



I do hereby certify this to be a complete, accurate, and true copy of the document which is on file or is of record in the offices of the Texas Board of Nursing.
Stephanie P. Thomas
Executive Director of the Board

BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

BRENT ANDREW STEPHENS

Case No. 2014-1444

Registered Nurse License No. 603027

Respondent.

DECISION AND ORDER

Pursuant to Title 16 of the California Code of Regulations, section 1403, the attached Stipulated Settlement is hereby adopted by the Board of Registered Nursing as its Decision and Order in the above-entitled matter.

This Decision shall become effective on NOVEMBER 25, 2014.

IT IS SO ORDERED this 25TH day of NOVEMBER, 2014.

Louise R. Bailey

Louise R. Bailey, M.Ed., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
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6

7 **BEFORE THE**
8 **BOARD OF REGISTERED NURSING**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2014-1444

12 **BRENT ANDREW STEPHENS**
216 E. Euclid Avenue, Apt. #4
San Antonio, TX 78212

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

13 **Registered Nurse License No. 603027**

14 Respondent.

15
16 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
17 entitled proceedings that the following matters are true:

18 PARTIES

19 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of
20 Registered Nursing. She brought this action solely in her official capacity and is represented in
21 this matter by Kamala D. Harris, Attorney General of the State of California, by Frank H. Pacoe,
22 Supervising Deputy Attorney General.

23 2. Brent Andrew Stephens (Respondent) is representing himself in this proceeding and
24 has chosen not to exercise his right to be represented by counsel.

25 3. On or about July 30, 2002, the Board of Registered Nursing issued Registered Nurse
26 License No. 603027 to Brent Andrew Stephens (Respondent). The Registered Nurse License
27 expired on August 31, 2004, and has not been renewed.

28 / / /

1 Registered Nursing may communicate directly with the Board regarding this stipulation and
2 surrender, without notice to or participation by Respondent. By signing the stipulation,
3 Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the
4 stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this
5 stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of
6 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between
7 the parties, and the Board shall not be disqualified from further action by having considered this
8 matter.

9 11. The parties understand and agree that Portable Document Format (PDF) and facsimile
10 copies of this Stipulated Surrender of License and Order, including Portable Document Format
11 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

12 12. This Stipulated Surrender of License and Order is intended by the parties to be an
13 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
14 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
15 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
16 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
17 executed by an authorized representative of each of the parties.

18 13. In consideration of the foregoing admissions and stipulations, the parties agree that
19 the Board may, without further notice or formal proceeding, issue and enter the following Order:

20 **ORDER**

21 IT IS HEREBY ORDERED that Registered Nurse License No. 603027, issued to
22 Respondent Brent Andrew Stephens, is surrendered and accepted by the Board of Registered
23 Nursing.

24 1. The surrender of Respondent's Registered Nurse License and the acceptance of the
25 surrendered license by the Board shall constitute the imposition of discipline against Respondent.
26 This stipulation constitutes a record of the discipline and shall become a part of Respondent's
27 license history with the Board of Registered Nursing.

28

1 2. Respondent shall lose all rights and privileges as a registered nurse in California as of
2 the effective date of the Board's Decision and Order.

3 3. Respondent shall cause to be delivered to the Board his pocket license and, if one was
4 issued, his wall certificate on or before the effective date of the Decision and Order.

5 4. If Respondent ever files an application for licensure or a petition for reinstatement in
6 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
7 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
8 effect at the time the petition is filed, and all of the charges and allegations contained in
9 Accusation No. 2014-1444 shall be deemed to be true, correct and admitted by Respondent when
10 the Board determines whether to grant or deny the petition.

11 5. If and when Respondent's license is reinstated, he shall pay to the Board costs
12 associated with its investigation and enforcement pursuant to Business and Professions Code
13 section 125.3 in the amount of \$ 2,282.50. Respondent shall be permitted to pay these costs in a
14 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the
15 Board from reducing the amount of cost recovery upon reinstatement of the license.

16 6. If Respondent should ever apply or reapply for a new license or certification, or
17 petition for reinstatement of a license, by any other health care licensing agency in the State of
18 California, all of the charges and allegations contained in Accusation No. 2014-1444 shall be
19 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
20 Issues or any other proceeding seeking to deny or restrict licensure.

21 7. Respondent shall not apply for licensure or petition for reinstatement for two (2)
22 years from the effective date of the Board of Registered Nursing's Decision and Order.

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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 11-18-14 
BRENT ANDREW STEPHENS
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: 11/19/14 Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California

FRANK H. PACOE
Supervising Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 2014-1444

1 KAMALA D. HARRIS
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6 *Attorneys for Complainant*

7 **BEFORE THE**
8 **BOARD OF REGISTERED NURSING**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2014-1444

12 **BRENT ANDREW STEPHENS**
13 **a.k.a. BRENT STEPHENS**
14 **a.k.a. BRENT A. STEPHENS**
15 **614 Donaldson Ave.**
16 **San Antonio, TX 78201**

A C C U S A T I O N

17 **Registered Nurse License No. 603027**

18 **Respondent.**

19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
22 official capacity as the Executive Officer of the Board of Registered Nursing (Board), Department
23 of Consumer Affairs.

24 2. On or about July 30, 2002, the Board issued Registered Nurse License Number
25 603027 to Brent Andrew Stephens a.k.a. Brent Stephens a.k.a. Brent A. Stephens (Respondent).
26 The Registered Nurse License expired on August 31, 2004, and has not been renewed.

