



STATE OF OREGON
PUBLIC HEALTH DIVISION
OREGON PSILOCYBIN SERVICES SECTION OREGON
HEALTH AUTHORITY

IN THE MATTER OF:

InnerTrek Services Inc.
Thomas Eckert, President

Respondent.

**DEFAULT FINAL ORDER IMPOSING A
CIVIL PENALTY**

The Oregon Health Authority, Oregon Psilocybin Services Section (OHA or OPS) is charged with the jurisdiction, supervision, duties, functions and powers over the production, processing, transportation, delivery, sale, and purchase of psilocybin products and the provision of psilocybin services in the state. ORS 475A.235. OHA's authority includes issuing, renewing, suspending, revoking, imposing civil penalties, or refusing to issue licenses for the sale and provision of psilocybin services, including psilocybin facilitators. ORS Chapter 475A; OAR Chapter 333, Division 333.

OHA issued a Notice of Violation and Intent to Impose Civil Penalty (Notice) on June 9, 2025, to Respondent, proposing to impose a civil penalty of \$3,000. The Notice offered Respondent an opportunity for hearing if requested within 20 days of mailing of the Notice. The Notice designated the relevant portions of OHA's file on this matter, including all materials submitted by Respondent, as the record for purposes of default. Respondent did not request a hearing.

NOW, THEREFORE, after considering the relevant portions of OHA's file relating to this matter, OHA enters the following Order.

FINDINGS OF FACT

1. OPS issued InnerTrek Services Inc. (Respondent) a psilocybin service center license effective October 6, 2023, and the license has been active during the conduct alleged in the Notice.
2. Thomas Eckert, President of InnerTrek Services, is a licensee representative of Respondent and a licensed facilitator.
3. Respondent's service center premises is located at 11 NE Martin Luther King Blvd, Suite 601, Portland OR 97232 (Respondent's premises).
4. On May 18, 2024, Thomas Eckert and Rachel Aiden co-facilitated a group administration session at Respondent's premises. During the group session, both facilitators left the administration area for more than five minutes and no other facilitators were present to monitor clients participating in the administration session. Lack of continuous presence or monitoring by a facilitator during an administration session creates an increased risk to public health and safety as a facilitator is not there to identify and address potentially dangerous situations that may arise during an administration session.
5. At least one client who participated in the May 18, 2024, group administration session completed a written Client Consent to Receive Secondary Dose of Psilocybin Product, using an electronic version of the form posted on the Authority's website at the time of the session. The form requires a "Description of Secondary Dose (quantity and product type)." At least one of the forms completed for clients who participated in the May 18, 2024, group administration session describes the secondary dose as "TBD" and did not identify the product quantity or type.
6. OPS's investigation additionally found Respondent's standard practice, from at least November 22, 2024, to March 13, 2025, was to obtain client consent to receive a secondary dose prior to their administration session and to collect payment for all products after the administration session concluded, according to the total dose consumed. Respondent's standard practice did not require clients to pay for psilocybin products before an administration session begins. Respondent's standard practice during this time did not require clients who consented to the option for a second dose did not take possession of the secondary dose before the administration session began. During this time, Respondent's standard practice did not require that secondary doses be stored in a designated secured area outside of a limited access area and did not require clients to retrieve secondary doses themselves.

CONCLUSIONS OF LAW

A licensee is responsible for the violation of any rules in OAR Chapter 333, Division 333 and any provision of ORS 475A.210 to 475A.722.

Violation One

On May 18, 2024, a facilitator was not always present during an administration session and clients were not continuously monitored by facilitators when co-facilitators Thomas Eckert and Rachel Aiden left the client administration area for longer than five minutes during the administration session and did not maintain visual and audio contact with clients during that time. A facilitator must always be present during an administration session and continuously monitor any client participating in the session. Continuous monitoring means that a facilitator must maintain visual and audio contact with clients. Respondent committed a violation of OAR 333-333-5200(3) when co-facilitators Thomas Eckert and Rachel Aiden failed to be present and continuously monitor clients during an administration session on May 18, 2024.

