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NIGHTINGALE COLLEGE, LLC, dba
NIGHTINGALE EDUCATION GROUP

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

NIGHTINGALE COLLEGE, LLC dba
NIGHTINGALE EDUCATION GROUP, a
Delaware limited liability company

Plaintiff and Petitioner,

v.

CALIFORNIA BOARD OF REGISTERED
NURSING; LORETTA MELBY, in her official
capacity as Executive Officer of the Board of
Registered Nursing; and DOES 1 through 100,
inclusive,

Respondents and Defendants.

Case No. 26CV020260

**SUPPLEMENTAL DECLARATION OF
MIKHAIL SHNEYDER IN SUPPORT OF
NIGHTINGALE COLLEGE, LLC'S
REPLY IN SUPPORT OF MOTION FOR
A PRELIMINARY INJUNCTION**

Date: October 23, 2026
Time: 02:30 p.m.
Judge: Hon. Stephen P. Acquisto
Dept: 3B

Compl. filed: 08/24/2026
1st Am. Compl. filed: 09/15/2026

SUPPLEMENTAL DECLARATION OF MIKHAIL SHNEYDER

I, Mikhail Shneyder, declare as follows:

1. I am the Chief Executive Officer (“CEO”) of Nightingale College, LLC,¹ dba Nightingale Education Group (“Nightingale”). I hold a Doctor of Nursing Education (honoris causa) (“DNE(hc)”), a Master of Business Administration (“MBA”), and Registered Nurse (“RN”) licenses in Utah (under the multi-state compact) and California.

2. I have personal knowledge of the facts set forth in this declaration, including through my role as CEO and my review of business records that Nightingale creates and maintains in the ordinary course of its business. If called as a witness, I could and would testify competently to the facts stated herein.

3. I submit this supplemental declaration in support of Nightingale’s Reply in Support of Motion for a Preliminary Injunction and in response to the contention in Respondents and Defendants California Board of Registered Nursing (“BRN” or “Board”) and Loretta Melby’s (“Melby,” and together with the BRN, “Defendants”) Opposition that Nightingale transacts intrastate business in California and to the Opposition’s reliance on Nightingale’s registration with the California Bureau for Private Postsecondary Education (“BPPE”).

Nightingale’s Principal Place of Business and Operations Are in Utah, not California.

4. Nightingale is a Delaware limited liability company. Nightingale’s principal place of business is located at 95 S. State Street, Suite 400, Salt Lake City, Utah 84111. Nightingale has maintained its principal place of business in Utah at all times relevant to this action.

5. Nightingale conducts its operations primarily out of Utah. Nightingale’s executive leadership, including me, directs and manages the College’s business from Utah. The College’s core institutional functions, including admissions decisions, enrollment, registrar and academic records, financial aid, and academic administration, are directed from Utah and managed outside of California. Nightingale’s company-wide functions, including accounting and finance and Collaborator

¹ Nightingale College, LLC is the parent company and owner of Nightingale College (the “College”), one of the company’s operating divisions and the institution of higher education which is accredited and offers various educational programs to students. (See First Am. Compl. [“FAC”], ¶ 1 fn. 1.)

1 Experience (human resources), are likewise directed and managed from Utah.

2 6. Nightingale does not own, lease, or operate any campus, classroom, office, or other
3 facility in California. Nightingale's bank is headquartered in Arizona. The few Nightingale
4 employees who reside in California work remotely from their homes, and Nightingale maintains no
5 office for them.

6 7. The College delivers all of its instruction through a distance education model.
7 Educational materials are delivered to learners electronically through the College's online learning
8 systems, via the Internet. The College does not deliver educational materials to learners from any
9 physical location in California because the College is not a BRN-approved program. The College's
10 servers are hosted on the Internet in the "Cloud," and I am informed and believe that none of those
11 servers is located in California. Residents of California who enroll at the College do so as distance
12 education students of a Utah-based institution. Students complete their clinical experience entirely
13 outside of California. The BRN prohibits the College's students from attending clinical sites in
14 California because the College is not a BRN-approved program.

