

**In the Matter of
Permanent Registered Nurse
License Number 941850
Issued to AGNES FOSUAH ADDAI,
Respondent**

§ **BEFORE THE TEXAS**
§
§
§ **BOARD OF NURSING**
§

FORMAL CHARGES

This is a disciplinary proceeding under Section 301.452(b), Texas Occupations Code. Respondent, AGNES FOSUAH ADDAI, is a Registered Nurse holding license number 941850, which is in current status at the time of this pleading.

Written notice of the facts and conduct alleged to warrant adverse licensure action was sent to Respondent at Respondent's address of record, and Respondent was given opportunity to show compliance with all requirements of the law for retention of the license prior to commencement of this proceeding.

CHARGE I.

On or about March 16, 2018, Respondent submitted an application for licensure by endorsement to the Board attesting that he completed a nursing education program from Palm Beach School of Nursing, LLC. However, Respondent obtained the diploma/degree through fraudulent means by purchasing a fraudulent diploma/transcript. The Respondent was named by the U.S. Department of Health and Human Services Office of Inspector General (HHS-OIG) and its law enforcement partners as part of national scheme involving the sale and use of false and fraudulent nursing degree diplomas/transcripts.

The above action constitutes grounds for disciplinary action in accordance with Sections 301.451 and 301.452(b)(1),(2)&(10), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.5 and §217.12(6)(H)&(6)(I).

NOTICE IS GIVEN that staff will present evidence in support of the recommended disposition of up to, and including, revocation of Respondent's license(s) and/or privilege(s) to practice nursing in the State of Texas pursuant to the Nursing Practice Act, Chapter 301, Texas Occupations Code and the Board's rules, 22 TEX. ADMIN. CODE §§ 213.27 - 213.33.

NOTICE IS GIVEN that all statutes and rules cited in these Charges are incorporated as part of this pleading and can be found at the Board's website, www.bon.texas.gov.

NOTICE IS GIVEN that, based on the Formal Charges, the Board will rely on the Disciplinary Matrix, located at 22 TEX. ADMIN. CODE §213.33(b), which can be found under the "Discipline & Complaints; Board Policies & Guidelines" section of the Board's website, www.bon.texas.gov.

Filed this 13th day of February, 2023.

TEXAS BOARD OF NURSING



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