



OFFICE OF THE  
ATTORNEY GENERAL

ATTORNEY GENERAL OPINION  
2024-10A

Beth Kidd, Executive Director  
Oklahoma Board of Chiropractic Examiners  
421 N.W. 13<sup>th</sup> Street, Suite 180  
Oklahoma City, OK 73103

February 20, 2024

Re: White; Case No. 14-2022

Dear Executive Director Kidd:

This office has received your request for a written Attorney General Opinion regarding action that the Oklahoma Board of Chiropractic Examiners ("Board") intends to take in Case No. 14-2022.

The Oklahoma Chiropractic Practice Act ("Act") authorizes the Board to impose discipline on a chiropractic physician when the Board finds "by clear and convincing evidence" that the chiropractic physician has violated the Act or rules of the Board. 59 O.S.2021, 161.12(A)(12–13). Further the Board may also take action when a chiropractic physician performs a "major or minor surgery" or "administer[s] any drug" which is not "vitamins, minerals or nutritional supplements." 59 O.S.2021, 161.12(A)(5), (7). Such discipline may include "restriction of the practice of a chiropractic physician," an administrative fine, and "placement of a chiropractic physician on probation." 59 O.S.2021, 161.12 (A)(3–4), (6).

According to a Board complaint, the Respondent admitted to performing minor surgery utilizing a trocar to implant hormone pellets over the course of multiple years. Using a trocar to insert hormone pellets does not constitute an "injection" of vitamins, minerals, or supplements. The Board proposes to place the Respondent on probation for three years, assess a \$5,000 fine, require completion of an Ethics and Boundaries assessment examination, and suspend Respondent's injectable certification for one year. The Board may reasonably believe the proposed action is necessary to deter future violations

It is, therefore, the official opinion of the Attorney General that the Oklahoma Board of Chiropractic Examiners has adequate support for the conclusion that this action advances the State of Oklahoma's policy to protect public health, safety, and welfare.

A handwritten signature in blue ink, appearing to read "Rob Johnson", is written over the printed name.

ROB JOHNSON  
GENERAL COUNSEL