

IN THE MATTER OF
GABRIELA PALHARES

Respondent

Unlicensed

BEFORE THE
MARYLAND STATE
BOARD OF PHYSICIANS

Case Number: 2226-0015 B

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) (LexisNexis Supp. 2025), Panel B hereby orders **GABRIELA PALHARES** (the “Respondent”), an unlicensed individual, to immediately **CEASE AND DESIST** from all activities associated with the practice of medicine in the State of Maryland, as defined in Health Occ. § 14-101(o).

The pertinent provisions of the Maryland Medical Practice Act (the “Act”), Health Occ. §§ 14-101 *et seq.*, under which Panel B issues this Order provide the following:

§ 14-101. Definitions.

- (o) (1) “Practice medicine” means to engage, with or without compensation, in medical:
 - (i) Diagnosis;
 - (ii) Healing;
 - (iii) Treatment;
 - (iv) Surgery.
- (2) “Practice medicine” includes doing, undertaking, professing to do, and attempting any of the following:
 - (i) Diagnosing, healing, treating, preventing, prescribing for, or removing any physical, mental, or emotional ailment or supposed ailment of an individual:
 - 1. By physical, mental, emotional, or other process that is exercised or invoked by the practitioner, the patient, or both; or

2. By appliance, test, drug, operation, or treatment[.]

§ 14-206. Judicial Powers.

...

- (e) 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[.]

§ 14-601. License required to practice medicine.

- (1) Except as otherwise provided in this title, a person may not practice, attempt to practice, or offer to practice medicine in this State unless licensed by the Board[.]

§ 14-602. Representations to the public, practice of medicine.

- (a) 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.

COMAR 10.32.09.02 Definitions.¹

A. In this chapter, the following terms have the meanings indicated.

B. Terms Defined.

- (1) “ACCME” means the Accreditation Council on Continuing Medical Education.
- (2) “ACGME” means the Accreditation Council for Graduate Medical Education.
- (3) “AOA” means the American Osteopathic Association.
- (4) Cosmetic Medical Device.
 - (a) “Cosmetic medical device” means a device that alters or damages living tissue.

¹ The Maryland Board of Nursing has established a separate chapter specifically governing cosmetic procedures performed by nurses. Injectable treatments — including dermal fillers and neuromuscular agents such as Botox — are classified as Category D procedures. COMAR 10.27.25.03. This classification signals that these are among the more complex cosmetic procedures nurses may perform, and they are subject to the training and supervision requirements applicable to that category under the Board of Nursing's framework. COMAR 10.27.25.03. The Maryland Board of Nursing's cosmetic procedures regulations separately define injectable treatments to include dermal fillers and neuromuscular agents — the latter of which includes, but is not limited to, Botox and Dysport. COMAR 10.27.25.02.

(b) "Cosmetic medical device" includes any of the following items, when the item is used for cosmetic purposes:

- (i) Laser;
- (ii) Device emitting light or intense pulsed light;
- (iii) Device emitting radio frequency, electric pulses, or sound waves; and
- (iv) Devices used for the injection or insertion of foreign or natural substances into the skin, fat, facial tissue, muscle, or bone.

(5) Cosmetic Medical Procedure.

(a) "Cosmetic medical procedure" means a procedure using a cosmetic medical device or medical product to improve an individual's appearance.

(b) "Cosmetic medical procedure" includes the following:

- (i) Skin treatments using lasers;
- (ii) Skin treatments using intense pulsed light;
- (iii) Skin treatments using radio frequencies, microwave, or electric pulses;
- (iv) Chemical peels that ablate living skin tissue;
- (v) Skin treatments with phototherapy;
- (vi) Dermabrasion;
- (vii) Subcutaneous, intradermal, or intramuscular injections of medical products;
- (viii) Treatments intended to remove or cause destruction of fat; and
- (ix) Any treatment using a cosmetic medical device for the purpose of improving an individual's appearance.

(6) "Delegate" means to entrust a duty to a physician assistant under Health Occupations Article, Title 15, Annotated Code of Maryland.

(7) "Delegation" means the entrusting of a duty by a physician to a physician assistant under Health Occupations Article, Title 15, Annotated Code of Maryland.

(8) "Dermabrasion" means an abrasive process to remove epidermis and superficial dermis, resulting in a smoothing of contour irregularities.

(9) "Direct supervision" means oversight exercised by a supervising physician who is:

- (a) In the physical presence of a non-physician and a patient; and
- (b) Instructing the non-physician in the performance of a cosmetic medical procedure, or observing the performance of a non-physician being trained in the procedure.

