

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:	)	
GUIDE MBOU FOFFOU	)	Docket No. 2023-48
License No. 026.0147515	)	Docket No. 2023-49

STIPULATED VOLUNTARY SURRENDER OF LICENSE AND ORDER

STIPULATION

NOW COME the State of Vermont, by and through Prosecuting Attorney Ultan Doyle, and Respondent Guide Mbou Foffou, by and through his counsel James M Barber, Esq., who hereby Stipulate and Agree as follows:

Board Authority

1. The Vermont State Board of Nursing (the "Board") has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by Registered Nurses pursuant to 3 V.S.A. § 129(a); 3 V.S.A. § 129a; 3 V.S.A. § 814(d); 26 V.S.A. Chapter 28; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation ("OPR").

Stipulated Facts

2. Guide Mbou Foffou ("Respondent") of Katy, Texas is licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0147515. This license was originally issued on October 13, 2021 and expires on March 31, 2023.
3. Respondent is also licensed as an RN in New York under license number 791680, in Oklahoma under license number R0136004; and in Texas under license number 1009618.
4. On March 29, 2023, the State requested that Respondent's license be summarily suspended.
5. On March 29, 2023, to moot summary suspension proceedings, Respondent stipulated to a voluntary indefinite suspension pending a final hearing on the merits.
6. On October 13, 2021, Respondent applied for his Vermont RN license on the basis of endorsement.
7. In his application, Respondent stated that he had completed a Registered Nursing Education Program in a U.S. state or jurisdiction.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

8. Under the section of his application titled "Education details," Respondent stated that he had graduated with an Associate Degree in Nursing from "Palm Beach State College" in Lake Worth, Florida in August of 2019.
9. During the processing of Respondent's application, OPR received a verification report from the National Council of State Boards of Nursing ("NCSBN") which showed that Respondent stated that he had graduated from Palm Beach School of Nursing on his New York and Oklahoma license applications, and that he had graduated from Palm Beach State College on his Texas license application.
10. Palm Beach College and Palm Beach School of Nursing are separate institutions.
11. In a subsequent interview with an OPR investigator, Respondent said that he had attended Palm Beach School of Nursing and that him listing Palm Beach College on his application was a mistake.
12. Subsequent to Respondent receiving his Vermont RN license, OPR received the following information from NURSUS in regard to Respondent:

This nurse's name, DOB and/or SSN was included on an affidavit provided by the Department of Health and Human Services - Office of Inspector General and the Federal Bureau of investigation pursuant to their investigation into nursing programs. The affidavit was executed by a nursing school and identified this individual as a person that was issued an illegitimate nursing diploma and transcript. This information is provided for the purposes of assisting State Boards of Nursing in taking independent action.

13. The affidavit in question was executed by J.N., the owner of Palm Beach School of Nursing.
14. The affidavit detailed that in order to obtain an Associate Degree in Nursing from Palm Beach School of Nursing, students were required to complete 1,665 hours of instruction, which included 720 hours of clinical experience in a health care setting.
15. The affidavit further detailed that from around October 2016 to June 2022, Palm Beach School of Nursing issued transcripts and diplomas to individuals who did not complete the required program hours and clinical training necessary to obtain an Associate Degree in Nursing and transcript.
16. The affidavit identified Respondent as one of the individuals who obtained his Associate Degree in Nursing and his transcript without having completed the hours of instruction that the Palm Beach School of Nursing required.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

Violation One: 3 V.S.A. § 129a(a)(3) Failing to comply with provisions of federal or State statutes or rules governing the practice of the profession.

17. Paragraphs 2 through 16 above are incorporated herein.
18. As an RN, Respondent is required to comply with provisions of federal or State statutes or rules governing the practice of the profession.
19. Rule 5.6(a) of the Vermont Board of Nursing Administrative Rules requires an applicant who seeks licensure by endorsement "to be licensed in a United States jurisdiction on the basis of a U.S. nursing education program."
20. Paragraphs 3 through 15 demonstrate that Respondent is not licensed in a United States jurisdiction on the basis of a U.S. nursing education program because he did not complete a U.S. nursing education program.
21. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent committed unprofessional conduct in violation of 3 V.S.A. § 129a(a)(3).

Understandings

1. Respondent admits that the facts above are true and desires to voluntarily surrender his RN license. The Parties reach a full and final Stipulation pursuant to these Understandings, the Acceptance of Voluntary Surrender, and Order below.
2. Respondent understands that the Board must review and accept the terms of the Stipulated Voluntary Surrender of License. If the Board rejects any portion, the entire Stipulated Voluntary Surrender of License shall be null and void.
3. Respondent specifically waives any claims that any disclosures made to the full Board during its review of this agreement have prejudiced his right to a fair and impartial hearing in the future if this agreement is not accepted by the Board.
4. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
5. Respondent is not under the influence of any drugs or alcohol at the time he signs this Stipulated Voluntary Surrender of License.
6. Respondent voluntarily enters into this agreement after the opportunity to consult with legal counsel and is not being coerced by anyone into signing this Stipulated Voluntary Surrender of License.
7. Respondent voluntarily waives his right to a contested hearing before the Board and waives any right to appeal from this Stipulated Voluntary Surrender of License.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

8. Respondent agrees that the Acceptance of Voluntary Surrender and Order set forth below may be entered by the Board.

ACCEPTANCE OF VOLUNTARY SURRENDER AND ORDER

Based on the Stipulation above, it is **ORDERED AND ADJUDGED** as follows:

- A. The Board hereby **ACCEPTS** Respondent's **VOLUNTARY SURRENDER** of his RN license.
- B. Any future application for licensure shall be subject to the licensing requirements of that particular profession. If a future application for licensure in the State of Vermont is approved, that license shall be **CONDITIONED** pursuant to whatever terms are found to be reasonable at the time of Respondent's application for licensure, taking into account the stipulated facts above.
- C. This Stipulation and Consent Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. §129(a).
- D. This Stipulation and Consent Order will remain part of Respondent's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

AGREED TO:

Dated: 5/31/23

STATE OF VERMONT
SECRETARY OF STATE

By: Ultan Doyle
Ultan Doyle, Esq.
State Prosecuting Attorney

GUIDE MBOU FOFFOU
RESPONDENT

Dated: 5/31/23

By: Guide Mbou Foffou
Guide Mbou Foffou

APPROVED AS TO FORM:

Dated: 5/31/23

JAMES M. BARBER
ATTORNEY FOR RESPONDENT

By: James M. Barber
James M. Barber, Esq. 19305

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

APPROVED AND SO ORDERED:

Dated: 6/12/23

Date of Entry: 6/12/23

VERMONT BOARD OF NURSING

By: Jennifer Laurent
Chairperson

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

Office of Professional Regulation
Answer

Case Name: <u>Guide Mbow Foffou</u>	Docket Number: <u>2023-48 + 49</u>
Your Name: _____ (person completing the form B either the respondent or the respondent's attorney)	
Telephone: (daytime) _____	E-mail _____

Attach Additional Sheets As Needed

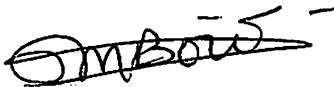
1. <u>Undisputed Facts:</u> State all material facts in the charges that you do not dispute. You may use the paragraph numbers from the specification of charges rather than repeating each statement.
<u>- All the PARAGRAPHS (FROM 2 to 16).</u>

2. <u>Disputed Issues of Fact:</u> State all material facts that you contend are disputed. You may use the paragraph numbers from the specification of charges rather than repeating each statement.
<u>N/A</u>

3. Legal Defenses: List all defenses that you intend to present to the charges.

4. Sign and Date: By signing, I affirm that all pages of this form are complete and truthful.

I ☒ have ☐ have not attached additional information.



