
BEFORE THE MISSISSIPPI STATE BOARD OF MEDICAL LICENSURE

IN THE MATTER OF THE PHYSICIAN'S LICENSE OF:

RICHARD EUGENE COOK., M.D.

LICENSE NO. 31126

DETERMINATION AND ORDER

The above titled matter came before the Mississippi State Board of Medical Licensure ("Board") in Jackson, Hinds County Mississippi, on May 22, 2025. On or about July 14, 2024, the Board's investigative staff reviewed a social media post that promoted a mobile hydration event on the Gulf Coast operating under the name of Moore Health and Wellness and initiated a complaint against Licensee thereafter.

Board members present for the May 22, 2025, proceedings were: Michelle Y. Owens, M.D., President; Ken Lippincott, M.D.; Kirk Kinard, D.O.; Roderick Givens, M.D., and Allen Gersh, M.D. Board member Randy Roth, M.D. appeared remotely. Consumer member Koomarie "Shoba" Gaymes was also present. Accordingly, a quorum of Board members was present throughout the hearing and deliberation.

Board Counsel Paul Barnes, Esq., presented the charges as set forth in the Affidavit as filed herein. Licensee, having been served with the Summons and Affidavit and being fully informed of his rights to a formal hearing before the Board, appeared before the Board and was represented by Douglas G. Mercier, Esq.

Pamela S. Ratliff, Special Assistant Attorney General, served as Administrative Hearing Officer, presided over the hearing, and was directed to prepare the Board's written decision in accordance with their deliberations.

The parties stipulated to exhibits and the following exhibits were introduced without objection: Board Composite Exhibit -1 (MSBML 000001-000631); Respondent Composite Exhibit – 1 (DR. COOK 001-188); and Respondent Exhibit - 1A (18 - page Medical Director Agreement). Patient records contained in the exhibits were admitted under seal.

And now, upon consideration of all the materials produced in the record before the Board along with the testimony presented at the hearing, the Board makes the following Findings of Fact, Conclusions of Law, and Order based on clear and convincing evidence:

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. The Board is established pursuant to the Mississippi State Board of Medical Licensure Act, Title 73, Chapter 43 of the Mississippi Code of 1972 as amended, and is charged with the duty of licensing and regulating the practice of medicine in the State of Mississippi under title 73, Chapter 25 of the Mississippi Code of 1972 as amended.
2. Sections 73-25-29, 73-25-83 and 73-25-87 of the Mississippi Code Ann. (1972) as amended provide that the Board may revoke or suspend a license or take any other actions as deemed necessary if a licensee has violated any provisions therein.
3. All parties were properly noticed for the matter now pending before the Board.
4. Licensee is a physician licensed to practice medicine in the state of Mississippi, currently holding Compact License Number 31126. Said license is valid until June 30, 2025.
5. At the time the affidavit was issued, Licensee reported his primary medical practice at 3450 Old Washington Road, Suite 103, Waldorf, Maryland.
6. Licensee testified he was hired “as a 1099 employee” of We Treat in February 2024.
7. Licensee testified he was hired by We Treat to be the Medical Director for Moore Health and Wellness to establish IV protocols for the IV hydration clinic.
8. Licensee testified developing IV infusion protocols was “extremely easy” as IV hydration involves amino acids and vitamins, which he claimed are extremely safe and are the “same as you can get at Safeway.”
9. Licensee agreed adding two or more medications to an IV solution is compounding.
10. Licensee testified his role at Moore Health and Wellness / We Treat was “mostly administrative” and that a minute part of his role was clinical. According to Licensee, “my role was ninety plus percent non-clinical.”
11. Licensee testified he initially talked with the clinic RN several times when first setting up the facility protocols. He testified he told the nurse [RN in the clinic] that “he would also be on call for her in case anything ever happened outside of the nurse practitioner that was already working with her company.”

12. Licensee testified the nurse practitioner for the IV Hydration clinic was not physically present in the clinic and evaluated patients via asynchronous or synchronous telemedicine.
13. Licensee testified he did not have a collaborative agreement with the nurse practitioner for the clinic. Licensee testified that his role did not have anything to do with collaboration and it was not his job to make sure the nurse practitioner for the clinic had a collaborative physician agreement in place.
14. Licensee testified when he found out the nurse practitioner for the IV hydration clinic had listed him as her collaborative physician, he immediately contacted the Mississippi Board of Nursing, advised the Board of Nursing that he was not the nurse's collaborative physician, and filed a complaint with the Mississippi Board of Nursing. Licensee testified when he informed We Treat of the matter and that he had reported the nurse practitioner to the Board of Nursing, he was told that he should have contacted We Treat first. Licensee advised no longer works for We Treat.
15. Licensee testified as Medical Director for the IV hydration clinic he was responsible for approving protocols. During the hearing, Licensee reviewed the "Infusion Standing Order Set(s)" and confirmed the forms contained his signature, printed name, and date of June 14, 2024 (MSBML 000050-000059). Licensee testified regarding the name of the IV infusion mixtures and name of the IV Drip(s), (i.e., "Muscle Repair", "Enhancement Drip/Myer's Cocktail", "Cold and Flu/Immunity", "Energy", and "Beauty Drip") and the infusion mixture listed for each. Licensee denied the "Infusion Standing Order Sets" were to be used as a standing order by the facility. Rather, Licensee explained the order sets were to ensure the fluids were on hand in the clinic when the patient was seen. Licensee was unable to explain why his signature and the date June 14, 2024 were on the "blank" "Infusion Standing Order Sets".
16. Licensee repeatedly testified that IV hydration is safe and carries a very low risk of harm. Licensee testified that the IV hydration clinic protocol is for an IV bolus of 250cc to 500cc. Of note, however, each "Infusion Standing Order Set" bearing Licensee's signature and date of June 14, 2024, list the amount of IV fluid to be administered as "1 Liter". (MSBML 000050-000059).
17. Licensee testified some potential dangers of IV fluids given too fast include allergic reaction or fluid overload if the patient has kidney, lung or heart issues.
18. Licensee testified that he did not review clinic patient records other than the patient records he produced to the Board in response to the Board's request. Again, Licensee explained his role was that of medical director. In response to the question what oversight he provided to the IV hydration clinic in

Mississippi, Licensee defined his oversight as, “mostly administrative” to ensure safe protocol.

