

IN THE MATTER OF

* BEFORE THE

SUSAN WILLIAMS

* MARYLAND STATE

Respondent

* BOARD OF PHYSICIANS

Unlicensed

* Case Number: 2219-0216

* * * * *

CONSENT ORDER

On February 11, 2021, Disciplinary Panel B (“Panel B”) of the Maryland State Board of Physicians (the “Board”) charged Susan Williams (“the Respondent”) under the Maryland Naturopathic Medicine Act (the “Act”), Md. Code Ann., Health Occ. §§ 14-5F-01 *et seq.*

Specifically, the Respondent was charged with violating the following:

Health Occ. § 14-5F-29. Unlicensed practice prohibited.

- (a) *In general.* -- 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.

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

- (a) *In general.* -- 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.

On May 26, 2021, Panel B was convened as a Disciplinary Committee for Case Resolution (“DCCR”) in this matter. Based on negotiations occurring as a result of this DCCR, the Respondent agreed to enter into this Consent Order, consisting of Findings of Fact, Conclusions of Law, Order, and Consent.

FINDINGS OF FACT

Panel B finds the following facts:

1. At all times relevant, the Respondent was not, and never had been, licensed to practice naturopathic medicine in the State of Maryland.
2. The Respondent was licensed to practice naturopathic medicine in the District of Columbia on October 10, 2013, under License Number NP-0043.
3. At all times relevant to these charges, the Respondent worked at a medical practice (the “Practice”)¹ owned and operated by a Maryland licensed physician (the “Physician”) located in Columbia, Maryland. The Respondent worked at the Practice from April 2017 to September 2019. The Physician was directly responsible for supervising the Respondent while she worked at the Practice.
4. On or about June 28, 2019, while investigating another matter, Board staff went on the website for the Practice and discovered that it listed the Respondent as “Sue Williams, ND” and “Dr. Sue Williams, Naturopathic and Epigenetic Physician”. The Practice website further stated that the Respondent specialized “in treating patients with

¹ To ensure confidentiality, the names of individuals, hospitals and healthcare facilities involved in this case are not disclosed in this document.

Autoimmune Diseases, Chronic Fatigue, Crohn's Disease, Ulcerative Colitis, LYME, MS, Hepatitis, Cancer, ED, Asthma/Allergies, COPD, Macular Degeneration, Candida, Heart Disease, Mold Toxicity, weight management, Fertility Issues and Women's Health." Board staff checked with the Board's licensing unit and determined that the Respondent was not licensed to practice naturopathic medicine by the Board. As a result, the Board opened an investigation of the Respondent.

5. In furtherance of its investigation, Board staff interviewed the Physician on or about July 23, 2020 and the Respondent on or about August 27, 2020. During the interview, both the Physician and the Respondent confirmed that the Respondent worked at the Practice under the Physician's supervision from April 2017 to September 2019. The Physician and the Respondent both stated that while the Respondent worked at the Practice, staff members would refer to her as "Dr. Williams". They further confirmed that in February 2018 and August 2019 the Physician paid for the Respondent to take the licensing examination in order for her to obtain licensure to practice naturopathic medicine in Maryland, but the Respondent failed to pass each time. Both the Physician and the Respondent stated in their interviews that in September 2019 they agreed that the Respondent would not continue to work at the Practice since she failed to obtain licensure to practice naturopathic medicine in Maryland.

6. As part of its investigation, the Board obtained from the Practice an appointment log of all patients who were seen by the Respondent. From the appointment log, the Board randomly selected five patients and obtained their medical records from the Practice. The Board forwarded the five patient medical records and related investigative

materials to a naturopathic physician licensed in Maryland for an expert review (the “Board Reviewer”) on whether the Respondent practiced naturopathic medicine on the five patients.

