

IN THE MATTER OF

* BEFORE THE

KAI IMANI PARKER

* MARYLAND STATE

Respondent

* BOARD OF PHYSICIANS

Naturopath License No. J00046 (Expired)

* Case Number: 2223-0098B

* * * * *

**AMENDED CHARGES UNDER THE MARYLAND NATUROPATHIC
MEDICINE ACT AND THE MEDICAL PRACTICE ACT**

Disciplinary Panel B of the Maryland State Board of Physicians (the "Board") hereby amends its previous charges against **KAI IMANI PARKER** (the "Respondent"), unlicensed, filed on January 18, 2024, under the Maryland Naturopathic Medicine Act and the Medical Practice Act, codified at Md. Code Ann., Health Occ. ("Health Occ.") §§ 14-5F-01 *et seq.* and §§ 14-101 *et seq.* (2014 Repl. Vol. & 2023 Supp.) (the "Acts") respectively. These Amended Charges supersede the previous charges filed on January 18, 2024, by including a possible fine of not more than \$50,000 if a disciplinary panel of the Board finds that there are grounds for action under Health Occ. § 14-5F-29(a) and/or Health Occ. § 14-5F-30(a)(2).

The pertinent provisions under the Acts provide:

§ 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.

ALLEGATIONS OF FACT¹

Disciplinary Panel B bases its charges on the following facts that it has reason to believe 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 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

¹ The allegations set forth in these charges are intended to provide the Respondent with reasonable notice of the asserted 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 these charges.

² The Respondent’s Direct Entry Midwife license 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.

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 '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.

16. The Respondent’s actions as set forth above constitute: practicing, attempting to practice, or offering to practice naturopathic medicine in Maryland without a license, in violation of Health Occ. § 14-5F-29(a); representing 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); using the title “naturopathic doctor” in Maryland without being licensed by the Board, using the initials “ND” after her name in Maryland without being licensed by the Board, in violation of Health Occ. § 14-5F-30(a)(3); using the title “physician” while she was licensed to practice naturopathic medicine in Maryland, in violation of Health Occ. § 14-5F-30(b); representing 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 using the terms “Dr.,” “doctor”, and “physician” with the intent to represent that she practiced 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. § 14-5F-29(a), and/or 14-5F-30(a)(1), (2) and/or (3), and/or 14-5F-30(b), the disciplinary panel may levy a civil fine of not more than \$50,000. If after a hearing, a disciplinary panel of the Board finds that there are grounds for action under Health Occ. § 14-602(a) and/or (b), the disciplinary panel may levy a civil fine of not more than \$50,000.

NOTICE OF DISCIPLINARY COMMITTEE FOR CASE RESOLUTION

The Respondent may appear before Disciplinary Panel B, serving as the Disciplinary Committee for Case Resolution ("DCCR") in this matter, on **WEDNESDAY, APRIL 24, 2024, 9:00 A.M.**, at the Board's offices, 4201 Patterson Avenue, Baltimore, Maryland 21215. The nature and purpose of the DCCR is described in the attached letter to the Respondent. If this matter is not resolved before the DCCR, a prehearing conference and hearing will be scheduled before an Administrative Law Judge at the Office of Administrative Hearings, 11101 Gilroy Road, Hunt Valley, Maryland 21031. The hearing will be conducted in accordance with the Administrative Procedure Act, Md. Code Ann., State Gov't §§ 10-201 *et seq.* (2021 Repl. Vol.).

**ANTHONY G. BROWN
ATTORNEY GENERAL**



K. F. Michael Kao
Assistant Attorney General
Office of the Attorney General

2/16/24
Date

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