



Board of Nursing

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P. H., Secretary

May 4, 2023

**VIA REGULAR AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Cert. Mail No.: 7022 3330 0001 3184 7079

Sema Comfort
3114 Lavall Court
Upper Marlboro, Maryland 20774-7502

Cert. Mail No.: 7022 3330 0001 3184 7086

Sema Comfort
3114 Lavall Court
Glenarden, Maryland 20774-7502

**RE: ORDER FOR SUMMARY SUSPENSION OF REGISTERED LICENSE
(License Number R234916) PURSUANT TO SECTION 10-226(c)(2) OF THE
ADMINISTRATIVE PROCEDURE ACT**

Dear Ms. Comfort:

Enclosed is an executed "Order for Summary Suspension of Registered Nurse License Pursuant to Section 10-226(c)(2) of the Administrative Procedure Act" issued by the Maryland Board of Nursing ("the Board"), pursuant to the authority of the Maryland Administrative Procedure Act, Md. Code Ann., State Government ("State Gov't.") § 10-226(c) (2021 Repl. Vol.). The enclosed Order suspends, effective immediately, your license to practice as a registered nurse in the State of Maryland.

The Board has scheduled a **Show Cause Hearing** in person before the Board on **TUESDAY, MAY 23, 2023, AT 1:30 PM at 4140 Patterson Avenue, Baltimore, Maryland 21215** on the summary suspension of your license. The Show Cause Hearing is an opportunity to present oral argument as to why the Board should not continue the summary suspension of your license. This opportunity to address the Board at the Show Cause Hearing is not an evidentiary hearing, therefore, the Board will not accept any documentary evidence nor will witnesses be allowed to testify. You will present argument to the Board first. After your presentation, the State will be provided the opportunity to respond. Both you and the State will be given 10 minutes each for oral argument. After the Show Cause Hearing, the Board will make a decision as to whether to continue the suspension of your license and you will be notified of the Board's decision in writing.

If you would like to request a postponement of the Show Cause hearing, please submit a written request for a postponement no later than Friday, May 19, 2023, by email or fax to:

4140 Patterson Avenue - Baltimore, Maryland 21215-2254
Toll Free: 1 (888) 202 - 9861 • Phone: (410) 585 - 1900 • TTY/TDD: 1 (800) 735 - 2258
Fax: (410) 358 - 3530
www.mbon.maryland.gov

**ORDER FOR SUMMARY SUSPENSION OF RN LICENSE
SEMA COMFORT – R234916**

**Attn: Amber Havens Bernal
Enforcement Division - Discipline Program
Maryland Board of Nursing
4140 Patterson Avenue
Baltimore, Maryland 21215
Fax: (410) 358-1499
mbon.nursingdiscipline@maryland.gov**

Please be advised that if your request for a postponement is granted, your license will remain suspended until you have the opportunity to be heard at a Show Cause hearing and the Board issues its written decision following the Show Cause Hearing. You are not required to appear at the Show Cause Hearing however, if you or your attorney do not attend the Show Cause Hearing, the Board will proceed in your absence, make a decision regarding whether to continue the summary suspension of your license, and will notify you in writing of its decision. The Board's written notification of its decision will also include instructions regarding your right to request a full evidentiary hearing before the Board on the merits of the summary suspension of your license.

Because your license to practice as a registered nurse in the State of Maryland is at issue and could be affected, **you are strongly urged to retain and be represented by an attorney at all stages of this proceeding.** If you choose to retain counsel, please be advised that, in order to appear on your behalf, your attorney must be admitted to the Bar in Maryland or specifically admitted pursuant to Maryland Rule 19-214 which governs special admission of out-of-state attorneys *pro hac vice*.

If you or your attorney have any questions about this letter or the enclosed Order, please contact the Administrative Prosecutor assigned to your case, Kelly Cooper, AAG, at 410-767-5828 or at kelly.cooper@maryland.gov, or Amber Havens Bernal, Enforcement Division, at mbon.nursingdiscipline@maryland.gov.