7. After reviewing the five patient records, the Board Reviewer determined that the Respondent did practice naturopathic medicine without a valid license in Maryland when treating the five patients. The Board Reviewer found that when treating the five patients, the Respondent performed services comprising the essential features of naturopathic medicine, including, but not limited to, subjective intake, laboratory result reviews, dietary counseling, IV nutrition, nutritional and herbal supplementation, pharmaceutical medication management and mind body medicine.

8. The Board Reviewer concluded that the Respondent through the Practice website and her own website “offered to practice naturopathic medicine, by both identifying herself as a naturopathic doctor and by offering testing and services consistent with the practice of naturopathic medicine.” The Board Reviewer further found that the Respondent practiced naturopathic medicine at the Practice “by identifying herself as a naturopathic doctor, seeing patients, using her training as a naturopathic doctor, and providing services consistent with the practice of naturopathic medicine.”

CONCLUSIONS OF LAW

Based on the Findings of Fact, Panel B concludes as a matter of law that the Respondent practiced, attempted to practice, or offered to practice naturopathic medicine in this State 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 Maryland, in violation of Health Occ. § 14-5F-30(a)(1); used the title “doctor of naturopathic medicine”, “doctor of naturopathy”, “naturopathic doctor”, or “naturopath” without being licensed to practice naturopathic medicine in Maryland, in violation of Health Occ. § 14-5F-30(a)(2); and used the initials “N.D.”, “ND”, “NMD”, or “N.M.D.” after her name without being licensed to practice naturopathic medicine in Maryland, in violation of Health Occ. § 14-5F-30(a)(3).

ORDER

It is, thus, on the affirmative vote of a majority of the quorum of Board Disciplinary Panel B, hereby

ORDERED that the Respondent shall cease and desist:

1. from practicing, attempting to practice, or offering to practice naturopathic medicine in Maryland; and
2. from representing to the public by title, by description of services, methods, and procedures, and otherwise, that the Respondent is licensed by the Board to practice naturopathic medicine in Maryland; and
3. from using the title “doctor of naturopathic medicine,” “doctor of naturopathy,” “naturopathic doctor,” “naturopath,” or “naturopathic physician” to represent, indicate, or suggest that the Respondent is licensed by the Board to practice naturopathic medicine in Maryland; and
4. from using the initials “N.D.,” “ND,” “NMD,” or “N.M.D.,” after the Respondent’s name to represent, indicate, or suggest that the Respondent is licensed by the Board to practice naturopathic medicine in Maryland; and it is further

ORDERED that the cease and desist provisions of this Consent Order, set forth above, will no longer be in effect if the Respondent becomes licensed by the Board to practice naturopathic medicine in Maryland, except the Respondent will still not be allowed to use the title “physician” in Maryland, *see* Health Occ. § 14-5F-30(b); and it is further

ORDERED that, within **TWO YEARS**, the Respondent shall pay a civil fine of **\$2,500**. The Payment shall be by money order or bank certified check made payable to the Maryland Board of Physicians and mailed to P.O. Box 37217, Baltimore, Maryland 21297. The Board will not renew or reinstate the Respondent’s license if the Respondent fails to timely pay the fine to the Board; and it is further

ORDERED that the effective date of the Consent Order is the date the Consent Order is signed by the Executive Director of the Board or her designee. The Executive Director or her designee signs the Consent Order on behalf of the disciplinary panel which has imposed the terms and conditions of this Consent Order; and it is further

ORDERED that, if the Respondent allegedly fails to comply with any term or condition imposed by this Consent Order, the Respondent shall be given notice and an opportunity for a hearing. If the disciplinary panel determines there is a genuine dispute as to a material fact, the hearing shall be before an Administrative Law Judge of the Office of Administrative Hearings followed by an exceptions process before a disciplinary panel; and if the disciplinary panel determines there is no genuine dispute as to a material fact, the Respondent shall be given a show cause hearing before a disciplinary panel; and it is further

ORDERED that, after the appropriate hearing, if the disciplinary panel determines that the Respondent has failed to comply with any term or condition imposed by this Consent Order, the disciplinary panel may impose a civil monetary fine on the Respondent; and it is further

ORDERED that this Consent Order is a public document. *See* Health Occ. §§ 1-607, 14-411.1(b)(2) and Gen. Prov. § 4-333(b)(6).