Signature

5/1/2023

Date

Please mail the original to:

Vermont Secretary of State
Office of Professional Regulation
Attn: Docket Clerk
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402

You must also send a copy to:

Prosecuting Attorney who charged the case
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402

COMMENTS

NAME : Guide MBOU FOFFOU

DOB : 02/27/1975

I went to a medical school called "UNIVERSITE DE KINSHASA; FACULTE DE MEDECINE" at DR CONGO where I graduated in JUIN 2004.

Before I moved to the United States in 2016, I worked as a medical doctor in CAMEROON (AFRICA) for about ten years (10 years).

I was asked by Palm Beach School of Nursing to Provide my medical school transcripts. After viewing and analyzing my transcripts, I was told by the Palm Beach School of Nursing that according to my medical Background, I did not need to attend the in-site classes. Therefore, they organized online classes for me

And asked me to come in situ just for practices.

At that time, I had hundred percent faith that the school was accredited.

In August 2022, I read on the news that the school was not more accredited for a long time ago. I tried to contact the school for more informations but they were not answering..

From there, I knew something was wrong with that school.

Since August 18th 2022, I decided by myself to stop working as Registered Nurse (RN) and really felt bad that the school did not tell me the truth.

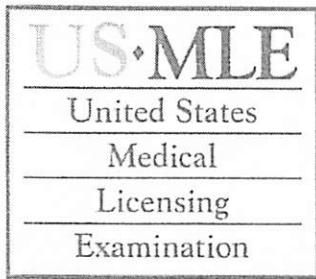
In all my life, I always follow and respect Protocols. Therefore, I decided to voluntary surrender all my RN licenses.

Actually, I am focusing on medical doctor National Board Exams via USMLE and I just passed the Step 1 one month ago.

Enclosed, please find copies of my medical school transcripts (originals are in french and translated are in english) and my USMLE step 1 result.

GUIDE MBOU FOFFOU

~~MAISON~~



United States Medical Licensing Examination®

Step 1 Score Report

FOR EXAMINEE USE ONLY. THIRD-PARTY USERS OF USMLE® SCORES
SHOULD RELY SOLELY ON OFFICIAL TRANSCRIPTS RECEIVED DIRECTLY
FROM THE EXAMINEE'S USMLE REGISTRATION ENTITY.

NAME: Mbou Foffou, Guide

USMLE ID: 0-867-753-6

TEST DATE: March 28, 2023

Your Test Result

PASS

Supplemental Information: Understanding the Content Areas

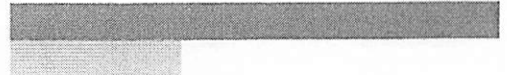
The information below is a visual representation of the content weighting on this examination. Descriptions of the topics covered in these content areas, as well as other topics covered on USMLE Step 1, can be found in the information materials on the USMLE website (<https://www.usmle.org>). Please use the contact form on the USMLE website if you have additional questions (<https://www.usmle.org/contact/>).

Physician Task

(% Items Per Test)

MK: Applying Foundational Science Concepts
PC: Diagnosis
Communication & Interpersonal Skills
PBLI: Evidence-Based Medicine

(60 - 70%)
(20 - 25%)
(6 - 9%)
(4 - 6%)



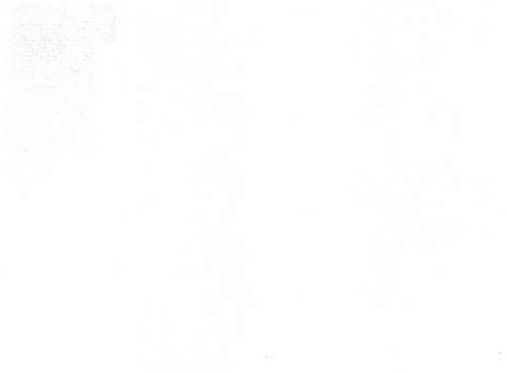
Abbreviations: MK, Medical Knowledge; PC, Patient Care; PBLI, Practice-based Learning and Improvement.

System

(% Items Per Test)

General Principles
Behavioral Health & Nervous Systems/Special Senses
Reproductive & Endocrine Systems
Respiratory and Renal/Urinary Systems
Blood & Lymphoreticular/Immune Systems
Multisystem Processes & Disorders
Musculoskeletal, Skin & Subcutaneous Tissue
Cardiovascular System
Gastrointestinal System
Biostatistics & Epidemiology/Population Health

(12 - 16%)
(9 - 13%)
(9 - 13%)
(9 - 13%)
(7 - 11%)
(6 - 10%)
(6 - 10%)
(5 - 9%)
(5 - 9%)
(4 - 6%)



Discipline

(% Items Per Test)

Pathology
Physiology
Biochemistry & Nutrition
Pharmacology
Gross Anatomy & Embryology
Microbiology
Behavioral Sciences
Histology & Cell Biology
Immunology
Genetics

(44 - 52%)
(25 - 35%)
(14 - 24%)
(15 - 22%)
(11 - 15%)
(10 - 15%)
(8 - 13%)
(8 - 13%)
(6 - 11%)
(5 - 9%)



TRANSLATED
MEDICAL SCHOOL
TRANSCRIPTS AND
DIPLOMA
(IN ENGLISH)



1330 Avenue of the Americas, Suite 23
New York City, NY, 10019
+1 646 457 4093

info@strakertranslations.com | www.strakertranslations.com

**DEMOCRATIC REPUBLIC OF THE CONGO
UNIVERSITY OF KINSHASA**

MBOU FOFFOU

[Emblem]

SCIENTIA SPLENDET ET CONSCIENTIA

**FACULTY OF MEDICINE
P.O. Box 834 KINSHASA XI**

FACULTY ADMISSIONS OFFICE

DETAILED ACADEMIC TRANSCRIPT

No. SAC/5500/UNIKIN/4318/2001.