27 **JURISDICTION**

28 3. This Accusation is brought before the Board under the authority of the following
laws. All section references are to the Business and Professions Code (Code) unless otherwise
indicated.

4. Code section 2750 provides, in pertinent part, that the Board may discipline any

1 licensee, including a licensee holding a temporary or an inactive license, for any reason provided
2 in Article 3 (commencing with section 2750) of the Nursing Practice Act.

3 5. Code section 2764 provides that the expiration of a license shall not deprive the
4 Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a
5 decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may
6 renew an expired license at any time within eight years after the expiration.

7 6. California Code of Regulations, title 16, section 1419.3(b), states that "a licensee may
8 renew a license that has been expired for more than eight years by paying the renewal and penalty
9 fees specified in section 1417, and providing evidence that he or she holds a current valid active
10 and clear registered nurse license in another state, a United States territory, or Canada, or by
11 passing the Board's current examination for licensure."

12 7. Section 2761 of the Code states in relevant part(s) that the board may take disciplinary
13 action against a certified or licensed nurse or deny an application for a certificate or license for
14 any of the following:

15 (a) Unprofessional conduct, which includes, but is not limited to, the following:

16 ...

17 (4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action
18 against a health care professional license or certificate by another state or territory of the United
19 States, by any other government agency, or by another California health care professional
20 licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that
21 action.

22 ...

23 (f) Conviction of a felony or of any offense substantially related to the qualifications,
24 functions, and duties of a registered nurse, in which event the record of the conviction shall be
25 conclusive evidence thereof.

26 COST RECOVERY

27 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
28 administrative law judge to direct a licentiate found to have committed a violation or violations of

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
2 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
3 renewed or reinstated.

4 FIRST CAUSE FOR DISCIPLINE
5 (Unprofessional Conduct - Out of State Discipline)
6 (Bus. & Prof. Section 2761, subd. (a)(4))

7 9. Respondent is subject to disciplinary action under Code section 2761, subdivision
8 (a)(4), for out of state discipline as set forth below:

9 10. On or about August 3, 2007, in *In the Matter of Registered Nurse License No. 615071*
10 *issued to Brent A. Stephens*, the Board of Nurse Examiners for the State of Texas (Texas Board)
11 made Findings of Fact, Conclusions of Law and issued an Order accepting the voluntary surrender
12 of Respondent's license to practice nursing in the State of Texas. The underlying circumstances
13 for the Texas Board's order are that on or about June 20, 2007, Respondent was indicted in
14 United States Western District Court, San Antonio, Texas, Cause Number SA07CR365, on a
15 charge of "Conspiracy to Transport Aliens," a violation of Title 8, United States Code (USC),
16 §1324(a)(1)(A)(ii), (a)(1)(A)(v)(I), and (a)(1)(B)(i), and on multiple charges of "Aiding and
17 Abetting Sex Trafficking of a Child and Sex Trafficking by Force, Fraud, and Coercion," a
18 violation of Title 18, USC, §2 and 1591(a).

19 SECOND CAUSE FOR DISCIPLINE
20 (Conviction)

21 11. Respondent is subject to disciplinary action under Code section 2761, subdivision (f)
22 for conviction of a felony or of any offense substantially related to the qualifications, functions,
23 and duties of a registered nurse as follows:

24 12. On or about June 24, 2009, in *United States of America v. Brent Andrew Stephens*
25 *aliases: Brent Stephens, Brent A. Stephens, Defendant*, United States District Court, Western
26 District of Texas, San Antonio Division, Case Number SA-07-CR-365 (05)-XR, USM Number
27 97218-180, Respondent was convicted by his guilty plea of violating 8 USC § 1324(a)(1)(A)(iii),
28 8 USC § 1324(a)(1)(A)(v)(I), 8 USC § 1324(a)(1)(B)(1) (Conspiracy to Harbor Aliens for
Commercial Advantage and Private Financial Gain), and 18 USC §§ 371 and 591 (Conspiracy

1 and Sex Trafficking by Force, Fraud, and Coercion). Respondent was committed to the custody
2 of the United States Bureau of Prisons for a term of sixty (60) months. The Court further ordered
3 that upon release from imprisonment, Respondent was to be placed in supervised release for a
4 term of three (3) years with mandatory and standard conditions including the directive that
5 Respondent follow all lifestyle restrictions or treatment requirements imposed by any therapist,
6 and continue those restrictions as they pertain to avoiding risk situations throughout the course of
7 supervision. This included a prohibition from residing or going places where a minor or minors
8 are known to frequent without prior approval of the probation officer. Further, Respondent would
9 be required to register with the State Sex Offender Registration Agency in any state where he
10 resides, is employed, carries on a vocation, or is a student, as directed by the probation officer.

11 PRAYER

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
13 and that following the hearing, the Board of Registered Nursing issue a decision:

- 14 1. Revoking or suspending Registered Nurse License Number 603027, issued to Brent
15 Andrew Stephens a.k.a. Brent Stephens a.k.a. Brent A. Stephens;
16 2. Ordering Brent Andrew Stephens a.k.a. Brent Stephens a.k.a. Brent A. Stephens to
17 pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of
18 this case, pursuant to Business and Professions Code section 125.3;
19 3. Taking such other and further action as deemed necessary and proper.
20

21
22 DATED: MAY 19, 2014

Louise R. Bailey
23 LOUISE R. BAILEY, M.ED., RN
24 Executive Officer
25 Board of Registered Nursing
26 Department of Consumer Affairs
27 State of California
28 Complainant

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