Signature on File

06/28/2021
Date

Christine A. Farrelly, Executive Director
Maryland State Board of Physicians

CONSENT

I, Susan Williams, acknowledge that I have consulted with legal counsel before signing this document.

By this Consent, I agree to be bound by this Consent Order and all its terms and conditions and understand that the disciplinary panel will not entertain any request for amendments or modifications to any condition.

I assert that I am aware of my right to a formal evidentiary hearing, pursuant to Md. Code Ann., Health Occ. § 14-5F-21 and Md. Code Ann., State Gov't §§ 10-201 *et seq.* concerning the charges. I waive this right and have elected to sign this Consent Order instead.

I acknowledge the validity and enforceability of this Consent Order as if entered after the conclusion of a formal evidentiary hearing in which I would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on my behalf, and to all other substantive and procedural protections as provided by law. I waive those procedural and substantive protections. I acknowledge the legal authority and the jurisdiction of the disciplinary panel to initiate these proceedings and to issue and enforce this Consent Order.

I voluntarily enter into and agree to comply with the terms and conditions set forth in the Consent Order as a resolution of the charges. I waive any right to contest the Findings

of Fact and Conclusions of Law and Order set out in the Consent Order. I waive all rights to appeal this Consent Order.

I sign this Consent Order, without reservation, and fully understand the language and meaning of its terms.

Signature on File

6/23/2021
Date

Susan Williams
Respondent

NOTARY

STATE OF Maryland

CITY/COUNTY OF Washington

I HEREBY CERTIFY that on this 23 day of June 2021, before me, a Notary Public of the foregoing State and City/County, appeared Susan Williams, and made oath in due form of law that signing the foregoing Consent Order was her voluntary act and deed.

AS WITNESSETH my hand and notarial seal.



[Signature]
Notary Public

My Commission expires: 2/5/2025

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SUSAN WILLIAMS

* MARYLAND STATE

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* BOARD OF PHYSICIANS

Unlicensed

* Case Number: 2219-0216

* * * * *

CHARGES UNDER THE MARYLAND NATUROPATHIC MEDICINE ACT

Disciplinary Panel B of the Maryland State Board of Physicians (the "Board") hereby charges **SUSAN WILLIAMS** (the "Respondent"), Unlicensed, under the Maryland Naturopathic Medicine Act (the "Act"), codified at Md. Code Ann., Health Occ. ("Health Occ.") §§ 14-5F-101 *et seq.* (2014 Repl. Vol. & 2020 Supp.).

Specifically, Disciplinary Panel B charges the Respondent with violating the following provisions of the Act:

Health Occ. § 14-5F-29. Unlicensed practice prohibited.

- (a) *In general.* -- 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.

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

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- (3) Use the initials “N.D.”, “ND”, “NMD”, or “N.M.D.” after the name of the individual.

ALLEGATIONS OF FACT¹

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

1. At all times relevant to these charges, the Respondent was not, and never had been, licensed to practice naturopathic medicine in the State of Maryland.

2. The Respondent was licensed to practice naturopathic medicine in the District of Columbia on October 10, 2013, under License Number NP-0043.

3. At all times relevant to these charges, the Respondent worked at a medical practice (the “Practice”)² owned and operated by a Maryland licensed physician (the “Physician”) located in Columbia, Maryland. The Respondent worked at the Practice from April 2017 to September 2019. The Physician was directly responsible for supervising the Respondent while she worked at the Practice.

4. On or about June 28, 2019, while investigating another matter, Board staff went on the website for the Practice and discovered that it listed the Respondent as “Sue Williams, ND” and “Dr. Sue Williams, Naturopathic and Epigenetic Physician”. The Practice website further stated that the Respondent specialized “in treating patients with

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 To ensure confidentiality, the names of individuals, hospitals and healthcare facilities involved in this case are not disclosed in this document. The Respondent may obtain the identity of the referenced individuals or entities in this document by contacting the administrative prosecutor.