I, the undersigned Professor MVUMBI LELO
Admissions Secretary of the University of Kinshasa Faculty of Medicine, hereby confirm that
the student MBOU FOFFOU GUIDE
was duly enrolled on the **PREMIER GRADUAT en SCIENCES BIOMEDICALES (FIRST
LEVEL UNDERGRADUATE BIOMEDICAL STUDIES)** program for the 1995-1996
academic year consisting of the following courses:

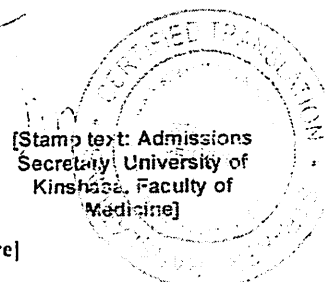
COURSE	THEORY HRS	PRAC. HRS	SCORE/20
Logic	45	25	14.00
Mathematics	45	45	14.00
General Biology	90	45	14.00
Introductory Statistics	30	30	19.00
Civics and Development	30	30	15.00
Introduction to Public Health	30	-	16.00
Physics	45	25	12.00
Medical English	30	-	16.00
Anthropology	15	-	10.00
Medical Psychology	15	-	12.00
General Chemistry	120	60	10.00
Biophysics	45	45	13.00
Public Health Internship (during vacation)	-	160	-

Grade: PASS (66 %) during the 2nd Exam Session of the
1995-1996 academic year.

Kinshasa, 11/12/2002

Professor **MVUMBI LELO**
Admissions Secretary

[Signature]





1330 Avenue of the Americas, Suite 23
New York City, NY, 10019
+1 646 457 4093

info@strakertranslations.com | www.strakertranslations.com

UNIVERSITY OF KINSHASA
FACULTY OF MEDICINE
ADMISSIONS OFFICE
P.O. Box 834 KINSHASA XI
DEMOCRATIC REPUBLIC OF THE CONGO

DETAILED ACADEMIC TRANSCRIPT

No. SAC/5500/UNIKIN/098/1999

I, the undersigned Professor LUTULA PENE-SHENDA Admissions
Secretary of the University of Kinshasa Faculty of Medicine, hereby confirm that the student MBOU
FOFFOU GUIDE was duly enrolled on the **DEUXIEME GRADUAT EN**
SCIENCES BIOMEDICALES (SECOND LEVEL UNDERGRADUATE BIOMEDICAL
SCIENCES) program for the 1996-1997 academic year consisting of the following courses:

COURSE	THEORY HRS	PRAC. HRS	SCORE/20
Anatomy	165	90	11.50
Entomology	15	10	19.00
Methodology	35	-	17.00
Nursing	30	20	11.00
General and Special Histology	45	30	10.30
Physiology	168	30	14.00
Biochemistry	60	30	09.50
Biophysics	45	45	-
Embryology	30	-	-
Internal Medicine and Pediatric Internship (during vacation)	-	160	-
Medical English	-	-	13.50

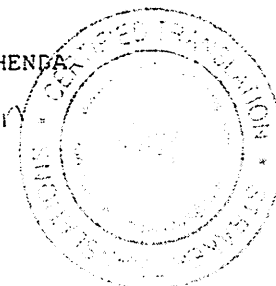
Grade: **PASS** (60%) during the 1st Exam Session of the
1996-1997 academic year.

Kinshasa. 02/11/1998

Professor LUTULA PENE-SHENDA
Admissions Secretary.

[Stamp text: Admissions
Secretary, University of
Kinshasa, Faculty of
Medicine]

[Signature]
02 NOV 98



straker
TRANSLATIONS



1330 Avenue of the Americas, Suite 23
New York City, NY, 10019
+1 646 457 4093

info@strakertranslations.com | www.strakertranslations.com

DEMOCRATIC REPUBLIC OF THE CONGO
UNIVERSITY OF KINSHASA

MBOU FOFFOU Guide

[Emblem]

SCIENTIA SPLENDET ET CONSCIENTIA

FACULTY OF MEDICINE
P.O. Box 834 KINSHASA XI
FACULTY ADMISSIONS OFFICE

DETAILED ACADEMIC TRANSCRIPT

No. SAC/5500/UNIKIN/1469/2000.

I, the undersigned Professor MVUMBI LELO
Admissions Secretary of the University of Kinshasa Faculty of Medicine, hereby confirm that the student
MBOU FOFFOU GUIDE was duly enrolled on the
TROISIEME GRADUAT en SCIENCES BIOMEDICALES (THIRD LEVEL UNDERGRADUATE BIOMEDICAL SCIENCES) program for the 1998-1999 academic year consisting of the following courses:

COURSE	THEORY HRS	PRAC. HRS	SCORE/20
Anatomic Pathology	90	45	11.00
Anatomy II (SPLANCHNOLOGY)	65	-	15.00
Elements of Public Health	-	45	13.00
- Hygiene	20	-	
- Nutrition	20	-	
- Demographics	20	-	
Microbiology Immunology	60	30	12.00
Laboratory Techniques	30	60	14.00
Surgical Semiology	30	30	18.00
Medical Semiology	30	30	14.00
Parasitology	-	-	10.00
- Protozoology	35	15	
- Helminthology	15	10	
Physiopathology	-	15	15.00
- Special	35	-	
- General	35	-	
General Surgery	30	-	11.00
Physiology II (Neurophysiology)	30	-	18.00
Neuroanatomy	40	-	-
General Pharmacology	30	-	12.00
Embryology (General and Special)	30	-	10.00
Senior Project	-	-	18.00
Surgery Internship during vacation	-	-	-

Optional Courses:

1. _____
2. _____
3. _____

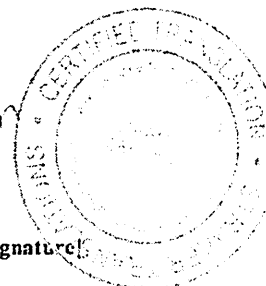
Grade: **PASS** (67.6%) during the 1st Exam Session of the
1998-1999 academic year.

Kinshasa, 05/10/2000.

[Stamp text: Admissions
Secretary, University of
Kinshasa, Faculty of
Medicine]

Professor MVUMBI LELO
Admissions Secretary

[Signature]



straker
TRANSLATIONS



1330 Avenue of the Americas, Suite 23
New York City, NY, 10019
+1 646 457 4093

info@strakertranslations.com | www.strakertranslations.com

**DEMOCRATIC REPUBLIC OF THE CONGO
UNIVERSITY OF KINSHASA**

[Emblem]

SCIENTIA SPLENDET ET CONSCIENTIA

FACULTY OF MEDICINE

P.O. Box 834 KINSHASA XI

FACULTY ADMISSIONS OFFICE

DETAILED ACADEMIC TRANSCRIPT

No. SAC/5500/UNIKIN/4368/2002.

