9), granted in June 2010. In 2012, it appeared to the Commission the programming offered by Medical Career Specialists was no longer limited to test preparation (refresher courses). As such, a Cease and Desist letter (attached) was sent to all known addresses for your institution. This action occurred under different GNPEC leadership and as such I have been unable to secure documentation that Medical Career Specialists received this letter. In December 2016, the Board of Nursing contacted the Commission regarding practical nursing education programs purportedly being offered by Medical Career Specialist. This led to the publication of the consumer alert on the Commission's website.

In response to your recent request for exemption, the code section, under which the institution was previously granted an exemption, is intended to include institutions which offer training for those whose previous education already makes them eligible to sit for the examination. The current website for Medical Career Specialist advertises its training as "accelerated education programs", easily interpreted as being postsecondary education requiring authorization by the Commission. Additionally, to my knowledge, the programs offered typically require a much longer training term. The Commission has many institutions authorized to offer training of this nature, all of which have had their curriculums assessed by a content expert to ensure education norms are being satisfied by the program. Please be aware that the brevity of your programs, should they be acting as the sole training to prepare students for exams, may present a consumer protection issue.

Should you still believe that programs is eligible for exemption, please email me both the certification exams associated with each of the below programs as well as the entrance requirements for each program.

[www.medicalcareerspecialists.com/programs.html](http://www.medicalcareerspecialists.com/programs.html)

## Available Programs

Live Chat Now! Show Now! 1 (800) 595-6276

"Healthcare continues to offer excellent opportunities for job seekers, and not only positions that require a medical degree." (-US News and World Report)


### Programs Offered










Medical Career Specialists offers a total of 9 accelerated education programs that range from 2 to 7 days in length. Certification examinations are offered for every program.

[>>Qualification Guidelines](#)

### CPR First Aid Available

Basic Life Support (BLS), Automated External Defibrillator (AED) through the American Heart Association can be added on to any of our 9 programs for a fee of \$125, which is all-inclusive.



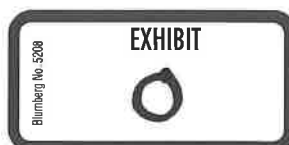
 Clinical Medical Assistant (5 days)	 Phlebotomy Technician (2 days)	 Patient Care Technician (5 days)
 Surgical Technician (5 days)	 Billing & Coding Specialist (5 days)	 EKG Technician (2 days)
 Pharmacy Technician (5 days)	 Medical Lab Assistant (3 days)	 Physician Technician (7 days)

Please note that due to the complexity involved in your case, including both the information provided to the Commission by other state agencies and via student complaints, an in person will be required prior to any GNPEC determination being made. My hope is that this would be scheduled for some time in late October but this depends on the information provided in response to this email.

Furthermore, for record keeping purposes, any questions or comments relative to this correspondence must be provided in writing.

Regards,

Laura S. Vieth  
Deputy Director  
Nonpublic Postsecondary Education Commission  
2082 East Exchange Place, Suite 220  
Tucker, GA 30081  
Office: 770-414-3306  
Email: [lauras@gnpec.org](mailto:lauras@gnpec.org)  
[www.gnpec.org](http://www.gnpec.org)



**From:** Brandy Smith [<mailto:bsmith@medicalcareerspecialists.com>]

**Sent:** Wednesday, September 13, 2017 11:13 PM

**To:** Pat Neri <[patn@gnpec.org](mailto:patn@gnpec.org)>

**Cc:** [fred@atlanta.bbb.org](mailto:fred@atlanta.bbb.org)

**Subject:** Assistance with Verification of Exemption Status

Dear Ms. Neri,

On 09/13/17 a consumer alert issued by the GNPEC was brought to my attention. The alert states that our organization is involved in illegal activity and has not applied to GNPEC for authorizations and/or approvals.

Prior to the alert being brought to our attention, we were under the impression that we are exempt from the "Nonpublic Postsecondary Educational Institutions Act of 1990.", under O.C.G.A. 20-3-250.3(10), pursuant to Georgia Law. This is the very first I am hearing of any potential problems, as no one has reached out to communicate that there may be an issue of any kind.

Our organization has been in existence and operation in Georgia since 2000 and has never engaged in any illegal activity at all whatsoever, and does not intend to begin doing so now.

I would like to open the channels of communication at this time to be given the opportunity to address any potential problems. As it is of the utmost importance to us that our business partners and the public know that we only engage in both fair and lawful business practices, and we would like to demonstrate this fact.

Please provide any information and instructions needed to begin the process of verification of "Exemption Status" or any other lawful processes that may be needed to clear our good name. Thank you in advance for your time and consideration.

Sincerely,

Brandy Smith, AOM  
MCS Staff

Medical Career Specialists  
[www.MedicalCareerSpecialists.com](http://www.MedicalCareerSpecialists.com)  
Ph: 1 (800) 595-6276  
Fx: (678) 487-8818  
3330 Cumberland Blvd Ste 500  
Atlanta, GA 30339

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**Nonpublic Postsecondary Education Commission**

**2082 East Exchange Place, Suite 220**

**Tucker, Georgia 30084-5305**

**(770) 414-3300**

**Fax (770) 414-3309**

**Nathan Deal**

Governor

September 12, 2012

**William C. Crews**

Executive Director

President/Director  
Medical Career Specialists

Copies of this letter were delivered to the following addresses:

400 Galleria Parkway  
Suite 1500  
Atlanta, Georgia 30339

2762 Cobb Parkway SE  
Atlanta, Georgia 30339

3040 Holcomb Bridge Road  
Norcross, Georgia 30071

Dear Sir and/or Madam:

Under the provisions of the Official Code of Georgia Annotated (O.C.G.A.) 20-3-250 ff, you are hereby directed to Cease and Desist offering programs under the name "Medical Career Specialists" described as:

Clinical Medical Assistant	Phlebotomy Tech(nician)
Patient Care Tech(nician)	Pharmacy Tech(nician)
Billing & Coding Specialist	Surgical Tech(nician)
Phleb(otomy)/EKG Tech(nician) (Combo)	Medical Laboratory Assistant

You are further directed to Cease and Desist advertising the existence of these programs via the URL specifically identified as [www.medicalcareerspecialists.com](http://www.medicalcareerspecialists.com) and through any other means of advertising and media which originate in the State of Georgia.

Medical Career Specials  
Page Two

You are finally directed to Cease and Desist enrolling students from the State of Georgia into any and all of the above identified programs at any of the above identified locations.

Any and all actions necessary on your part to comply with these directives must be accomplished by not later than ten (10) business days subsequent to the delivery of this letter. Should said actions not be accomplished by the end of this time period, you will be considered to be in violation of the cited Georgia Code and be subject to penalties prescribed under Code.

Such penalties may include the levying of a fine in the maximum amount of \$1000 per day per infraction of said Code. As this letter is being written, the separate infractions of Georgia Code that have been identified are listed below.

- advertising a non-authorized school—one (1)
- advertising a non-authorized program—eight (8)
- utilizing a Georgia address for such advertising—three (3)
- soliciting students—one (1)

A total minimum fine of \$13,000 per day can currently be substantiated and will be recommended to the Attorney General's Office for each day of infraction that occurs beyond the ten (10) business day period referenced above.

Should you have any question, please feel free to contact me at the above address, at [ccam@npec.state.ga.us](mailto:ccam@npec.state.ga.us) , or at 770-414-3208.

Respectfully yours,



Carl G. Camann, Ph.D.  
Deputy Director

**From:** [Brandy Smith](#)  
**To:** [Laura Vieth](#)  
**Cc:** [Pat Neri](#)  
**Subject:** [FWD: Re: Illegal Use of Erudite Nursing Institute's Name]  
**Date:** Thursday, October 12, 2017 2:31:17 PM  
**Attachments:** [untitled](#)

---

Ms. Vieth,

Please see the most recent incident of a student being scammed in our name below. We are in the process of trying to stop this from happening, but continue to receive reports like the one below. Thank you.

Sincerely,

Brandy Smith, AOM  
[www.MedicalCareerSpecialists.com](http://www.MedicalCareerSpecialists.com)  
Ph: 1 (800) 595-6276  
Fx: (678) 487-8818  
3330 Cumberland Blvd Ste 500  
Atlanta, GA 30339

----- Original Message -----

Subject: Re: Illegal Use of Erudite Nursing Institute's Name  
From: Janice L <[jlindsay1234@gmail.com](mailto:jlindsay1234@gmail.com)>  
Date: Wed, October 11, 2017 3:09 pm  
To: ENI Support <[support@eruditenursing.education](mailto:support@eruditenursing.education)>

Thank you would you happen to have that information? She scammed me for 2,000 dollars already

On Wed, Oct 11, 2017 at 5:53 PM ENI Support <[support@eruditenursing.education](mailto:support@eruditenursing.education)> wrote:

Good Afternoon Janice,

Please be advised that we have no record of you as a student, but have been receiving your homework assignments, sent to the attention of [REDACTED].

[REDACTED] is in no way associated with Erudite Nursing Institute or Medical Career Specialists. Neither does [REDACTED] or any other organization that [REDACTED] may claim to work with or for have any affiliation with Erudite Nursing Institute or Medical Career Specialists.

To the best of our knowledge based on several reports from students, [REDACTED] is advertising and attempting to run an illegitimate, unaccredited program through the illegal use of our name. This sort of fraudulent activity by [REDACTED] and [REDACTED] [REDACTED] has been reported by numerous students, to the Attorney General.

