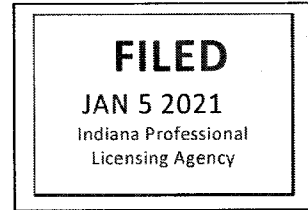


**BEFORE THE  
BEHAVIORAL HEALTH AND  
HUMAN SERVICES  
LICENSING BOARD  
CAUSE NUMBER: 2021 BHSB 0001**

**IN THE MATTER OF THE LICENSE OF: )  
AKOSUA GYEABOA, L.C.S.W., L.C.A.C )  
LICENSE NOS.: 34000416A (ACTIVE) )  
870011017A (ACTIVE) )**



**ADMINISTRATIVE COMPLAINT**

The State of Indiana (“Petitioner”), by counsel, Deputy Attorney General Nicholas A. Hart, on behalf of the Office of the Indiana Attorney General, and pursuant to Ind. Code § 25-1-7-7, Ind. Code ch. 25-1-5, Ind. Code § 25-23-1-7, the Administrative Orders and Procedures Act, Ind. Code ch. 4-21.5-3, and Ind. Code ch. 25-1-9, files its Administrative Complaint against the Clinical Social Worker and Clinical Addiction Counselor licenses of Akosua Gyeaboa (“Respondent”), and in support alleges and states the following:

**FACTS**

1. Respondent is a Clinical Social Worker in the State of Indiana, having been issued license number 34000416A by Endorsement on November 25, 1992.
2. Respondent is also a Clinical Addiction Counselor in the State of Indiana, having been issued license number 870011017A by Grandfathering on July 26, 2011.
3. On September 30, 2019, the Office of the Attorney General received a consumer complaint from Raynette Hughes (“Hughes”) against Respondent. Hughes alleged that she had requested her records from Respondent in person on April 29, 2019, and later by text message and verbally over the phone, but that Respondent had not provided them.

4. Hughes provided a screenshot of emails between her and Respondent. This included an email from Hughes to Respondent on July 16, 2019, in which Hughes attached a signed mental health release and asked for her records. Respondent did not provide Hughes with her records, despite receiving a release.

5. Respondent failed to assert that there was good medical cause not to provide Complainant with her records upon advice of a physician as permitted pursuant to Ind. Code § 16-39-2-4.

6. On or about October 19, 2020, Hughes informed the Office of the Attorney General that Respondent has still not provided her with her records.

#### **VIOLATIONS**

7. By Respondent's failure to provide mental health records to a patient for inspection, despite patient providing her with a signed release form, Respondent has violated Ind. Code § 16-39-2-4, and is subject to discipline pursuant to Ind. Code § 25-1-9-4(a)(3).

**ACCORDINGLY**, Petitioner demands this Board enter an order finding that:

1. Respondent is subject to discipline according to Ind. Code § 25-1-9;
2. Imposes an appropriate disciplinary sanction;
3. Directs the Respondent to immediately pay all costs incurred in the prosecution of this case; and

4. Provides any further relief that the Board deems just and proper.

Respectfully submitted,



By: \_\_\_\_\_

Nicholas Hart  
Deputy Attorney General  
Attorney No. 36031-06

Indiana Office of the Attorney General  
Medical Licensing  
302 West Washington Street, Fifth Floor  
Indianapolis, Indiana 46204-2770  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing "Administrative Complaint" has been served upon the Respondent at the address listed below, by United States First Class Mail on this 5th day of January, 2021.

Akosua Gyeaboa  
1640 Kessler Boulevard West Drive  
Indianapolis, IN 46228



By: \_\_\_\_\_

Nicholas A. Hart  
Deputy Attorney General

**OFFICE OF THE INDIANA ATTORNEY GENERAL**

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