I, the undersigned **Professor MVUMBI LELO**, Admissions Secretary of the University of Kinshasa Faculty of Medicine, hereby confirm that the student MBOU FOFFOU GUIDE was duly enrolled on the **PREMIER DOCTORAT en MEDECINE (FIRST LEVEL MEDICAL DOCTORATE)** program for the 1999-2000 academic year consisting of the following courses:

COURSE	THEORY HRS	PRAC. HRS	SCORE/20
Internal Medicine	75	-	08.00
- Nephrol., Hematol., Pulmonol., Cardio.			
- Medical Clinic			
Special Surgery	75	-	13.00
- Trauma., Urol., Thorac., Maxillofacial			
- Surgical Clinic			
Gynecology-Obstetrics	30	-	12.00
- Gynecology Clinic	-	45	
- Gynecology Internship	-	30	
Stomatology	15	15	19.00
Infectious and Parasitic Pathology	15	-	19.00
- Infectious Pathology Clinic	-	15	
Special Pharmacology	90	30	15.00
Otorhinolaryngology	30	15	16.00
Public Health (Epidemiology)	30	30	14.00
Radiology	15	15	18.00
- Radiology Clinic	-	15	

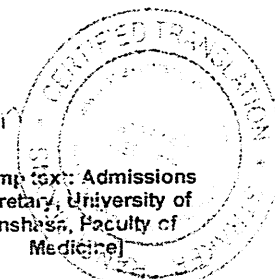
Grade: DISTINCTION (74%) during the 1st Exam Session of the 1999-2000 academic year.

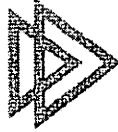
Kinshasa, 20/12/2002.

Professor Dr MVUMBI LELO

Admissions Secretary
[Signature]

[Stamp text: Admissions
Secretary, University of
Kinshasa, Faculty of
Medicine]





1330 Avenue of the Americas, Suite 23
New York City, NY, 10019
+1 646 457 4093

info@strakertranslations.com | www.strakertranslations.com

**DEMOCRATIC REPUBLIC OF THE CONGO
UNIVERSITY OF KINSHASA**

**MBOU FOFFOU
GUIDE**

[Emblem]

SCIENTIA SPLENDET ET CONSCIENTIA

**FACULTY OF MEDICINE
P.O. Box 834 KINSHASA XI
FACULTY ADMISSIONS OFFICE**

DETAILED ACADEMIC TRANSCRIPT

No. SAC/5500/UNIKIN/4369/2002

I, the undersigned Professor MVUMBI LELO, Admissions Secretary of the University of Kinshasa Faculty of Medicine, hereby confirm that the student MBOU FOFFOU GUIDE was duly enrolled on the **DEUXIEME DOCTORAT en MEDECINE (SECOND LEVEL MEDICAL DOCTORATE)** program for the 2001-02 academic year consisting of the following courses:

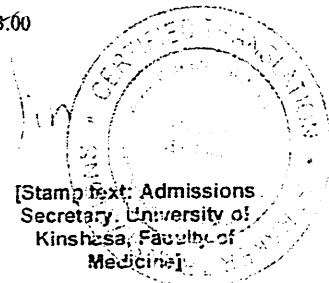
COURSE	THEORY HRS	PRAC. HRS	SCORE/20
Gynecology-Obstetrics	30	-	13.00
- Gynecology Clinic	-	45	
- Gynecology-Obstetrics Internship	-	30	
Internal Medicine	75	-	12.00
- Endocrinology, Gastroenterology, Rheumatology and Connective Tissue Diseases, Metabolic Disorders			
- Medical Clinic	-	60	
Surgical Techniques and Practices	45	15	13.00
Pediatrics	-	45	11.00
- Cardiopulmonary, Neonatology, Dialysis, Nutritional Rehabilitation, Pediatric Clinic	-	30	
Neurology and Neurological Clinic	30	15	14.00
Psychiatry and Psychiatric Clinic	30	15	13.00
Dermatology and Dermatological Clinic	30	15	17.00
Special Surgery	75	-	11.00
- Gastrointestinal Surgery, Orthopedics, Pediatric Surgery, Neurosurgery, Cardiovascular, Surgical Clinic	-	60	
- Surgery Internship	-	30	
Anesthesia and Surgical Intensive Care	15	-	15.00
- Practical Exercises	-	15	
Physiotherapy	15	-	13.00
Legal Medicine	15	-	15.00
Medical Ethics	15	-	10.00
Public Health	60	-	17.00
- Public Health Administration & Planning, Organization of Hospital Institutions, Occupational Medicine			
Radiology	15	-	
Ophthalmology	30	10	13.00

Grade: PASS (67%) during the 1st Exam Session of the
2001-2002 academic year.

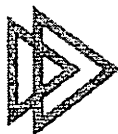
Kinshasa 20/12/2002

Professor MVUMBI LELO
Admissions Secretary
[Signature]

[Stamp text: Admissions
Secretary, University of
Kinshasa, Faculty of
Medicine]



straker
TRANSLATIONS



1330 Avenue of the Americas, Suite 23
New York City, NY, 10019
+1 646 457 4093

info@strakertranslations.com | www.strakertranslations.com

DEMOCRATIC REPUBLIC OF THE CONGO
UNIVERSITY OF KINSHASA

MBOU FOFFOU GUIDE

[Emblem]

SCIENTIA SPLENDET ET CONSCIENTIA

FACULTY OF MEDICINE
P.O. Box 834 KINSHASA XI

FACULTY ADMISSIONS OFFICE

DETAILED ACADEMIC TRANSCRIPT

No. SAC/5500/UNIKIN/1045/2004

I, the undersigned Professor NKIAMA EKISAWA
Admissions Secretary of the University of Kinshasa Faculty of Medicine, hereby confirm that Doctor
MBOU FOFFOU GUIDE
duly completed their internships in the four departments below and obtained the following grades
for the *TROISIEME DOCTORAT EN MEDECINE* (THIRD LEVEL MEDICAL DOCTORATE)
program during the 2002-2003 academic year.

TITLE	INTERNAL MEDICINE	PEDIATRICS	OB-GYN.	SURGERY
Hospital Internship/35	29.25	25.90	26.25	27.13
Exam/65	42.25	42.25	29.25	35.75
Total/100	72.00	68.00	56.00	63.00

Internship duration: 12 months

Grade: **PASS** (65%) during the 1st Exam Session of the

2002-2003 academic year.

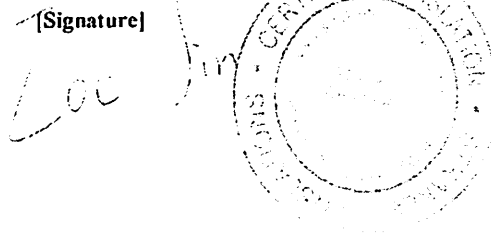
Kinshasa, 15/07/2004.

