

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:)
Ejike Egwuekwe) **Docket No. 2023-186**
License No. 026.0043006)

VOLUNTARY SURRENDER OF LICENSE

STIPULATION

NOW COME the State of Vermont, by and through Prosecuting Attorney George Hasselback and Respondent Ejike Egwuekwe by and through his attorney Evan Chadwick, to hereby Stipulate and Agree as follows:

1. The Vermont State Board of Nursing (the "Board") has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by Registered Nurses ("RNs") pursuant to 3 V.S.A. § 129(a); 3 V.S.A. § 129a; 3 V.S.A. § 814(d); 26 V.S.A. Chapter 28; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation ("OPR").

Stipulated Facts

2. Ejike Egwuekwe ("Respondent") of Alief, Texas, holds a license to practice as an RN under license number 026.0043006. This license was originally issued on July 20, 2008, and expires on March 31, 2025.
3. On or about April 15, 2010, the Board entered a Stipulation and Consent Order agreed upon by the State and Respondent ("the Stipulation").
4. Among other things, the Stipulation specified that Respondent had "attended an education institution that did not meet the qualifications of the ARBN Chapter 4, Subchapter 1."
5. Via the Stipulation, the Board ordered that Respondent's RN license be labelled "INACTIVE-CONDITIONED" until such time as certain criteria were met.
6. One such criterion was that Respondent "complete an approved nursing program that satisfies the requirements of ARBN Chapter 4, Subchapter 1."
7. Respondent did not complete any such program within two (2) years of the entry date of the Stipulation.
8. On or about February 28, 2023, Respondent applied for a renewal of his RN license.

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9. As part of that application, Respondent was asked to confirm that he had “completed at least 50 days (400 hours) within the last two (2) years or 120 days (960 hours) within the last five (5) years” of active nursing practice, in order to qualify to “renew” his license, as opposed to applying for new licensure.
10. Respondent confirmed that he had completed the requisite active practice within the requisite time period.
11. This was false, because Respondent had not engaged in any active nursing practice during the requisite time period.
12. Due to Respondent’s false certification of active nursing practice, his application was incorrectly processed as a renewal of an active license.
13. Had Respondent answered truthfully, his application for renewal would have been denied.
14. As part of that application, Respondent was asked the following question:

Since your license was last renewed (or since it was issued if within the last two years): Have you ever been DENIED a license, certificate, registration, or authorization to practice ANY profession by Vermont or ANY other state, federal authority, or other jurisdiction?
15. Respondent answered “no” to this question.
16. This answer was false, because Respondent was denied a license to practice nursing by the Florida Board of Nursing on or about March 21, 2022.
17. Had Respondent answered truthfully, his application for renewal would have been denied.
18. As part of that application, Respondent was also asked the following question:

Since your license was last renewed (or since it was issued if within the last two years): Has Vermont or any other state, federal authority, or other jurisdiction taken any DISCIPLINARY ACTION against (e.g., warned, reprimanded, fined, restricted, conditioned, suspended, revoked, or conditioned) a license, certificate, registration, or authorization to practice any profession that you hold or have held in any profession or occupation?
19. Respondent answered “no” to this question.
20. This answer was false, because Respondent had a license to practice nursing revoked by the Texas Board of Nursing on or about September 14, 2010.

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21. Had Respondent answered truthfully, his application for renewal would have been denied.
22. Due to his false answers to several questions posed to him, on or about August 18, 2023, Respondent was issued an unencumbered Vermont RN license, with an expiration date of March 31, 2025.
23. Respondent's license was suspended on January 9, 2024, pending the resolution of this matter.

Violation One: 26 V.S.A. § 1582(a)(1) Making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license.

24. Vermont law prohibits making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license.
25. Paragraphs 3 through 23 above demonstrate that when Respondent applied for a renewal of a Vermont RN license, he falsely certified that he met minimum active nursing practice requirements to qualify for renewal of a nursing license as opposed to application for a new nursing license.
26. Paragraphs 3 through 23 above demonstrate that when Respondent applied for a renewal of a Vermont RN license, he was asked if he had ever been denied a license by any other jurisdiction and answered "no" despite having been denied a nursing license by the Florida State Board of Nursing.
27. Paragraphs 3 through 23 above demonstrate that when Respondent applied for a renewal of a Vermont RN license, he was asked if he had ever had a license disciplined by any other jurisdiction and answered "no" despite having had a nursing license revoked by the Texas State Board of Nursing.
28. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 26 V.S.A. §1582(a)(1).