15 **Enrollment Agreements Are Executed and Accepted Outside of California.**

16 8. Every student who enrolls at the College, including a student who resides in
17 California, does so through a written enrollment agreement provided to the prospective student
18 digitally via the Internet. A prospective student first submits an application for admission. The
19 College's admissions personnel review the application and decide whether to admit the applicant.
20 The admission decisions are made in Utah.

21 9. The enrollment agreements become effective only when accepted by the College. The
22 College accepts and executes enrollment agreements with all prospective students outside California.
23 Enrollment agreements are accepted by the College when they are signed on the College's behalf by
24 Admissions Processors and by Jannette Anderson, the College's Registrar, all of whom are located
25 outside California. The College's Admissions Advisors do not sign enrollment agreements on the
26 College's behalf.

27 ///

28 ///

Financial Transactions with Students Occur Outside California.

10. The only financial transaction between the College and its students is the student's payment under the enrollment agreement. That payment is collected, and every financial agreement with a student is executed, outside California, via the Internet. The College bills tuition and fees to students electronically through its student information system. Student payments are deposited into accounts held by Nightingale at its bank, which is headquartered in Arizona. This includes payments made on behalf of students by the United States Department of Education in the form of federal student aid, including Pell Grants and Federal Student Loans. The College's third-party loan servicers are located outside California.

Nightingale's Registration with the BPPE

11. Nightingale is registered with BPPE as an out-of-state institution.

12. Nightingale obtained its BPPE registration because, as I understand it, California's Private Postsecondary Education Act requires an institution located outside California that offers distance education to California residents to register with the BPPE. Nightingale registered to comply with that requirement as it applies to California residents who choose to enroll at the College from California. Nightingale has not sought, and the BPPE has not granted, approval to operate a campus or other institution with a physical presence in California.

13. Nightingale's BPPE registration did not change where or how Nightingale conducts its business. Nightingale's registration did not result in Nightingale opening any office or facility in California, relocating any operations to California, accepting or executing enrollment agreements in California, or receiving or processing student payments in California. Nightingale's operations remained centered in Utah before and after it registered with the BPPE.

14. As part of its BPPE registration, the BPPE required Nightingale to designate an agent for service of process in California. This registration does not require Nightingale to otherwise conduct business operations in California.

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Nightingale's LVN Transfer of Credit Policy Is Publicly Available on the College's Website.

15. Nightingale's block transfer of credit policy for licensed vocational nurses ("LVNs") is reflected in the Advanced Placement Section of the "Learner Classifications" materials, both in the College's catalog and online. A true and correct copy of the "Learner Classifications" materials is attached hereto as **Exhibit A**. The policy is publicly available and can be accessed online at the following link: <https://nightingale.edu/catalog/registration-information/enrollment/learner-classifications.pdf>.

16. In meetings with Nightingale's representatives in July and August 2026, Ms. Melby told us that she had accessed Nightingale's website and publicly available materials as part of her review of the College's coursework.

17. To my knowledge, neither Ms. Melby nor the BRN ever requested the policy from Nightingale or the College. In any event, the policy has been publicly available on the College's website at all relevant times.

18. Attached as **Exhibit B** are true and correct copies of three deficiency letters received by the College's graduates from the BRN (with the applicant's name and personally identifying information redacted). These letters were provided to the College by the applicants themselves. In total, the College has received at least 18 such letters from its graduates, all dated between September 17, 2026 and October 14, 2026. All 18 of the letters contain substantially the same text as the three samples attached hereto. Approximately 61% of the College's graduates who currently cannot obtain RN licensure in California are already licensed as LVNs in the State.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 16th day of October 2026, at Salt Lake City, Utah

Signed by:

13FDF5854BB2482...
Mikhail Shneyder

EXHIBIT A

ENROLLMENT

LEARNER CLASSIFICATIONS

Note: Changes to course registration, such as adding or dropping courses may affect learner classification. This, in turn, may impact the learner's academic progress and eligibility for financial aid. It is recommended that learners considering changes to course registration contact a [learner funding advisor \(fundingadvising@nightingale.edu\)](mailto:fundingadvising@nightingale.edu) for more information.