THE FACULTY ADMISSIONS SECRETARY.

[Stamp text: Admissions
Secretary, University of
Kinshasa, Faculty of
Medicine]

Professor NKIAMA EKISAWA

[Signature]



straker
TRANSLATIONS



101 California Street, Suite 2710
San Francisco, CA, 94111
+1 415 854 8146

info@strakertranslations.com | www.strakertranslations.com

Democratic Republic of the Congo
[logo] Kinshasa University
Faculty of Medicine

Diploma #102.4820.03

Whereas **Mbou Foffou Guide**, born in **Foumbot** on **February 27, 1975**, holds a graduate diploma in biomedical sciences and certificates of achievement in first and second cycle doctoral studies in medicine,
Whereas he has passed third cycle doctoral exams in medicine as of **June 25, 2004** with a **Satisfactory** merit,
We, the undersigned President, Secretary and Members of the Jury responsible for the exams in third cycle doctoral studies in medicine grant **Mbou Foffou Guide** the title of **Doctor of Medicine**.
In witness whereof, we deliver him this diploma in attestation of his attendance in the courses and exercises required in the program and of the fact that all legal requirements have been fulfilled.

On behalf of the President of the Republic,
We, the undersigned President, Secretary and Members of the Ratification Committee attest that this Diploma has been delivered in accordance with regulations and that all requirements set in Congolese legislation regarding the conferring of academic degrees have been met. In witness whereof, we ratified this diploma on **October 19, 2006** and it has been registered under #5851, vol. CXVIII, series B.

Issued in Kinshasa on **October 19, 2006**
[seal]

On behalf of the Ratification Committee,
Secretary, [signature]

Minister of Higher
and University Education
[signature]

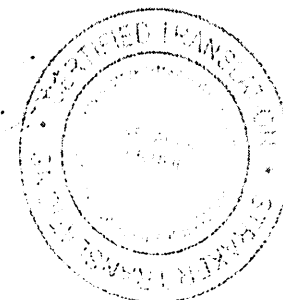
Issued in Kinshasa on **March 28, 2006**
Secretary of the Jury President of the Jury
[signature] [signature]

[seal]

Incumbent

President of the University
[signature]

0001118





WWW.WES.ORG

P.O. Box 5087, Bowling Green Station
New York, NY 10274-5087

U.S.A

Tel: +1 212-966-6311 Fax: +1 212-739-6100

Email: www.wes.org/contact-us

09-Mar-2020

Guide MBOU FOFFOU
12720 HERITAGE OAKS DR
Oklahoma City, OK 73120

Reference#: 4037721/aa

World Education Services is pleased to provide you with the enclosed credential evaluation report (Reference No: 4037721).

A WES evaluation report reflects our expertise in international education systems and our best judgment of your academic qualifications. WES evaluates formal academic qualifications (degrees, diplomas, certificates and transcripts) awarded by secondary and post-secondary institutions. WES does not evaluate trade, occupational or industrial qualifications therefore they are not included in our evaluation reports.

Your evaluation report is stored and available for future use.

To order duplicate reports visit:

<https://applications.wes.org/createaccount/login/login>

Please send your questions to customer services at wes.org/contact-us. All inquiries must be submitted in writing. To protect your privacy, WES staff cannot discuss evaluations over the telephone.

We thank you for choosing WES for your credential evaluation.

Sincerely,
World Education Services

BY UPS GROUND



* 1 6 7 1 1 2 5 8 *



CREDENTIAL EVALUATION AND AUTHENTICATION REPORT

Name: MBOU FOFFOU, Guide
Date of Birth: February 27, 1975

Date : March 09, 2020
Ref#: 4037721/aa
Page: 1 of 4

U.S. EQUIVALENCY SUMMARY

First professional degree in medicine (Doctor of Medicine) from a regionally accredited institution

CREDENTIAL ANALYSIS

- | | |
|---|---|
| 1. Name on Credential:
Credential Authentication:
Country:
Credential:

Year:
Awarded By:
Status:
Admission Requirements:

Length of Program:
Major:

U.S. Equivalency: | <p>MBOU FOFFOU, Guide
<i>Documents were verified by the institution</i>
Democratic Republic of the Congo
Diplôme de Docteur en Médecine
(Diploma of Doctor in Medicine)
2004
University of Kinshasa
Accredited Institution
<i>Diplôme d'Etat d'Etudes Secondaires du Cycle Long</i>
(State Diploma of Secondary Studies)
Six years
Medicine</p> <p>First professional degree in medicine (Doctor of Medicine)</p> |
|---|---|





COURSE-BY-COURSE ANALYSIS

Name: MBOU FOFFOU, Guide
Date of Birth: February 27, 1975

Date : March 09, 2020
Ref#: 4037721/aa
Page: 2 of 4

INSTITUTIONS - DATES - SUBJECTS	U.S. Semester Credits	U.S. Grades
University of Kinshasa		
1995-1996		
Logic	3.0	A
Mathematics	4.0	A
Biology	5.5	A
Statistics	2.5	A
Civics and Development	2.5	A
Public Health	1.5	A
Physics	3.0	B+
Medical English	1.5	A
Medical Anthropology	1.0	B
Medical Psychology	1.0	B+
Chemistry	7.5	B
Biophysics	4.0	B+
1996-1997		
Anatomy	10.5	B
Entomology	1.0	A
Methodology	1.5	A
Nursing Care	2.0	B
General and Specialized Histology	3.0	B
Physiology	8.5	A
Biochemistry	4.0	Pass
Medical English	1.5	B+
1998-1999		
Pathological Anatomy	5.5	B
Anatomy II	2.5	A
<i>Splanchnology</i>		
Public Health	3.5	B+
<i>Hygiene, Nutrition, Demography</i>		
Microbiology and Immunology	4.0	B+
Laboratory Techniques	4.0	A
Surgical Semiology	2.5	A
Medical Semiology	2.5	A
(Continued on next page)		





COURSE-BY-COURSE ANALYSIS

Name: MBOU FOFFOU, Guide
Date of Birth: February 27, 1975

Date : March 09, 2020
Ref#: 4037721/aa
Page: 3 of 4

INSTITUTIONS - DATES - SUBJECTS	U.S. Semester Credits	U.S. Grades
Parasitology	3.0	B
<i>Protozoology and Helminthology</i>		
General and Specialized Physiopathology	3.5	A
General Surgery	1.5	B
Neurophysiology	1.5	A
Pharmacology	1.5	B+
General and Specialized Embryology	1.5	B
Final Project	1.0	A
1999-2000		
Internal Medicine	3.0	Pass
<i>Nephrology, Hematology, Pulmonology, Cardiology; Medical Clinic</i>		
Specialized Surgery	3.0	B+
<i>Traumatology, Urology, Thoracic and Maxillofacial; Surgical Clinic</i>		
Obstetrics and Gynecology	4.5	B+
<i>with Clinic and Internship</i>		
Stomatology	1.5	A
Infectious and Parasitic Pathology	1.5	A
<i>with Clinic</i>		
Specialized Pharmacology	5.0	A
Otorhinolaryngology	2.0	A
Epidemiology	2.5	A
Radiology	2.0	A
<i>with Clinic</i>		
2001-2002		
Obstetrics and Gynecology	4.5	B+
<i>with Clinic and Internship</i>		
Internal Medicine	5.5	B+
<i>Endocrinology, Gastroenterology, Rheumatology, Connective Tissue and Metabolic Diseases; Medical Clinic</i>		
Surgical Techniques and Practices	2.5	B+
(Continued on next page)		





