

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

FILED

JUN 13 2024

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
DUSTIN COREY BROOKS, PA.,)
LICENSE NO. PA 2731,)
)
Defendant.)

Case No. 24-04-6327

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Dustin Corey Brooks, PA (“Defendant”), alleges and states as follows:

I. JURISDICTION

1. The Board has jurisdiction over the subject matter and is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of its licensees in the State of Oklahoma. 59 O.S. § 480, *et seq.* and Okla. Admin. Code 435:5-1-1, *et seq.*
2. Defendant holds physician assistant license No. 2731, issued 09/12/2017 by the Oklahoma State Board of Medical Licensure and Supervision. The acts and/or omissions complained of herein occurred while Defendant was licensed to practice as a physician assistant by the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. This action arises out of unprofessional conduct by Defendant as detailed herein. The Board originally received information from a former patient alleging that Defendant and the patient had engaged in a sexual relationship. Defendant subsequently admitted to the Board investigator to having been engaged in at least one sexual interaction with the patient while she was in fact Defendant’s patient.

III. VIOLATIONS

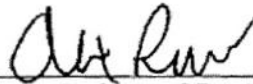
4. Based on the foregoing, Defendant is subject to discipline for the commission of prohibited acts, specifically described as follows:

- a. Acts contrary to Chapter 15, Title 435 of the Oklahoma Administrative Code, the Physician Assistant Act, or other laws or regulations governing the licensed health professional or any stipulation or agreement of the Board, in violation of Okla. Admin. Code § 435:15-5-11(a)(3), to wit:
 - i. Engaging in unprofessional or immoral conduct, Okla. Admin. Code § 435:15-5-11(b)(9).
- b. Violation of any provision of the Medical Practice Act or the rules promulgated by the Board, in violation of Okla. Admin. Code § 435:15-5-11(a)(4), to wit:
 - i. Engaging in physical conduct with a patient which is sexual in nature, or in any verbal behavior which is seductive or sexually demeaning to a patient, 59 O.S. § 509(17).

V. CONCLUSION

Given the foregoing, the undersigned respectfully requests 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 suspension or revocation and any other appropriate action with respect to Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,

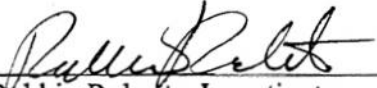


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VERIFICATION


I, Robbin Roberts, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Dustin Corey Brooks, PA.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Robbin Roberts, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 6-13-24



County, State of Execution