19. Licensee confirmed he authorized Empower to use his name and prescriptive authority to order supplies and have supplies sent to Moore Health and Wellness.
20. Licensee testified he reviewed the applicable rules and regulations governing IV hydration in Mississippi and “without a doubt” believed that what he was doing complied with the applicable laws and rules and regulations in Mississippi.
21. Licensee testified he does not currently serve as medical director for any facilities in Mississippi. He serves as medical director for “about a dozen” facilities nationally.
22. Licensee testified he has active medical license in 43 or 44 states, including the District of Columbia.
23. Licensee confirmed his signature on the notice of location change (MSMBL 000228) which stated:

“I Richard Cook, M.D. am the medical director for Moore Health & Wellness. Moore Health & Wellness has moved from Suite B 2501 4th St Meridian, MS 39503. I treat patients here. Signed by Medical Director: Richard E. Cook, M.D. 5/31/24.”

Licensee was unsure if the notice was posted online.

24. Documents introduced at hearing included a copy of Moore Health Policies and Procedure manual (MSBML 000016 – 00049) which provided in part:

- POLICIES AND PROCEDURES- STANDING ORDERS

Patient requirements

IV infusions are to be administered to patients/clients **over the age of 18**, unless prior approval from MD Dr. Richard Cook is documented. The infusion should be given as orders dictate. All clients must be determined to be **clinically eligible** to receive IV Hydration following an evaluation by clinical staff.

If there is a question regarding eligibility, the **MD should be consulted prior** to administering IV Hydration.

Borderline high blood pressure- Cannot give 1000ml NS with SBP > 150 or DBP > 92 without MD order and the client must sign borderline high blood pressure lability [sic] waiver.”
(MSBML 000017).

- Plan of care

Appropriate IV infusion and plan of care should be agreed upon by both client and clinical staff. Benefits of each drip should be discussed as well as risks. Any questions or discrepancies in plan of care should be directed to the medical director.

Upon agreement, the registered nurse is to mix the selected IV infusion according to standing order formulation and **label the mixed IV bag accurately**. Appropriate boosters selected should be drawn up according to **boost guidelines** associated with ordered formulation.

Pre-Infusion Assessment and Vital Signs

Perform pre-infusion physical assessment and vital signs as necessary, according to professional standards and guidelines set forth by licensed staff. Document any required assessment details including vital signs accurately in patient medical record as agreed upon by licensed staff and medical director. Consult with medical director for any questionable findings in regards to patient assessment prior to, during, or after infusion.
(MSBML 000018).

- IV infusions will be administered according to the **standing orders** in place by the provider, and a signed copy of those orders will be kept on file (on grounds or electronically).

Orders will be **reviewed annually** by the provider to ensure continued accuracy. Annual competencies will be completed to ensure clinical competencies of staff.
(MSMBL 000020).

DETERMINATIONS

25. Based on the clear and convincing evidence and testimony presented, Licensee is found not guilty of Count I of the Affidavit, i.e., guilty of prescribing, administering, or dispensing any legend drug without a good faith prior examination and medical indication, in violation of Miss. Code Ann., Section 73-25-29(13).

26. Based on the clear and convincing evidence and testimony presented, Licensee is found guilty of Count II of the Affidavit, i.e., guilty of unprofessional misconduct, which includes being guilty of knowingly performing any act which in any way assists an unlicensed person to practice medicine, in violation Miss. Code Ann., Sections 73-25-29(8)(b) and 73-25-83(a).

27. Based on the clear and convincing evidence and testimony presented, Licensee is found guilty of Count III of the Affidavit, i.e., guilty of unprofessional conduct, which includes, but is not limited to, being guilty of any dishonorable or unethical conduct likely to deceive defraud or harm the public, in violation of Miss. Code Ann., Sections 73-25-29(8)(d) and 73-25-83(a).

Based upon the above Findings of Fact and Conclusions of Law, and clear and convincing evidence, the Board finds the following Order to be appropriate under the circumstances.

ORDER

IT IS THEREFORE ORDERED that Licensee complete a Continuing Medical Education ("CME") course in ethics approved by the Dr. Kenneth Cleveland on behalf of the MSBML within six (6) months of the date of the signature of this Order.

IT IS FURTHER ORDERED that Licensee shall reimburse the Board for all costs incurred in relation to the pending matter pursuant to Miss. Code Ann., Section 73-25-30, as amended. Licensee shall be advised of the total assessment, not to exceed \$10,000 by written notification, and shall tender to the Board a certified check or money order within forty (40) days after the date the assessment is mailed to Licensee's current mailing address.


IT IS FURTHER ORDERED that this decision and opinion is a final order of the Board and is conclusive evidence of the matters described herein.

IT IS FURTHER ORDERED that the Determination and Order shall be public record. It may be shared with other licensing boards (in and out of state), and the public, and may be reported to the appropriate entities as required or authorized by state and/or federal law or guidelines. This action shall be spread upon the Minutes of the Board as its official act and deed.

SO ORDERED this the 22nd day of May, 2025.

**MISSISSIPPI STATE BOARD OF
MEDICAL LICENSURE**

BY: _____


**MICHELLE Y. OWENS, M.D.,
PRESIDENT**