COURSE-BY-COURSE ANALYSIS

Name: MBOU FOFFOU, Guide
Date of Birth: February 27, 1975

Date : March 09, 2020
Ref#: 4037721/aa
Page: 4 of 4

INSTITUTIONS - DATES - SUBJECTS	U.S. Semester Credits	U.S. Grades
Pediatrics <i>Cardiopulmonary Diseases, Neonatology, Hemato- Nephrology, Nutritional Rehabilitation; Pediatric Clinic</i>	3.0	B
Neurology <i>with Clinic</i>	2.0	A
Psychiatry <i>with Clinic</i>	2.0	B+
Dermatology <i>with Clinic</i>	2.0	A
Specialized Surgery <i>Digestive Surgery, Orthopedics, Pediatric Surgery, Neurosurgery, Cardiovascular Surgery; Surgical Clinic and Internship</i>	7.0	B
Anesthesia and Intensive Care <i>with Practical Exercises</i>	1.5	A
Physiotherapy	1.0	B+
Legal Medicine	1.0	A
Medical Deontology	1.0	B
Public Health <i>Public Health Administration and Planning, Organization of Hospital Institutions, Occupational Medicine</i>	2.5	A
Ophthalmology	1.5	B+
2002-2003		
Internal Medicine Internship	4.0	A
Pediatric Internship	4.0	B+
Obstetrics and Gynecology Internship	4.0	B
Surgery Internship	4.0	B+

SUMMARY

Total Professional Semester Credits: 185.0 GPA: 3.52



ORIGINAL
MEDICAL SCHOOL
TRANSCRIPTS
AND
DIPLOMA
(IN FRENCH)

REPUBLIQUE DEMOCRATIQUE DU CONGO
UNIVERSITE DE KINSHASA



FACULTE DE MEDECINE
B.P. 834 KINSHASA XI

SECRETARIAT ACADEMIQUE FACULTAIRE

ATTESTATION DE REUSSITE DETAILLEE

N° SAC/5500/UNIKIN/4318 /2001.

Je soussigné, Professeur Dr **MVUMBI LELO**
Secrétaire Académique de la Faculté de Médecine de l'Université de Kinshasa, atteste par la présente que l'étudiant (e) **ABOU FOFFOU GUIDE**
a régulièrement suivi les cours de **PREMIER GRADUAT en SCIENCES BIOMEDICALES** pendant l'année académique 19 **95-1996** avec la distribution horaire ci-après :

INTITULES	H.Th.	H.Pr.	COTES/20
Logique	45	25 14	14,00
Mathématiques	45	45 14	14,00
Biologie générale	90	45 14	14,00
Eléments de statistique	30	30 19	19,00
Civisme et Développement	30	30 16	15,00
Eléments de Santé Publique	30	... 16	16,00
Physique	45	25 12	12,00
Anglais Médical	30	-- 16	16,00
Anthropologie	15	-- 10	10,00
Psychologie Médicale	15	-- 12	12,00
Chimie Générale	120	60 10	10,00
Biophysique	45	45 10	13,00
Stage en Santé Publique (pendant les vacances)	--	160	

Mention : **SATISFACTION**
Académique 1995 - 1996

66
(66 %) en 2^e Session pour l'année

Fait à Kinshasa , le 11/12 /2002.

Professeur Dr **MVUMBI LELO**
Secrétaire Académique



UNIVERSITE DE KINSHASA
FACULTE DE MEDECINE
SECRETARIAT ACADEMIQUE
B.P. 834 KINSHASA XI
REPUBLIQUE DEMOCRATIQUE DU CONGO

ATTESTATION DE REUSSITE DETAILLEE

N° SAC/5500/UNIKIN/ 098 11999

Je soussigné, Professeur Dr LUTULA PENE-SHENDA Secrétaire
Académique de la Faculté de Médecine de l'Université de Kinshasa, atteste par la
présente que l'étudiant (e) MBOU FOEFOU GILDE
a régulièrement suivi les cours de **DEUXIEME GRADUAT** en **SCIENCES**
BIOMEDICALES pendant l'année académique 1996-1997 avec la distribution horaire ci-
après :

INTITULES	H.Th.	H.Pr.	COTES/20
Anatomie	165	90	11,50
Entomologie	15	10	19,00
Méthodologie	35	--	17,00
Soins infirmiers	30	20	11,00
Histologie générale et spéciale	45	30	10,30
Physiologie	168	30	14,00
Biochimie	60	30	09,50
Biophysique	45	45	
Embryologie	30	--	
Stage en Médecine Interne et en Pédiatrie (pendant les vacances)	--	160	
Anglais Médical			13,50

Mention : SATISFACTION
académique 1996-1997.

(60 %) en

Ière Session pour l'année

Fait à Kinshasa, le 02/11/1998



Professeur Dr LUTULA PENE-SHENDA
Secrétaire Académique.

02.11.98

UNIVERSITE DE KINSHASA



FACULTE DE MEDECINE

B.P. 834 KINSHASA XI

SECRÉTARIAT ACADEMIQUE FACULTAIREATTESTATION DE REUSSITE DETAILLEE

N° SAC/5500/UNIKINI/1469/2000.

Je soussigné, Professeur Dr **MVUMBI LELO**
 Secrétaire Académique de la Faculté de Médecine de l'Université de Kinshasa, atteste par la
 présente que l'étudiant (e) **MBOU FOFFOU GUIDE**
 a régulièrement suivi les cours de **TROISIEME GRADUAT en SCIENCES**
BIOMEDICALES pendant l'année académique 1998-1999 avec la distribution horaire ci-
 après :

INTITULES	H.Th.	H.Pr.	COTES/20
✓ Anatomie Pathologique	90	45 11	11,00
✓ Anatomie II (SPLANCHNOLOGIE)	65	-- 15	15,00
✓ Eléments de Santé Publique	--	45 13	13,00
- Hygiène	20	--	
- Nutrition	20	--	
- Démographique	20	--	
✓ Microbiologie Immunologie	60	30 12	12,00
✓ Technique de Laboratoire	30	60 14	14,00
✓ Sémiologie Chirurgicale	30	30 18	18,00
✓ Sémiologie Médicale	30	30 14	14,00
✓ Parasitologie	--	-- 10	10,00
- Protozoologie	35	15	
- Helminthologie	15	10	
✓ Physiopathologie	--	15 15	15,00
- Spéciale	35	--	
- Générale	35	--	
✓ Chirurgie générale	30	-- 11	11,00
✓ Physiologie II (Neurophysiologie)	30	-- 15	18,00
Neuro-Anatomie	40	--	
✓ Pharmacologie générale	30	-- 12	12,00
✓ Embryologie (Générale et Spéciale)	30	-- 10	10,00
✓ Travail de fin de cycle	--	-- 18	18,00
Stage de vacance en chirurgie	--	--	

Compléments :

1.
2.
3.