(10) "Immediately available supervision" means the responsibility of a licensed physician to provide necessary direction in person, by telephone, or by other electronic means.

(11) "Non-Physician" means an individual who:

- (a) Meets the requirements of Regulation .04 of this chapter; and
- (b) Is not licensed in Maryland as a physician.

(12) "On-site supervision" means oversight exercised by a supervising physician who is:

- (a) Present at the site; and
- (b) Able to respond in person during a delegated or assigned cosmetic medical procedure.

(13) "Physician assistant" means a physician assistant with a current certificate to practice in Maryland.

COMAR 10.32.09.03 Physician Qualifications.

A. License. A physician shall obtain a license to practice medicine in Maryland before the physician may perform, delegate, assign, or supervise cosmetic medical procedures or the use of cosmetic medical devices.

B. Education.

(1) A physician who performs, assigns, supervises, or delegates the performance of cosmetic medical procedures by a non-physician first shall obtain training in the indications for and performance of the cosmetic medical procedures and operation of any cosmetic medical device to be used.

(2) Training programs provided by a manufacturer or vendor of cosmetic medical devices or supplies may not be a physician's only education in the cosmetic medical procedures or the operation of the cosmetic medical devices to be used.

(3) ACCME or AOA approved continuing education, or completion of an ACGME or AOA accredited postgraduate program that includes training in the cosmetic medical procedure performed satisfies this requirement.

COMAR 10.32.09.04 Qualifications of Individual to Whom Acts May Be Delegated and Assigned.

A. A cosmetic medical procedure may be delegated to a physician assistant or assigned to any other health care provider licensed under Health Occupations Article, Annotated Code of Maryland, whose licensing board has determined that the procedure falls within the provider's scope of practice.

B. A physician may not permit any individual who performs cosmetic medical procedures delegated or assigned by that physician to operate a cosmetic medical

device or perform a cosmetic medical procedure unless the individual has received:

- (1) Training as described in Regulation .07 of this chapter; and
- (2) Any training required by that individual's health occupations board.

INVESTIGATIVE FINDINGS²

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

Background

1. The Respondent never has been licensed to practice medicine in the State of Maryland. The Respondent never has been licensed or certified by any health occupations licensing board in Maryland.

The Complaint

2. On or about July 28, 2025, the Board received a Complaint concerning the Respondent. The Complainant inquired whether the Respondent was authorized to provide “injection services” in Maryland. The Complainant stated the Respondent represented she was a biomedical engineer and had an office (the “Office”) in Gaithersburg, Maryland.

3. After reviewing the Complaint, the Board opened an investigation of the Respondent.

Board Investigation

² 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.

4. In furtherance of its investigation, Board staff in part conducted a site visit of the Respondent's Office; reviewed the Respondent's social media content including her Instagram account and her appointment website; received a written response from the Respondent; subpoenaed appointment logs, credentials, an employee list, and invoices for products; and conducted an under-oath interview.

Site Visit

5. On November 4, 2025, Board staff conducted an unannounced site visit to the Office of the Respondent. Board staff observed a waiting room with seating, four interior doors and a bathroom. While at the Office, Board staff observed two prospective clients enter the Office. Both clients stated they were in the Office to see the Respondent.

6. Later, the Respondent and three clients exited one of the interior doors. Thereafter, the three clients exited the Office.

7. The Respondent proceeded to invite Board staff to enter the interior door. Once inside, Board staff observed a table with a large mirror, a large white massage chair in the middle of the room, and a counter with boxes. The Respondent then asked Board staff to exit the interior room.

8. The Respondent asked the two prospective clients to enter the interior room and the Respondent closed the door. After a brief period, the two clients exited the Office.

9. Board staff provided the Respondent with Board correspondence, including four subpoenas. The Respondent asked Board staff about microneedling, inquired about what she is permitted to do, and commented that some estheticians are able to perform certain needling treatments.

10. Board staff requested to inspect the interior room but the Respondent refused. The Respondent stated that she would provide the materials responsive to the subpoenas, and requested Board staff to make an appointment to inspect her Office. Board staff left the premises after being in the Office approximately 55 minutes.

Social Media

11. Screenshots of the Respondent's Instagram account entitled "Gabriela Palhares" and username "byinjectorgab" taken by Board staff on March 31, 2026 state that the Respondent "specializes in injectables," and that she is a "biomedical scientist specializing in aesthetics." It also is represented on the Instagram account that the Respondent is an "aesthetic injector" with a "Reference in lips, Botox and Facial Filler." In response to a question on her Instagram account as to whether the Respondent holds a "medical license," it is stated, "Yes, of course. Otherwise she wouldn't be able to practice and post on Instagram."

