

IN THE MATTER OF

* BEFORE THE

KAI IMANI PARKER

* MARYLAND STATE

Respondent

* BOARD OF PHYSICIANS

Naturopath License No. J00046 (Expired)

* Case Number: 2223-0098B

* * * * *

CEASE AND DESIST ORDER

Pursuant to the authority granted to Disciplinary Panel B (“Panel B”) of the Maryland State Board of Physicians (the “Board”) under Md. Code Ann., Health Occ. (“Health Occ.”) §§ 14-206(e)(1) and (2)(i) and (vii) and 14-5F-25(1) (2021 Repl. Vol. & 2023 Supp.), Panel B hereby orders **KAI IMANI PARKER** (the “Respondent”), an unlicensed individual, to immediately **CEASE AND DESIST** from all activities associated with the practice of naturopathic medicine in the State of Maryland, as defined in Health Occ. § 14-5F-01(k), and from representing to the public that she is authorized to practice medicine and naturopathic medicine in the State of Maryland.

The pertinent provisions of the Maryland Medical Practice Act, Health Occ. §§ 14-101 *et seq.* and the Maryland Naturopathic Medicine Act, Health Occ. §§ 14-5F-01 *et seq.*, under which Panel B issues this Order provide the following:

§ 14-206. Judicial Powers.

...

(e) *Cease and desist orders; injunctions.* – A disciplinary panel may issue a cease and desist order or obtain injunctive relief against an individual for:

(1) Practicing a profession regulated under this title or Title 15 of this article without a license;

- (2) Representing to the public, by title, description of services, methods, procedures, or otherwise, that the individual is authorized to practice:

- (i) Medicine in this State, in violation of § 14-602 of this title

* * *

- (vii) Naturopathic medicine in this State, in violation of § 14-5F-30 of this title[.]

§ 14-5F-25. Cease and desist orders.

A disciplinary panel may issue a cease and desist order for:

- (1) Practicing naturopathic medicine without a license or with an unauthorized person[.]

§ 14-5F-29. Practicing without license.

- (a) Except as otherwise provided in this subtitle, an individual may not practice, attempt to practice, or offer to practice naturopathic medicine in this State without a license.

§ 14-5F-30. Unauthorized practice – Representations to public.

- (a) Unless an individual is licensed to practice naturopathic medicine, the individual may not:
 - (1) Represent to the public by title, by description of services, methods, or procedures, or otherwise, that the individual is licensed by the Board to practice naturopathic medicine;
 - (2) Use the title “doctor of naturopathic medicine”, “doctor of naturopathy”, “naturopathic doctor”, or “naturopath”; or
 - (3) Use the initials “N.D.”, “ND”, “NMD”, or “N.M.D.” after the name of the individual.
- (b) An individual licensed to practice naturopathic medicine in the State may not use the title “physician”.

§ 14-602. Misrepresentation as a practitioner of medicine.

- (a) *In general.* -- Unless authorized to practice medicine under this title, a person may not represent to the public, by description of services,

methods, or procedures, or otherwise, that the person is authorized to practice medicine in this State.

- (b) *Certain representations prohibited.* -- Except as otherwise provided in this article, a person may not use the words or terms “Dr.”, “doctor”, “physician”, “D.O.”, or “M.D.” with the intent to represent that the person practices medicine, unless the person is:
- (1) Licensed to practice medicine under this title;
 - (2) A physician licensed by and residing in another jurisdiction, while engaging in consultation with a physician licensed in this State;
 - (3) A physician employed by the federal government while performing duties incident to that employment;
 - (4) A physician who resides in and is licensed to practice medicine by any state adjoining this State and whose practice extends into this State; or
 - (5) An individual in a postgraduate medical program that is accredited by an accrediting organization recognized by the Board in regulations while the individual is practicing medicine in the program.

INVESTIGATIVE FINDINGS¹

Based on the investigatory information received by, made known to, and available to Panel B, there is reasonable cause to believe that the following facts are true:

I. BACKGROUND AND COMPLAINTS

1. The Respondent originally was licensed to practice naturopathic medicine in the State of Maryland on or about December 18, 2018, under License Number J00046. The

¹ The statements regarding the Board’s investigative findings are intended to provide the Respondent with reasonable notice of the basis 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 matter.

Respondent allowed her Maryland naturopathic medicine license to expire on March 31, 2022. The Respondent did not renew her Maryland naturopathic medicine license, which expired on March 31, 2022.

2. The Respondent has active licenses as: Naturopath Physician in the District of Columbia under License Number ND2200029; Direct Entry Midwife in Maryland under License Number DEM00017²; and Acupuncturist in Maryland under License Number U02544.

3. The Respondent was an independent contractor for a wellness center (the “Center”)³ located in Columbia, Maryland that provided services in acupuncture, Chinese herbal medicine, naturopathic medicine, nutrition counseling and massage therapy throughout Maryland. The Respondent terminated her business relationship with the Center on or about April 1, 2023.

