

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

FILED

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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**

**ORDER ACCEPTING  
VOLUNTARY SUBMITTAL TO JURISDICTION**


The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision ("Board"), by and through Alex A. Pedraza, Assistant Attorney General, for the State of Oklahoma ("State") and Board staff, as represented by the Board Secretary, Billy H. Stout, M.D., and the Executive Director of the Board, Sandra Harrison, along with Dustin Corey Brooks, PA ("Defendant"), physician assistant license no. 2731, appearing *pro se*, (collectively, the "Parties"), appear and offer this Order Accepting Voluntary Submittal to Jurisdiction (herein, "Order" or "Agreement") for acceptance by the Board. Okla. Admin. Code § 435:5-1-5.1.

By voluntarily submitting to jurisdiction and entering into this Order, Defendant acknowledges the allegations contained herein and further acknowledges that a hearing before the Board could result in some sanction under the Physician Assistant Act ("Act"). 59 O.S. § 519.1, *et seq.*

Defendant, Dustin Corey Brooks, states that he is of sound mind and is not under the influence of, or impaired by, any medication or drug and that he fully recognizes his right to appear before the Board for an evidentiary hearing on the allegations made against him. Defendant hereby voluntarily waives his right to a full hearing, submits to the jurisdiction of the Board and agrees to abide by the terms and conditions of this Order. Defendant acknowledges that he has read and understands the terms and conditions stated herein, and that this Agreement may be reviewed and discussed with him by legal counsel prior to execution.

If the Board does not accept this Order, the Parties stipulate that it shall be regarded as null and void. Stipulations by Defendant herein, if any, shall not be regarded as evidence against him in a subsequent disciplinary hearing. Defendant will be free to defend himself and no inferences

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will be made from his willingness to have this Order accepted by the Board. The Parties stipulate that neither the presentation of this Order nor the Board's consideration of this Order shall be deemed to have unfairly or illegally prejudiced the Board or its individual members and, therefore, shall not be grounds for precluding the Board nor any individual Board member from further participation in proceedings related to the matters set forth herein.

### **Findings of Fact**


Plaintiff, Defendant and Board staff each, and jointly, stipulate and agree as follows:

1. Defendant obtained his license to practice as a physician assistant in Oklahoma from the Board on September 12, 2017.
2. The Board originally received information from a former patient alleging that Defendant and the patient had engaged in a sexual relationship.
3. 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. Defendant and the former patient subsequently terminated their patient-provider relationship shortly thereafter.

### **Conclusions of Law**

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 physician assistants in the State of Oklahoma. 59 O.S. § 519.1, *et seq.* and Okla. Admin. Code 435:15-1-1, *et seq.*
2. Notice was provided as required by law and the rules of the Board. 75 O.S. § 309; 59 O.S. § 504; Okla. Admin. Code §§ 435:3-3-5; 435:3-3-6.
3. The Board is authorized to take disciplinary action against the license of any physician assistant in the State of Oklahoma for any 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, or for the violation of any provision of the Medical Practice Act or the rules promulgated by the Board. Okla. Admin. Code 435:15-5-11(a).
4. The Board is authorized to accept voluntary submittals to jurisdiction mutually agreed to by parties to a disciplinary action to resolve the action without need for a hearing. 75 O.S. § 309(E); Okla. Admin. Code § 435:5-1-5.1.
5. Based on the foregoing, Defendant could be found guilty of unprofessional conduct 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

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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).

### ORDERS

**IT IS THEREFORE ORDERED** by the Oklahoma State Board of Medical Licensure and Supervision as follows:

1. The Board hereby adopts the Agreement of the Parties in this Order Accepting Voluntary Submittal to Jurisdiction, including the findings of fact and conclusions of law stated herein.
2. Defendant, **COREY DUSTIN BROOKS, PA**, shall comply with all the following terms and conditions for a period of no less than **THREE (3) YEARS**:

#### Specific Terms:

- a. Defendant shall undergo polygraph testing biannually for two (2) years, then on an annual basis by a provider preapproved by the Board Secretary and/or Compliance Coordinator.
- b. Defendant shall attend weekly sexual boundaries meetings with David Mitchell, M.D. Attendance may be in person or via videoconference.
- c. Defendant shall participate in and successfully complete an intensive workshop on professional sexual misconduct/professional boundaries with extended follow up, such as Professional Boundaries, Inc. The course must:
  - i. Be preapproved by the Board Secretary;
  - ii. Participation in the same must commence within six (6) months after the filing of the Board Order.
- d. Defendant shall establish a process of individual *psychotherapy* *IN* with a therapist preapproved by the Board Secretary.

