PERMANENT VOLUNTARY SURRENDER GLORY ANYAEGBU R233953

Gary N. Hicks, MS, RN, CEN, CNE President Maryland Board of Nursing 4140 Patterson Avenue Baltimore, Maryland 21215-2254

RE: Glory Anyaegbu: R233953 Permanent Voluntary Surrender of Registered Nurse License

Dear Mr. Hicks,

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I agree to permanently voluntarily surrender my license to practice as a Registered Nurse ("RN") in the State of Maryland, License Number R233953. I understand that, as of the effective date of this Permanent Voluntary Surrender, I may not practice as a RN, with or without compensation, as defined in the Maryland Nurse Practice Act ("the Act"), Md. Code Ann., Health Occupations Article ("Health Occ.") §§ 8-101 *et seq.* (2021 Repl. Vol.) and the Board's regulations, Code of Maryland Regulations ("COMAR") 10.27.01 *et seq.* I understand that, as of the effective date of this Permanent Voluntary Surrender, I am in the same position as an unlicensed individual.

I understand that this Permanent Voluntary Surrender shall become a PUBLIC RECORD and shall become effective on the date of the Board's acceptance of the Permanent Voluntary Surrender. I understand and agree that this Permanent Voluntary Surrender may be released or published by the Board as a final decision and order under the Public Information Act, Md. Code Ann., Gen. Prov. §§ 4-101 *et. seq.* (2019 Repl. Vol.). I expressly consent to the publication of this Permanent Voluntary Surrender, including any and all information that may be protected from disclosure under federal and state law.

On or about April 30, 2018, I submitted an on-line <u>Application for RN License By Exam</u> ("RN Application") to the Board and indicated that I graduated from Med-Life Institute – West Palm Beach, in January 2018. I affirmed and agreed to the following statement "I affirm that the contents of this document are accurate to the best of my knowledge".

When I registered to take the NCLEX-RN exam, I indicated that I attended Palm Beach School of Nursing and that I graduated in January 2018.

In an affidavit signed on June 7, 2022, Johanah Napoleon, the owner and operator of Palm Beach School of Nursing and Med-Life Institute – WPB, identified me by name, SSN and DOB as one of the individuals who did not complete the required program hours and clinical training necessary to obtain a transcript or a nursing associate in science degree and transcript from Med-Life Institute or Palm Beach School of Nursing.

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In my written response to the Maryland Board of Nursing's (the "Board") request for information, I stated that I attended Palm Beach School of Nursing and received a degree in

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January 2018. I further indicated in my written response that I completed my clinicals in the classroom using equipment, videos, and simulation.

My <u>Official Transcript</u> from Palm Beach School of Nursing indicates that I completed nursing courses and clinical practicums in adult nursing I, psychiatric nursing, maternal and newborn nursing, pediatric nursing, and adult nursing II, while attending Palm Beach School of Nursing.

On March 6, 2023, the Board issued an <u>Order for Summary Suspension of Registered</u> <u>Nurse License</u> "Order for Summary Suspension" which ordered the summary suspension of my RN license.

On March 28, 2023, the Board issued Notice of Agency Action – Charges under the Marvland Nurse Practice Act ("Charges"), charging my RN license with violations under Health Occ. § 8-316 (a): (30) "Violates regulations adopted by the Board or an order from the Board"; to wit, COMAR 10.27.01.05. A. "An applicant for the registered nurse licensure examination shall: (1) Complete satisfactorily and meet all requirements for a diploma or degree from a registered nursing education program approved by the Board; or (2) Have a diploma or degree from a registered nursing education program in another state, territory, or country determined by the Board to be substantially equivalent¹ to the registered nursing education program approved in this State at the time of the applicant's graduation."²

In lieu of proceeding to an evidentiary hearing on the Order for Summary Suspension and Charges, I agree to surrender my RN license. I agree the Board has enough evidence to prove by a preponderance of the evidence the <u>Investigative Findings</u> in the Order for Summary Suspension issued on March 6, 2023 and the above violation cited in the Charges issued on March 28, 2023, and may sanction my RN license accordingly, pursuant to Health Occ. § 8-316 and COMAR 10.27.26.