We are currently in the process of communicating with the State and



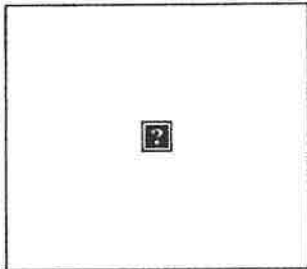
prove we have no connection with [REDACTED] or the fraudulent programs she has been illegally running in our name without permission. We have received several complaints of this individual taking students' money and running a scam in our name.

Under Georgia Law, it is illegal for anyone to offer a nursing program if they are not a nurse or higher (medical doctor, etc.). [REDACTED] is only an allied healthcare worker, not a nursing or medical professional qualified to teach nursing classes or programs. Also, [REDACTED] does not have a school and is not associated with any schools.

Please be advised that the State Attorney General may be in the process of bringing charges against [REDACTED] and her program participants at this time. To protect your money, interests, and ability to practice nursing, you may want to contact the State Attorney General to notify them you have fallen victim to [REDACTED] and [REDACTED] scam. Thank you.

Sincerely,

Megan G.  
ENI Support  
MCS Staff



[www.EruditeNursing.education](http://www.EruditeNursing.education)  
[www.MedicalCareerSpecialists.com](http://www.MedicalCareerSpecialists.com)  
Ph: 1 (800) 595-6276  
Fx: (678) 487-8818  
3330 Cumberland Blvd Ste 500  
Atlanta, GA 30339

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----- Original Message -----

Subject:

From: "Janice L" <[jlindsay1234@gmail.com](mailto:jlindsay1234@gmail.com)>

Date: 10/3/17 4:34 pm

To: "Janice L" <[JLINDSAY1234@GMAIL.COM](mailto:JLINDSAY1234@GMAIL.COM)>, "Instructor Page"

||| | <rpape@eruditenursing.com>

**From:** Pat Neri  
**To:** Brandy Smith  
**Cc:** Laura Vieth  
**Bcc:** Pat Neri  
**Subject:** Medical Career Specialists Request for Exemption  
**Date:** Friday, October 27, 2017 3:53:00 PM

---

Brandy Smith, AOM  
MCS Staff  
Medical Career Specialists  
3330 Cumberland Blvd, Suite 500  
Atlanta, GA 30339

RE: Application for Exemption

Dear Ms. Smith:

I have again reviewed your request for exemption as a test preparation site under the Nonpublic Postsecondary Educational Institutions Act of 1990. Section 9 of the Act states:

*“A school where the sole purpose of the instructional program is review or preparation for a specific occupational examination recognized by a government agency or bona fide trade, business, or fraternal organization and where the student’s occupational training received from another school already makes the student eligible to sit for the examination;”*

Medical Career Specialist’s is providing accelerated training programs rather than just test preparation for a prior school’s graduate. One example is the Physician Technician program which is offered over 7 days and offers certification in six different disciplines and states, in part, that “This program enables its participants to be able to assist Physicians, Doctors, and Nurses in multiple facets ...”

Reference has been made to a past exemption authorization which clearly stated that “Should Medical Career Specialists decide to expand its training for students who have not received training from another school or who are not eligible to sit for a specific examination, then Medical Career Specialists must contact NPEC immediately to begin the authorization process.”

At this time, I would refer you to the Commission website at <https://gnpec.org/authorization/> to review the requirements for full authorization

Sincerely,

Pat

Patricia J. Neri  
Exempt Institution Coordinator  
Nonpublic Postsecondary Education Commission  
2082 East Exchange Place, Suite 220  
Tucker, GA 30084  
770-414-3235



[patn@gnpec.org](mailto:patn@gnpec.org)  
[www.gnpec.org](http://www.gnpec.org)

cc Laura S. Vieth, Deputy Director



**Nonpublic Postsecondary Education Commission**

2082 East Exchange Place, Suite 220

Tucker, Georgia 30084-5305

(770) 414-3300

Fax (770) 414-3309

**Brian P. Kemp**  
Governor

**Kirk Shook**  
Executive Director

November 5, 2019

**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

# 7019 0160 0000 2142 0533

Erudite Nursing Institute  
3330 Cumberland Blvd SE #500  
Atlanta, GA 30339

*RE: Request to Cease and Desist Operations – Erudite Nursing Institute*

Dear Sir or Madam:

The Georgia Nonpublic Postsecondary Education Commission (“GNPEC”), which authorizes the operation of nonpublic postsecondary institutions in the State of Georgia, has been advised that you are conducting nonpublic postsecondary activities in this State without GNPEC’s required authorization to do so.

As set forth in O.C.G.A. § 20-3-250.7(a)(1), “[n]o person, agent, group, or entity of whatever kind, alone or in concert with others, shall operate in this state a nonpublic postsecondary educational institution or conduct postsecondary activities in this state unless issued a current certificate of valid authorization by the executive director.” Pursuant to O.C.G.A. § 20-3-250.8(a) and O.C.G.A. § 20-3-250.14(c), you are hereby directed to cease and desist enrolling students in the State of Georgia into any and all of the identified programs listed below until a current Certificate of Authorization or Notice of Exemption has been granted by this Agency:

- Licensed Practical Nurse (LPN)
- Registered Nurse (RN)
- Bachelor of Science in Nursing (BSN)

You are further directed to cease and desist advertising the existence of these programs by any means, including the URL specifically identified as <https://www.eruditenursing.education>, until a current Certificate of Authorization or Notice of Exemption has been granted by this Agency.

In the event of your noncompliance with these directives, you shall be deemed in willful violation of O.C.G.A. § 20-3-250.7 and O.C.G.A. § 20-3-250.14(c). GNPEC will seek to assess a civil penalty not to





exceed \$1,000.00 for each violation, with each day's failure to comply considered a separate violation. O.C.G.A. § 20-3-250.21. Moreover, your failure to comply with the directives set forth in this letter will result in the case being turned over to the Office of the Attorney General to initiate any appropriate action or proceeding for enforcement. O.C.G.A. § 20-3-250.18(a).

Please be further reminded that under Georgia law, it is a misdemeanor for any person, including any individual, corporation, or association, to “[c]onduct a nursing education program in this state unless the program has been approved” by the Georgia Board of Nursing. O.C.G.A. § 43-26-42(7). It is also a misdemeanor for any person, including any individual, corporation, or association, to “[c]onduct a nursing education program preparing persons to practice nursing as registered professional nurses unless the program has been approved” by the Georgia Board of Nursing. O.C.G.A. § 43-26-10(7).

Should you have any questions, please feel free to contact me by email at [kshook@gnpec.ga.gov](mailto:kshook@gnpec.ga.gov). I look forward to your anticipated cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Shook', followed by a horizontal line extending to the right.

Kirk Shook  
Executive Director  
Georgia Nonpublic Postsecondary Education Commission

cc: Kristen Settlemire, Assistant Attorney General (via email)



**ERUDITE**

*Nursing Innovation for the Future™*

RECEIVED  
JAN 12 2020  
NPEC

From:

Melody Knight  
Erudite Nursing Institute™  
100 S. Ashley Drive, Suite 600  
Tampa, Fla 33602

E-mail: [mknight@EruditeNursing.education](mailto:mknight@EruditeNursing.education)

Ph: 1(800) 595-6276

Fax: (678) 487-8818

**\*Preferred method of contact is e-mail or fax.\***

To:

Brian Kemp, Georgia Governor  
206 Washington Street, Suite 203  
State Capitol  
Atlanta, Ga30334

Certified Mail@#: 7020 0640 0000 0758 7813

Kirk Shook, Executive Director  
GNPEC  
2082 E Exchange Pl # 220  
Tucker, GA 30084  
Phone: (770) 414-3300  
Fax: (770) 414-3309

Certified Mail@#: 7020 0640 0000 0758 7721

Friday, January 1, 2021

## COMPLAINT

**RE: Georgia Nonpublic Postsecondary Education Commission/GNPEC**  
*(Harassment, Defamation, Violation of State Law & Ga Code)*

Pursuant § 20-3-250.5 (enacted by Ga. L. 1990, p. 1166), the Georgia Nonpublic Postsecondary Education Commission (GNPEC), hereinafter "the commission", only has authority to regulate "nonpublic" as oppose to "private" postsecondary education.



RECEIVED  
JAN 12 2020  
NPEC

Erudite Nursing Institute™ is a PRIVATE (not “nonpublic”), not-for-profit institute of secondary education over which “the commission” has not been granted authority by the Ga Constitution, Ga Code, Laws of Ga, U.S. Constitution, U.S. Code nor any other legal authority.

Any alleged/feigned authority of “the commission” to regulate *private* postsecondary institutions previously found under § 20-3-100 through § 20-3-120 and/or § 20-3-200 through § 20-3-214 has long since been repealed by law, (Ga. L. 1990, p. 1160 and Ga. L. 2019, p. 919), respectively. SEE ATTACHMENTS “A”, “B” & “C”.

“The commission” is NOT one of the six (6) CONSTITUTIONAL Boards or Commissions provided for in **Article IV, Constitution of the State of Georgia** and instead, is extremely limited in its powers and functions. SEE ATTACHMENT “D”.

Pursuant § 20-3-250.5(a), “the commission” is “a *BUDGET* unit of the executive branch of the state government” [emphasis added], authorized pursuant § 20-3-250.5(b)(2) “to establish minimum criteria in conformity with Code Section 20-3-250.6”. SEE ATTACHMENT “E”.

Code Section 20-3-250.6 is found in the **Official Code of Georgia Annotated (O.C.G.A.)** under **Article 7**, pertaining to Scholarships, Loans, and Grants. SEE ATTACHMENT “F”.

