



## **CSL Therapy's Statement Addressing Complaint Letter (001) 2025**

March 16, 2025

### **Section 1: The State of Maryland Nursing Board Review**

In pursuant to the authority of Maryland Code Ann., State Government Article 10-226(c)(2)(2021 Repl. Vol. & 2023 Supp.) the state of Maryland Board of Nursing (referred to as the Board) found reason to find that the public health, safety, or welfare imperatively required emergency action in the form of the suspension of a licensed State of Maryland Registered Nurse (throughout this document, referred to as the “Respondent”).

This complaint was initiated and filed by CSL Therapy Organization, after being directed to do so by the Respondent in writing. After the Respondent was contacted about the concerns being presented in this statement, they instructed CSL Therapy staff to present any and all concerns to the Board of Nursing. Based on investigatory information received by the State of Maryland Board of Nursing, the board believes that the following facts are true:

In January of 2019 the Maryland Board issued the Respondent a license to practice as a registered nurse in the State of Maryland. In October of 2023, the Maryland Board of Nursing received a complaint regarding the Respondent's registered nursing practice stating that the Respondent owns a business in which she is practicing beyond the scope of their registered nursing license as well as employing and delegating tasks to unqualified individuals.

Multiple photographs and videos of hands performing massages of individuals' body parts; while stating that “our team is licensed with the State of Maryland Board of Nursing”. The State of Maryland Board of Nursing does not oversee massage and bodywork.

In one video that was posted on the Respondent's social media, hands are seen performing massage on one individual on which there is an indwelling surgical drain protruding from the abdomen. Blood is draining from the indwelling surgical drain into an attached bag where audio can be heard stating “*she is here for her first lymphatic draining massage*”.

While nurses are allowed to perform manual lymphatic drainage, a skin stretching technique that encourages or produces slight pressure within the lymphatic system, nurses are not allowed to

incorporate lymphatic drainage techniques with massage and incorrectly title it lymphatic drainage massage. At no point in time should there ever be blood draining from a patient if said patient is there to receive a lymphatic drainage treatment.

The Board also reviewed a video posted on TikTok under the Respondent's business name of hands performing a procedure in which a Q-Tip was inserted into an opening in the skin and bloody purulent drainage is seen draining out of the opening in the skin. After the board asked the Respondent to submit personal records, resumes, credentials, background checks, drug screens, and continuing education records; staff position descriptions and their assigned responsibilities under which each licensee functioned— including volunteer and paid employment, as well as medical records, scheduled appointments, and client lists. The Respondent only provided copies of a staff member's undated job offer letter, resume, screenshot of their RN licensure information from the Board's website, and the screenshot of a CNA certification from the board's website. No Body Altering Aesthetics formal training or proof of continued industry education was provided as requested by the Board. The Respondent also failed to provide clear job descriptions, background checks, photo identifications, or any drug screens of employees to the Board. The Respondent also improperly trained and delegated cosmetic procedures to their RN employees of which they were not authorized to practice and was beyond the RN's scope of practice.

As it pertains to the Respondent, they provided a certificate of completion for basic life support (CPR and AED), and the following certificate of completions: "Brazilian Lymphatic Drainage", "Brazilian Facial Drainage", "Brazilian Post Surgery Drainage", and an IV Infusion & Injectable clinic course. CSL Therapy notes that *Brazilian Lymphatic Techniques are sufficient for nonsurgical applications but do not meet the standards of care needed for post surgical clients.* Additionally, these courses are supplemental to manual lymphatic drainage courses that are offered by reputable institutions recognized by existing boards such as the State of Maryland's Board of Massage and the State of Maryland's Board of Nursing, and are not sufficient enough to replace these in depth trainings as stand alone educational programs. Note: this does not disqualify a proficient peer reviewed program from including lymphatic techniques within their teachings as acknowledged by CSL Therapy.

The Board has found that the Respondent failed to complete a program of study or education course in lymphatic drainage massage that meet the standards set forth by the Board included but not limited to:

- Nursing Assessments
- Cosmetic Indications and Contraindications for Treatment
- Appropriate Nursing Interventions
- Appropriate Documentation
- Annual competency of the nurses' own staff

The Board found the Respondent having not received the appropriate training under the Board's regulations and statutes for cosmetic procedures. The Respondent improperly trained, assigned, and delegated cosmetic procedures as well as lymphatic drainage massage to their RN employees. According to the Board, the Respondent knowingly participated in misrepresentation when acting in the capacity of a nurse by using the title "RN" in their business name, indicating to the general public their services were being provided to the standards of practice of a Maryland licensed registered nurse; when in fact the services the Respondent provided at their business not only failed to meet even the most basic standards of care in the practice of registered nursing, but violates multiple standards set forth in the Nurse Practice Act (NPA) and Board regulations.