Sincerely,



Karen E. B. Evans, MSN, RN-BC
Executive Director
Maryland Board of Nursing

Enclosure: Order for Summary Suspension of Registered Nurse License Pursuant to Section 10-226(c)(2) of the Administrative Procedure Act

cc: Kelly Cooper, Assistant Attorney General, Administrative Prosecutor

IN THE MATTER OF

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BEFORE THE MARYLAND

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SEMA COMFORT

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BOARD OF NURSING

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License Number: R234916

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OAG CASE No. 23-BP-059

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**ORDER FOR SUMMARY SUSPENSION OF REGISTERED NURSE LICENSE
PURSUANT TO SECTION 10-226(c)(2) OF THE ADMINISTRATIVE PROCEDURE
ACT**

The Maryland Board of Nursing (the “Board”) hereby orders the **SUMMARY SUSPENSION** of the license of Sema Comfort, (the “Respondent”), License Number R234916 to practice registered nursing in the State of Maryland. The Board takes this action pursuant to the authority of Maryland Code Ann., State Government Article (“SG”) § 10-226(c)(2) (2021 Repl. Vol. & 2022 Supp.), which provides:

- (2) A unit may order summarily the suspension of a license if the unit:
 - (i) finds that the public, health, safety, or welfare imperatively requires emergency action; and
 - (ii) promptly gives the licensee:
 - 1. Written notice of the suspension, the finding and the reasons that support the finding; and
 - 2. An opportunity to be heard.

The Board has reason, as set forth below, to find that the public health, safety, or welfare imperatively requires emergency action (“SG”) § 10-226(c) (2).

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**INVESTIGATIVE FINDINGS AND REASONS IN SUPPORT OF SUMMARY
SUSPENSION**

Based on investigatory information obtained by, received by and made known to and available to the Board, the Board has reason to believe that the following facts are true:¹

1. On September 5, 2018, the Respondent was issued a license to practice as a registered nurse (“RN”) in the State of Maryland, license number R234916. The Respondent's license is currently non-renewed and expired on December 28, 2022.

APPLICATION FOR RN

2. On or about May 5, 2018, the Respondent submitted an online Maryland Application for RN by Exam (“RN Exam Application”). On the RN Exam Application, the Respondent indicated that she attended a basic nursing education program at Met-Life Institute – West Palm Beach - ADN.

3. On the RN Exam Application, the Respondent affirmed and agreed with the following statement: “I affirm that the contents of this document are accurate to the best of my knowledge” and was advised that “providing false or misleading information may result in disciplinary action by the Board and may result in denial of licensure.”

RN SCHOOL

4. On July 8, 2021, a Criminal Complaint and Affidavit of Criminal Complaints were filed alleging that Johanah Napoleon and other individuals committed (1) Conspiracy to Commit Health Care Fraud (2) Conspiracy to Commit False Statements Relating to Health Care Matters and (3) False Statements Relating to Health Care Matters. The Affidavit alleged that Napoleon and

¹The allegations set forth in this document are intended to provide the Respondent with reasonable notice of the Board's action. They are not intended as, and do not necessarily represent a complete description of the evidence, either documentary or testimonial, to be offered against the Respondent in connection with this action.

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other individuals worked together to sell fraudulent transcripts and diplomas that indicate that various individuals completed necessary courses and clinical hours to obtain nursing degrees and a number of these unqualified individuals subsequently obtained employment at various healthcare providers in the District of Maryland.

5. On June 2, 2022, an Information was filed alleging that Johanah Napoleon committed Conspiracy to Commit Mail Fraud and Wire Fraud. Johanah Napoleon was identified as the President of Palm Beach School of Nursing. According to the Information, the Purpose of the Conspiracy was “for the defendant [Johanah Napoleon] and her co-conspirators to unlawfully enrich themselves by, among other things, selling fraudulent nursing diplomas, educational transcripts and other credentials, assisting the purchasers in fraudulently obtaining licensure and ultimately employment in the healthcare field.”

6. In a notarized affidavit, signed on June 7, 2022, Johanah Napoleon declared under penalties of perjury the following information was true and correct:

I owned and operated the following schools:

....

Med-Life Institute WPB LLC (“Med-Life”) from September 28, 2015 until it was dissolved on September 23, 2016. Med-Life was located at 2695 N. Military Trail, Suite #17, West Palm Beach, FL 33409. Med-Life continued to issue diplomas and transcripts after its dissolution. Med-Life Institute was licensed by the Florida Commission for Independent Education and the Florida Board of Nursing and was authorized to offer Nursing – Associate in Science Degree. The objective of the program was to “prepare the student to meet the requirements of the Florida Department of Health and the Florida Board of Nursing for Registered Nurse Education and meet eligibility for licensing exam (NCLEX-RN) in order to work as a Registered Nurse in a variety of settings in a safe and effective manner.” Med-Life was authorized to provide instruction on campus to individuals seeking a[n] Associate in Science Degree. This program required students to complete 1665 hours of instruction,

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which included 720 hours of clinical experience in a health care setting.

