BEFORE THE BOARD OF NATUROPATHIC MEDICINE STATE OF OREGON

In the Matter of Dr. Jeri Otterstrom, ND, Licensee. Case Nos. 23-03-07 21-12-50 22-02-05

CONSENT ORDER AND SETTLEMENT AGREEMENT

1.

The Board of Naturopathic Medicine (Board) is the state agency responsible for licensing, regulating, and disciplining naturopathic physicians in the State of Oregon, pursuant to Oregon Revised Statutes (ORS) chapter 685 and Oregon Administrative Rules (OAR) Chapter 850. Dr. Jeri Otterstrom, ND (Licensee) is a licensed naturopathic physician in Oregon and subject to the jurisdiction of the Board.

2.

The parties wish to resolve this matter informally, without any hearing, appeal, or judicial review, by entering this Settlement Agreement and Consent Order, pursuant to ORS 183.417(3) on the terms set forth below. The Board finds, the Licensee denies but stipulates to, the facts and violations in the Amended Consolidated Notice of Proposed Disciplinary Action dated August 28, 2023, and incorporated herein.

3.

SETTLEMENT AGREEMENT

The Board finds violations referenced in the Amended Consolidated Notice of the Proposed Disciplinary Action and this Settlement Agreement and Consent Order. Licensee

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agrees that the Board may enter the Consent Order set forth below, including the following terms and conditions:

- A. Probation 24 months, during which Licensee must comply with the conditions listed below in B, C and D.
- B. Civil Penalty \$10,000 imposed.
 - a. \$2,500 paid per payment plan of \$115 a month. First payment due 30 days from the date of licensee signature on this Consent / Settlement agreement. Licensee shall make a \$115 payment to the Board on / by the first of every month thereafter. If licensee fails to make a payment as required on the first day of the month, this will be considered a violation of probation and the Board may find the Licensee in violation and impose further sanctions or penalties.
 - b. \$7,500 waived if Licensee complies with all probation conditions and not found in violation of any condition of probation; makes all monthly civil penalty payments by the first of each month per payment plan imposed, and not found in violation of any statute or rule and disciplined by the Board.
- C. Licensure Suspension Six (6) months licensure suspension. This suspension is stayed so long as Licensee complies with all probation conditions during the period of probation: Licensee; makes all monthly civil penalty payments by the first of each month per payment plan imposed, and Licensee is not found in violation of any statute or rule and disciplined by the Board. If at the end of the probation period, Licensee complies with these conditions, the suspension will be waived.
- D. Licensee shall comply with the statutes, rules and orders of the Board.
- E. Licensee's failure to comply with any term of this order, ORS Chapter 685 or OAR
 Chapter 850 shall be grounds for additional discipline by the Board.
- F. Licensee enters into this Settlement Agreement and Consent Order voluntarily and without any force or duress. Licensee states that the Board and Board staff have not made

promises or representations not stated herein to induce her to sign this document and agree to issuance of the Order.

- G. Licensee acknowledges that she had the opportunity to seek the advice of legal counsel.Licensee further acknowledges that she understands and agrees to the terms of this Order.
- H. Licensee understands she has the right to a contested case hearing under the Administrative Procedures Act (ORS Chapter 183) and fully and finally waives any and all right to a hearing and any rights to appeal or otherwise challenge this Settlement Agreement and Consent Order.
- I. The parties acknowledge that this Settlement Agreement and Consent Order is a public document.
- J. This Settlement Agreement and Consent Order shall take effect on the date it is signed by the Board.

IT IS SO STIPULATED.

CONSENT ORDER

The Board issues the following order:

A. Probation -24 months

B. Civil Penalty - \$10,000 imposed.

i. \$2,500 paid per payment plan of \$115 a month.

a. First payment due 30 days from the date of licensee signature on this Consent Order and Settlement agreement.

CONSENT ORDER AND SETTLEMENT AGREEMENT

b. Licensee shall make a \$115 payment to the Board on / by the first day of every month thereafter.

c. If licensee fails to make a payment as required on the first day of the month, the Board may find the Licensee in violation of this probation and impose further sanctions or penalties.

ii. \$7,500 waived if Licensee complies with:

a. All probation conditions and not found in violation of any condition of probation.

b. Makes all monthly civil penalty payments per payment plan imposedc. Licensee is not found in violation of any statute or rule and disciplined by the Board.

C. Licensure Suspension – Six (6) month licensure suspension; stay of imposition and waived if;

i. Licensee complies with all probation conditions and not found in violation of any condition of probation:

ii. Licensee Makes all monthly civil penalty payments per payment plan imposed; and

iii. Licensee is not found in violation of any statute or rule and disciplined by the Board.

DATED this 27 day of December , 2023.

BOARD OF NATUROPATHIC MEDICINE - State of Oregon

MBBostotz

Mary-Beth Baptista, Executive Director

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