4. On or about April 7, 2023, the Board received a referral from the Anne Arundel County State’s Attorney’s Office, through the Maryland Board of Nursing, regarding an investigation it was conducting regarding potential unlicensed practice by the Respondent with respect to a patient (“Patient 1”). In this investigation, the Anne Arundel State’s Attorney’s Office reported that on or about October 30, 2022, during an investigation of an incident that resulted in a fetal demise, the Respondent was on scene “holding herself out to be a doctor of naturopathic oriental medicine, a midwife, and a

² The Respondent’s Direct Entry Midwife expired on October 28, 2023.

³ For confidentiality and privacy purposes, the names of individuals and health care facilities involved in this case are not disclosed in this document. The Respondent may obtain the names of all individuals and health care facilities referenced in this document by contacting the administrative prosecutor.

‘physician.’” Subsequently, the Anne Arundel State’s Attorney’s Office was unable to verify the Respondent’s purported licenses.

5. After receiving the referral, the Board initiated an investigation of the Respondent.

6. On or about April 14, 2023, the Board received a second complaint against the Respondent from a patient (“Patient 2”) alleging that in early March 2023, she paid \$7,000 to the Respondent for midwifery services that were never provided. Patient 2 further stated that when she demanded a refund from the Respondent, the Respondent returned \$4,500 to Patient 2 but refused to refund the initial deposit of \$2,500.

7. After receiving the second complaint, the Board initiated a second investigation of the Respondent.

II. BOARD INVESTIGATION

8. As part of its investigation, the Board obtained relevant police records, business records and patient records. Board investigators also conducted under-oath interviews of relevant witness, including the Respondent’s midwifery patients, business associates, and the Respondent herself.

Misrepresentation as a practitioner of medicine and naturopathic medicine

9. The Board’s investigation revealed that after her Maryland naturopathic medicine license expired on March 31, 2022, the Respondent continued to represent to the public that she was licensed to practice naturopathic medicine in Maryland through websites on the internet. On the Center’s website, which listed its address as located in Columbia, Maryland, the Respondent continued to represent herself as a “Naturopathic Doctor-Certified” and use the initials “ND” after her name. Throughout the website, the

Respondent was repeatedly referred to as “Dr. Parker.” One description on the website stated, “As a trained primary care physician, Dr. Parker provides Naturopathic Medical Care for the whole family!”

10. Even as late as September 23, 2023, the Respondent sent an email to a Board investigator representing herself as “Dr. Kai Parker, ND, DOM, CPM, Naturopathic Physician, Doctor of Oriental Medicine, and Homebirth Midwife.” The address listed under the Respondent’s titles was the Center’s address located in Columbia, Maryland.

11. On or about October 30, 2022, the Anne Arundel County Police Department responded to the residence of Patient 1 in Crofton, Maryland, regarding the death of Patient 1’s infant. The body camera of the police officer (“Officer 1”) who initially arrived at the residence showed that when he approached the Respondent and introduced himself, the Respondent stated, “[S]o, I’m a doctor.” Officer 1 then asked the Respondent, “What’s your last name, it’s doctor what?” The Respondent responded, “My last name is Parker.” When asked where her office was located, the Respondent provided an address in Columbia, Maryland.

12. For the next approximately one hour, Officer 1 continued to make references of the Respondent being a doctor, and the Respondent made no attempt to correct Officer 1. It was not until a second police officer (“Officer 2”) asked the Respondent for her credentials that the Respondent responded that she had a Maryland midwifery license. After providing her license number to the officers, the Respondent stated, “I’m also a naturopathic physician.” Later when Officer 2 asked the Respondent, “Are you a medical doctor? MD?”, the Respondent responded, “I am a naturopathic physician. I am a ND.” Officer 2 then asked the Respondent through which organization she was licensed, the

Respondent stated, “the Board of Physicians is for my naturopathic.” Throughout multiple police body camera footages, the Respondent never informed the police officers that her license to practice naturopathic medicine in Maryland expired approximately seven months prior on March 31, 2022.

Practicing Naturopathic Medicine in Maryland without a License

13. On or about March 24, 2022, the Respondent and Patient 1 entered into a *Payment Agreement for Homebirth Package* (the “Agreement”). Pursuant to the Agreement, Patient 1 agreed to pay a fee of \$7,000 for naturopathic and midwifery services that included, but were not limited to: initial consultation, nutritional/lifestyle assessment, routine prenatal examinations, routine lab work, labor and birth, newborn examinations and postpartum care. The terms of the Agreement encompassed prenatal care, labor and birth, and six months of postpartum care. Patient 1 also agreed to an informed consent form, which stated, in part, “Consent: I acknowledge that I am contracting for the services of a Naturopathic Physician and Certified Professional Midwife. I understand that Naturopathic Physicians who have been trained in the art of Natural Childbirth provide care for people who have normal, uncomplicated pregnancies and expect a normal delivery of a healthy child.”