Among other commentary, the Respondent made the following statements to the Board:

- ***“Incisional drainage is a byproduct of lymphatic drainage. If someone has recently had surgery when you are manipulating the lymph and excess swelling it does, fluid will follow the path of least resistance and it does come out of incisions.”***— THIS IS AN INCORRECT STATEMENT.
- The Respondent admitted that one of the registered nurses on staff ***“would provide the lymphatic draining sessions”***— The board found that this employee was not trained or certified in lymphatic drainage treatments, nor are they a massage therapist.
- ***“The fluid will go out... of the incision the doctor provides from the liposuction. It happens. It’s normal.”***— This is not a consistent presentation for all clients.
- ***“Why do I need medical records for what I do?”***— There are several Annotations and COMARs for the state of Maryland requiring healthcare professionals to keep medical records.
- ***“There are no orders for what I do because it is postOp care. You are not required to get this done. They come to me because they want this support.”*** While orders are not required by existing healthcare boards for elective palliative care, if the Respondent had completed any peer-reviewed body altering aesthetics postOp program and obtained a certificate of completion, they would have (like other certified providers) learned not only the importance of taking clinical notes but also its requirement within the Body Altering Aesthetics industry.

Given that the Respondent is not a massage therapist, the Board required them to receive a prescription or an order from a Nurse Practitioner or Doctor to perform lymphatic drainage techniques for any of their clients; of which they never obtained.

The Respondent admitted that clients do not have treatment plans, nor does the Respondent provide treatment plans for the clients. The Respondent does not have their client sign informed consent forms. The Respondent also states that ***“clients do not care about [the Respondents] certifications”*** but that they only ***“care about [the Respondent’s] licensure”***. Just as patients

look to nursing licensure as a reflection of education, skill, and capability, clients DO look for and seek out Body Altering Aesthetics postOp certified providers to ensure quality care and a safe recovery. This shared perspective demonstrates a parallel reliance and necessitates a collaborative approach where credentials are the marker of expertise in niche respective fields. *Note: In CSL Therapy's focus on excellence, it is a requirement that all bodyworkers in both PostOp & Nonsurgical body contouring, provide treatment protocols and plans for clients.*

This is a summary of the findings from the Maryland Board of Nursing from the complaint that was submitted due to concerns of public safety.

## **Section 2: Acknowledgment of Claims**

*Note: During testimony, the presiding government agency stated on the record that each claim that has since been mentioned in the inflammatory statements are baseless to the complaint (paraphrased).*

CSL Therapy was founded with the mission to elevate post-surgical and non-surgical medicine, while fostering a community for continuous learning and growth. We remain steadfastly dedicated to these core beliefs, and are focused on advancing excellence in patient care and professional development. There is no interest in attacking or dismantling, but instead offering opportunities for elevation to the highest standards of care in this emerging industry. As some may be aware, there is false information circulating regarding the ethics and validity of the CSL Therapy Organization. The organization would like to address some of the concerns that these salacious statements may bring not only to our: partners, the CSL Therapy board certified providers, stakeholders, and the BAA community at large, but also to the surgeons and the clients that over the last five years have respected, trusted, and looked to CSL Therapy as the pioneers and leaders for standards of care for the Body Altering Aesthetics industry.

There has been mention of surgeon correspondence that was in progress of being edited to reflect industry concerns shared in conversations during quarterly CSL Therapy Surgeon Bureau meetings as it pertained to a particular postOp provider. CSL Therapy acknowledges that this erroneous and unprofessionally submitted item to a government agency as part of an investigation has undoubtedly stirred up emotions for all parties involved; for which the organization sincerely apologizes. Upon being informed of the error, the letter was retracted from the submission.