This is a Category III violation, as it is a violation that creates an increased risk to public health or safety. OAR 333-333-6200(3). This is Respondent's first violation of OAR 333-333-5200(3). Under OAR 333-333-6200, Exhibit 1, a licensee's first category III violation in a two-year period warrants a civil penalty of \$2,500.

Violation Two

Respondent did not receive written consent to receive a secondary dose in the form and manner prescribed by the Authority for at least one client who participated in the May 18, 2024, group administration session and who wanted the option to consume a secondary dose. Written consent must be completed according to the form provided by the Authority which requires that the form describe the quantity and product type. At least one of the forms completed for clients who participated in the May 18, 2024, group administration session describes the secondary dose as "TBD" and does not describe the quantity and product type. This is a violation of OAR 333-333-5240(3)(a).

From at least November 22, 2024, to March 13, 2025, Respondent did not require clients to purchase and take possession of secondary doses before the administration session begins. This is a violation of OAR 333-333-5240(3)(b).

From at least November 22, 2024, to March 13, 2025, Respondent did not require that secondary doses be stored in a designated secured area outside of a limited access area nor require clients to retrieve secondary doses from the designated secured area, if they chose to consume a secondary dose. This is a violation of OAR 333-333-5240(3)(c) and (d).

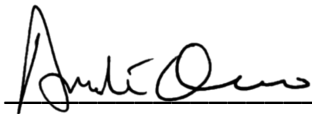
OHA proposed a single civil penalty for violation of OAR 333-333-5240(3)(a), (b), (c), and (d). This is a Category IV violation, as it is a violation that is technical in nature. OAR 333-333-6200(3). This is Respondent's first Category IV violation. Under OAR 333-333-6200, Exhibit 1, a licensee's first category IV violation in a two-year period warrants a civil penalty of \$500.

ORDER

NOW THEREFORE, OHA find that Respondent committed one Category III violation of OAR 333-333-5200(3) and one Category IV violation of OAR 333-333-5240(3)(a), (b), (c), and (d) and imposes a total civil penalty of \$3,000 against Respondent for this violation. ORS 475A.513; OAR 333-333-6200.

IT IS SO ORDERED.

Dated this 22nd day of July 2025_____.



Andre Ourso

Administrator, Center for Health Protection
Oregon Health Authority
Public Health Division

Appeal Rights: You have the right to appeal this Order to the Oregon Court of Appeals pursuant to ORS 183.482. To appeal you must file a petition for judicial review with the Court of Appeals within 60 days from the day this Order was served on you. If this Order was personally delivered to you, the date of service is the day you received the Order. If this Order was mailed to you, the date of service is the day it was mailed not the day you received it. If you do not file a petition for judicial review within the 60-day time period, you will lose your right to appeal.

PAYMENT

The civil penalty may be paid via the online Training Licensing and Compliance program (TLC). If not paid online, payments may be made as follows:

Money orders and checks are payable to Oregon Psilocybin Services.

You may mail a money order or check, to the following address:

Oregon Health Authority - Public Health Division
Fiscal Services
RE: OPS
PO Box 14260
Portland, OR 97293-0260

In-person payment with a money order or check:

To make an in-person fee payment with a money order or check, proceed to Cashier's Office on the second floor of the Portland State Office Building at:

800 NE Oregon St, Suite 200
Portland, OR 97232
Hours: 9am to 4pm, Monday to Friday

NOTICE

A civil penalty becomes due and payable 10 days after the order imposing the civil penalty becomes final by operation of law or on appeal. If unpaid, civil penalties may be recorded and filed with the county clerks as liens against property 10 days after the expiration of the statutory appeals period. Pursuant to ORS 293.231, OHA is required to assign liquidated and delinquent civil penalties to the Department of Revenue, as provided in ORS 293.250, not later than 90 days after the civil penalty becomes due and payable. Reasonable administrative costs, collection costs, attorney's fees, and all other costs and charges necessary for the collection of any amount not paid when due, including but not limited to collection charges assessed by the Department of Revenue may be added to the total civil penalty amount.