Full-Time

A learner who is registered for twelve (12) or more semester credits in undergraduate academic programs or for nine (9) semester credits in graduate academic programs.

Three-Quarters Time

A learner who is registered for nine (9) to eleven (11) semester credits in undergraduate academic programs or for seven (7) to eight (8) semester credits in graduate academic programs.

Half-Time

A learner who is registered for six (6) to eight (8) semester credits in undergraduate academic programs or for five (5) to six (6) semester credits in graduate academic programs.

Less Than Half-Time

A learner who is registered for less than six (6) semester credits in undergraduate academic programs or for less than five (5) semester credits in graduate academic programs.

Auditor

A learner who is enrolled in a course but is not taking the course for credit.

Advanced Placement

The College offers advanced placement in the Bachelor of Science in Nursing (BSN) Program to qualified licensed practical and vocational nurses (LPN/LVN). To be considered for advanced placement, the learner must hold a current, active, and unencumbered license to practice as an LPN/LVN in any U.S. jurisdiction. Some learners may hold licenses to practice in more than one state. If any of the learner's licenses are encumbered at the time of enrollment, the College reserves the right to require a re-certification of competency, which may result in ineligibility for the advanced placement option. Failure to disclose an encumbered license may result in disciplinary action. Advanced placement LPN/LVN learners are granted a block transfer of credit for BSN 206 and BSN 225, free of charge.

To earn a transfer of credit for BSN 215, learners must successfully complete the Medical Dosage Calculation (MDC) self-paced online course as described in the [Acceptance Notification and Matriculation Requirements](#) section of the Catalog. Otherwise, learners must complete BSN 215. To earn a transfer of credit for BSN 246 and/or BSN 266, candidates must pass the required placement exams as described in the [Admissions Requirements and Procedures](#) section of the BSN Program.

The College offers advanced placement in the Licensed Practical Nursing (LPN) to Associate of Science in Nursing (ASN) Program to qualified licensed practical and vocational nurses (LPN/LVN). To earn transfer of credit for ASN 241 and/or ASN 261, candidates must pass the required placement exams as described in the [Admissions Requirements and Procedures section of the LPN-to-ASN program](#).

The College offers advanced placement in the Bachelor of Science in Nursing (BSN) Program to qualified active duty or retired U.S. Air Force medical technicians and U.S. Navy corpsmen. Service members who have successfully completed the Basic Medical Technician Corpsman (BMTTC) curriculum at the U.S. Military's Medical Education Training Center (METC) in San Antonio, Texas, within the three (3) years immediately preceding admissions application will be granted the automatic eleven (11) semester credit block transfer, free of charge. Upon acceptance, applicants granted the block transfer will be required to take the HESI Fundamentals exam and remediate if necessary. Service members who do not qualify for automatic credit block transfer may request to take the HESI Fundamentals advanced placement exam as described in the [Admissions Requirements and Procedures section of the BSN Program](#).

The College offers advanced placement in the Bachelor of Science in Nursing (BSN) Program to licensed registered nurses. To be considered for advanced placement, the learner must hold a current, active, and unencumbered license to practice as a registered nurse in any U.S. jurisdiction. Advanced placement RN learners are granted a block transfer of forty-eight (48) semester credits toward all lower-division nursing core course requirements. Some learners may hold licenses to practice in more than one state. If any of a learner's licenses are encumbered at the time of enrollment, the College reserves the right to require a recertification of competency, which may include ineligibility for the advanced placement option. Failure to disclose an encumbered license may result in disciplinary action.

The College offers advanced placement in the Bachelor of Science in Nursing (BSN) Program and the Licensed Practical Nursing (LPN) to Associate of Science in Nursing (ASN) Program to individuals who transfer nursing credits. For more information, learners may refer to the [Transfer of Credit](#) section of the Catalog and the [Admissions Requirements and Procedures section of the BSN Program](#) and the [Admissions Requirements and Procedures section of the LPN-to-ASN program](#).

