

<b>IN THE MATTER OF</b>	*	<b>BEFORE THE</b>
<b>PRAMIT JITESH PATEL</b>	*	<b>MARYLAND STATE</b>
<b>Respondent</b>	*	<b>BOARD OF PHYSICIANS</b>
<b>Unlicensed</b>	*	<b>Case Number: 2220-0117B</b>

\* \* \* \* \*

**CHARGES UNDER THE MARYLAND MEDICAL PRACTICE ACT**

Disciplinary Panel B (“Panel B”) of the Maryland State Board of Physicians (the “Board”) hereby charges Pramit Jitesh Patel (the “Respondent”), an unlicensed individual, under the Maryland Medical Practice Act (the “Act”), Md. Code Ann., Health Occ. (“Health Occ.”) §§ 14-101 *et seq.* (2014 Repl. Vol. & 2019 Supp.). Panel B charges the Respondent under the following provisions of the Act:

**Health Occ. § 14-101. Definitions.**

- (o) *Practice medicine.* – (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[.]

**Health Occ. § 14-601. Practicing without license.**

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.

**Health Occ. § 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.

**Health Occ. § 14-606. Penalties.**

- (a) *Imposition of penalties.* . . .
  - . . .
  - (4) Except as provided in paragraph (5) of this subsection,<sup>[1]</sup> a person who violates § 14-601 or § 14-602 of this subtitle is:
    - . . .
    - (ii) Subject to a civil fine of not more than \$50,000 to be levied by a disciplinary panel.

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<sup>1</sup> Health Occ. § 14-606(a)(5) exempts former licensees who, under certain conditions, do not timely renew their licenses. This paragraph does not apply in this case.

## ALLEGATIONS OF FACT<sup>2</sup>

Panel B bases its charges against the Respondent on the following facts that it has cause to believe are true:

### **I. BACKGROUND AND COMPLAINT**

1. At all relevant times, the Respondent has never been licensed to practice medicine in the State of Maryland. He has never been licensed or certified by any health occupations licensing board in Maryland.

2. On or about October 28, 2019, the Board received a complaint from one of the Respondent's neighbors ("Individual A")<sup>3</sup> alleging that the Respondent represented to her and other neighbors in and around Hanover, Maryland, that the Respondent was an orthopedic surgeon. Individual A alleged that the Respondent "offered medical advice" to Individual A's son following an ankle injury.

3. In a follow-up to her complaint, Individual A provided the Board with a screenshot of a LinkedIn<sup>4</sup> profile for the Respondent, which listed his name as "Pramit Patel MD," listed his occupation as "Director – Surgical Outcomes" for a company in the Baltimore area, and listed his education as "Doctor of Medicine-MD, Medicine," in 2008 from a university in Missouri ("University A").

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<sup>2</sup> The statements of the Respondent's conduct set forth in this document are intended to provide the Respondent with reasonable notice of the alleged facts. 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 the charges.

<sup>3</sup> For confidentiality and privacy purposes, the names of witnesses, patients, health care providers, health care facilities, and other institutions are not disclosed in this document. The Respondent may obtain the identity of the referenced individuals, facilities, or institutions by contacting the assigned administrative prosecutor.

<sup>4</sup> LinkedIn.com is a social and business networking website in which users can upload their resumes and curricula vitae. Its contents are user-generated.

## **II. BOARD INVESTIGATION**

4. The Board opened an investigation of the Respondent based on Individual A's complaint.

### **A. Interview of Individual A**

5. As part of its investigation, Board staff interviewed Individual A under oath on or about November 10, 2019.

6. Individual A stated that the Respondent first introduced himself to her as an orthopedic surgeon when her family moved into the Respondent's neighborhood about five years earlier. Individual A said that she did not question the Respondent's claim until about six months earlier when another individual close to the Respondent told Individual A that the Respondent was not actually a medical doctor.

7. Individual A also said that her son had an ankle injury approximately two years earlier that the Respondent assessed and provided advice on how to wrap the ankle and treat it with rest, compression, and ice.

8. Individual A also stated that the Respondent had filed a defamation lawsuit against her and several other neighbors in which the Respondent identified himself with an "M.D." after his name.

