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Houston Community College  
Attn: Dr. Jolly Joseph  
1900 Pressler St.  
Houston, Texas 77030

May 31, 2016

RE: Affidavit of Graduation

Dear Dr. Joseph:

Please be advised, I represent the interests of [REDACTED]

[REDACTED] in connection with Houston Community College's refusal to tender an Affidavit of Graduation.

My clients completed the academic requirements to graduate from HCC's nursing program and are entitled to receive an Affidavit of Graduation. The affidavit is necessary to take the NCLEX-RN examination and move forward in their respective careers. HCC is not authorized to withhold or delay the distribution of the Affidavit of Graduation.

It is my understanding that the Board of Nursing placed HCC on probation due to the low passage rate on the NCLEX-RN examination in the preceding years. As a condition of probation, HCC must attain a passage rate of 80 percent for first time candidates for the year 2016. In response to the passage rate requirement, HCC selectively withheld the Affidavit from those students who have graduated, but appeared less promising.

Several of my clients referenced a conversation with Dr. Joseph where she offered free remedial classes to prepare for the exam. Dr. Joseph has stated that the Affidavit of Graduation was not conditioned upon taking the additional classes. On behalf of my clients, I am demanding that HCC tender to each student above an Affidavit of Graduation immediately.

If this matter is not resolved by June 3, 2016 I will file a lawsuit against HCC and the Texas Board of Nursing for declaratory relief and injunctive relief. I will also seek money damages on behalf of each client above against HCC including my attorney's fees.

Sincerely,

  
Keith Gross