Understandings

1. This Stipulation is neither an admission of facts by Respondent nor a concession by the State of Vermont that its charges are not well-founded. To avoid delay, uncertainty, inconvenience, and the expense of protracted litigation, the parties enter this full and final Stipulation pursuant to these Understandings and the Order below. Respondent does not contest that the State has evidence which, if believed by the fact finder, may establish by a preponderance of the evidence that he engaged in the alleged misconduct.
2. Respondent agrees the conditions below are necessary to protect the public.

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3. Respondent understands that this Voluntary Surrender Stipulation and Order will be reviewed and the tribunal may accept or reject the Order set forth below. If the tribunal rejects all or any portion of the Order, then this entire document shall be null and void.
4. Respondent specifically waives any claim that any disclosures made to the tribunal during its review of this agreement prejudice Respondent's right to a fair and impartial hearing if this agreement is not accepted and proceeds to a merits hearing before the same tribunal.
5. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
6. Respondent is not under the influence of any drugs or alcohol at the time he signs this Stipulated Voluntary Surrender of License.
7. Respondent voluntarily enters into this agreement after the opportunity to consult with legal counsel and is not being coerced by anyone into signing this Stipulated Voluntary Surrender of License.
8. Respondent agrees the Order set forth below may be entered, will be a binding Order upon Respondent, and will be made public.

ACCEPTANCE OF VOLUNTARY SURRENDER AND ORDER

Based on the Stipulation above, it is **ORDERED AND ADJUDGED** as follows:

- A. The Board hereby **ACCEPTS** Respondent's **VOLUNTARY SURRENDER** of his license.
- B. Any future application for licensure shall be subject to the licensing requirements of that particular profession. If a future application for licensure in the State of Vermont is approved, that license shall be conditioned pursuant to whatever terms are found to be reasonable at the time of Respondent's application for licensure, taking into account the stipulated facts above.
- C. This Stipulation and Consent Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. §129(a).
- D. This Stipulation and Consent Order will remain part of Respondent's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

AGREED TO:

Dated: 9-30-2024

By: _____

STATE OF VERMONT
SECRETARY OF STATE

George L. Hasselback
George L. Hasselback
Prosecuting Attorney
George.hasselback@vermont.gov

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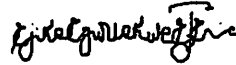
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RESPONDENT

Dated: 09 / 30 / 2024

By: 
Ejike Egwuekwe

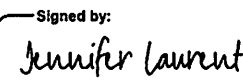
ATTORNEY FOR RESPONDENT

Dated: 09 / 30 / 2024

By: *Evan Chadwick, Esq.*
Evan Chadwick, Esq.

APPROVED AND SO ORDERED:

Dated: 10/19/24

By: 
Signed by:
EB1741915719477...
Chairperson

Date of Entry: 10/20/24

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IN RE:)
Ejike Egwuekwe) **Docket No. 2023- 186**
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SPECIFICATION OF CHARGES

NOW COMES the State of Vermont ("the State") and makes the following charges against Respondent Ejike Egwuekwe:

Board Authority

1. The Vermont State Board of Nursing (the "Board") has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by Registered Nurses ("RNs") pursuant to 3 V.S.A. § 129(a); 3 V.S.A. § 129a; 3 V.S.A. § 814(d); 26 V.S.A. Chapter 28; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation ("OPR").

Statement of Facts

2. Ejike Egwuekwe ("Respondent") of Alief, Texas, holds a license to practice as an RN under license number 026.0043006. This license was originally issued on July 20, 2008, and expires on March 31, 2025.
3. On or about April 15, 2010, the Board entered a Stipulation and Consent Order agreed upon by the State and Respondent ("the Stipulation").
4. Among other things, the Stipulation specified that Respondent had "attended an education institution that did not meet the qualifications of the ARBN Chapter 4, Subchapter 1."
5. Via the Stipulation, the Board ordered that Respondent's RN license be labelled "INACTIVE-CONDITIONED" until such time as certain criteria were met.
6. One such criterion was that Respondent "complete an approved nursing program that satisfies the requirements of ARBN Chapter 4, Subchapter 1."
7. Respondent did not complete any such program within two (2) years of the entry date of the Stipulation.
8. Respondent claims to have subsequently completed a "Professional Nursing Degree" from Ideal Professional Institute of Miami Gardens ("IPI") on or about June 29, 2023.