Erudite Nursing Institute™ does not, has not and will not participate in any such scholarship, loan, or grant programs over which “the commission” has been granted authority under O.C.G.A. Article 7. “The commission” does not have any authority over nor business with Erudite Nursing Institute™ and is currently in violation of the aforementioned Code Sections and Laws of Georgia.

“The commission” is an executive-branch commission—beholden to the Governor’s Office—that is fiscal in nature, NOT authorized to exercise any *police powers* or *legislative powers* of the state. Nevertheless, “the commission” has resorted to multiple and on-going threats, instances of harassment, as well as public defamation and shaming for over five (5) years against Erudite Nursing Institute™—for all of which it lacks any legal authority. SEE ATTACHMENTS “G” & “H”.

As can be expected, Erudite Nursing Institute™ has suffered significant monetary damage over the last several years as a direct result of “the commission’s” willful negligence, illegal threats and harassment, public shaming, as well as its intent to cause harm. Erudite Nursing Institute™ has also suffered irreparable damage to its reputation as a direct result of “the commission” publishing false statements, as well as had our Better Business Bureau (BBB) accreditation revoked due to “the commission’s” false consumer alert. SEE ATTACHMENTS “I” & “J”.

Furthermore, “the commission” even contacted the State Attorney General, as well as the Solicitor General—both of whom launched (unsuccessful) investigations—to try to have charges illegally brought against Erudite Nursing Institute™, despite our having been in compliance with the law at all times and despite “the commission’s” lack of legal authority for doing so.

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We have suffered public scorn, criticism, hate via countless comments and false reviews on social media platforms referencing "the commissions" false consumer alert including, but not limited to Facebook, Yelp, Twitter, and Google.

We are demanding immediate written, public retraction/correction (via "the commission's" website) of the public defamation to which Erudite Nursing Institute™ has been unlawfully subjected for over five (5) years, as well as a written apology. In addition, we demand all records pertaining to Erudite Nursing Institute™ in "the commission's" possession be immediately deleted, including but not limited to: complaints, inquiries, all other correspondences. Thank you.

Sincerely,

*Melody K.*

Melody K.  
Credentialing & Regulatory Compliance  
Erudite Nursing Institute™

**\*Preferred method of contact is e-mail or fax.\***

P.S.

The committees to which "the commission" is mandated to submit an annual written report pursuant § 20-3-250.5(b)(7) summarizing its activities in regard to its responsibilities, activities, and administration have been copied on this communication to make them aware of "the commission's error in any previous reporting it may have done pertaining to Erudite Nursing Institute™.

CC:

ATTN: Rick Jasperse, Chairman  
House Higher Education Committee  
417-A State Capitol  
Atlanta, GA 30334  
(404) 656-5064

ATTN: Rick Jasperse, Chairman  
House Education Committee

218-A State Capitol  
Atlanta, GA 30334  
(404) 656-7153

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ATTN: Martin IV, P. K., Chairman  
Senate Education and Youth Committee  
324-B Coverdell Legislative Office Building  
Atlanta, GA 30334  
Phone: (404) 463-6598

Lindsey Tippins, Chairman  
Senate Higher Education Committee  
121-E State Capitol  
Atlanta, GA 30334  
Phone: (404) 657-0406

ATTACHMENT "A"

al Assembly

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Document: O.C.G.A. § 20-3-100

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**O.C.G.A. § 20-3-100**

**Copy Citation**

Current through the 2020 Regular Session of the General Assembly

GA - Official Code of Georgia Annotated TITLE 20. EDUCATION CHAPTER 3.  
POSTSECONDARY EDUCATION ARTICLE 3. REGULATION OF PRIVATE DEGREE-  
GRANTING INSTITUTIONS

§§ 20-3-100 through 20-3-120

Reserved. Repealed by Ga. L. 1990, p. 1166, § 4, effective April 10, 1991.

OFFICIAL CODE OF GEORGIA ANNOTATED

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ATTACHMENT "B"

al Assembly

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Document: O.C.G.A. § 20-3-200

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**O.C.G.A. § 20-3-200**

**Copy Citation**

Current through the 2020 Regular Session of the General Assembly

GA - Official Code of Georgia Annotated TITLE 20. EDUCATION CHAPTER 3.  
POSTSECONDARY EDUCATION ARTICLE 6. PRIVATE COLLEGES AND  
UNIVERSITIES AUTHORITY

§§ 20-3-200 through 20-3-214. (See Editor's notes.)

Reserved. Repealed by Ga. L. 2019, p. 919, § 7-1/HB 553, effective July 1, 2019.

OFFICIAL CODE OF GEORGIA ANNOTATED

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ATTACHMENT "C"

LC 33 7902S/AP

19

155

**PART VI**

156

**SECTION 6-1.**

157 Code Section 20-3-73.3 of the Official Code of Georgia Annotated, relating to the Georgia  
158 Southern University Herty Advanced Materials Development Center and its advisory board,  
159 is amended by repealing subsection (f).

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160

**PART VII**

161

**SECTION 7-1.**

162 Chapter 3 of Title 20 of the Official Code of Georgia Annotated, relating to postsecondary  
163 education, is amended by repealing Article 6, relating to the Private Colleges and  
164 Universities Authority, and designating said article as reserved.

165

**SECTION 7-2.**

166 Any assets of the Private Colleges and Universities Authority existing as of June 30, 2019,  
167 shall devolve by operation of law and without further action to the State of Georgia on July  
168 1, 2019. Any liabilities and obligations of the Private Colleges and Universities Authority  
169 existing as of June 30, 2019, shall be transferred to and assumed by the State of Georgia, by  
170 such instruments as may be required to maintain the same.

171

**PART VIII**

172

**SECTION 8-1.**

173 Article 2 of Chapter 14 of Title 20 of the Official Code of Georgia Annotated, relating to  
174 education accountability assessment programs, is amended by repealing Part 7, relating to  
175 the Education Information Steering Committee, and designating said part as reserved.

176

**SECTION 8-2.**

177 Any assets of the Education Information Steering Committee existing as of June 30, 2019,  
178 shall devolve by operation of law and without further action to the State of Georgia on July  
179 1, 2019. Any liabilities and obligations of the Education Information Steering Committee  
180 existing as of June 30, 2019, shall be transferred to and assumed by the State of Georgia, by  
181 such instruments as may be required to maintain the same.



# ATTACHMENT "D"

Designated as  
The Constitution of the State of Georgia

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CONSTITUTION  
OF THE  
STATE OF GEORGIA

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# ATTACHMENT "E"

## i NOTICE

(#)

### **GNPEC Staff Continuing Daily Operations Remotely**

GNPEC encourages you to abide by local, state, and federal guidelines regarding in-person operations. If instruction is modified from what was previously approved, notify your RS immediately. Please continue timely submissions of all applications.

## § 20-3-250.5. Administration; general powers and duties

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(a) The commission shall be assigned to the Georgia Student Finance Commission for administrative purposes only. The commission shall be a budget unit of the executive branch of the state government.

(b) The commission shall have the following powers and duties:

(1) To establish and promulgate standards, rules, regulations, and policies for carrying out the provisions of this part and for the orderly operation of the commission. To effectuate the purposes of this part, the commission may request from any department, division, board, bureau, commission, or other agency of the state, and such agency shall provide such information as will enable the commission to exercise properly its powers and perform its duties under this part;

(2) To establish minimum criteria in conformity with Code Section 20-3-250.6, including quality of education, ethical and business practices, health and safety, and fiscal responsibility which applicants for authorization to operate or for an agent's permit shall meet before such authorization or permit may be issued, and to continue such authorization or permit in effect. The criteria to be developed under this paragraph shall be such as will effectuate the purposes of this part but will not unreasonably hinder legitimate educational innovation;

# ATTACHMENT "F"

LexisNexis  
Custom Solution

al Assembly

More ▾

Document: O.C.G.A. § 20-3-250.6

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## O.C.G.A. § 20-3-250.6

### Copy Citation

Current through the 2020 Regular Session of the General Assembly

GA - Official Code of Georgia Annotated TITLE 20. EDUCATION CHAPTER 3.  
POSTSECONDARY EDUCATION ARTICLE 7. SCHOLARSHIPS, LOANS, AND  
GRANTS PART 1A. NONPUBLIC POSTSECONDARY EDUCATIONAL INSTITUTIONS

### § 20-3-250.6. Minimum standards for educational institutions

(a) In establishing the criteria required by paragraph (2) of subsection (b) of Code Section 20-3-250.5, the commission shall observe and shall require compliance with the following minimum standards:

(1) A nonpublic postsecondary educational institution must be maintained and operated, or, in the case of a new institution, it must demonstrate that it can be maintained and operated in compliance with the following minimum standards:

(A) That the quality and content of each course or program of instruction, training, or study are such as may reasonably and adequately achieve the stated objective for which the course or program is offered;

(B) That the institution has adequate space, equipment, library and physical facilities, instructional materials, and personnel to provide education of good quality;

(C) That the education and experience qualifications of directors, administrators, supervisors, and instructors are such as may reasonably ensure that the students will receive education consistent with the objectives of the course or program of study and that each director and instructor shall satisfactorily meet educational qualifications and other requirements established by the commission;

(D) That the institution provides students and other interested persons with a catalog or other written description containing information describing the programs offered; program objectives; length of program; schedule of tuition, fees, and all other charges and expenses necessary for completion of the course of study; cancellation and refund policies consistent with standards adopted by the commission; prior year's enrollment, graduation, and job placement rates; and such other material facts concerning the institution and the program or

1/1/2021

ATTACHMENT "G"