14. The Respondent provided naturopathic and midwifery services to Patient 1 from on or about March 24, 2022, until October 30, 2022, when Patient 1’s newborn was delivered without a heartbeat. Examples of the services the Respondent provided Patient 1 after her Maryland naturopathic medicine license had expired included:

- a. On or about April 22, 2022, Patient 1 texted the Respondent complaining of having a migraine for the past two days. The

Respondent texted Patient 1 back stating, “Head pain is common in pregnancy. Magnesium usually helps. I’d take 300-400 mg of magnesium per day.”

- b. On or about May 10, 2022, Patient 1 sent a picture of an herbal supplement called Echinacea Goldenseal and asked the Respondent whether she could take that supplement. The Respondent texted Patient 1 back stating, “Goldenseal is a little too moving for me for pregnancy. Elderberry, Grapefruit seed extract, Vitamin C, Garlic, Apple Cider Vinegar, Vitamin D.”
- c. On or about May 31, 2022, Patient 1 texted the Respondent stating that she had a cough for about a week and asked whether she could take Alka-Seltzer Plus or Delsym. Patient 1 stated, “Both boxes say to consult with physician before taking.” The Respondent responded a few hours later stating, “I wouldn’t take these. Maybe passionflower just until you feel better.”

15. During its investigation of the Respondent, the Board also obtained scheduling records from the Center after the Respondent’s Maryland naturopathic medicine license had expired on March 31, 2022. These scheduling records showed that from April 2022 to April 2023, the Respondent had routine appointments with patients for “Naturopathic-Follow-Up (Pediatric/Newborn) Appointment.” At least four of the patients who routinely had these appointments resided in Maryland.

CONCLUSIONS OF LAW

Based on the foregoing Investigative Findings, Panel B concludes as a matter of law that the Respondent: practiced, attempted to practice, or offered to practice naturopathic medicine in Maryland without a license, in violation of Health Occ. § 14-5F-29(a); represented to the public by title, by description of services, methods, or procedures, or otherwise, that she was licensed by the Board to practice naturopathic medicine, in violation of Health Occ. § 14-5F-30(a)(1); used the title “naturopathic doctor” in Maryland without being licensed by the Board; used the initials “ND” after her name in Maryland without being licensed by the Board, in violation of Health Occ. § 14-5F-30(a)(3); used the title “physician” while she was licensed to practice naturopathic medicine in Maryland, in violation of Health Occ. § 14-5F-30(b); represented to the public, by description of services, methods, or procedures, or otherwise, that she was authorized to practice medicine in Maryland, in violation of Health Occ. § 14-602(a); and used the terms “Dr.,” “doctor”, and “physician” with the intent to represent that she practiced medicine, in violation of Health Occ. § 14-602(b).

ORDER

Based on the foregoing Investigative Findings and Conclusions of Law, it is, by Panel B, hereby:

ORDERED that pursuant to the authority under the Maryland Medical Practice Act, Health Occ. § 14-206(e)(1), (2)(i), and (2)(vii), and the Maryland Naturopathic Medicine Act, Health Occ. §§ 14-5F-25, the Respondent, Kai Imani Parker, shall **IMMEDIATELY CEASE AND DESIST** from the practice of naturopathic medicine and representing to the

public that she is authorized to practice medicine and naturopathic medicine in the State of Maryland; and it is further

ORDERED that this order is **EFFECTIVE IMMEDIATELY** pursuant to Md. Code Regs. 10.32.02.11E(1)(b), and it is further

ORDERED that, if the Respondent fails to comply with this Cease and Desist Order, a disciplinary panel of the Board may impose a civil fine upon the Respondent, pursuant to COMAR 10.32.02.11E(4) and COMAR 10.32.02.09C; and it is further

ORDERED that this is a **PUBLIC DOCUMENT** pursuant to Md. Code Ann., Gen. Prov. §§ 4-101 *et seq.* and Md. Code Regs. 10.32.02.11E(1)(a).

Signature on File

01/10/2024
Date

Christine A. Farréllý 
Executive Director
Maryland State Board of Physicians

NOTICE OF OPPORTUNITY FOR A HEARING

The Respondent may challenge the factual or legal basis of this initial order by filing a written opposition, which may include a request for a hearing, within 30 days of its issuance. The written opposition shall be made to:

Christine A. Farrelly
Executive Director
Maryland State Board of Physicians
4201 Patterson Avenue, 4th Floor
Baltimore, Maryland 21215

A copy shall also be mailed to:

K. F. Michael Kao
Assistant Attorney General
Maryland Office of the Attorney General
Health Occupations Prosecution and Litigation Division
300 West Preston Street, Suite 201
Baltimore, Maryland 21201

If the Respondent files a written opposition and a request for a hearing, the Board shall consider that opposition and provide a hearing if requested. If the Respondent does not file a timely written opposition, the Respondent will lose the right to challenge this initial Cease and Desist Order, and this Cease and Desist Order will remain in effect.