IN AND BEFORE THE OKLAHOMA STATE BOARD OF MEDICAL LICENSURE AND SUPERVISION STATE OF OKLAHOMA

FILED

STATE OF OKLAHOMA EX REL. THE OKLAHOMA BOARD OF MEDICAL LICENSURE AND SUPERVISION, Plaintiff)))	JUN - 5 2003 OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
v. LEE EDWARD BROWN, M.D., LICENSE NO. 19232,))))	Case No. 03-05-2664
Defendant.)	

COMPLAINT

COMES NOW the plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Lee Edward Brown, M.D., Oklahoma license no. 19232, alleges and states as follows:

- 1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma pursuant to 59 Okla. Stat. §480 et seq.
 - Defendant, Lee Edward Brown, M.D., holds Oklahoma license no. 19232.
- 3. On May 17, 2003, Defendant arrived at the home of his wife, from whom he was separated at the time. He had previously been served with a protective order whereby it was ordered that he not be allowed to enter the premises. Subsequently, his wife arrived at her home and was unable to enter. She contacted the Oklahoma City Police Department for fear that Defendant might be inside of the home.
- 4. When the police arrived and entered the home, they identified themselves as Oklahoma City police officers. The Defendant then advised the police officers that he considered them to be burglars and told them he was going to his bedroom to get a gun. Minutes

later, he emerged from the bedroom and pointed a loaded and cocked shotgun at a police officer. The police officer ordered him to drop the gun and he then retreated to the bedroom. Minutes later he surrendered to the police

- 5. Defendant was arrested and placed in the police vehicle for transport to jail. While handcuffed in the car, he attempted to escape, then kicked out the back passenger door window of the car.
- 6. On or about May 27, 2003, Defendant was charged with the crimes of FELONIOUSLY POINTING A WEAPON, a felony, in violation of 21 O.S. §1279, 1289.16, MALICIOUS INJURY/MISCHIEF, in violation of 21 O.S. §1760, and DOMESTIC ABUSE, a misdemeanor, in violation of 21 O.S. §644C in the District Court of Cleveland County, State of Oklahoma.
 - 7. Defendant is guilty of unprofessional conduct in that he:
 - A. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. § 509 (9) and OAC 435:10-7-4 (11).
 - B. Engaged in practice or other behavior that demonstrates an incapacity or incompetence to practice medicine and surgery in violation of OAC 435:10-7-4 (18).
 - C. Is physically or mentally unable to practice medicine and surgery with reasonable skill and safety in violation of OAC 435:10-7-4 (17).

Conclusion

WHEREFORE, plaintiff requests that the Board conduct a hearing, and upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including the revocation or suspension of the Defendant's license to practice as a physician and surgeon in the State of Oklahoma, the assessment of costs and fees incurred in this action, and any other appropriate action with respect to Defendant's license to practice as a physician and surgeon in the State of Oklahoma.

Respectfully submitted,

Elizabeth A. Scott, OBA #12470
Assistant Attorney General
State of Oklahoma
5104 N. Francis, Suite C
Oklahoma City, OK 73118

Attorney for the State of Oklahoma ex rel. Oklahoma State Board of Medical Licensure and Supervision