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- c. Defendant shall establish a relationship with a primary care physician, preapproved by the Board Secretary. Any prescription of CDS to Defendant must be discussed with the Board Secretary and or Compliance Coordinator, except for emergency diagnoses.

**Standard Terms:**


- a. Defendant shall conduct his/her practice in compliance with the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act and the Physician Assistant Act (collectively "the Acts") as interpreted by the Board. Any question of interpretation regarding the Acts or this Order shall be submitted in writing to the Board, and no action based on the subject of the question will be taken by Defendant/Applicant until clarification of interpretation is received by Defendant/Applicant from the Board or its authorized designee. 59 O.S. § 480, *et seq.*; 59 O.S. § 519.1, *et seq.*
- b. Defendant shall furnish a file-stamped copy of this Order stipulating terms imposed by the Board to each and every state in which he holds licensure or applies for licensure and to all hospitals, clinics or other facilities in which he holds or anticipates holding any form of staff privileges or employment.
- c. Defendant shall submit any required reports and/or forms on a timely and prompt basis to the Compliance Coordinator or authorized designee.
- d. Defendant will keep the Board informed of his current address.
- e. Until such time as all indebtedness to the Board has been satisfied, Defendant will reaffirm said indebtedness in any bankruptcy proceeding.
- f. Defendant shall promptly notify the Board Secretary and/or Compliance Coordinator of any citation or arrest for traffic or for criminal offenses.
- g. Upon request, Defendant shall make himself available for one or more personal appearances before the Board or its authorized designee.
- h. Defendant will execute such releases of medical and psychiatric records during the entire term of this Order as necessary for use by the Board Secretary and/or Compliance Coordinator to obtain copies of medical records and assessments and authorize the Board Secretary and/or Compliance Coordinator to discuss Defendant's case with Defendant's treating physicians and/or any physicians holding Defendant's records.
- i. If Defendant moves his residence or practice location out of the State of Oklahoma during the time this Order is in effect, this Order will be tolled until such time as Defendant returns to the State of Oklahoma and begins practicing within the state. Defendant will notify the Board Secretary and/or Compliance Coordinator prior to moving out-of-state.


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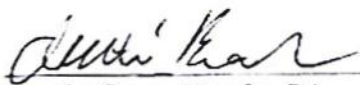
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- j. Failure to meet any of the terms of this Order will constitute cause for the Board to initiate additional proceedings to suspend, revoke or modify Defendant's license after due notice and hearing.
3. Promptly upon receipt of an invoice, Defendant shall pay all costs of this action authorized by law, including without limitation, legal fees, investigation costs, staff time, salary and travel expenses, witness fees and attorney's fees.
4. A copy of this Order shall be provided to Defendant as soon as it is processed.

Dated this 21<sup>st</sup> day of November, 2024.


  
Trevor Nutt, President  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

  
Billy H. Stout, M.D., Board Secretary  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

  
Dustin Corey Brooks, PA  
License No. 2731  
*Defendant*

  
Alex A. Pedraza, OBA No. 33584  
Assistant Attorney General  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
*Counsel for Plaintiff*

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**CERTIFICATE OF SERVICE**

This is to certify that on the 22nd day of November 2024, a true and correct copy of this Order was transmitted as indicated, postage prepaid, to the following:

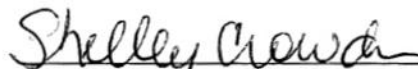
U.S Certified Mail

Dustin Corey Brooks, P.A.  
704 City Ave.  
Moore, Oklahoma 73071

**Defendant**

Email:

Alex A. Pedraza, AAG  
STATE OF OKLAHOMA  
OKLAHOMA STATE MEDICAL  
BOARD  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
(405) 522-5264  
Alex.pedraza@oag.ok.gov  
**Attorney for Plaintiff**

  
Shelley Crowder