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9. Ideal Professional Institute appears on a list compiled by the Federal Bureau of Investigation of educational institutions that have issued fraudulent nursing degrees.
10. On or about February 28, 2023, Respondent applied for a renewal of his RN license.
11. As part of that application, Respondent was asked to confirm that he had “completed at least 50 days (400 hours) within the last two (2) years or 120 days (960 hours) within the last five (5) years” of active nursing practice, in order to qualify to “renew” his license, as opposed to applying for new licensure.
12. Respondent confirmed that he had completed the requisite active practice within the requisite time period.
13. This was false, because Respondent had not engaged in any active nursing practice during the requisite time period.
14. Due to Respondent’s false certification of active nursing practice, his application was incorrectly processed as a renewal of an active license.
15. Had Respondent answered truthfully, his application for renewal would have been denied.
16. As part of that application, Respondent was asked the following question:

Since your license was last renewed (or since it was issued if within the last two years): Have you ever been DENIED a license, certificate, registration, or authorization to practice ANY profession by Vermont or ANY other state, federal authority, or other jurisdiction?
17. Respondent answered “no” to this question.
18. This answer was false, because Respondent was denied a license to practice nursing by the Florida Board of Nursing on or about March 21, 2022.
19. Due to Respondent’s false answer, his application for renewal escaped further scrutiny that would have exposed the suspect nature of his “Professional Nursing Degree” from IPI.
20. Had Respondent answered truthfully, his application for renewal would have been denied.
21. As part of that application, Respondent was also asked the following question:

Since your license was last renewed (or since it was issued if within the last two years): Has Vermont or any other state, federal

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authority, or other jurisdiction taken any DISCIPLINARY ACTION against (e.g., warned, reprimanded, fined, restricted, conditioned, suspended, revoked, or conditioned) a license, certificate, registration, or authorization to practice any profession that you hold or have held in any profession or occupation?

22. Respondent answered “no” to this question.
23. This answer was false, because Respondent had a license to practice nursing revoked by the Texas Board of Nursing on or about September 14, 2010.
24. Due to Respondent’s false answer, his application for renewal escaped further scrutiny that would have exposed the suspect nature of his “Professional Nursing Degree” from IPI.
25. Had Respondent answered truthfully, his application for renewal would have been denied.
26. Due to his false answers to several questions posed to him, Respondent was able to escape appropriate scrutiny of his credentials and on or about August 18, 2023, Respondent was issued an unencumbered Vermont RN license, with an expiration date of March 31, 2025.
27. Respondent’s license was suspended on January 9, 2024 pending the resolution of this matter.

Violation One: 26 V.S.A. § 1582(a)(1) Making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license.

28. The State re-alleges and incorporates Paragraphs 3 through 27 above.
29. Vermont law prohibits making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license.
30. Paragraphs 3 through 27 above demonstrate that when Respondent applied for a renewal of a Vermont RN license, he falsely certified that he met minimum active nursing practice requirements to qualify for renewal of a nursing license as opposed to application for a new nursing license.
31. Paragraphs 3 through 27 above demonstrate that when Respondent applied for a renewal of a Vermont RN license, he was asked if he had ever been denied a license by any other jurisdiction and answered “no” despite having been denied a nursing license by the Florida State Board of Nursing.
32. Paragraphs 3 through 27 above demonstrate that when Respondent applied for a renewal of a Vermont RN license, he was asked if he had ever had a license

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disciplined by any other jurisdiction and answered "no" despite having had a nursing license revoked by the Texas State Board of Nursing.

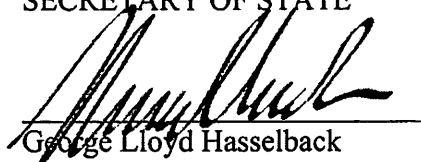
33. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 26 V.S.A. §1582(a)(1).

WHEREFORE, the State of Vermont respectfully requests that pursuant to 3 V.S.A. §814(c), Respondent's RN license be disciplined and that pursuant to 26 V.S.A. § 1647c(d) the Board order Respondent to cease-and-desist any practice within the State of Vermont under any multistate licensure privilege.

DATED at Montpelier, Vermont this 29th day of April, 24.

STATE OF VERMONT
SECRETARY OF STATE

By:



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