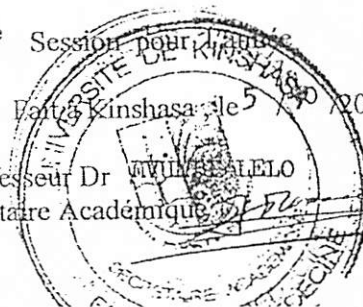
Mention : SATISFACTION

Académique 1998-1999

(69,6 %) en 1ère

Session pour l'année

Faculté de Kinshasa, le 5 mai 2000.

 Professeur Dr **MVUMBI LELO**
 Secrétaire Académique


UNIVERSITE DE KINSHASA



FACULTE DE MEDECINE

B.P. 834 KINSHASA XI

SECRETARIAT ACADEMIQUE FACULTAIRE**ATTESTATION DE REUSSITE DETAILLEE**

N° SAC/5500/UNIKIN/ 43 68 /2002

Je soussigné, **Professeur Dr MVUMBI LELO**, Secrétaire Académique de la Faculté de Médecine de l'Université de Kinshasa, atteste par la présente que l'étudiant (e)MBOU. FORTOU. GILDE..... a régulièrement suivi les cours de **PREMIER DOCTORAT en MEDECINE** pendant l'année académique 1999-~~2000~~ avec la distribution horaire ci-après :

INTITULES	H.Th.	H.Pr.	COTES/20
Médecine interne	75	- 05	08,00
- Néphrol., hématol., pneumol., cardio			
- Clinique médicale			
Chirurgie spéciale	75	- 13	13,00
- Traumat., urol., thorac., maxillo-fac.			
- Clinique chirurgicale			
Gynécologie-Obstétrique	30	- 15	12,00
- Clinique gynécologique	--	45	
- Stage de gynécologie	--	30	
Stomatologie	15	15	19,00
Pathologie infectieuse et parasitaire	15	- 19	19,00
- Clinique de pathologie infectieuse	--	15	
Pharmacologie spéciale	90	30 15	15,00
Oto-Rhino-Laryngologie	30	15 16	16,00
Santé Publique (Epidémiologie)	30	30 10	14,00
Radiologie	15	15 18	18,00
- Clinique radiologique	--	15	
Mention : DISTINCTION (74 %) en 1 ^{ère} Session pour l'année Académique 1999 - 2000 2000			

Fait à Kinshasa , le 20/ 12 /2002.

Professeur Dr MVUMBI LELO
Secrétaire Académique



UNIVERSITE DE KINSHASA



FACULTE DE MEDECINE

B.P. 834 KINSHASA XI

SECRETARIAT ACADEMIQUE FACULTAIRE**ATTESTATION DE REUSSITE DETAILLEE**

N° SAC/5500/UNIKIN/ 4369/2002

Je soussigné, Professeur Dr MVUMBI LELO, Secrétaire Académique de la Faculté de Médecine de l'Université de Kinshasa, atteste par la présente que l'étudiant (e) MBOU FOFFOU GUIDE

a régulièrement suivi les cours de **DEUXIEME DOCTORAT en MEDECINE** pendant l'année académique 192001-02 avec la distribution horaire ci-après :

INTITULES	H.Th.	H.Pr.	COTES/20
Gynécologie-Obstétricale	30	--	13,00
- Clinique de gynécologie	--	45	
- Stage de Gynécologie-Obstétrique	--	30	
Médecine Interne	75	--	12,00
- Endocrinologie, gastro-entérologie, rhumato et collagénose, maladies métaboliques	--	60	
- Clinique médicale	--	15	13,00
Techniques chirurgicales & Pratiques	45	45	11,00
Pédiatrie	--	30	14,00
- Cardio-pulmonaire, néonatalogie, hématonéphro, réhabilitation nutritionnelle, clinique pédiatrique	--	15	13,00
Neurologie & Clinique neurologique	30	15	17,00
Psychiatrie & Clinique psychiatrique	30	--	11,00
Dermatologie & Clinique dermatologique	30	--	60
Chirurgie spéciale	75	--	30
- Chirurgie digestive, orthopédie, chirurgie pédiatrique, neurochirurgie, cardio-vasculaire, clinique chirurgicale	--	15	15,00
- Stage de chirurgie	--	15	13,00
Anesthésie-réanimation	15	--	15,00
- Exercices pratiques	--	15	10,00
Physiothérapie	15	--	17,00
Médecine légale	15	--	
Déontologie médicale	15	--	
Santé publique	60	--	
- Administration & planification de la S.P., organisation des institutions hospitalières, médecine du travail.	15	--	
Radiologie	30	10	43,00
Ophtalmologie	30	10	

Mention : SATISFACTION (67 %) en 1^{ère} Session pour l'année Académique 19 2001-2002

Fait à Kinshasa , le 20/ 12/2002

Professeur Dr MVUMBI LELO
Secrétaire Académique



REPUBLIQUE DEMOCRATIQUE DU CONGO
UNIVERSITE DE KINSHASA



FACULTE DE MEDECINE
B.P. 834 KINSHASA XI
SECRETARIAT ACADEMIQUE FACULTAIRE

ATTESTATION DE REUSSITE DETAILLEE

N° SAC/5500/UNIKIN/ 1045 /2004.

Je soussigné, Professeur Dr **NKIAMA EKISAWA** Secrétaire Académique de
la Faculté de Médecine de l'Université de Kinshasa, atteste par la présente que le Docteur
MBOU FOFFOU GUIDE

a régulièrement effectué son stage dans les quatre services ci-après et a obtenu les côtes
suivantes en **TROISIEME DOCTORAT EN MEDECINE** pendant l'année académique
2002.-2003.