12. A screenshot of her Instagram account documents in response to a question as to whether the Respondent is a "medical professional," the Respondent stated "yes!"

13. A screenshot from the Respondent's Instagram account documents a December 22, 2024 post by "byinjectorgab" that describes a "jawline filler" procedure in which dermal fillers are injected into the jawline area. The post by "byinjectorgab" states the filler is placed along the jawline by injection and takes 30-60 minutes.

14. Another post on the Respondent's Instagram account features a picture of a female's face stating @gabrielapalhares "did my botox and fillers and today for the first time I did my lips and I'm loving it – still swollen[.]"

15. A separate post on the Respondent's Instagram account features a picture of the Respondent performing a procedure wearing a surgical mask and scrubs on a woman lying in a reclined chair that states "officially have been injected by @byinjectorgab only the best and the only one I trust with my lips."

16. Another post on the Respondent's Instagram account has a photograph of a gold syringe and states "The Secret of BEAUTY in one Syringe" with the initials GP.

17. An additional post of her Instagram account features a photograph of the Respondent with a caption "How to make Botox last longer."

18. There also are several videos on the Respondent's Instagram account in which she is pictured performing procedures with captions that include "Botox," "Lip Filler," and/or "Puppet Lines."

19. Also, on her appointment website, a menu of procedures offered by the Respondent are listed. These procedures include "Botox," "Lip Filler," and "Microneedling with Drug Delivery."

Written Response

20. In her written response to the Board, the Respondent stated her "purpose has always been rooted in a genuine passion for beauty, anatomy, and the art of helping others feel more confident in their own skin." The Respondent admitted that she does have "clients" and claims she "always shared that I was pursuing studies in Biomedicine." The Respondent stated she "never held myself out as a physician or someone who practices medicine." While the Respondents admitted that she performs services on her clients, she never described what these services were in her written response.

Board Interview

21. On April 1, 2026, Board staff conducted an under-oath interview with the Respondent.

22. At her interview, the Respondent stated she began providing services at the Office in approximately April 2024. The Respondent stated as of November 4, 2025, she no longer provides services at the Office. The Respondent did state that at the time of the site visit by Board staff and prior, she did use a hyaluron pen³ that contained filler on client's lips and face as a "skin booster."

23. The Respondent confirmed that her Instagram account was under her name "Gabriela Palhares" and username "byinjectorgab." The Respondent stated she was responsible for posting content on the account, including photographs, videos and services she provided.

24. The Respondent stated she was responsible for scheduling clients at the Office. The Respondent stated she mainly would use the platform WhatsApp to communicate with clients.

25. When clients would contact the Respondent through her Instagram account, the Respondent stated she personally would respond to those messages.

26. Board staff questioned the Respondent concerning her Instagram account that states she provides "Botox and facial filler." The Respondent stated that she does not

³ A hyaluronic pen (or hyaluron pen) is a needle-free spring device that uses high pressure to push hyaluronic acid into the skin. While marketed as a painless, affordable alternative to traditional dermal fillers, the FDA and medical experts issue severe warnings against their use. *See, e.g., "Patient and Injector Perspectives on the Use of the Hyaluron Pen: A Population Based Study," Plast Reconstr Surg Glob Open, 2024 Sep18; 12.*

inject the “toxic type A” Botox but rather a product called “Microtox” through microneedling.⁴

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 medicine without a license in violation of Health Occ. § 14-601, and/or represented to the public, by description of services, methods, or procedures, or otherwise, that the person is authorized to practice medicine in this State in violation of Health Occ. § 14-602.

ORDER

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

ORDERED that pursuant to the authority under the Act, Health Occ. § 14-206(e)(1), the Respondent, Gabriela Palhares, shall **IMMEDIATELY CEASE AND DESIST** from the practice of medicine; 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 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).

⁴ Microtox (also known as Meso-Botox or micro-dosing) is a cosmetic procedure that uses hyper-diluted neurotoxins—such as Botox or Dysport—injected superficially into the skin rather than deep into the muscles. Instead of paralyzing muscles to smooth deep wrinkles, Microtox targets the skin's surface and underlying glands. Tiny droplets of diluted toxin are placed just below the epidermis using ultra-fine needles or a micro-stamping device.

09/16/2026
Date

Signature on File

Christine A. Farrelly
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:

Gregory L. Lockwood
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 Order to Cease and Desist and this Order will remain in effect.