

PERMANENT VOLUNTARY SURRENDER
EUNICE KING
R227347

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

**RE: Permanent Surrender of License to Practice as a Registered Nurse
Eunice King - License Number R227347**

Dear Mr. Hicks:

I agree to permanently voluntarily surrender my license to practice as a Registered Nurse ("RN") in the State of Maryland, License Number R227347. I understand that, as of the effective date of this Permanent Voluntary Surrender, I may not practice as an 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 2022 Supp.) 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 February 28, 2017, I submitted an on-line Application for Endorsement of RN License ("RN Application") to the Board and indicated that I graduated from Palm Beach School of Nursing in February 2016. 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 also indicated that I attended Palm Beach School of Nursing and that I graduated in February 2016.

In my written response to the Maryland Board of Nursing's (the "Board") request for information and in my interview with the Board's investigator, I stated that I attended Med-Life Institute – West Palm Beach and received an Associate in Science of Nursing degree on February 13, 2016.

In an affidavit signed on June 7, 2022, Johanah Napoleon, the owner and operator of Palm Beach School of Nursing and Med-Life Institute – West Palm Beach, identified me by name, SSN

KING, Eunice (R227347)
Permanent Voluntary Surrender

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 either school.

My Official Transcript from Med-Life Institute – West Palm Beach indicates that I completed 15 hours of clinical experience at Med-Life. During my Board interview, I stated that I had completed the majority of my courses and clinicals at another nursing school before transferring to Med-Life. I further indicated that I did not complete certain classes or clinical experiences listed on my transcript from Med-Life.

On March 7, 2023, the Board issued an Order for Summary Suspension of Registered Nurse License (“Order for Summary Suspension”), which ordered the immediate suspension of my RN license. On March 22, 2023, following a show cause hearing at the Board, the Board issued an Order Continuing Summary Suspension of Registered Nurse License. On March 28, 2023, the Board issued Charges Under the Maryland Nurse Practice Act (“Charges”) charging me with violations of the Health Occ. § 8-316(a)(1), (2), (25), and (30).

I understand that if an evidentiary hearing were to be held, the Board would have sufficient evidence to prove by a preponderance of evidence the Investigative Findings in the Order for Summary Suspension and the following violation under Health Occ. § 8-316 (a): (30) “Violates regulations adopted by the Board or an order from the Board”; to wit, COMAR 10.27.01.10 A. “An applicant licensed to practice registered nursing or practical nursing in another state, territory, or country is eligible for licensure without examination if the applicant: (3) Submits the following verifications directly to the Board from the appropriate authority: (a) That at the time that applicant graduated from the nursing education program, it was approved as a registered nursing or licensed practical nursing education program in that state, territory, or country; (b) That the applicant meet the educational qualifications¹ of this State at the time of the applicant's graduation from the nursing education program.”²

I further understand that the Board would have sufficient evidence to conclude as a matter of law that I violated the Act and to sanction my RN license accordingly pursuant to Md. Code Ann., 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 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 R227347, in the State of Maryland. I agree and understand that if I ever decide to re-apply for licensure as an 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

¹ COMAR 10.27.01.B (8) provides: “Educational Qualifications” means that at the time the applicant graduated from a registered nursing education program, the program was substantially equivalent to the registered nursing ...education programs approved in this State.

² In its discretion, the Board dismissed the other charges listed in the March 28, 2023, Charges.

KING, Eunice (R227347)
Permanent Voluntary Surrender

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 this Permanent Voluntary Surrender and 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 further agree and understand that, if I submit an application for licensure, the Board would have sufficient evidence to find that I have violated Md. Code Ann., Health Occ. § 8-316 (a) (3) ("Is disciplined by a licensing... authority in this State ...for an act that would be grounds for disciplinary action under the Board's disciplinary statutes") on the basis of this Permanent Voluntary Surrender, and may exercise its discretion to deny my application, grant my application without discipline, or grant my application with discipline, including, but not limited to, probation with terms and conditions. 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,

Eunice King 5/18/2023
Eunice King, R227347 Date

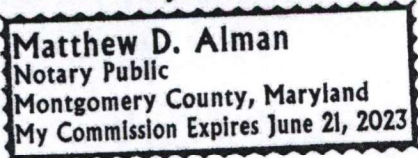
NOTARIZATION

STATE: Maryland

COUNTY: Montgomery

I HEREBY CERTIFY that on this 18th day of May, 2023, before me, Notary Public of the State and City/County aforesaid, **Eunice King** personally appeared and made oath in due form of law that signing the foregoing Permanent Voluntary Surrender was the voluntary act and deed of **Eunice King**.

AS WITNESSETH my hand and notarial seal.

SEAL 

[Signature]
Notary Public

My Commission Expires: 6/21/23

KING, Eunice (R227347)
Permanent Voluntary Surrender

ACCEPTANCE

ON BEHALF OF THE MARYLAND BOARD OF NURSING, on this 24 day of
May, 2023, I accept **Eunice King**'s public Permanent Voluntary Surrender of her
license to practice as a registered nurse in the State of Maryland, license number R227347.

May 24, 2023
Date

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