



OFFICE OF THE ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2025-42A

Cathy Kirkpatrick, Executive Director  
Oklahoma State Board of Veterinary Medical Examiners  
2920 N. Lincoln Blvd., Suite C  
Oklahoma City, OK 73105

August 1, 2025

Re: Gary White ("Respondent"), Case No. C-24-080

Dear Executive Director Kirkpatrick:

This office has received your request for a written Attorney General Opinion regarding action the Oklahoma State Board of Veterinary Medical Examiners ("Board") intends to take in the above-referenced case.

The Oklahoma Veterinary Practice Act ("Act") authorizes the Board to impose discipline when a veterinarian is guilty of unprofessional conduct, which includes "[v]iolation of any provisions of the [Act] or the rules and policies of the Board or of an action, stipulation or agreement of the Board." 59 O.S.2021, § 698.14a(22).

Following a hearing on April 30, 2025, the Board found by clear and convincing evidence that Respondent's actions listed below exhibited unprofessional conduct and are grounds for disciplinary action.

- a. Violation of OAC 775:10-5-30(6)(B) by failing to provide appropriate labels on twelve (12) bottles of Xylazine, a veterinary prescription drug;
- b. Violation of OAC 775:10-5-30(6)(C) by dispensing twelve (12) bottles of Xylazine on twelve (12) different days without first having established a veterinarian-client-patient relationship ("VCPR") and determining that such prescription drugs were therapeutically indicated for the health or well-being of the animal;
- c. Violation of OAC 775:10-5-30(6)(D) by dispensing veterinary prescription drugs when the drugs were not necessary or required for the medical care of animals;
- d. Violation of OAC 775:10-5-30(16) by failing to properly prepare, record, manage or maintain veterinary records; and
- e. Violation of OAC 775:25-1-3(a) and OAC 775:25-1-3(b) by dispensing veterinary prescription drugs for use by a companion animal without an existing VCPR as defined by

the Act and the rules of the Board and without affixing the label to the Immediate container with the required information.

Finding that Respondent's actions are in violation of the Act, the Board proposes to place Respondent's DVM license on probation for a period of five (5) years from the date of the Final Order. Terms and conditions of Respondent's probation are:

- 1) Respondent shall appear before the Board annually,
- 2) Respondent shall complete an additional ten (10) hours of continuing education covering record keeping and drug labeling, due by December 31, 2025,
- 3) Respondent shall pay the following in the manner set forth below:  
Pay the Board the sum of \$15,000.00, consisting of an initial payment of \$7,500.00 to be paid no later than June 15, 2025. The payment of the remaining \$7,500.00 is hereby deferred until April 30, 2029, at which time such payment shall be waived, conditioned upon Respondent's full compliance with the other terms of the Final Order. However, in the event Respondent violates any term(s) of the Final Order, Respondent shall immediately pay to the Board the outstanding balance of the fine.

It is, therefore, the official opinion of the Attorney General that the Oklahoma State Board of Veterinary Medical Examiners has adequate support for the conclusion that this board's action advances the State's policy of protecting the health, safety, and well-being of the citizens of Oklahoma.



CHERYL DIXON

*Deputy General Counsel*