### **B. Respondent's Statements to Neighbors**

9. As part of its investigation, Board staff spoke with other neighbors of the Respondent. These individuals stated the following:

- a. A neighbor and licensed physician ("Individual B") said that she searched for the Respondent's National Provider Identifier ("NPI") number but could not find one. She also explained that the Respondent circulated a curriculum vitae ("CV") to neighbors while

he was running for election to the community Homeowners' Association ("HOA") and this CV clearly stated the Respondent was a physician.

- b. A neighbor ("Individual C") said that the Respondent told her that he worked in Columbia, Maryland, as an orthopedic surgeon. She also said that she viewed a LinkedIn profile for the Respondent that listed a medical degree from University A. She explained that the Respondent also identified himself as a physician on a nomination form that he submitted to run for HOA president.
- c. A neighbor ("Individual D") said that a couple of years earlier, the Respondent came to Individual D's house to review his son's x-rays after an ankle injury. Individual D explained that he obtained the Respondent's contact information from Individual A. The Respondent told Individual D that he did not see anything concerning on the x-rays and to have Individual D's son continue with physical therapy.

### **C. The Court Pleading**

10. As part of its investigation, the Board obtained a copy of the complaint that the Respondent filed against Individual A, among others. The complaint was filed in the Circuit Court for Anne Arundel County on or about November 25, 2019. The caption of the case included among the plaintiffs, "Pramit Patel, M.D."

11. The complaint alleged that the defendants, among other things, made "various defamatory allegations . . . concerning each of the Plaintiffs," which included "accusations that [the Respondent] is not a licensed physician and has misrepresented himself as such[.]" The complaint asserted as factual support that "[the Respondent] is a medical doctor, licensed to practice medicine in the State of Maryland. His license has never been suspended or revoked."

#### **D. Interview of Individual E**

12. As part of its investigation, Board staff interviewed an acquaintance of the Respondent (“Individual E”) under oath on or about September 10, 2020. Individual E said that he had met the Respondent only a few times through Individual A.

13. In or around January 2018, Individual E injured his knee. He contacted the Respondent through an online messenger and asked to see the Respondent at his office. The Respondent responded through the online messenger that his practice was too busy to accept new patients but asked Individual E if his pain worsened when he put weight on it, if it was sharp pain, and if the pain increased when he shifted or twisted. According to Individual E, the Respondent stated that he believed Individual E’s injury was likely a meniscus injury and that an MRI would be necessary to show the full extent of the injury. The Respondent also referred Individual E to a physician in Glen Burnie, Maryland.

#### **E. Documents from Individual F**

14. On or about September 11, 2020, the Board issued a subpoena to an individual who had a close affiliation with the Respondent (“Individual F”) for copies of any documents related to the Respondent’s education, training, experience, and licensure. In response, Individual F produced the following documents, among others, all of which appear to have been forged documents:

- a. A Maryland medical license issued to “Pramit Jitesh Patel” with an expiration date of September 30, 2019.<sup>5</sup>
- b. A CV for the Respondent stating that, among other things, he was a “General Surgery Resident” at a university in Chicago, Illinois (“University B”) in 2008 and earned a “Medical Doctorate” from University A in 2008 “with Honors.”

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<sup>5</sup> Board records show that the license number stated on this document is issued to another individual.

- c. A copy of a framed diploma from University B stating that “Pramit Jitesh Patel, M.D. completed a four year [*sic*] program from June 23, 2008 to June 22, 2012 as a Resident in Orthopaedic Surgery.”
- d. A copy of a framed diploma from University B stating that “Pramit Jitesh Patel, M.D. has successfully completed a clinical fellowship in Sports Medicine July 2, 2012 through June 28, 2013.”
- e. A controlled dangerous substances (“CDS”) registration certificate from the Maryland Department of Health for “Pramit J. Patel MD” with an expiration date of September 30, 2020.<sup>6</sup>
- f. A Controlled Substance Registration Certificate from the Drug Enforcement Agency issued to “Pramit J. Patel” on September 13, 2014 and listing the address of an orthopedic practice in Columbia, Maryland.<sup>7</sup>
- g. A letter dated June 21, 2017 from the Chief Medical Officer of the Maryland Department of Health and Mental Hygiene to “Dr. Pramit J. Patel,” stating, among other things, “This letter serves as an initial notice of approval of your application for Maryland state medical licensure.”<sup>8</sup>

## **E. University Records**

15. On or about September 11, 2020, the Board issued a subpoena to University B to produce records related to the Respondent’s education, training, or experience in a university program. On or about September 24, 2020, an individual from University B responded by email to Board staff stating, “From the student records perspective, our system indicates that no record found [*sic*]. We also reached out to staff managing resident/fellow records, and they couldn’t find anything.”