Erudite Nursing Institute - Google Search



Erudite Nursing Institute



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About 727,000 results (0.54 seconds)

www.eruditenursing.education

### Erudite Nursing Institute™ | Nursing Innovation for the Future™

Home Welcome Home · About · CORONAVIRUS COVID-19 CERTIFICATION; Academic Programs Coursework & Classes. LICENSED PRACTICAL NURSE ... Tuition & Fees · Qualification Guidelines · About · Program Length

www.eruditenursing.education · Admissions

### Tuition & Fees | Erudite Nursing Institute™

Erudite Nursing Institute™, 2017-2018 Estimated Cost of Attendance\*. Based on average undergraduate student matriculation in accordance with standard ...

www.eruditenursing.education · about

### About | Erudite Nursing Institute

Erudite Nursing Institute™ is a not-for-profit, nationally-accredited educational institution for higher educational pursuits that is closed to the General Public.

www.facebook.com · ... · Nursing School

### Erudite Nursing Institute - Home | Facebook

Erudite Nursing Institute, Atlanta. 6171 likes · 3 talking about this. Erudite provides accelerated Nursing education programs for qualifying medical...

gnpec.georgia.gov · ... · Consumer Links

### Consumer Alerts | Georgia Nonpublic Postsecondary ...

Erudite Nursing Institute/Medical Career Specialists. August 2, 2016. The Georgia Nonpublic Postsecondary Education Commission (the Commission) and the ...

www.yelp.com · ... · Nursing Schools

### Erudite Nursing Institute - Nursing Schools - 3330 ... - Yelp

Apr 9, 2020 — 3330 Cumberland Blvd SE Atlanta, GA 30339 Directions (800) 595-6276 Call Now From the Business Specialties Erudite Nursing Institute ( ... Rating: 3 · 2 reviews

allnurses.com · new-school-erudite-nursing-1598745

### new school - Erudite Nursing Institute - School / College ...

Jan 2, 2016 — Hello fellow nursing students Has anyone heard of Erudite Nursing education in Atlanta Georgia? If so please give feedback. Will I be able to sit ...

erudite-nursing-institute.business.site

### Erudite Nursing Institute - Nursing School in Atlanta

Erudite Nursing Institute™. Nursing School in Atlanta. Open today until 5:00 PM. Get QuoteCall nowGet directionsWhatsAppMessage usContact UsFind ...

www.bbb.org · atlanta · profile · training-program

### Medical Career Specialists | Better Business Bureau® Profile

Additional Information: Erudite Nursing Institute(r) is a trade and service mark of Medical Career Colleges(r). Medical Career Colleges(r) is owned by Medical ...

twitter.com · eruditenursing

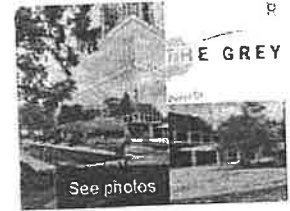
### Erudite Nursing Institute (@EruditeNursing) | Twitter

The latest Tweets from Erudite Nursing Institute (@EruditeNursing). EN! provides fast-track nursing programs for medical professionals. Address: 3330 ...

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### Erudite Nursing Ins

Website Directions Sa Nursing school in Vinings, Georg

Located in: City View Vinings Address: 3330 Cumberland Blv Hours: Closes soon · 5PM · Op Phone: (800) 595-6276

Hours or services may diffe Suggest an edit · Own this busin

Send to your phone

### From Erudite Nursing I

"Erudite Nursing Institute offers n fast-track nursing programs at th levels for qualifying medical pers weeks (LPN) to 12-weeks (MSN)

### Updates from Erudite N

View previous updates on Googl

### Profiles



### Reviews

- 162 Google reviews
- "I send more money to m my job is as nurse."
- "Will be applying as soon my tuition."
- "I couldn't be happier and people can be ungrateful"
- Tamah Clark - Edit ★★★★★ 4 years ago

View all Google reviews

People also search for

Ad · [www.mercer.edu/mercer/nursing](http://www.mercer.edu/mercer/nursing) ▾

### Mercer University Nursing - 12-Month Nursing Program

Online, On-Site & In-Hospital. BSN for non-nurses. BA/BS Degree Required. Online or Onsite Format. Top Clinical Placements. Three Start Dates. Online Courses. CCNE Accredited. Accelerated Learning Path · About Mercer

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### Become an RN in 11 Months - ASN Blended (ONLINE) Program

Classes Starting August 2020 / Start Now (no waiting list) Affordable Price. Request More Information. Quality Education. Highlights: Offering Affordable Education, Providing Private School Education, Providing Accelerated Programs. About Us · Contact Us

### Searches related to Erudite Nursing Institute

- is erudite nursing institute legit
- erudite nursing institute nclex
- erudite nursing institute tuition
- erudite nursing institute login
- erudite nursing prerequisites
- erudite nursing institute school code
- erudite nursing deadline
- night nursing schools in georgia

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**(#)****GNPEC Staff Continuing Daily Operations Remotely**

GNPEC encourages you to abide by local, state, and federal guidelines regarding in-person operations. If instruction is modified from what was previously approved, notify your RS immediately. Please continue timely submissions of all applications.

## Consumer Alerts

### Erudite Nursing Institute/Medical Career Specialists

**August 2, 2016**

The Georgia Nonpublic Postsecondary Education Commission (the Commission) and the Georgia Board of Nursing (the Board) were recently made aware that Erudite Nursing Institute/Medical Career Specialists is advertising registered and practical nursing education programs. O.C.G.A. Sections 43-26-10(7) and 43-26-42(7) state that it is a misdemeanor for an entity to conduct a nursing education program preparing persons to practice nursing as registered professional nurses or licensed practical nurses unless the program has been approved by the Board. O.C.G.A. Section 20-3-250.7 states that postsecondary activities such as these must be authorized by the Executive Director of the Commission subject to fines being levied. The following contact information for these programs has been identified:

Erudite Nursing Institute/Medical Career Specialists

<http://eruditenursing.education/> (<http://eruditenursing.education/>)

School of Nursing

Medical Career Specialists

3330 Cumberland Blvd Ste.

500 Atlanta, GA 30339

The Board has not approved Erudite Nursing Institute/Medical Career Specialists nor has an application for approval been submitted. The Commission has not authorized Erudite Nursing Institute nor has an application for authorization been submitted.

Consumers are cautioned not to apply to these entities.

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## The College Network

**August 3, 2014**

The Georgia Nonpublic Postsecondary Education Commission has received sufficient information relative to The College Network to issue the following advisory to residents of the State of Georgia:

Consumers seeking information on postsecondary educational opportunities may find solicitations concerning The College Network. Consumers are cautioned to review any information they receive about The College Network with close scrutiny.

The College Network is not a postsecondary school, a college, a university, or an educational teaching or training entity of any kind. It cannot issue certificates or degrees, nor can it issue credit for any postsecondary level course.

The College Network is headquartered in Indianapolis, Indiana. The Better Business Bureau of Central Indiana has extensive information available on its website relative to The College Network, including a consumer alert. This information can be accessed in the Better Business Bureau review (<http://www.bbb.org/indy/business-reviews/publishers-book/the-collegenetwork-inc-in-indianapolis-in-3004933/>). The content of that specific consumer alert is accessible via a link on that website.

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[Español](#)

ATTACHMENT "I")

[Business Login](#)

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 [My BBB](#)




[Home](#) > [Georgia](#) > [Atlanta](#) > [Training Program](#) > Medical Career Specialists



« **Business Profile**


## Business Profile

# Medical Career Specialists

 3330 Cumberland Blvd  
SE STE 500  
Atlanta, GA 30339-5997

 <http://www.medicalcareerspecialists.com>

 [Email this Business](#)

 [\(800\) 595-6276](tel:(800)595-6276)

### CURRENT ALERTS FOR THIS BUSINESS

#### Business Alert:

The Georgia Nonpublic Postsecondary Education Commission along with the Georgia Board of Nursing issued the following CONSUMER ALERT:

#### ERUDITE NURSING INSTITUTE/MEDICAL CAREER SPECIALISTS

The Georgia Nonpublic Postsecondary Education Commission (the Commission) and the Georgia Board of Nursing (the Board) were recently made aware that Erudite Nursing ...

[Read More](#)

### ADDITIONAL BUSINESS INFORMATION

**Additional Information:** Erudite Nursing Institute(r) is a trade and service mark of Medical Career Colleges(r).

Medical Career Colleges(r) is owned by Medical Career Specialists(r).

[See all additional business information](#)

### Contact Information


 3330 Cumberland Blvd SE STE 500



Atlanta, GA 30339-5997

 <http://www.medicalcareerspecialists.com>

 Email this Business

 [\(800\) 595-6276](tel:(800)595-6276)

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## Customer Reviews

THIS BUSINESS HAS 0 REVIEWS

[Read reviews](#)

[Be the First to Review!](#)

## Customer Complaints

2 complaints closed in last 3 years

1 complaints closed in last 12 months

[Read complaints](#)

[File a Complaint](#)

## BBB Rating & Accreditation



THIS BUSINESS IS NOT BBB ACCREDITED

**Years in Business:** 20

**Customer Reviews are not used in the calculation of BBB Rating**

[Overview of BBB Rating](#)

## Customer Complaints

2 Customer Complaints

## Customer Reviews

0 Customer Reviews

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## Products & Services

This company states they offer standard and fast track programs for LPN, RN, and BSN degrees.

