

Question 1  
MEDICAL LICENSURE & SUPERVISION

Verified Complaint  
Brian Lee, OA 912

### III. VIOLATIONS

5. Based on the foregoing, **BRIAN CHRISTOPHER LEE, OTA**, is guilty of unprofessional conduct as follows:
- a. Dishonorable or immoral conduct that is likely to deceive, defraud, or harm the public, in violation of Okla. Admin. Code 435: 30-1-10(a)(2).
  - b. Fraudulent billing practices and/or violation of Medicare and Medicaid laws, in violation of OAC 435:30-1-10(a)(6).
  - c. Violation of any provision(s) of the Occupational Therapy Practice Act or the rules and regulations of the board in violation of Okla. Admin. Code 435: 30-1-10(a)(28) and 59 O.S. §888.9(4) and (5).

### IV. CONCLUSION

Given the foregoing, the undersigned respectfully request the Board to conduct a hearing, and upon proof of the allegation(s) contained herein, impose an appropriate punishment pursuant to the applicable law and rule on **BRIAN CHRISTOPHER LEE, OTA**, including an assessment of costs and attorneys' fees incurred in this action as provided by law.

Respectfully submitted,

  
Amanda E. Everett, OBA # 30107  
Assistant Attorney General  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION  
101 N.E. 51<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
Tel. 405.962.1400  
Amanda.Everett@oag.ok.gov

### VERIFICATION

I, Melissa Davis, RN, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding **BRIAN CHRISTOPHER LEE, OTA,**  
and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

  
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**Melissa Davis, RN, Investigator**  
**OKLAHOMA STATE BOARD OF MEDICAL**  
**LICENSURE AND SUPERVISION**

Executed this 23 day of February, 2021, in Oklahoma County, State of Oklahoma.