

PERMANENT VOLUNTARY SURRENDER
TITILAYO OLUBUNMI OJO
R232420

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 - R232420

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 R232420. 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 January 3, 2018, I submitted an on-line Application for Endorsement for RN (“RN Application”) to the Board and indicated that I graduated from Palm Beach School of Nursing in February 2017. 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 February 2017. On or about December 27, 2017, I received a license by exam in New York.

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 and received an Associate in Science of Nursing degree.

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

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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.

During my interview with Board staff, I admitted that I took my pre-requisites at the same time I was attending my classes at Med-Life. I also admitted that I only took Anatomy and Physiology in my LPN Program.

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 April 26, 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 charge 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 R232420, 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 cited in the March 28, 2023, Charges.

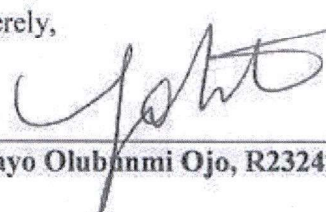
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demonstrate that I meet all the Board's requirements for issuance of an initial license, that exists at the time I apply and that I am fit for RN licensure in Maryland.

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,



Titilayo Olubunmi Ojo, R232420 Date 6/21/23

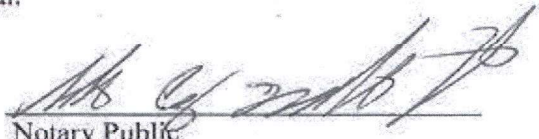
NOTARIZATION

STATE: Maryland
COUNTY: Baltimore

I HEREBY CERTIFY that on this 21 day of June, 2023 before me, Notary Public of the State and City/County aforesaid, **Titilayo Olubunmi Ojo** personally appeared and made oath in due form of law that signing the foregoing Permanent Voluntary Surrender was the voluntary act and deed of **Titilayo Olubunmi Ojo**.

AS WITNESSETH my hand and notarial seal.

SEAL

My Commission Expires: 08/26/2026


Notary Public

Arthur Leroy Mathew II
NOTARY PUBLIC
Baltimore County, Maryland
My Commission Expires 8/26/2026

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ACCEPTANCE

ON BEHALF OF THE MARYLAND BOARD OF NURSING, on this 28 day of June, 2023, I accept **Titilayo Olubunmi Ojo's** public Permanent Voluntary Surrender of her license to practice as a registered nurse in the State of Maryland, license number R232420.

6/28/23
Date

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

Maryland Board of Nursing