Matriculated

A degree-seeking learner who has completed all admission and matriculation requirements is considered fully matriculated in an academic program. A degree-seeking learner who has not completed all admission matriculation requirements may be considered conditionally matriculated. It is strongly recommended that both fully matriculated and conditionally matriculated learners complete the Learner Success Series in the first semester of enrollment. See the corresponding program's Admissions Requirements and Procedures section of this Catalog for more information.

Nonmatriculated

The two (2) types of non-matriculated learners include: (1) continuing education or non-degree seeking learners and (2) degree-seeking learners who are enrolled in an academic program but still need to complete all matriculation requirements. In addition to other matriculation requirements, non-matriculated degree-seeking learners must complete the Learner Success Series in the first semester of enrollment to fully matriculate in the academic program.

For more information, see the [Non-Matriculated Learners Requirements](#) section of this Catalog.

Pending Graduate

A learner who has successfully completed the academic program course requirements but has one (1) or more other graduation requirements outstanding will be granted pending graduate status for up to one (1) additional academic semester. The degree will not be conferred and, where applicable, the learner may not apply for RN licensure or take the NCLEX-RN® exam until all graduation requirements are met. If all graduation requirements are not completed within the allowed time frame, the learner will be withdrawn from the College without graduating.

The learner may request reinstatement for future graduation upon completing all graduation requirements. At its sole discretion, the College may grant the request and charge a \$100 non-refundable reinstatement for graduation fee.

Note to prelicensure program learners: *Learners who do not complete all graduation requirements within one (1) academic semester of program completion must retake the standardized exit exam at their own expense. If the learner does not successfully pass the exam, the learner will be required to complete prescribed remediation in addition to standard graduation requirements before graduation clearance is issued.*

Posthumous Degrees

To recognize the achievements of a learner who passes away prior to the completion of their academic degree requirements, the College will award posthumous degrees at the next relevant commencement ceremony for learners who meet the following conditions:

- The learner has completed 75% or more of their academic program;
- The learner is in good academic standing in their academic program and current courses at the time of their passing.

Degrees will be awarded posthumously unless the learner's family requests otherwise.

EXHIBIT B



September 17, 2026

Dear [REDACTED]

The California Board of Registered Nursing (Board) has completed its review of your application for licensure as a registered nurse and your transcript submitted from Nightingale College, [REDACTED]. Additionally, the Board has reviewed general information supplied directly by Nightingale College pertaining to its courses of instruction for its Bachelor of Science in Nursing degree.

After its review of your application and transcript, the Board has determined, in accordance with California Business and Professions Code section 2736, that your coursework does not meet California's minimum educational requirements for licensure. The specific deficiencies in your course of instruction are identified below. To satisfy California's licensure requirements, you must complete the deficient coursework through an approved nursing program in California (a list of such programs is available on the Board's website at www.rn.ca.gov), or an out-of-state nursing program that provides courses of instruction that are equivalent to California standards.

The specific deficiencies identified in the Board's review of your application are as follows:

- 1) An applicant for licensure that completed nursing training out of state must complete the equivalent of a minimum of 500 hours of clinical training in direct patient care. (Bus. & Prof. Code, §§ 2736, subd. (a)(2) & 2786, subd. (a)(2).) Based on the Board's review of your application, it appears that you completed 360 hours of clinical training in direct patient care, resulting in a deficiency of 140 hours. In order to cure this deficiency and qualify for licensure, you must complete an additional 140 hours of clinical training in direct patient care.
- 2) An applicant for licensure that completed nursing training out of state must complete the equivalent of a minimum of 30 hours of supervised direct patient care clinical hours in obstetrics, with theoretical instruction in such subject matter to be taught concurrently with clinical practice. (Bus. & Prof. Code, §§ 2736, subd. (a)(2) & 2786, subd. (a)(2); Cal. Code Regs., tit. 16, § 1426, subd. (d).) Based on the Board's review of your application, it appears that you did not complete clinical training in obstetrics, resulting in a deficiency of 30 hours. In order to cure this deficiency and qualify for licensure, you must complete 30 hours of clinical training in direct patient care in the content area of obstetrics; such clinical hours must be completed concurrently with theoretical coursework in obstetrics.
- 3) An applicant for licensure that completed nursing training out of state must complete the equivalent of a minimum of 30 hours of supervised direct patient care clinical hours in pediatrics, with theoretical instruction in such subject matter to be taught concurrently with clinical practice. (Bus. & Prof. Code, §§ 2736, subd. (a)(2) & 2786, subd. (a)(2); Cal. Code Regs., tit. 16, § 1426, subd. (d).) Based on the Board's review of your application, it appears that you did not complete clinical training in pediatrics, resulting in a deficiency of 30 hours. In order to cure this deficiency and qualify for licensure, you must complete 30 hours of clinical training in direct patient care in the content area of pediatrics; such clinical hours must be completed concurrently with theoretical coursework in pediatrics.