## Business Details

### Location of This Business

3330 Cumberland Blvd SE STE 500, Atlanta, GA 30339-5997

 Email this Business

**BBB File Opened:** 8/10/2010  
**Years in Business:** 20  
**Business Started:** 11/21/2000  
**Business Incorporated:** 5/30/2008 in GA, USA  
**Type of Entity:** Corporation

### Alternate Business Name

Erudite Nursing Institute  
Medical Career Colleges®

### Business Management

Ms. Brandy Smith, Operations Assistant  
Ms. Sarah Lynn Andrews, Director of Education

### Contact Information

Other Contacts  
Ms. Michelle Bleakley, Manager of Operations  
Mr. Jeremy Pacaw, Administrative Assistant

### Additional Contact Information

Fax Numbers

(678) 487-8818 

Email Addresses

 Email this Business 

Website Addresses

<http://www.eruditenursing.education>  
<https://www.eruditenursing.education/>

Atlanta, GA



For Businesses

Write a Review

Log In

Sign Up

Restaurants Home Services Auto Services More



ATTACHMENT "J"

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Today is a holiday! Business hours may be different today.

# Erudite Nursing Institute



2 reviews Details

Unclaimed • Nursing Schools Edit

Write a Review

Add Photo

Share

Save

## COVID-19 Updates

Edit

"ONLINE classes available for 5-week LPN, 7-week RN, 9-week BSN, and 12-week MSN. Classes held Winter, Spring, Summer, and Fall."

Posted on April 9, 2020

## Updated Services

- ✓ Virtual classes

## Photos & videos

See all 1 photos →



Add photo

## Services Offered

Virtual Classes

## You Might Also Consider

Sponsored



Fortis College

4 reviews

5.2 miles away from Erudite Nursing Institute

Pamela R. said "I just graduated from the Fortis DH program and have started interviewing as well as working interviews. I have never felt more prepared and confident in what I am doing. There were parts of the program I questioned due to be an..." read more in Colleges & Universities, Vocational & Technical School

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### Interactive College Of Technology

9.0 miles away from Erudite Nursing Institute

**Rebecca R. said** "After my husband moved to the US, we were looking for a good ESL program in the Atlanta area. Our neighbors highly recommended ICT so we checked it out. Long story short, my husband LOVED his ESL teachers, peers, and staff. We ended..." [read more](#)  
in Language Schools, Colleges & Universities, Vocational & Technical School



### Atlanta Career Institute

13

15.5 miles away from Erudite Nursing Institute

**Vanessa Z. said** "I wanted to become a phlebotomist, and tried to look for good schools online, my friend has taken this class before and told me great things about this school, I was also happy that it was a 6 week program because looking up other..." [read more](#)  
in Vocational & Technical School

## About the Business

Erudite Nursing Institute (ENI) is a unique and vivacious institution of higher learning with a program model designed to fit the times in which we live. Innovative, captive, and scholarly with its 5, 7, and 9 week Nursing programs (LPN, RN, BSN); Erudite Nursing Institute is as stunning, unique, and wond...

[Read more](#)

## Location & Hours



[Edit business info](#)

**3330 Cumberland Blvd SE**  
Atlanta, GA 30339

[Get directions](#)

## Ask the Community

[Ask a question](#) +

**Q:** Can you take the NCLEX after completing the nursing program at Erudite, and can you link me to a Student Ambassador who has taken the NCLEX exam?

**A:** Greetings Lakesha D, and thank you for your inquiry into our programs. Please note that our programs are closed to the General Public, which means students must first apply for and obtain an ATA before applying. This is to ensure they are in fact... [more](#)  
**Jessica C., Business Owner** 2 years ago

[View question details](#)

**Q:** Are you able to sit for NCLEX?

**A:** Greetings, Naomi. Yes, students that meet all graduation requirements, as well as all requirements of the respective Board may take the NCLEX-RN or NCLEX-PN examination. Board requirements usually include finger printing, background checks, minimum... [more](#)  
**Jessica C., Business Owner** 2 years ago

[View 1 more answer](#)

### Recommended Reviews

Search within reviews



Yelp Sort

**Username**

Location

0 0

With so few reviews, your opinion of Erudite Nursing Institute could be huge. Start your review today.



**Gina D.**

Chicago, IL

0 11

11/3/2017

First to Review

Erudite is the best. The medical lectures provided are second to none. The lectures are given by medical professionals in a very informative manner. You will not receive the in-depth medical education from a traditional school. I've been a student in a traditional school and it just does not compare. I received A's in the traditional setting so I feel my opinion on the level of education is trustworthy. All of the lectures are set forth by a doctor, nurse or trained personnel. They are easy to navigate and you will learn about topics that you would never gain in a standard 9-12 month course. The staff is exceptional. I had many questions and they answered all of them and more.

Useful Funny Cool 1



**Gloria U.**

Ellenwood, GA

9 1

12/17/2018

gnpec.georgia.gov/consum...  
Please read this, very important consumer alert about this school.

Useful 22 Funny 3 Cool 1

16 other reviews that are not currently recommended

### You Might Also Consider



#### Peachtree CPR

Our business specializes in hands on training in CPR, BLS, and First Aid. When students leave our training they are confident in what to do in an emergency situation. We have lifelike manikins that tell you if you are doing CPR... [read more](#)  
in Cpr Classes, First Aid Classes



#### Tutor Me Education

8.8 miles away from Erudite Nursing Institute

Our business specializes in private tutoring and test-preparation by expert and experienced tutors. In addition to K-12, college, and graduate subjects, we provide college counseling, MCAT, LSAT, DAT, SAT, ACT, ISEE, SSAT test-prep... [read more](#)  
in Tutoring Centers, Test Preoaration, Private Tutors

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eruditening.education

(800) 595-6276

Get Directions  
3330 Cumberland Blvd SE, Atlanta, GA 303

Message the Business



#### Is this your business?

Claim your business to immediately update business information, respond to reviews, and more!

Claim This Business

### You Might Also Consider

Sponsored



#### Mathnasium

5 1

17.3 miles

"Taylors confidence has improved tremendously since and her first math test..." [read more](#)

1 of 1



#### Attentive Safety CPR and Training

10.8 miles

Attentive Safety CPR and Safety Training teaches Indi group CPR, First... [read more](#)

Sponsored

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### People Also Viewed



#### Clinical Skills Training Center



Adult Education, Nursing Schools,  
Vocational & Technical School

### Near Me

Nursing Schools Near Me

### Service Offerings in Atlanta

Virtual Classes

### Frequently Asked Questions about Erudite Nursing Institute

#### How is Erudite Nursing Institute rated?

Erudite Nursing Institute has 3 stars.

#### About

- About Yelp
- Careers
- Press
- Investor Relations
- Content Guidelines
- Terms of Service
- Privacy Policy
- Ad Choices

#### Discover

- Yelp Project Cost Guides
- Collections
- Talk
- Events
- The Local Yelp
- Yelp Blog
- Support
- Yelp Mobile
- Developers
- RSS

#### Yelp for Business

- Claim your Business Page
- Advertise on Yelp
- Yelp for Restaurant Owners
- Table Management
- Business Success Stories
- Business Support
- Yelp Blog for Business

#### Languages

English ▾

#### Countries

United States ▾



**Nonpublic Postsecondary Education Commission**

2082 East Exchange Place, Suite 220

Tucker, Georgia 30084-5305

(770) 414-3300

Fax (770) 414-3309

**Brian P. Kemp**  
Governor

**Kirk Shook**  
Executive Director

January 26, 2021

**SENT VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED**

Medical Career Specialists, Inc.  
c/o Consonantia Divina, Ltd, its Registered Agent  
1755 The Exchange, Ste. 190  
Atlanta, GA 30339

Medical Career Specialists, Inc.  
3330 Cumberland Blvd. Suite 500  
Atlanta, GA 30339

**RE: Instruction to Cease and Desist Operations**

Dear Sir or Madam:

I serve as legal counsel to the Georgia Nonpublic Postsecondary Education Commission (“GNPEC” or “Agency”). As you may be aware, GNPEC authorizes the operation of nonpublic postsecondary institutions in the State of Georgia.

GNPEC is in receipt of information that you are conducting nonpublic postsecondary activities in this state without GNPEC’s required authorization to do so. Such operation is in direct violation of Georgia law, and you are directed to immediately **cease and desist** from further operation.

Pursuant to O.C.G.A. § 20-3-250.7(a)(1), “[n]o person, agent, group, or entity of whatever kind, alone or in concert with others, shall operate in this state a nonpublic postsecondary educational institution or conduct postsecondary activities in this state unless issued a current certificate of valid authorization by the executive director.”

Pursuant to O.C.G.A. § 20-3-250.14(c), you are hereby directed to immediately **cease and desist** enrolling students in the State of Georgia into any and all programs, including, but not limited to, the following programs, until a current Certificate of Authorization or Notice of Exemption has been granted by this Agency: certification training courses for phlebotomy technician, electrocardiograph/EKG technician, clinical medical assistant, medical laboratory technician/assistant, surgical technician/technologist, pharmacy technician, and physician technician, as well as three programs that allow students to bridge into the 5-week Licensed Practical Nursing (LPN) program offered through Erudite Nursing Institute.



You are further directed to **cease and desist** advertising the existence of these programs by any means, including, but not limited to, the URL specifically identified as <https://medicalcareerspecialists.com/> until a current Certificate of Authorization or Notice of Exemption has been granted by this Agency.

You are instructed to immediately **cease and desist** unauthorized and unlawful operations described herein. In the event you fail to do so within ten (10) days of receipt of this letter, GNPEC will proceed with litigation requesting a court order mandating cessation of operations and a judgment of monetary damages in favor of GNPEC and the State of Georgia.