Palm Beach School of Nursing LLC (“Palm Beach School of Nursing”) from its incorporation on or about April 11, 2016 to present... Palm Beach School of Nursing was licensed by the Florida Commission for Independent Education and the Florida Board of Nursing and was authorized to offer a Nursing – Associate in Science Degree. The objective of the program was to “prepare the student to meet the requirements of the Florida Department of Health and the Florida Board of Nursing for Registered Nurse Education and meet eligibility for licensing exam (NCLEX-RN) in order to work as a Registered Nurse in a variety of settings in a safe and effective manner.” Palm Beach School of Nursing was authorized to provide instruction on campus to individuals seeking a[n] Associate in Science Degree. This program required students to complete 1665 hours of instruction, which included 720 hours of clinical experience in a health care setting.

....

....

From in or around October 2016 to in or around December 2020, . . . Med-Life, [and] Palm Beach School of Nursing, . . . issued transcripts and diplomas to 62 individuals listed in Attachment A, who completed the required program hours and clinical training necessary to receive either a practical nursing diploma and transcript or a nursing associate in science degree and transcript.

From in or around October 2016 to present, . . . Med-Life, [and] Palm Beach School of Nursing . . . issued transcripts and diplomas to 4989 individuals listed in Attachment B, who did not complete the required program hours and clinical training necessary to obtain either a practical nursing diploma and transcript of a nursing associate in science degree and transcript.

7. The Respondent’s name, date of birth, and social security number appears on Attachment B of Johanah Napoleon’s Affidavit indicating that the Respondent was issued a transcript and diploma without completing the required program hours and clinical training necessary to obtain a nursing associate in science degree and transcript.

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BOARD'S INVESTIGATION

8. The Respondent completed and submitted to the Board an Investigative Questionnaire which he signed on or about April 18, 2023, which states:

By my signature below, I hereby certify under the penalties of perjury that the information I provided in or attached to this Questionnaire is true and correct to the best of my knowledge and belief.

9. As part of that Questionnaire, the Respondent reported that she attended a university (the "University") where she graduated from on September 27, 2007; then she attended a college (the "College #1") which she did not receive a diploma from; and then attended Palm Beach School of Nursing where she received a diploma from on December 1, 2017. The Respondent further reported that she "received clinical courses as noted on the transcripts."

10. The Respondent attached transcripts from the University, College #1, College #2, and Palm Beach School of Nursing.

11. A review of the transcript from the University revealed the Respondent was enrolled in, and completed, the University's practical nursing program, and was awarded a practical nursing certificate on September 27, 2007.

12. A review of the transcript from College #2 revealed the Respondent took courses from June 2, 2008 to December 16, 2010. The courses included Intro to Statistics; College Reading & Stud; Prin/Strategies Succes; Introduction to Compos; Comp 1: Expository Writ; Genral [sic] Psychology; Introduction to Sociol; Human Anatomy & Physio (failed), Microbiology (withdrew), and Interpersonal Communic.

13. A review of the transcript from College #1 revealed the Respondent transferred the following credits to College #1: Tech of RDNG & WRTG II, Elements of Statistics, General

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Psychology, and Intro to Sociology. The Respondent passed the department exam for the following: Fundamentals of Nursing, Profess and Commu in Nursing, Basic Health Assessment, Nursing Health and Illness I, Nursing Special Populations I, and Patho Pharmacology in Nursing.

The transcript further provided the following institution credits:

Fall 2012	BI 107	Prin of Biology I		
Spring 2013	AR 127	Art Appreciation		
Spring 2013	En 102	Tech OF RDNG & WRTG II		
Spring 2013	HS 130	Hist African Amer Since 1865		
Summer I 2013	BI 204	Human Anat & Phys I		
Summer II 2013	BI 205	Human Anat & Phys II		
Fall 2013	BI 203	Microbiology		
Summer I 2014	NU 130	LPN Transition Course		
Fall 2014	NURS 225	Nursing Health and Illness II		
Fall 2014	NURS 226	Maternal-Child Nursing		
Spring 2015	NURS 205	Transition to Pro NSG Prac		
Spring 2015	NURS 226	Maternal-Child Nursing		

14. The Respondent included an Official Transcript from Palm Beach School of Nursing with her Questionnaire. The Official Transcript dated September 28, 2018, listed the school as Palm Beach School of Nursing, the dates attended as June 27, 2016, to December 1, 2017, and provided the following information:

Course Number	Nursing Course Title²	Credit Hours	Grade
NUR 100	LPN to RN Transition	3	
NUR 104	Critical Thinking & the Nursing Process	3	
NUR 103	Pharmacology	3	
NUR 201	Adult Nursing 1	3	
NUR 202	Adult Nursing 1 Practicum (lab: 1 hour, clinical: 2 hours)	3	
NUR 203	Psychiatric Nursing	3	
NUR 204	Psychiatric Nursing Practicum (lab: 1 hour, clinical: 2 hours)	3	

² The transcript does not indicate these courses were transferred. The transcript indicated that the following general education courses were also completed: introduction to health care, human anatomy & physiology (lab), human development, microbiology, college writing, college algebra, psychology, sociology, and pathophysiology.