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<sup>6</sup> Records from the Maryland Office of Controlled Substances Administration, which issues CDS registration certificates, show that the registration number stated on this document does not exist.

<sup>7</sup> The DEA registration number on this document is only 8 characters long, while DEA registration numbers are commonly 9 characters long. In addition, the practice listed on the registration certificate had no knowledge of the Respondent when contacted by the Board.

<sup>8</sup> The Board directly issues medical licenses to qualified applicants. The Chief Medical Officer for the Department is not involved in those procedures or decisions.

16. On or about September 17, 2020, the Board issued a subpoena to University A to produce records related to the Respondent's education, training, or experience in a university program. On or about October 20, 2020, University A provided transcripts to the Board showing that the Respondent earned a Bachelor of Arts in biology in May 2003 and a second Bachelor of Arts in economics in May 2006. There was no record of the Respondent's attending medical school or earning a medical degree from University A.

**F. Attempts to Contact the Respondent**

17. On or about January 10, 2020, the Board sent a letter to the Respondent's home address that notified him of the complaint against him and requested a written response from him within ten business days. The Board also issued a subpoena to the Respondent to produce copies of the Respondent's academic and professional degrees, a medical degree, any medical licenses, and any medical certificates. The Respondent did not provide a written response or documents.

18. On or about July 30, 2020, the Board issued a subpoena to the Respondent at this home address to appear by telephone for an interview with Board staff on or about August 6, 2020. The Respondent did not appear for the interview.

**III. GROUNDS FOR DISCIPLINE**

19. The Respondent's conduct described above constitutes, in whole or in part, the practice, attempt to practice, or offer to practice medicine in Maryland without being licensed by the Board, in violation of Health Occ. § 14-601.

20. The Respondent's conduct described above constitutes, in whole or in part, the misrepresentation to the public, by description of services, methods, or procedures, or

otherwise, that the Respondent was and is authorized to practice medicine in Maryland, in violation of Health Occ. § 14-602(a).

21. The Respondent's conduct described above constitutes, in whole or in part, use of the terms "Dr.," "doctor," "physician," and/or "M.D." with the intent to represent that the Respondent practices medicine, in violation of Health Occ. § 14-602(b).

### **NOTICE OF POSSIBLE SANCTIONS**

If, after a hearing, a disciplinary panel of the Board finds that there are grounds for action under Health Occ. §§ 14-601, 14-602(a) and/or 14-602(b), the disciplinary panel may impose a civil fine against the Respondent of not more than \$50,000 for each ground pursuant to Health Occ. § 14-606(a)(4)(ii) and Md. Code Regs. 10.32.02.09.

### **NOTICE OF DISCIPLINARY COMMITTEE FOR CASE RESOLUTION CONFERENCE, PREHEARING CONFERENCE AND HEARING**

A Disciplinary Committee for Case Resolution ("DCCR") Conference in this matter is scheduled for **Wednesday, March 24, 2021, at 9:00 a.m.**, at the Board's office, 4201 Patterson Avenue, Baltimore, Maryland 21215. The nature and purpose of the DCCR is described in the attached letter to the Respondent. The Respondent must confirm in writing his intent to attend the DCCR. The Respondent should send written confirmation of his intent to participate in the DCCR to:

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

If the case cannot be resolved at the DCCR, a pre-hearing conference and a hearing in this matter will be scheduled at the Office of Administrative Hearings, 11101 Gilroy Road, Hunt Valley, Maryland 21031. The hearing will be conducted in accordance with Md. Code Ann., Health Occ. § 14-405 and Md. Code Ann., State Gov't §§ 10-201 *et seq.* (2014 Repl. Vol. & 2019 Supp.).

**BRIAN E. FROSH**  
**ATTORNEY GENERAL OF MARYLAND**

JAN. 29, 2021

Date



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