BEFORE THE BOARD OF CHIROPRACTIC EXAMINERS
STATE OF OKLAHOMA

IN THE MATTER OF THE COMPLAINT AGAINST	)	
REBECCA BURTON, D.C. **(License #3973)** 2803 W. University Blvd. Durant, OK 74701	)	Complaint No.: 013-2026
Respondent.	)	

CONSENT ORDER

COMES NOW, the Oklahoma State Board of Chiropractic Examiners (hereinafter the "Board") by and through its legal counsel, Assistant Attorney General Austin J. Bower, and Rebecca Burton, D.C. ("Respondent"), being represented by legal counsel, and hereby submit the following Consent Agreement, Stipulation of Facts, Conclusions of Law, and Order (collectively "Consent Order") to the Board and request the acceptance of same pursuant to 75 O.S. Section 309(E) et seq., 59 O.S. Section 161 *et seq.* and OAC 140: 1-1-1 *et seq.*

CONSENT AGREEMENT

Respondent understands and agrees that:

1. The Board has jurisdiction over the parties and subject matter of this action pursuant to 59 O.S. § 161.1 *et seq.* Respondent agrees to submit to the Board's jurisdiction and present this action to the members currently appointed.

2. This Consent Order is subject to the Board's approval and will be effective only when the Board accepts it. Should the Board, in its discretion, not approve this Consent Order, the Consent Order is withdrawn and shall be of no evidentiary value, nor shall it be relied upon or introduced in any disciplinary action by any party hereto, except that Respondent agrees that

should the Board reject the Consent Order and this case proceeds to hearing, Respondent shall assert no claim that the Board was prejudiced by its review and discussion of this document or any records relating thereto.

3. Respondent has the right to a formal administrative hearing at which she may present and cross-examine the Board's witnesses. Respondent hereby irrevocably waives her right to such formal hearing concerning these allegations and irrevocably waives her right to any rehearing or judicial review relating to the allegations contained in this Consent Order.

4. Respondent has the right to consult an attorney prior to entering into this Consent Order and Respondent has done so.

5. Any record prepared in this matter, all investigative materials prepared or received by the Board concerning allegations, and all related materials and exhibits may be retained in the Board's file.

6. Respondent understands that once the Board approves and adopts this Consent Order, it shall constitute a public record that may be disseminated as a formal action by the Board.

STIPULATION OF FACTS

7. Respondent is a licensed chiropractic physician holding license No. 3973.

8. On April 23, 2026, a complaint was filed alleging Respondent unlawfully possessed, prescribed, or administered a drug, medicine, serum, or vaccine. The complaint was assigned to Oklahoma State Board of Medical Licensure and Supervision investigator Robbin Roberts for investigation.

9. Pursuant to Agent Roberts's investigation, Respondent unlawfully issued three (3) prescriptions for testosterone cypionate, a Schedule-III controlled dangerous substance, between October 15, 2025, and February 23, 2026. Respondent did so by utilizing the DEA and OBNDD

registration credentials of her clinic's medical director, Howard Douglas, M.D., to order the drug via an online ordering platform, Olympia Pharmaceuticals.

10. The complaint was received by the Board and the evidence was gathered by the Advisory Committee and the Executive Director, Beth Kidd. The complaints and evidence were presented to the Advisory Committee during the July 22, 2026, meeting of the Advisory Committee. The Advisory Committee, in consultation with the Board's prosecuting attorney, considered the evidence presented and concluded that the information submitted was sufficient to support the recommendation of a hearing on the matter before the Oklahoma Board of Chiropractic Examiners.

11. Respondent is not admitting to any of the specific allegations against her by entering into this Consent Agreement.

12. In order to resolve all contested issues raised in this matter, the parties agree to the below Agreed Conclusions of Law and Agreed Order.

CONCLUSIONS OF LAW

13. The Board has jurisdiction over this matter under 59 O.S. § 161.1 *et seq.*

14. If proven by clear and convincing evidence the conduct and circumstances described in the Stipulation of Facts constitute violations by Respondent of the following:

Violation of 59 O.S. § 161.12

> The following acts or occurrences by a chiropractic physician shall constitute grounds for which the penalties specified in subsection A of this section may be imposed by order of the Board:
>
> . . .
>
> 7. Unlawfully possessing, prescribing or administering any drug, medicine, serum or vaccine. This section shall not prevent a chiropractic physician from possessing, prescribing or administering, by a needle or otherwise, vitamins, minerals or nutritional supplements, or from practicing within the scope of the science and art of chiropractic as defined in Section 161.2 of this title.
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> . . .
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> 12. Violating any provision of the Oklahoma Chiropractic Practice Act; or
> 13. Violating any of the rules of the Board.