Autoimmune Diseases, Chronic Fatigue, Crohn's Disease, Ulcerative Colitis, LYME, MS, Hepatitis, Cancer, ED, Asthma/Allergies, COPD, Macular Degeneration, Candida, Heart Disease, Mold Toxicity, weight management, Fertility Issues and Women's Health." Board staff checked with the Board's licensing unit and determined that the Respondent was not licensed to practice naturopathic medicine by the Board. As a result, the Board opened an investigation of the Respondent.

5. In furtherance of its investigation, Board staff interviewed the Physician on or about July 23, 2020 and the Respondent on or about August 27, 2020. During the interview, both the Physician and the Respondent confirmed that the Respondent worked at the Practice under the Physician's supervision from April 2017 to September 2019. The Physician and the Respondent both stated that while the Respondent worked at the Practice, staff members would refer to her as "Dr. Williams". They further confirmed that in February 2018 and August 2019 the Physician paid for the Respondent to take the licensing examination in order for her to obtain licensure to practice naturopathic medicine in Maryland, but the Respondent failed to pass each time. Both the Physician and the Respondent stated in their interviews that in September 2019 they agreed that the Respondent would not continue to work at the Practice since she failed to obtain licensure to practice naturopathic medicine in Maryland.

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investigative materials to a naturopathic physician licensed in Maryland for an expert review (the “Board Reviewer”) on whether the Respondent practiced naturopathic medicine on the five patients.

7. After reviewing the five patient records, the Board Reviewer determined that the Respondent did practice naturopathic medicine without a valid license in Maryland when treating the five patients. The Board Reviewer found that when treating the five patients, the Respondent performed services comprising the essential features of naturopathic medicine, including, but not limited to, subjective intake, laboratory result reviews, dietary counseling, IV nutrition, nutritional and herbal supplementation, pharmaceutical medication management and mind body medicine.

8. The Board Reviewer concluded that the Respondent through the Practice website and her own website “offered to practice naturopathic medicine, by both identifying herself as a naturopathic doctor and by offering testing and services consistent with the practice of naturopathic medicine.” The Board Reviewer further found that the Respondent practiced naturopathic medicine at the Practice “by identifying herself as a naturopathic doctor, seeing patients, using her training as a naturopathic doctor, and providing services consistent with the practice of naturopathic medicine.”

9. The Respondent’s actions, as described above, constitute practicing, attempting to practice, or offering to practice naturopathic medicine in this State 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 is licensed by the Board to practice naturopathic medicine, in violation of Health Occ. § 14-5F-30(a)(1);

using the title “doctor of naturopathic medicine”, “doctor of naturopathy”, “naturopathic doctor”, or “naturopath” without being licensed to practice naturopathic medicine in Maryland, in violation of Health Occ. § 14-5F-30(a)(2); and using the initials “N.D.”, “ND”, “NMD”, or “N.M.D.” after her name without being licensed to practice naturopathic medicine in Maryland, in violation of Health Occ. § 14-5F-30(a)(3).

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 Health Occ. § 14-5F-30(a)(1), (2) and/or (3), the disciplinary panel may impose a civil fine of no more than \$50,000 to be levied by the Board.

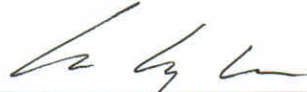
NOTICE OF DISCIPLINARY COMMITTEE FOR CASE RESOLUTION

The Respondent may appear before Disciplinary Panel B, serving as the Disciplinary Committee for Case Resolution ("DCCR") in this matter, on **WEDNESDAY, MAY 26, 2021, 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.* (2014 Repl. Vol.).

**BRIAN E. FROSH
ATTORNEY GENERAL**

2/11/2021

Date



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