In the event of your noncompliance with these directives upon receipt of this letter, you will be deemed in willful violation of O.C.G.A. § 20-3-250.7 and O.C.G.A. § 20-3-250.8. Accordingly, GNPEC will take action to assess a civil penalty not to exceed \$1,000.00 for each violation, with each day's failure to comply considered a separate and additional violation. GNPEC reserves the right to seek additional lawful remedies for such violations. You should govern yourself accordingly.

Moreover, your failure to comply with the directives set forth in this letter will result in immediate referral of this matter to the Office of the Attorney General to initiate any and all appropriate actions or proceedings for enforcement.

Please contact me at (770) 724-9019 or via email at [bannino@gsfc.org](mailto:bannino@gsfc.org) to discuss this matter further. I look forward to your anticipated cooperation and compliance.

GNPEC reserves all rights, remedies, claims, and defenses regarding this matter.

Sincerely,



Brian M. Annino

cc: Kirk Shook, GNPEC Executive Director (via email only)  
Dr. Laura Vieth, GNPEC Deputy Director (via email only)  
Kristen Settlemire, Esq, Assistant Attorney General (via email only)



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Erudite Nursing Institute  
 c/o Consonantia Divina, Ltd  
 1755 The Exchange  
 Suite 190  
 Atlanta, GA 30339



9590 9402 4455 8248 1248 63

2. Article Number (Transfer from service label)

7018 2290 0000 2229 9294

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee

B. Received by (Printed Name)  Agent  
 Addressee

C. Date of Delivery  
 2-1-21

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type
- Adult Signature
  - Adult Signature Restricted Delivery
  - Certified Mail®
  - Certified Mail Restricted Delivery
  - Collect on Delivery
  - Collect on Delivery Restricted Delivery
  - Insured Mail
  - Insured Mail Restricted Delivery (over \$500)
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Return Receipt for Merchandise
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery

Domestic Return Receipt

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Medical Career Specialist  
 c/o Consonantia Divina  
 1755 The Exchange  
 Suite 190  
 Atlanta, GA 30339



9590 9402 6137 0209 8028 28

2. Article Number (Transfer from service label)

7006 3450 0002 0749 5802

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee

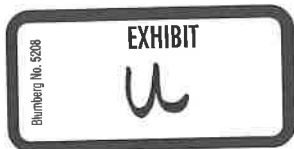
B. Received by (Printed Name)  Agent  
 Addressee

C. Date of Delivery  
 2-1-21

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type
- Adult Signature
  - Adult Signature Restricted Delivery
  - Certified Mail®
  - Certified Mail Restricted Delivery
  - Collect on Delivery
  - Collect on Delivery Restricted Delivery
  - Insured Mail
  - Insured Mail Restricted Delivery (over \$500)
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Return Receipt for Merchandise
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery

Domestic Return Receipt



USPS TRACKING#



9590 9402 4455 8248 1248 63



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

GNPEC  
attn: Brian Annino  
2082 E. Exchange Place  
Suite 220  
Tucker, GA 30084

64-533499



USPS TRACKING#



9590 9402 6137 0209 8028 28



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

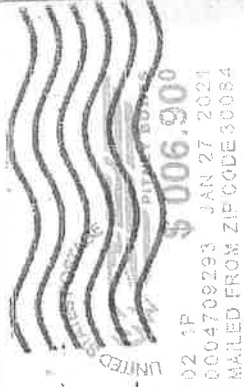
GNPEC  
attn: Brian Annino  
2082 E. Exchange Place  
Suite 220  
Tucker, GA 30084





Nonpublic Postsecondary Education Commission  
 2082 East Exchange Place, Suite 220  
 Tucker, Georgia 30084-5305

ATLANTA METRO 301  
 ATLANTA METRO 301  
 13 FEB 2021 4:41 PM 5



*Return to sender*

*MB 17*

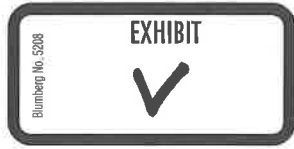
RECEIVED  
 FEB 18 2021  
 NPEC

Medical Career Specialists, Inc.  
 c/o Consonantia Divina, Ltd., its Registered Agent  
 1755 The Exchange  
 Suite 19 (NIXIE  
 Atlanta, GA 30302-1115

300 5 E L 0202/15/21  
 RETURN TO SENDER  
 REFUSED  
 UNABLE TO FORWARD

9505 3450 0002 0749 5802  
 9505 3450 0002 0749 5802

BC: 30084530599 \*1141-02601-15-37



## Kristen Settlemire

---

**From:** Brian Annino <bannino@gsfc.org>  
**Sent:** Tuesday, January 26, 2021 2:53 PM  
**To:** MKNIGHT@ERUDITENURSING.EDUCATION  
**Cc:** Kirk Shook; Laura S Vieth, EdD; Pat Hairston; Kristen Settlemire;  
oag.civil.eserve@myfloridalegal.com  
**Subject:** Georgia Nonpublic Postsecondary Education Commission  
**Attachments:** Ltr Erudite Nursing Institute 012621.pdf  
  
**Importance:** High

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Knight – I serve as legal counsel to the Georgia Nonpublic Postsecondary Education Commission. Please see attached correspondence pertaining to Erudite Nursing Institute and confirm your receipt on behalf of same. Thank you.

Sincerely,  
Brian Annino



**Brian M. Annino, Esq.**  
General Counsel  
Georgia Student Finance Commission  
Office: 770.724.9019  
Mobile: 470.774.4700  
Toll Free: 800.505.GSFC

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**Nonpublic Postsecondary Education Commission**

2082 East Exchange Place, Suite 220

Tucker, Georgia 30084-5305

(770) 414-3300

Fax (770) 414-3309

**Brian P. Kemp**  
Governor

**Kirk Shook**  
Executive Director

January 26, 2021

**SENT VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED AND VIA EMAIL TO  
MKNIGHT@ERUDITENURSING.EDUCATION**

Erudite Nursing Institute  
3330 Cumberland Blvd  
Atlanta, GA 30339

Erudite Nursing Institute  
c/o Consonantia Divina, Ltd., Registered Agent for Medical Career Specialists, Inc.  
1755 The Exchange, Ste. 190  
Atlanta, GA 30339

Melody Knight  
Erudite Nursing Institute  
100 S. Ashley Drive, Suite 600  
Tampa, FL 33602

**RE: Instruction to Cease and Desist Operations**

Dear Sir or Madam:

I serve as legal counsel to the Georgia Nonpublic Postsecondary Education Commission (“GNPEC” or “Agency”). As you may be aware, GNPEC authorizes the operation of nonpublic postsecondary institutions in the State of Georgia.

GNPEC is in receipt of information that you are conducting nonpublic postsecondary activities in this State without GNPEC’s required authorization to do so. Such operation is in direct violation of Georgia law, and you are directed to immediately **cease and desist** from further operation.

Pursuant to O.C.G.A. § 20-3-250.7(a)(1), “[n]o person, agent, group, or entity of whatever kind, alone or in concert with others, shall operate in this state a nonpublic postsecondary educational institution or conduct postsecondary activities in this state unless issued a current certificate of valid authorization by the executive director.”

Pursuant to O.C.G.A. § 20-3-250.14(c), you are hereby directed to immediately **cease and desist** enrolling students in the State of Georgia into any and all programs, including, but not limited to, the programs identified below, until a current Certificate of Authorization or Notice of Exemption has been granted by this Agency:

- Licensed Practical Nurse (LPN)
- Registered Nurse (RN)
- Bachelor of Science in Nursing (BSN)

You are further directed to **cease and desist** advertising the existence of these programs by any means, including, but not limited to, the URL specifically identified as <https://www.eruditenursing.education/> and social media platforms until a current Certificate of Authorization or Notice of Exemption has been granted by this Agency.

You are instructed to immediately **cease and desist** unauthorized and unlawful operations described herein. In the event you fail to do so within ten (10) days of receipt of this letter, GNPEC will proceed with litigation requesting a court order mandating cessation of operations and a judgment of monetary damages in favor of GNPEC and the State of Georgia.

In the event of your noncompliance with these directives upon receipt of this letter, you will be deemed in willful violation of O.C.G.A. § 20-3-250.7 and O.C.G.A. § 20-3-250.8. Accordingly, GNPEC will take action to assess a civil penalty not to exceed \$1,000.00 for each violation, with each day's failure to comply considered a separate and additional violation. GNPEC reserves the right to seek additional lawful remedies for such violations. You should govern yourself accordingly.

Moreover, your failure to comply with the directives set forth in this letter will result in immediate referral of this matter to the Office of the Attorney General to initiate any and all appropriate actions or proceedings for enforcement.

Finally, GNPEC strictly denies any claims set forth in your January 1, 2021, correspondence (to the extent such claims are plausible or actionable) and reserves all rights, remedies, claims, and defenses regarding this and all matters.

Please contact me at (770) 724-9019 or via email at [bannino@gsfc.org](mailto:bannino@gsfc.org), should you wish to discuss this matter further. I look forward to your anticipated cooperation and compliance.

Sincerely,



Brian M. Annino

cc: Kirk Shook, GNPEC Executive Director (via email only)  
Dr. Laura Vieth, GNPEC Deputy Director (via email only)  
Kristen Settlemire, Esq, Assistant Attorney General (via email only)  
Florida Commission of Independent Education (via email only)  
Florida Attorney General (via email only)

## Kristen Settlemire

---

**From:** Melody Knight <mknight@EruditeNursing.education>  
**Sent:** Tuesday, January 26, 2021 3:21 PM  
**To:** Brian Annino  
**Cc:** Kirk Shook; Laura S Vieth, EdD; Pat Hairston; Kristen Settlemire;  
oag.civil.eseve@myfloridalegal.com  
**Subject:** RE: Georgia Nonpublic Postsecondary Education Commission  
**Importance:** High

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon Mr. Annino,

We have been anxiously awaiting your reply for several weeks now--thank you for your much anticipated response.