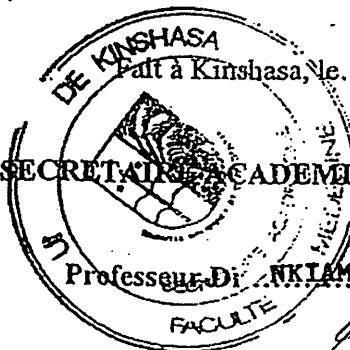
INTITULES MEDECINE INTERNE PEDIATRIE GYNECO-OBST. CHIRURGIE

Stage Hosp/35	29,25	25,90	26,25	27,13
Examen : 65	42,25	42,25	29,25	35,75
Total/100	72,00	68,00	56,00	63,00

Durée de stage : 12 mois

Mention : **SATISFACTION** (65 %) en 1^{re} Session pour l'année
académique **2002-2003**

DE KINSHASA
Fait à Kinshasa, le 15.07.2004
LE SECRETAIRE ACADEMIQUE FACULTAIRE,
Professeur Dr **NKIAMA EKISAWA**





REPUBLIQUE DEMOCRATIQUE DU CONGO

UNIVERSITE DE KINSHASA
FACULTE DE MEDECINE

DIPLOME N° 102.4820.03

Nous, Président, Secrétaire et Membres du Jury chargé de procéder aux examens du troisième doctorat en médecine,

Attendu que le (la) nommé(e) MBOU FOFFOU GUIDE né(e) à Foumbot le 27 fév. 1975 est porteur du diplôme de gradué(e) en sciences biomédicales et des certificats de réussite du premier et du deuxième doctorat en médecine,

Attendu qu'il/elle a réussi avec la mention Satisfaction en date du 25 juin 2004 les examens inscrits au programme du troisième doctorat en médecine,

Avons conféré et conférons à MBOU FOFFOU GUIDE le grade de **DOCTEUR EN MEDECINE**.

En foi de quoi, nous lui avons délivré le présent Diplôme, attestant en même temps qu'il/elle a suivi régulièrement les cours et exercices prévus au programme et que toutes les prescriptions légales en vigueur ont été observées.

AU NOM DU PRESIDENT DE LA REPUBLIQUE,

Nous, Président, Secrétaire et Membres de la Commission d'Entérinement, attestons que le présent Diplôme a été délivré régulièrement et que toutes les conditions prescrites par la législation congolaise relatives à la collation des grades académiques ont été observées.

En foi de quoi nous l'avons entériné le 19 octobre 2006 et enregistré sous le n° 5851 folio CXVIII au registre litéra B Fait à Kinshasa le 19 octobre 2006

Pour la Commission d'Entérinement,
Le Secrétaire,

Le Ministre de l'Enseignement
Supérieur et Universitaire,

Fait à Kinshasa, le 28 mars 2006

Le Secrétaire du Jury,

Le Porteur,

Le Président du Jury

Le Recteur de l'Université

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:	)	
GUIDE MBOU FOFFOU	)	Docket No. 2023-48
License No. 026.0147515	)	Docket No. 2023-49

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and makes the following Charges against the Respondent Guide Mbou Foffou:

Board Authority

1. The Vermont State Board of Nursing (the "Board") has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by Registered Nurses pursuant to 3 V.S.A. § 129(a); 3 V.S.A. § 129a; 3 V.S.A. § 814(d); 26 V.S.A. Chapter 28; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation ("OPR").

Statement of Facts

2. Guide Mbou Foffou ("Respondent") of Katy, Texas is licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0147515. This license was originally issued on October 13, 2021 and expires on March 31, 2023.
3. Respondent is also licensed as an RN in New York under license number 791680, in Oklahoma under license number R0136004; and in Texas under license number 1009618.
4. On March 29, 2023, the State requested that Respondent's license be summarily suspended.
5. On March 29, 2023, to moot summary suspension proceedings, Respondent stipulated to a voluntary indefinite suspension pending a final hearing on the merits.
6. On October 13, 2021, Respondent applied for his Vermont RN license on the basis of endorsement.
7. In his application, Respondent stated that he had completed a Registered Nursing Education Program in a U.S. state or jurisdiction.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

8. Under the section of his application titled "Education details," Respondent stated that he had graduated with an Associate Degree in Nursing from "Palm Beach State College" in Lake Worth, Florida in August of 2019.
9. During the processing of Respondent's application, OPR received a verification report from the National Council of State Boards of Nursing ("NCSBN") which showed that Respondent stated that he had graduated from Palm Beach School of Nursing on his New York and Oklahoma license applications, and that he had graduated from Palm Beach State College on his Texas license application.
10. Palm Beach College and Palm Beach School of Nursing are separate institutions.
11. In a subsequent interview with an OPR investigator, Respondent said that he had attended Palm Beach School of Nursing and that him listing Palm Beach College on his application was a mistake.
12. Subsequent to Respondent receiving his Vermont RN license, OPR received the following information from NURSIS in regard to Respondent:

This nurse's name, DOB and/or SSN was included on an affidavit provided by the Department of Health and Human Services - Office of Inspector General and the Federal Bureau of investigation pursuant to their investigation into nursing programs. The affidavit was executed by a nursing school and identified this individual as a person that was issued an illegitimate nursing diploma and transcript. This information is provided for the purposes of assisting State Boards of Nursing in taking independent action.

13. The affidavit in question was executed by J.N., the owner of Palm Beach School of Nursing.
14. The affidavit detailed that in order to obtain an Associate Degree in Nursing from Palm Beach School of Nursing, students were required to complete 1,665 hours of instruction, which included 720 hours of clinical experience in a health care setting.
15. The affidavit further detailed that from around October 2016 to June 2022, Palm Beach School of Nursing issued transcripts and diplomas to individuals who did not complete the required program hours and clinical training necessary to obtain an Associate Degree in Nursing and transcript.
16. The affidavit identified Respondent as one of the individuals who obtained his Associate Degree in Nursing and his transcript without having completed the hours of instruction that the Palm Beach School of Nursing required.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

Violation One: 3 V.S.A. § 129a(a)(3) Failing to comply with provisions of federal or State statutes or rules governing the practice of the profession.

17. The State re-alleges and incorporates Paragraphs 2 through 16 above.
18. As an RN, Respondent is required to comply with provisions of federal or State statutes or rules governing the practice of the profession.
19. Rule 5.6(a) of the Vermont Board of Nursing Administrative Rules requires an applicant who seeks licensure by endorsement "to be licensed in a United States jurisdiction on the basis of a U.S. nursing education program."
20. Paragraphs 3 through 15 demonstrate that Respondent is not licensed in a United States jurisdiction on the basis of a U.S. nursing education program because he did not complete a U.S. nursing education program.
21. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent committed unprofessional conduct in violation of 3 V.S.A. § 129a(a)(3).

Relief Requested

WHEREFORE, the RN license of Respondent should be revoked, suspended, reprimanded, conditioned, or otherwise disciplined.

DATED at Montpelier, Vermont this 19th day of April, 2023.

STATE OF VERMONT
SECRETARY OF STATE

By:


Ultan Doyle
Prosecuting Attorney
(802)828-1217
ultan.doyle@vermont.gov

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402