**Though CSL Therapy acknowledges that this submission could appear to be a major deciding factor regarding the licensure of an uncertified postOp provider within another healthcare field, it is important that we make it unequivocally clear that the**

**aforementioned correspondence played no bearing on any decision by any government agency to summarily suspend or revoke any licensure of any postOp care provider.** Any time a healthcare/medical board makes a decision to suspend or revoke any of its licensees, it is done so with due diligence. In this particular circumstance, the uncertified post operative care provider was **SUMMARILY SUSPENDED** from practicing as a registered nurse based on (among other things) evidence directly from the provider's own business' social media presence, where the business willingly and knowingly shared unsafe, unsanitary, & dangerous practices such as reopening incisions with unsterile tools; including but not limited to Q-tip swabs.

CSL Therapy founder Tai Brown honorably employs the term "LMT" as "Latent Massage Therapist" to dignify her retirement from the field of Massage Therapy, in which she was licensed for over a decade. During her tenure, she traveled the world learning and certifying in modalities and techniques that have greatly contributed to the development of this community. Any time she has announced her professional expertise, it is prefaced by stating that she is a retired Massage Therapist. For those that have been under her tutelage, followed her social media platforms, or directly engaged with Mrs. Brown, her separation from the field of massage to focus on the growth of the Body Altering Aesthetics industry, has always been clearly expressed. The government agency was informed and made aware of this during the original investigation; it is also written in the Respondent's summary suspension.

CSL Therapy received its first accreditation from the American Council of Body Altering Aesthetics. The American Council of Body Altering Aesthetics, commonly known as ACBAA, was established in 2020 to accredit and pre-accredit healthcare programs, including Body Altering Aesthetics, medical assistants, phlebotomy, and certified nursing assistant programs to name a few. In setting and enforcing quality benchmarks, ACBAA ensures these programs provide professional students with the education and credentials needed to serve their communities. **ACBAA is not a federal agency**; they are a private organization that abides by federal accrediting laws as laid out by the United States Department of Education. As per the Council for Higher Education Accreditation, accreditation in the United States is carried out by private nonprofit organizations, such as ACBAA, which was designed for this purpose. Specialized accredited organizations also operate throughout the country and review programs and some single purpose institutions. Every five (5) years, the U.S. Department of Education reviews accreditation applications for compliance with educational standards. Now in its fifth year, ACBAA is submitting its application, reaffirming its commitment to maintaining excellence in healthcare education.

ACBAA's accreditation process includes self-study, on-site evaluations, and continuous monitoring to ensure institutions uphold these standards. This oversight protects students from fraudulent programs that could compromise their financial and professional futures. Each year,

CSL Therapy works to extend its professional affiliates to further define its credibility, seeking additional accrediting affiliations and memberships.

**Professional licenses are only issued by government agencies.** CSL Therapy does not issue any professional licenses. However, CSL Therapy does provide private, internal organization licenses to our educational partners through our Advanced Scholastic Training (AST) program. All courses submitted through the AST program come with an NDA thus the course solely remains the intellectual property of the original proprietor. As it goes through a peer review for efficacy, each course is validated by contracted third-party specialists in the respective course submission fields.

It has never been the intention or the goal of CSL Therapy for any healthcare provider to lose or have their professional licensure suspended. Rather, our mission is to educate, collaborate, support, and uplift the ethical professionals who service the patients in the Body Altering Aesthetics industry.

### **Section 3: CSL Therapy Organization Objectives**

CSL Therapy was founded on the principle of bridging critical gaps within the post-surgical and non-surgical medical landscape, specifically within the rapidly evolving Body Altering Aesthetics industry. We recognize the unique challenges faced by both practitioners and clients in this underserved field, where medical gaps and instances of negligence are absorbed by clients— often leaving individuals vulnerable. Our dedication lies in developing comprehensive solutions that prioritize client safety and well-being, while simultaneously fostering a supportive community for professional growth and education.

Our intent is to continue driving positive change through education, innovation, and advocacy. CSL Therapy remains committed to empowering clients and raising industry standards, tirelessly working to ensure that this niche industry provides safe, effective, and ethical care. We aim to cultivate a thriving community of knowledgeable professionals, actively addressing the challenges of this emerging industry and empowering clients to navigate the medical landscape with confidence.

In our unwavering commitment to ensuring the highest standards of care and healthcare safety within the industry, CSL Therapy will continue to report observed infractions that compromise public safety to the appropriate regulatory bodies and relevant stakeholders for thorough review.