



April 17, 2015

Jeri Warhaftig
Deputy Attorney General
P.O. Box 45029
Newark, NJ 07101

Dear Deputy Attorney General Warhaftig:

Am writing to express concern that Vikram Kaji, MD, has apparently taken over ownership of Steven Chase Brigham's New Jersey abortion clinics following Brigham's medical license revocation.

As part of my job as Senior Policy Advisor for Operation Rescue, I have extensively researched and studied Brigham's history of shoddy medical and business practices as well as his penchant for deceptive behavior. In addition, I have collected documentation of Kaji's misadventures that support my concerns that he is unfit to assume ownership of Brigham's abortion facilities.

Based on the information below, I am asking that the ownership transfer to Kaji, if it occurred, not be accepted and that a closure order be issued for all Brigham's New Jersey abortion businesses.

Evidence of Ownership Transaction

First, I am concerned that I can find no evidence that an ownership transaction actually took place between Brigham and Kaji.

A search of the New Jersey Division of Revenue Business Entity Search yielded multiple companies in which Brigham is listed as the principal party, many of which are recognizable as some of his abortion clinic aliases.

However, a Business Entity Search under Vikram Kaji's name yielded only one entry: The Kaji Family Charitable Trust, established in 1977. If Kaji truly now owns Brigham's eight New Jersey abortion businesses, why is there no business record? ([Exhibit 1](#))

Pattern of Concealing Ownership

Brigham has a documented history of attempting to conceal his ownership of abortion clinics.

For example, Brigham had been ordered by the State of Pennsylvania in July 2010, not to have any ownership or affiliation with any abortion business in that state after authorities determined that his abortion operations were too dangerous to continue. ([Exhibit 2](#)) Instead, he opened an abortion business named Integrity Family Health in Philadelphia, Pennsylvania, in 2013. Eventually, the Pennsylvania Department of Health ordered that abortion facility to close in November 2013, citing Brigham's illegal, surreptitious connection. ([Exhibit 3](#))

Use of “Front Man” for Illegal Abortion Operations

There is reason to believe that Kaji is being used as a “front man” to conceal Brigham’s continued control over his abortion businesses.

As you are well aware, in the deceptive scheme that ultimately cost Brigham his New Jersey medical license, Brigham started late-term abortions at his office in Voorhees, New Jersey where it was only legal for him to do abortions in New Jersey up to 14 weeks. Later, he would transport the women to a clandestine facility in Elkton, Maryland, where the abortions would be completed.

Brigham had no medical license in Maryland, so he employed octogenarian George Shepard, Jr. as the facility’s “medical director” to give his clinic the appearance of legitimacy, even attributing abortion procedures to Shepard. But Shepard was elderly and had a disabled arm. He was incapable of conducting abortions. A transcript of an interview with Shepard conducted by the Maryland Board of Physicians indicated that Shepard was unaware that Brigham had used him as a pawn to conceal the illegitimacy of Brigham’s Maryland abortion practice. Shepard thought he was employed to check the refrigerator temperatures and “make sure everything was done right.” ([Exhibit 4](#))

Now it is possible that Vikram Kaji may be Brigham’s next pawn in a scheme to maintain secret control of his New Jersey abortion clinics, should the appeal of his revocation ever succeed.

Kaji’s Improper Sexual Conduct and Drug Violations

There is also concern that Kaji is unfit to operate an abortion business.

Kaji was convicted by the New Jersey Board of Medical Examiners in 1993 for having improper sexual contact with three patients. After a lengthy relationship that involved improper sexual conduct, Kaji reportedly had sex without a condom with one young girl in the birthing center of his office during business hours. He knew his victim was vulnerable to his advances because she had been a depressed victim of child sex abuse with a history of psychiatric hospitalization. He later misperscribed drugs for her including Seconal and steroids. Kaji at first fought the charges, saying the sex was consensual, but later admitted that he had made an error in moral judgment. ([Exhibit 5](#))

Kaji was also accused of giving improper breast and rectal exams to two other women. New Jersey placed Kaji on a 1-year suspension and fined him \$5,000 and ordered him to undergo psychological counseling. The Federal Drug Enforcement Agency ordered Kaji’s license to prescribe controlled substances revoked in 1994. Also that year, Pennsylvania suspended Kaji for 36 months after learning of the New Jersey action.

The New York Medical Board was less forgiving. It revoked Kaji’s medical license for “sexual misconduct and drug abuse” in 1995, and banned him from practicing in that state. ([Exhibit 6](#))

Forced Abortion

Kaji also participated in at least one documented case of forced abortion.

In 2005, Marcia Carroll, the mother of one of Kaji’s underage patients, testified before the United States House of Representatives (see p. 17) regarding her daughter’s February, 2005, experience at Kaji’s New Jersey clinic.

Carroll state that her daughter was “coerced, harassed and threatened” into having an abortion across state lines, in direct violation of parental consent laws, and the clinic staff never breathed a word about Kaji’s long history of sexual abuse.” ([Exhibit 7](#))

Physical Impairment?

In May 2013, the New Jersey Board of State Medical Examiners filed an Interim Consent Order against Kaji. The order reveals that inspections of several of Brigham’s abortion facilities revealed deficiencies and Board violations. The Board found that Kaji had “failed to adequately fulfill his responsibilities as Medical Director.” ([Exhibit 8](#))

Furthermore, it was noted that Kaji had recently suffered a stroke that impaired his memory and the vision in his right eye, raising questions about his ability to continue practicing.

Kaji’s possible physical impairment poses the question of his fitness to practice and oversee a busy chain of abortion businesses.

Prayer for Action

In all, Kaji’s history is disturbing at best. It is a mystery to me why he is still allowed to practice medicine in New Jersey, much less take over ownership of Brigham’s shoddy chain of abortion businesses.

I reiterate my request that you disallow the alleged transfer of ownership of Brigham’s New Jersey abortion businesses to Kaji. I further request that Brigham’s abortion facilities be ordered closed in order to comply with New Jersey law and for the sake of public protection.

Sincerely,

/s/

Cheryl Sullenger
Senior Policy Advisor
Operation Rescue

Enclosures