We are in receipt of your letter dated 01/26/2021 and would like to immediately address your errors, illegal demands, and the fact of your operating outside of your legal authority.

Please expect an official letter shortly. Thank you.

Sincerely,

Melody Knight  
ENI Staff



Phone: 1 (800) 595-6276

Fax: (678) 487-8818

### Corporate Office

Web: [www.EruditeNursing.education](http://www.EruditeNursing.education)

3330 Cumberland Blvd

Atlanta, GA 30339

### Regional Administrative Office

Web: [www.EruditeNursing.com](http://www.EruditeNursing.com)

100 S. Ashley Drive, Suite 600

Tampa, Fla 33602



Please reply "stop" or "unsubscribe" if you would like to receive no further communications. Thank you.

CONFIDENTIALITY NOTICE: This e-mail message including attachments, if any, is intended for the person or entity to which it is addressed and may contain confidential, privileged, and/or proprietary material. Any unauthorized review, use, disclosure or distribution is prohibited. See Section 18 U.S.C. 2511. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

----- Original Message -----

Subject: Georgia Nonpublic Postsecondary Education Commission

From: Brian Annino <[bannino@gsfc.org](mailto:bannino@gsfc.org)>

Date: Tue, January 26, 2021 2:53 pm

To: "MKNIGHT@ERUDITENURSING.EDUCATION"

<[MKNIGHT@ERUDITENURSING.EDUCATION](mailto:MKNIGHT@ERUDITENURSING.EDUCATION)>

Cc: Kirk Shook <[kshook@gnpec.ga.gov](mailto:kshook@gnpec.ga.gov)>, "Laura S Vieth, EdD"

<[laurav@gnpec.ga.gov](mailto:laurav@gnpec.ga.gov)>, Pat Hairston <[PAT@GSFC.org](mailto:PAT@GSFC.org)>, Kristen Settlemire

<[KSettlemire@LAW.GA.GOV](mailto:KSettlemire@LAW.GA.GOV)>, "oag.civil.eserve@myfloridalegal.com"

<[oag.civil.eserve@myfloridalegal.com](mailto:oag.civil.eserve@myfloridalegal.com)>

Ms. Knight – I serve as legal counsel to the Georgia Nonpublic Postsecondary Education Commission. Please see attached correspondence pertaining to Erudite Nursing Institute and confirm your receipt on behalf of same. Thank you.

Sincerely,  
Brian Annino



GAfutures

**Brian M. Annino, Esq.**  
General Counsel  
Georgia Student Finance  
Commission  
Office: 770.724.9019  
Mobile: 470.774.4700  
Toll Free: 800.505.GSFC

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**ERUDITE**

*Nursing Innovation for the Future™*

RECEIVED

FEB 03 2021

NPEC

From:

Melody Knight  
Erudite Nursing Institute™  
100 S. Ashley Drive, Suite 600  
Tampa, Fla 33602  
E-mail: [mknight@EruditeNursing.education](mailto:mknight@EruditeNursing.education)  
Ph: 1(800) 595-6276  
Fax: (678) 487-8818

**\*Preferred method of contact is e-mail or fax.\***

To:

Brian Kemp, Georgia Governor  
206 Washington Street, Suite 203  
State Capitol  
Atlanta, Ga30334

**Certified Mail@#:** 7020 0640 0000 0758 7738

Gregory B. Friel, Deputy Assistant Attny Gen.  
U.S. Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, N.W.  
Office of the Assistant Attorney General, Main  
Washington, D.C. 20530

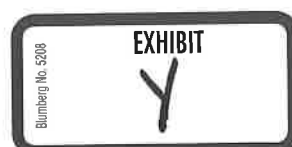
**Certified Mail@#:** 7020 0640 0000 0758 7790

Tuesday, January 26, 2021

**SECOND COMPLAINT RE: Georgia Nonpublic Postsecondary Education  
Commission/GNPEC Harassment, Defamation, Deprivation of Rights Under Color of Law,  
Conspiracy Against Rights  
(18 U.S.C. 242 and 18 U.S.C. 241)**

Dear Governor Kemp,

This is a second official complaint to you in your official capacity as the Governor and Chief Executive Officer for the State of Georgia concerning the very important matter of violation of State and Federal Law by the Georgia Non-public Postsecondary Education Commission (GNPEC) and its employees, namely: Kirk Shook, Laura Vieth, and Brian Annino.



In the letter to you dated 01/01/2021, you were informed that said GNPEC and the above-named persons have been operating outside of their lawful authority resulting in deprivation of rights under color of law (18 U.S.C. 242) and conspiracy against rights (18 U.S.C. 241).

As indicated by the Office of the Attorney General for the U.S. Department of Justice:

Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States.

For the purpose of Section 242, acts under "color of law" include acts not only done by federal, state, or local officials within their lawful authority, but also acts done beyond the bounds of that official's lawful authority, if the acts are done while the official is purporting to or pretending to act in the performance of his/her official duties. Persons acting under color of law within the meaning of this statute include police officers, prisons guards and other law enforcement officials, as well as judges, care providers in public health facilities, and others who are acting as public officials. It is not necessary that the crime be motivated by animus toward the race, color, religion, sex, handicap, familial status or national origin of the victim.

The offense is punishable by a range of imprisonment up to a life term, or the death penalty, depending upon the circumstances of the crime, and the resulting injury, if any.

As shown via the applicable legal authorities in the referenced letter dated 01/01/2021, the GNPEC does not have legal standing or authority to assert its jurisdictional purview where such jurisdiction is not lawfully applicable. Nevertheless, GNPEC representative, Brian Annino, has written a letter titled "Instruction to Cease and Desist" on 01/26/2021 under his purported authority as a public official serving the GNPEC. However, as previously demonstrated pursuant Georgia law, Mr. Annino is operating outside of his lawful authority, in violation of rights and privileges of persons protected by the Constitution and laws of the United States, which now places him in violation of Federal Law.

Further, as delineated by the Office of the Attorney General for the U.S. Department of Justice:

Section 241 of Title 18 is the civil rights conspiracy statute. Section 241 makes it unlawful for two or more persons to agree together to injure, threaten, or intimidate a person in any state, territory or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States, (or because of his/her having exercised the same). Unlike most conspiracy statutes, Section 241 does not require that one of the conspirators commit an overt act prior to the conspiracy becoming a crime.

The offense is punishable by a range of *imprisonment up to a life term* or the death penalty, depending upon the circumstances of the crime, and the resulting injury, if any.

Please be advised that all students are being advised to collect the name, date, and title of all persons involved in violation of their rights for complaints to be filed with the Federal Bureau of Investigation (FBI) for each and every instance of violation of the above Federal Law. Thank you.

Sincerely,

/s/

Melody K.  
Credentialing & Regulatory Compliance  
Erudite Nursing Institute™

**\*Preferred method of contact is e-mail or fax.\***

P.S.


The committees to which “the commission” is mandated to submit an annual written report pursuant § 20-3-250.5(b)(7) summarizing its activities in regard to its responsibilities, activities, and administration have been copied on this communication to make them aware of “the commission’s error in any previous reporting it may have done pertaining to Erudite Nursing Institute™.

CC:

Kirk Shook, Executive Director  
GNPEC  
2082 E Exchange Pl # 220  
Tucker, GA 30084  
Phone: (770) 414-3300  
Fax: (770) 414-3309

**Certified Mail®#:** 7020 0640 0000 0758 7745

Kirk Shook, GNPEC Executive Director (via email)  
Laura Vieth, GNPEC Deputy Director (via email only)  
Kristen Settlemire, Esq, Assistant Attorney General (via email only)  
Florida Commission of Independent Education (via email only)  
Florida Attorney General (via email only)

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THE UNITED STATES  
DEPARTMENT OF JUSTICE  
CONSPIRACY AGAINST RIGHTS

## SUMMARY

Section 241 of Title 18 is the civil rights conspiracy statute. Section 241 makes it unlawful for two or more persons to agree together to injure, threaten, or intimidate a person in any state, territory or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States, (or because of his/her having exercised the same). Unlike most conspiracy statutes, Section 241 does not require that one of the conspirators commit an overt act prior to the conspiracy becoming a crime.

The offense is punishable by a range of imprisonment up to a life term or the death penalty, depending upon the circumstances of the crime, and the resulting injury, if any.

### TITLE 18, U.S.C., SECTION 241

If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same;...

They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.

[Return to the Criminal Section Home Page](#)


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*Updated August 6, 2015*

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THE UNITED STATES  
DEPARTMENT OF JUSTICE  
DEPRIVATION OF RIGHTS UNDER COLOR OF LAW

#### SUMMARY

- Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States.  
For the purpose of Section 242, acts under "color of law" include acts not only done by federal, state, or local officials within their lawful authority, but also acts done beyond the bounds of that official's lawful authority, if the acts are done while the official is purporting to or pretending to act in the performance of his/her official duties. Persons acting under color of law within the meaning of this statute include police officers, prisons guards and other law enforcement officials, as well as judges, care providers in public health facilities, and others who are acting as public officials. It is not necessary that the crime be motivated by animus toward the race, color, religion, sex, handicap, familial status or national origin of the victim.

The offense is punishable by a range of imprisonment up to a life term, or the death penalty, depending upon the circumstances of the crime, and the resulting injury, if any.

