

BEFORE THE
BOARD OF NATUROPATHIC MEDICINE
STATE OF OREGON

In the Matter of the License of:
Dr. Maeghan Cook, ND
Licensee.

Case No. 23-04-15

**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. Maeghan Cook (Licensee) has been a licensed naturopathic physician in the State of Oregon since August 2015 and is 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, but Licensee denies to the following:

3.

The Sphincter of Oddi is within the abdominal cavity and is part of the visceral organ system. The Sphincter of Oddi is the muscular valve surrounding the exit of the bile duct and pancreatic duct into the duodenum, which opens and closes to allow bile and pancreatic juice to flow between the pancreas and the small intestine.

4.

Trigger points are discrete, focal, hyperirritable spots located in a taut band of skeletal muscle. They produce pain locally and in a referred pattern and often accompany chronic musculoskeletal disorders. Acute trauma or repetitive microtrauma may lead to the development of stress on muscle fibers and the formation of trigger points. Palpation of a hypersensitive bundle or nodule of muscle fiber of harder than normal consistency is the physical finding typically associated with a trigger point.

5.

Perineural injection therapy, also known as neural prolotherapy (NPT or “Prolo”), is a neuropathic pain treatment option for patients suffering from nerve-related pain. A trigger point injection (TPI) can help soothe myofascial pain, especially in the neck, shoulder, arms, legs and lower back. “Myo” means muscle and “fascial” means fascia. Your fascia is the thin, white connective tissue that’s wrapped around every muscle. NPT uses dextrose or mannitol injections to resolve pain and promote regrowth in damaged nerves and tissues.

6.

Licensee established care with Patient in September 2021. On / about March 27, 2023, Licensee diagnosed Patient with dysfunction of Sphincter of Oddi. Licensee told Board Investigator she performed perform trigger point and perineural injections on Patient's abdominal muscles directly over the Sphincter of Odi on April 11, 2023, and May 16, 2023. Licensee said she performed TPI and NPT injections to treat the somatic muscular pain in the pain in the abdominal muscles and facia. Somatic pain occurs when pain receptors in tissues (like the skin, muscles, and joints) are activated. Visceral pain occurs when pain receptors in the pelvis, abdomen, chest, or intestines are activated. Licensee said when she performs trigger point injections, she palpates the muscle to find the trigger point (knot) and doesn't go any deeper than the knot.

7.

Patient chart notes for treatment on April 11, 2023, state Licensee performed "2CC procaine injected around sphincter of oddi. 10cc total, administered in 0.5cc injections along interior costal margin and ring of fire pattern, around previous surgical site scar, sphincter of oddi, and 11th intercostal muscles."

8.

Patient chart notes for treatment on May 16, 2023, state Licensee administered, ".5ml inj. along R rotator cuff, paraspinal, and throughout cervical and thoracic regions. TPI into QL bilat and sphincter of Oddi followed intercostal, superficial nerves of T9-12" Licensee also noted in Patient's chart "2. Dysfunction of sphincter of Oddi-Patient reports continued abdominal pain and bloating... Bodywork is performed and tolerated well. PIT injections given and tolerated well."

9.

Trigger point injections are used to treat muscle pain, specifically myofascial pain syndrome. Trigger point injections are performed in discrete, focal, hyperirritable spots located in a taut band of skeletal muscle, to treat musculoskeletal disorders, by injecting medicine (usually local anesthetics like lidocaine) directly into the trigger point to relieve pain and improve range of motion. The Sphincter of Oddi is not a skeletal muscle, it is in the abdominal cavity and is part of the visceral organ system. Trigger points are only found in muscle, trigger points are not found in the Sphincter of Oddi.

10.

Licensee performing "2CC procaine injected around sphincter of oddi. 10cc total, administered in 0.5cc injections along interior costal margin and ring of fire pattern, around previous surgical site scar, sphincter of oddi, and 11th intercostal muscles," constitutes a violation of 850-050-0010(1)(c)(B) Negligent Treatment.

11.

On May 16, 2023, Licensee administering, ".5ml inj. along R rotator cuff, paraspinal, and throughout cervical and thoracic regions. TPI into QL bilat and sphincter of Oddi followed intercostal, superficial nerves of T9-12" Licensee also noted in Patient's chart "2. Dysfunction of sphincter of Oddi-Patient reports continued abdominal pain and bloating... Bodywork is

performed and tolerated well. PIT injections given and tolerated well” constitutes a violation of 850-050-0010(1)(c)(B) Negligent Treatment.

12.

SETTLEMENT AGREEMENT

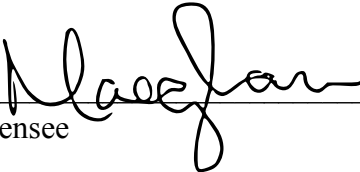
The Board finds, and the Licensee denies the findings of facts and conclusions of law regarding the violations referenced in this settlement agreement and consent order. Licensee stipulates the Board may enter the Consent Order set forth below, including the following terms and conditions:

- A. Probation: 18 months
- B. Civil Penalty: \$3,000 – paid in full prior to signature on final Order.
- C. Continuing Education: Ten (10) hours of Board approved education as follows:
 - a. Five (5) hours in-person / hands on soft tissue, intramuscular (non-joint) injection education, previously submitted to the Board and accepted for compliance with this term.
 - b. Five (5) hours CE related to prolotherapy previously submitted to the Board and accepted for compliance with this term.
- D. Licensee may perform Trigger Point and Perineural Injection Therapy based on compliance with 12 C.
- E. Licensee may perform subcutaneous, intramuscular, intravenous injections and IV therapy, of injectable grade injectate. For injections beyond subcutaneous, intramuscular, intravenous injections and IV therapy, of an injectable grade injectate. Licensee must complete all education required in 850-040-0240.
- F. Licensee shall comply with the statutes, rules and orders of the Board.
- G. 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.
- H. 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.
- I. 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.
- J. Licensee understands that she has the right to a contested case hearing under the Administrative Procedures Act (ORS Chapter 183), and fully and finally waives all right to a hearing and any rights to appeal or otherwise challenge this Settlement Agreement and Consent Order.

K. The parties acknowledge that this Settlement Agreement and Consent Order is a public document.

L. This Settlement Agreement and Consent Order shall take effect on the date it is signed by the Board.

IT IS SO STIPULATED.



Licensee

3-31-25

Date

CONSENT ORDER

The Board issues the following order:

- A. Probation: 18 months
- B. Civil Penalty: \$3,000 – paid in full prior to signature on final Order.
- C. Continuing Education: Ten (10) hours of Board approved education as follows:
 - a. Five (5) hours in-person / hands on soft tissue, intramuscular (non-joint) injection education, previously submitted to the Board and accepted for compliance with this term.
 - b. Five (5) hours CE related to prolotherapy previously submitted to the Board and accepted for compliance with this term.
- D. Licensee may perform Trigger Point and Perineural Injection Therapy based on compliance with 12 C.
- E. Licensee may perform subcutaneous, intramuscular, intravenous injections and IV therapy, of injectable grade injectate. For injections beyond subcutaneous, intramuscular, intravenous injections and IV therapy, of an injectable grade injectate. Licensee must complete all education required in 850-040-0240.

DATED this 4 day of April 2025.

BOARD OF NATUROPATHIC MEDICINE - State of Oregon



Mary-Beth Baptista, JD, Executive Director