

Eric M. Gordon, PT
5309 Weywood Drive
Reisterstown, Maryland 21136

2-6-19
Date

Kimberly Rotondo, PTA, Chair
Maryland Board of Physical Therapy Examiners
4201 Patterson Avenue
Baltimore, Maryland 21215

Re: Surrender of License to Practice Physical Therapy
License No. 17059
Case No. PT 17-04

Dear Ms. Rotondo and Members of the Board:

Please be advised that I have decided to surrender my license to practice physical therapy in the State of Maryland, License Number 17059. I understand that the decision to surrender my license means that I may not practice physical therapy or limited physical therapy, with or without supervision and/or compensation, or otherwise engage in the practice of physical therapy or limited physical therapy in Maryland as they are defined in the Maryland Physical Therapy Act (the "Act"), Md. Code Ann., Health Occ. § 13-101 *et seq.* In other words, I understand that the surrender of my license means that I am in the same position as an unlicensed individual as of September 11, 2017. I understand that this Letter of Surrender shall become effective immediately upon the date of acceptance by the Maryland Board of Physical Therapy Examiners (the "Board").

I understand that this Letter of Surrender is a PUBLIC document and upon the Board's acceptance and execution, becomes a FINAL ORDER of the Board.

My decision to surrender my license to practice physical therapy in Maryland has been prompted by an investigation of my license by the Board. In lieu of proceeding with disciplinary action by the Board, I have decided to surrender my license to practice physical therapy in Maryland.

I acknowledge that the Board initiated an investigation into this matter following my disclosing to the Board on March 16, 2015, that I expected to be indicted in the near future on charges of filing a false claim in a bankruptcy proceeding and associated offenses. The Board's investigation into my misconduct could have resulted in charges under the Act for my subsequent conviction on April 7, 2017, of conspiracy to commit mail and wire fraud, conspiracy to commit money laundering, and falsification of records in bankruptcy.

Specifically, the Board could have charged me with the following violations under § 13316 of the Act:

Subject to the hearing provisions of § 13-317 of this subtitle, the Board may deny a license or restricted license to any applicant, reprimand any licensee or holder of a restricted license, place any license or holder of a restricted license on probation, or suspend or revoke a license or restricted license if the applicant, licensee, or holder:

(6) Is convicted of or pleads guilty or nolo contendere to a felony or to a crime involving moral turpitude, whether or not any appeal or other proceeding is pending to have the conviction or plea set aside[.]

I wish to make it clear that I have voluntarily, knowingly, and freely chosen to submit this Letter of Surrender to avoid prosecution under the Act and to resolve this matter. I acknowledge that if the Board were to issue charges against me, the Office of the Attorney General could prove by a preponderance of the evidence at an administrative hearing that I violated the Act as set forth above.

I understand that by executing this Letter of Surrender, I am waiving any right to contest any charges that could issue from the Board's investigative findings in a formal evidentiary hearing at which I would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, and to all other substantive and procedural protections provided by law, including the right to appeal.

I understand that the Board will advise the National Practitioner Data Bank of this Letter of Surrender, and in response to any inquiry, will advise that I have surrendered my license in lieu of disciplinary action under the Act. I understand that this Letter of Surrender will be posted on the Board's website along with all other formal disciplinary actions. I understand that, in the event that I apply for licensure in any form in any other state or jurisdiction, this Letter of Surrender, and all underlying investigative documents, may be released by the Board to the same extent as a Final Order that would result from disciplinary action pursuant to Md. Code Ann., General Provisions § 4-101 *et seq.* Finally, I understand that this Letter of Surrender is considered disciplinary action by the Board.

I understand that I may not petition the Board to have my license reinstated for a minimum of three (3) years following September 11, 2017. I understand that before my license may be reinstated, I must comply with the minimum licensure requirement for reinstatement, including fees and possible reexamination. In the event that I apply for reinstatement to practice physical therapy, I fully understand that the Board has full and absolute discretion to grant or deny my application for reinstatement.

If the Board does grant my petition for reinstatement, I understand that the Board, in its sole discretion, will set terms and conditions that shall apply to my receiving a reinstated Maryland license, including but not limited to a probationary period and conditions. I also understand that if I petition for reinstatement I bear the burden of demonstrating to the Board that I am competent to practice physical therapy and possess good moral character, as specified in §§ 13-302 and 13-312 of the Act. I understand that if I determine that I would like to once again practice in Maryland, I will approach the Board in the same posture as one whose license has been revoked for violation of the Act.

I acknowledge that I may not rescind this Letter of Surrender in part or in its entirety for any reason whatsoever. Finally, I wish to make clear that I have been advised of my right and given an opportunity to consult with an attorney before signing this Letter of Surrender. I fully understand both the nature of the Board's actions and this Letter of Surrender. I acknowledge that I understand and comprehend the language, meaning and terms and effect of this Letter of Surrender. I make this decision knowingly and voluntarily.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing Letter are true:

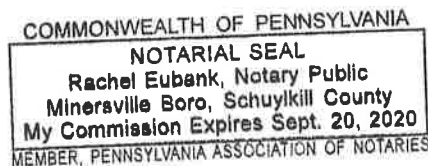
Eric M. Gordon 

Commonwealth of Pennsylvania
STATE OF MARYLAND
COUNTY/CITY OF
Schuylkill

I hereby certify that on this 6th Feb day of, 2019, before me personally appeared ERIC M. GORDON, and made an oath in due form that the foregoing Letter of Surrender was his voluntary act and deed.

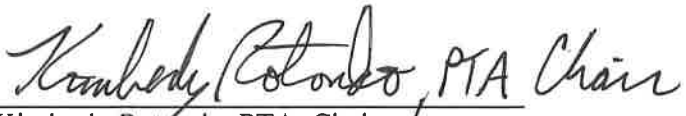
(Name) Rachel Eubank, (Title) Notary,
Authorized by the Act of July 7, 1955, as amended, to administer oaths (18 U.S.C. § 4004).

Rachel Eubank



ACCEPTANCE

On behalf of the Maryland State Board of Physical Therapy Examiners, on this 4 day of March, 2019, I accept the PUBLIC SURRENDER of the license to practice physical therapy in the State of Maryland held by Eric M. Gordon.



Kimberly Rotondo, PTA, Chair
Maryland Board of
Physical Therapy Examiners