#### TITLE 18, U.S.C., SECTION 242

***Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, ... shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.***

[Return to the Criminal Section Home Page](#)

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Updated May 19, 2020

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Yes No

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# Federal Civil Rights Statutes

## Title 18, U.S.C., Section 249 - Matthew Shepard and James Byrd, Jr., Hate Crimes Prevention Act

This statute makes it unlawful to willfully cause bodily injury—or attempting to do so with fire, firearm, or other dangerous weapon—when 1) the crime was committed because of the actual or perceived race, color, religion, national origin of any person, or 2) the crime was committed because of the actual or perceived religion, national origin, gender, sexual orientation, gender identity, or disability of any person and the crime affected interstate or foreign commerce or occurred within federal special maritime and territorial jurisdiction.

The law also provides funding and technical assistance to state, local, and tribal jurisdictions to help them to more effectively investigate, prosecute, and prevent hate crimes.

The law provides for a maximum 10-year prison term, unless death (or attempts to kill) results from the offense, or unless the offense includes kidnapping or attempted kidnapping, or aggravated sexual abuse or attempted aggravated sexual abuse. For offenses not resulting in death, there is a seven-year statute of limitations. For offenses resulting in death, there is no statute of limitations.

## Title 18, U.S.C., Section 241 - Conspiracy Against Rights

This statute makes it unlawful for two or more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States, (or because of his/her having exercised the same).

It further makes it unlawful for two or more persons to go in disguise on the highway or on the premises of another with the intent to prevent or hinder his/her free exercise or enjoyment of any rights so secured.

Punishment varies from a fine or imprisonment of up to ten years, or both; and if death results, or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title or imprisoned for any term of years, or for life, or may be sentenced to death.

## Title 18, U.S.C., Section 242 - Deprivation of Rights Under Color of Law

This statute makes it a crime for any person acting under color of law, statute, ordinance, regulation, or custom to willfully deprive or cause to be deprived from any person those rights, privileges, or immunities secured or protected by the Constitution and laws of the U.S.

This law further prohibits a person acting under color of law, statute, ordinance, regulation or custom to willfully subject or cause to be subjected any person to different punishments, pains, or penalties, than those prescribed for punishment of citizens on account of such person being an alien or by reason of his/her color or race.

Acts under "color of any law" include acts not only done by federal, state, or local officials within the bounds or limits of their lawful authority, but also acts done without and beyond the bounds of their lawful authority; provided that, in order for unlawful acts of any official to be done under "color of any law," the unlawful acts must be done while such official is purporting or pretending to act in the performance of his/her official duties. This definition includes, in addition to law enforcement officials, individuals such as Mayors, Council persons, Judges, Nursing Home Proprietors, Security Guards, etc., persons who are bound by laws, statutes ordinances, or customs.

Punishment varies from a fine or imprisonment of up to one year, or both, and if bodily injury results or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire shall be fined or imprisoned up to ten years or both, and if death results, or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.

## Title 18, U.S.C., Section 245 - Federally Protected Activities

1) This statute prohibits willful injury, intimidation, or interference, or attempt to do so, by force or threat of force of any person or class of persons because of their activity as:

- a. A voter, or person qualifying to vote...;
- b. a participant in any benefit, service, privilege, program, facility, or activity provided or administered by the United States;
- c. an applicant for federal employment or an employee by the federal government;
- d. a juror or prospective juror in federal court; and
- e. a participant in any program or activity receiving Federal financial assistance.

2) Prohibits willful injury, intimidation, or interference or attempt to do so, by force or threat of force of any person because of race, color, religion, or national origin and because of his/her activity as:

- a. A student or applicant for admission to any public school or public college;
- b. a participant in any benefit, service, privilege, program, facility, or activity provided or administered by a state or local government;
- c. an applicant for private or state employment, private or state employee; a member or applicant for membership in any labor organization or hiring hall; or an applicant for employment through any employment agency, labor organization or hiring hall;
- d. a juror or prospective juror in state court;
- e. a traveler or user of any facility of interstate commerce or common carrier; or
- f. a patron of any public accommodation, including hotels, motels, restaurants, lunchrooms, bars, gas stations, theaters...or any other establishment which serves the public and which is principally engaged in selling food or beverages for consumption on the premises.

3) Prohibits interference by force or threat of force against any person because he/she is or has been, or in order to intimidate such person or any other person or class of persons from participating or affording others the opportunity or protection to so participate, or lawfully aiding or encouraging other persons to participate in any of the benefits or activities listed in items (1) and (2), above without discrimination as to race, color, religion, or national origin.

Punishment varies from a fine or imprisonment of up to one year, or both, and if bodily injury results or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire shall be fined or imprisoned up to ten years or both, and if death results or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be subject to imprisonment for any term of years or for life or may be sentenced to death.

## **Title 18, U.S.C., Section 247 - Church Arson Prevention Act of 1996**

Prohibits (1) intentional defacement, damage, or destruction of any religious real property, because of the religious, racial, or ethnic characteristics of that property, or (2) intentional obstruction by force or threat of force, or attempts to obstruct any person in the enjoyment of that person's free exercise of religious beliefs. If the intent of the crime is motivated for reasons of religious animosity, it must be proven that the religious real property has a sufficient connection with interstate or foreign commerce. However, if the intent of the crime is racially motivated, there is no requirement to satisfy the interstate or foreign commerce clause.

Punishment varies from one year imprisonment and a fine or both, and if bodily injury results to any person, including any public safety officer performing duties as a direct or proximate result of conduct prohibited by this section, and the violation is by means of fire or an explosive, a fine under this title or imprisonment of not more than forty years or both; or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire shall be fined in accordance with this title and imprisonment for up to twenty years, or both, and if death results or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined in accordance with this title and imprisoned for any term of years or for life, or both, or may be sentenced to death.

## **Title 18, U.S.C., Section 248 - Freedom of Access to Clinic Entrances (FACE) Act**

This statute prohibits (1) the use of force or threat of force or physical obstruction, to intentionally injure, intimidate or interfere with or attempt to injure, intimidate or interfere with any person or any class of persons from obtaining or providing reproductive health services; (2) the use of force or threat of force or physical obstruction to intentionally injure, intimidate, or interfere with or attempt to injure, intimidate, or interfere with any person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship; or (3) intentionally damages or destroys the property of a facility, or attempts to do so, because such facility provides reproductive health services or intentionally damages or destroys the property of a place of religious worship. This statute does not apply to speech or expressive conduct protected by the First Amendment. Non obstructive demonstrations are legal.

Punishment varies from a fine or imprisonment for an offense involving exclusively a nonviolent physical obstruction, the fine shall be not more than \$10,000 and the length of imprisonment shall be up to six months, or both, for the first offense; and the fine shall, notwithstanding section 3571, be up to \$25,000 and the length of imprisonment shall be not more than 18 months, or both, for a subsequent offense; and if bodily injury results, the length of imprisonment shall be up to ten years, and if death results, it shall be for any term of years or for life.

## **Title 18, U.S.C., Section 844(h) - Federal Explosives Control Statute**

Whoever (1) uses fire or an explosive to commit any felony which may be prosecuted in a court of the United States, or (2) carries an explosive during the commission of any felony which may be prosecuted in a court of the United States, including a felony which provides for an enhanced punishment if committed by the use of a deadly or dangerous weapon or device shall, in addition to the punishment provided for such felony, be sentenced to imprisonment for five years but not more than 15 years. In the case of a second or subsequent conviction under this subsection, such persons shall be sentenced to imprisonment for ten years but not more than 25 years.

## **Title 42, U.S.C., Section 3631 - Criminal Interference with Right to Fair Housing**



This statute makes it unlawful for any individual(s), by the use of force or threatened use of force, to injure, intimidate, or interfere with (or attempt to injure, intimidate, or interfere with), any person's housing rights because of that person's race, color, religion, sex, handicap, familial status or national origin. Among those housing rights enumerated in the statute are:

- The sale, purchase, or renting of a dwelling;
- the occupation of a dwelling;
- the financing of a dwelling;
- contracting or negotiating for any of the rights enumerated above;
- applying for or participating in any service, organization, or facility relating to the sale or rental of dwellings.

This statute also makes it unlawful by the use of force or threatened use of force, to injure, intimidate, or interfere with any person who is assisting an individual or class of persons in the exercise of their housing rights.

Punishment varies from a fine of up to \$1,000 or imprisonment of up to one year, or both, and if bodily injury results, shall be fined up to \$10,000 or imprisoned up to ten years, or both, and if death results, shall be subject to imprisonment for any term of years or for life.

## Title 42, U.S.C., Section 14141 - Pattern and Practice

This civil statute was a provision within the Crime Control Act of 1994 and makes it unlawful for any governmental authority, or agent thereof, or any person acting on behalf of a governmental authority, to engage in a pattern or practice of conduct by law enforcement officers or by officials or employees of any governmental agency with responsibility for the administration of juvenile justice or the incarceration of juveniles that deprives persons of rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

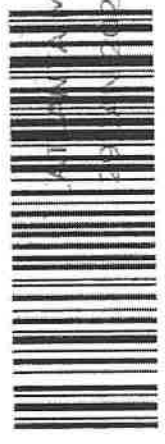
Whenever the Attorney General has reasonable cause to believe that a violation has occurred, the Attorney General, for or in the name of the United States, may in a civil action obtain appropriate equitable and declaratory relief to eliminate the pattern or practice.

Types of misconduct covered include, among other things:

1. Excessive Force
2. Discriminatory Harassment
3. False Arrest
4. Coercive Sexual Conduct
5. Unlawful Stops, Searches, or Arrests

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