I understand that, by executing this Permanent Voluntary Surrender, I am waiving the right, now and in the future, to any evidentiary hearing at which I would have the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, and to contest the facts

- (i) Medical and surgical nursing;
- (ii) Maternal and child health;
- (iii) Psychiatric nursing; and
- (iv) Geriatric nursing;

¹ COMAR 10.27.01.01 C. provides: "Substantially equivalent" means a registered nursing ... education program that:

⁽¹⁾ Contains theoretical learning experiences and related clinical learning experiences that include direct patient care within various settings consistent with program objectives, outcomes, or competencies conducted either concurrently with or after the theoretical learning experience; and

⁽²⁾ Meets the curriculum requirement for Maryland schools of nursing at the time of the applicant's graduation, including, but not limited to:

⁽c) Didactic and clinical instruction in nursing care of families and clients throughout the life span in a variety of care settings requiring nursing measures appropriate for: ...

⁽d) Didactic and clinical instructional content that includes, but is not limited to, the areas of: 1

² In its discretion, the Board dismissed the other violations cited in the March 28, 2023 Charges.

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summarized in this Permanent Voluntary Surrender, and at which I would have the right to all other substantive and procedural protections provided by law, including the right to appeal.

In executing this agreement to permanently surrender my RN license, I agree that I will never be eligible for reinstatement of my RN license, license number R233953, in the State of Maryland. I agree and understand that if I ever decide to re-apply for licensure as a RN in Maryland, I will approach the Board in the same posture as an unlicensed individual applying for initial RN licensure. I understand that it will be my burden, as an applicant for licensure, to demonstrate that I meet all the Board's requirements for issuance of an initial license, that exists at the time I apply and that I am fit for RN licensure in Maryland.

I agree and understand that, in considering whether to grant any future application for licensure, the Board may review my entire Board file, including any information that the Board receives after execution of this document, and may require me to undergo medical, psychological, and/or psychiatric evaluations and drug and alcohol testing to determine my fitness to receive a license. I understand that the Board is not required to grant me a new RN license.

I acknowledge that I may not rescind this Permanent Voluntary Surrender in part or in its entirety for any reason whatsoever. I fully understand the nature and effect of both the Board's actions and this Permanent Voluntary Surrender. Finally, I wish to make it clear that I had an opportunity to discuss this matter with legal counsel and that I willingly, knowingly, and voluntarily sign this Permanent Voluntary Surrender.

Sincerely, GLORY ANY AEGBU, R233953

NOTARIZATION

STATE OF Washington COUNTY OF DC

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I HEREBY CERTIFY that on this 19th day of July, 2023, before me, a Notary Public of the State of washing how of the County afore-said, personally appeared GLORY ANYAEGBU and declared and affirmed under penalties of perjury that signing the foregoing Permanent Voluntary Surrender was the voluntary act and deed of GLORY ANYAEGBU.

My commission expires: 03/31/2027.

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ACCEPTANCE

ON BEHALF OF THE MARYLAND BOARD OF NURSING, on this $\frac{22}{2}$ day of August,

2023, GLORY ANYAEGBU'S PERMANENT VOLUNTARY SURRENDER of her RN

license, license number R233953, in the State of Maryland, is hereby accepted.

Gary N. Hicks, MS, RN, CEN, CNE The Board President's Signature Appears on the Original Document

ANYAEGBU, GLORY (LPN APPLICANT) Consent Order of Denial of Application for Licensure as a Licensed Practical Nurse

CONSENT

By this Consent, I acknowledge that I have read this Consent Order in its entirety and I hereby accept and submit to the foregoing Consent Order and its conditions. I acknowledge the validity of this Consent Order as if entered into after the conclusion of a formal evidentiary hearing in which I would have had the right to legal counsel authorized to practice law in Maryland, to confront witnesses, to give testimony, to request subpoenas for witnesses, to call witnesses on my own behalf, to introduce testimony and evidence on my own behalf, and to all other substantive and procedural protections provided by law. I waive these rights, as well as any appeal rights under Maryland Code Annotated, State Government Article § 10-222.

I sign this Consent Order after having an opportunity to consult with an attorney, voluntarily and without reservation, and I fully understand and comprehend the language, meaning, terms, and effect of this Consent Order.

Glory Anyaeglu, LPN Applicant

NOTARIZATION

STATE: Washing CITY/COUNTYD C.

I HEREBY CERTIFY that on this <u>19</u>^M day of <u>5</u><u>J</u>, 2023, before me, Notary Public of the State and City/County aforesaid, Glory Anyaegbu personally appeared, and made oath in due form of law that signing the foregoing Consent Order was the voluntary act and deed of Glory Anyaegbu.

AS WITNESSETH my hand and notarial seal.

SEAL

my Shih Notary Public

My Commission Expires: 03/31/2027