If you believe you have already satisfied the requirements identified in the deficiencies listed above and you wish to supply additional documentation as proof of having done so, you are welcome to submit such documentation through the BreEZe online application portal. Such additional information could include, but is not necessarily limited to: records regarding clinical hours completed such as timesheets and documentation identifying the nursing subjects covered, clinical objectives met, and the nursing supervisor; travel documents demonstrating your presence at clinical sites that were used to complete your coursework; proof of transfer credits, such as a transcript and course catalogue from an LVN/LPN program and a copy of Nightingale College's applicable transfer credit policy; etc.

If you submit additional documents, please allow a minimum of eight weeks for processing. You may log in to your BreEZe account at www.rn.ca.gov to monitor the most current status of your application. You may also wish to contact your nursing program or another approved nursing program if you have questions about the course of instruction that you received or about options to cure the deficiencies noted above.

EXAMINATION APPLICANTS: Please be advised that Section 1410.4(b) of the California Code of Regulations requires you to remove the deficiency, submit transcripts, and take the Examination within a three-year period from the date of this letter, or your application will be deemed abandoned and your file destroyed.

You may also contact the Board with additional questions about your application via email at: Kaylee.Ha@dca.ca.gov

Sincerely,


Licensing Program Analyst
California Board of Registered Nursing

September 17, 2026

Dear [REDACTED]

The California Board of Registered Nursing (Board) has completed its review of your application for licensure as a registered nurse and your transcripts submitted from Nightingale College, [REDACTED]

[REDACTED] Additionally, the Board has reviewed general information supplied directly by Nightingale College pertaining to its courses of instruction for its Bachelor of Science in Nursing degree.

After its review of your application and transcript, the Board has determined, in accordance with California Business and Professions Code section 2736, that your coursework does not meet California's minimum educational requirements for licensure. The specific deficiencies in your course of instruction are identified below. To satisfy California's licensure requirements, you must complete the deficient coursework through an approved nursing program in California (a list of such programs is available on the Board's website at www.rn.ca.gov), or an out-of-state nursing program that provides courses of instruction that are equivalent to California standards.

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obstetrics; such clinical hours must be completed concurrently with theoretical coursework in obstetrics.

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If you believe you have already satisfied the requirements identified in the deficiencies listed above and you wish to supply additional documentation as proof of having done so, you are welcome to submit such documentation through the BreEZe online application portal. Such additional information could include, but is not necessarily limited to: records regarding clinical hours completed such as timesheets and documentation identifying the nursing subjects covered, clinical objectives met, and the nursing supervisor; travel documents demonstrating your presence at clinical sites that were used to complete your coursework; proof of transfer credits, such as a transcript and course catalogue from an LVN/LPN program and a copy of Nightingale College's applicable transfer credit policy; etc.

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You may also contact the Board with additional questions about your application via email at: Angelina.Lopez@dca.ca.gov

Sincerely,


Licensing Program Analyst
California Board of Registered Nursing

September 17, 2026

Dear [REDACTED]

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You may also contact the Board with additional questions about your application via email at: Deann.Corrado@dca.ca.gov

Sincerely,


Licensing Program Analyst
California Board of Registered Nursing