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NUR 205	Maternal and Newborn Nursing	3	
NUR 206	Maternal and Newborn Nursing Practicum (lab: 1 hour, clinical: 2 hours)	3	
NUR 207	Pediatric Nursing	3	
NUR 208	Pediatric Nursing Practicum (lab: 1 hour, clinical: 2 hours)	3	
NUR 301	Adult Nursing II	3	
NUR 302	Adult Nursing II Practicum (lab: 1 hour, clinical: 2 hours)	3	
NUR 401	Advanced Nursing Skills (clinical: 3 hours)	3	
NUR 402	Professional Nursing Leadership	3	

NCLEX EXAM

15. According to the NCSBN NCLEX³ Administration, the Respondent sat for the NCLEX-RN examination on the following dates:

Appt	Status	Member Board
08-29-2018	Delivery Successful	Maryland Board of Nursing
07-07-2018	Delivery Successful	Maryland Board of Nursing

16. According to the NCLEX Registration Data, the Respondent graduated from Palm Beach School of Nursing in December 2017 and sat for the RN examination on August 29, 2018.

DISCUSSION

17. The Respondent submitted information on her RN Exam Application that she received her basic nursing education from Met-Life Institute – West Palm Beach - ADN. The registration information to NCLEX, indicated that the Respondent graduated in December 2017 with her basic nursing education from Palm Beach School of Nursing. The transcript the Respondent provided to the Board as part of her written response indicated that the Respondent graduated on December 1, 2017, from Palm Beach School of Nursing.

³ NCLEX is an acronym for the National Council Licensure Examination.

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18. The Respondent provided false/contradictory information about her RN education.

19. In a signed affidavit, Johanah Napoleon, owner and operator of Palm Beach School of Nursing and Med-Life Institute – West Palm Beach, provided a list of individuals who did not complete the required program hours and clinical training at Palm Beach School of Nursing and Med-Life Institute, necessary to receive a transcript or a nursing associate in science degree. The Respondent was identified on the list by name, date of birth and social security number.

20. The Respondent does not meet the Board's statutory and regulatory requirements for RN licensure in Maryland.

21. The Respondent holds a non-renewed RN license, however, without further board action there is nothing to prevent her from renewing her Maryland RN license. The Respondent's ability and opportunity to practice as an RN in the State of Maryland and/or any compact state on a fraudulently obtained RN license, poses a serious risk and danger to the public health, safety, and welfare.

CONCLUSION OF LAW

Based on the foregoing investigative findings and reasons, the Board finds that the public health, safety or welfare imperatively requires emergency action in this case pursuant to Md. Code Ann., State Govt. § 10-226(c)(2) (2021 Repl. Vol.).

ORDER

It is hereby:

ORDERED that pursuant to the authority vested in the Board of Nursing by Maryland Code Ann., State Govt. § 10-226(c)(2) (2021 Repl. Vol.) the license of Sema Comfort to practice as a registered nurse in the State of Maryland is hereby **SUMMARILY SUSPENDED**; and be it further

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ORDERED that there will be a Show Cause Hearing on **Tuesday May 23, 2023 at 1:30 p.m.** before the Board at the Maryland Board of Nursing offices, 4140 Patterson Avenue, Baltimore, Maryland 21215: and be it further

ORDERED that if, the suspension of the Respondent’s license is continued following a Show Cause Hearing, the Respondent has the right to a full evidentiary hearing before the Board and a hearing will be scheduled before the Board if the Respondent submits a written request for an evidentiary hearing to the Board **no later than thirty (30) days from the date of the Board’s written decision issued after the Show Cause Hearing;** and be it further

ORDERED that if the Respondent does not submit a timely written request to the Board for an evidentiary hearing within 30 days from the date of the Board’s written decision issued after the Show Cause Hearing, the Respondent shall have waived all rights now and in the future to any hearing on the merits of the summary suspension of the Respondent’s license and the factual allegations contained in this Order for Summary Suspension; and it is further

ORDERED that this Order for Summary Suspension shall remain in effect and the summary suspension of the Respondent’s license shall continue until further Order of the Board; and it is further

ORDERED that this, “Order for Summary Suspension of Registered Nurse License” is a **PUBLIC RECORD** pursuant to Md. Code Ann., General Provisions § 4-101 *et seq.* & § 4-333 (2019).

May 4, 2023
Date

Karen E.B. Evans, MSN, RN-BC The Executive Director’s Signature Appears on the Original Document Maryland Board of Nursing