59 O.S. §§ 161.12(B)(7), (12), (13).

Violation of OAC 140:15-7-5. Code of Ethics

> There is hereby created the "Oklahoma Chiropractic Code of Ethics." This Code of Ethics is based upon the fundamental principle that the ultimate end and objective of the chiropractic physician's professional services and effort should be: "The greatest good for the patient."
> ...
> (6) Chiropractic physicians shall maintain the highest standards of professional and personal conduct. Chiropractic physicians shall refrain from all illegal or morally reprehensible conduct;
> (7) Chiropractic physicians shall assure that the patient possesses enough information to enable an intelligent choice in regard to proposed chiropractic treatment. The patient shall make his or her own determination on such treatment;
> (8) Chiropractic physicians shall observe the appropriate laws, decisions and rules of state and federal governmental agencies of the United States and the State of Oklahoma and cooperate with the pertinent activities;

OAC 140:15-7-5(6), (8), (13).

15. Any stipulation of fact which is properly a conclusion of law is incorporated herein as a conclusion of law.

ORDER

Based upon the foregoing Consent Agreement, Stipulation of Facts and Conclusions of Law, the following Order is issued:

16. Respondent shall not order any substances or supplies, the sale of which is restricted in any way, for use in patient care or for use by any patient, in any name but her own. No employee, partner, business associate, volunteer worker, or contractor shall be permitted to place any orders in Respondent's name if such orders are for substances or materials whose sale is restricted in any way. Nothing in this provision shall prevent the performance of clerical restocking tasks, including but not limited to the routine ordering of office supplies, cleaning supplies, or other such business essentials, nor the ordering of over-the-counter non-prescription supplements, by unlicensed

persons in the name of Respondent or Respondent's business. The prefilling, queuing, preparing, or otherwise assisting in the processing or submission of orders for restricted substances by unlicensed individuals shall not constitute a violation of this Order, so long as Respondent specifically authorizes and gives final approval[1] for each order prior to its issuance and documents the same.

17. Respondent agrees that no substances or supplies, the sale of which is restricted in any way, which are ordered by a licensed healthcare provider employed or contracted with Respondent may be utilized or administered by anyone other than the ordering provider, or a patient in the context of a valid patient-provider relationship.[2]

18. Respondent shall attend and complete eight (8) hours of continuing education in one or more of the following topics within one-hundred and eighty (180) days of the issuance of this Order:

a. Legal/regulatory compliance;

b. Prescriptive authority; or

c. Risk management and malpractice;

The continuing education credit hours may be earned through in-state or out-of-state education programs, and may be virtual or in-person. Respondent shall be responsible for any fees associated with the completion of the continuing education courses, and shall evidence her completion of the continuing education credit hours by submitting certificates of completion and course descriptions

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[1] **"Final approval," as the term is used in this order, means that the essential details of each order for a restricted substance--including but not limited to dosage, patient instructions, and substance or listing name—are reviewed and approved by Respondent prior to the issuance of the order such that no essential details of any order could be altered by any employee or agent of Respondent following Respondent's approval of the order.**

[2] A "valid patient-provider relationship," as the term is used in this order, requires an in-person evaluation of the patient by the provider, the patient's informed consent to treatment by that provider, and that the provider undertakes to diagnose and/or treat the patient and actually does treat or diagnose the patient.

of the programs completed. Courses that discuss or focus upon topics not enumerated above may be rejected as noncompliant at the sole discretion of the Executive Director.

19. Respondent shall undergo and pass the Ethics and Boundaries (EBAS) exam for Unprofessional Conduct within one-hundred eighty (180) days of the issuance of this order, and shall be responsible for any fees associated with the completion of the exams.

20. Respondent shall be placed on probation for twenty-four (24) months, beginning on the date of the issuance of this order, during which time she consents to unannounced audits by the Board of all orders for restricted substances and supplies submitted by her or any employee or contractor of hers. Such audits shall pertain only to orders for restricted substances and supplies, and shall not permit the Board or its agents access to irrelevant materials outside the scope of this provision.

21. Respondent shall pay an administrative penalty of three thousand dollars ($3,000.00) within ninety (90) days of the issuance of this Order. Such penalty may be paid in lump sum or installments.

22. Respondent shall pay attorneys' fees and costs in the amount of seven hundred and fifty dollars ($750.00) within ninety (90) days of the issuance of this Order.

23. Respondent understands and agrees that the Board reserves the right to prosecute any future violations of the Oklahoma Chiropractic Practice Act or the Oklahoma Administrative Code, and to consider this Consent Order as a factor in the determination of any sanctions and penalties, if any, should the Board determine any violation has occurred.

24. Failure to comply with any of the terms of this Order may result in further disciplinary action against Respondent.

25. This Consent Order shall be effective on the date of entry and signature set forth below.

IT IS SO ORDERED ON THIS 16 DAY OF October 2026.

10-29-26
Board President, Oklahoma Board of Chiropractic Examiners

Austin J. Bower, Attorney for the Board

Rebecca Burton, D.C., Respondent

Kristopher K. McVay, Attorney for Respondent