PERMANENT VOLUNTARY SURRENDER IFEYINWA PATRICIA IKOLI R240100

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 License Number R240100

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 R240100. 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, 2018, I submitted an on-line Application for RN License by Exam ("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 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 Palm Beach School of Nursing and received an Associate in Science of Nursing degree on January 6, 2018.

I further indicated that I completed my clinicals in the classroom using equipment, videos, and simulation. My Official Transcript from Palm Beach School of Nursing indicates that I completed 15 hours of clinical experience.

IKOLI, Ifeyinwa Patricia (R240100) Permanent Voluntary Surrender

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 either school.

On March 8, 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 Health Occupations § 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 violations under Health Occ. § 8-316 (a): (30) "Violates regulations adopted by the Board or an order from the Board"; to wit, COMAR 10.27.01.10 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 qualifications 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 R240100, 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 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.

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

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.

IKOLI, Ifeyinwa Patricia (R240100) Permanent Voluntary Surrender

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,

Ifeyinwa Patricia Ikoli, R240100 Date

NOTARIZATION

STATE: District of Columbia		
COUNTY: N/A		
I HEREBY CERTIFY that on this 21 day of	June	, 2023 before me,
Notary Public of the State and City/County aforesaid, Is and made oath in due form of law that signing the fore		
the voluntary act and deed of Ifeyinwa Patricia Ikoli.		
AS WITNESSETH my hand and notarial seal.		

Notary Pub Notary Pub My-Commission Expires: 41/30/2025

EKATERINA CHRISTOPHERSON NOTARY PUBLIC DISTRICT OF COLUMBIA My Commission Expires November 30, 2025

IKOLI, Ifeyinwa Patricia (R240100) Permanent Voluntary Surrender

ACCEPTANCE

ON BEHALF OF THE MARYLAND BOARD	OF NURSING, on this 28 day of
June, 2023, I accept Ifeyinwa Pa	tricia Ikoli's public Permanent Voluntary
Surrender of her license to practice as a registered n	urse in the State of Maryland, license number
R240100.	
	Gary N. Hicks, MS, RN, CEN, CNE
Coloobs	The Board President's Signature
6/28/23 Date	Appears on the Original Document
	Maryland Board of Nursing