**BEFORE THE**
**MEDICAL BOARD OF CALIFORNIA**
**DEPARTMENT OF CONSUMER AFFAIRS**
**STATE OF CALIFORNIA**

| | | |
|---|---|---|
| **In the Matter of the Accusation Against:** | ) | |
| **Stanley K. Brown, M.D.** | ) | **Case No. 800-2019-53044** |
| **Physician's and Surgeon's Certificate No. C 42176** | ) | |
| **Respondent** | ) | |

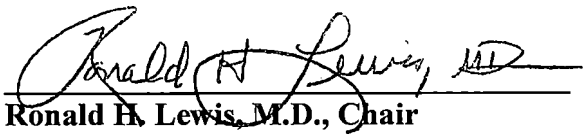
## DECISION

**The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.**

**This Decision shall become effective at 5:00 p.m. on January 9, 2020 .**

**IT IS SO ORDERED December 10, 2019 .**

**MEDICAL BOARD OF CALIFORNIA**



**Ronald H. Lewis, M.D., Chair**
**Panel A**

XAVIER BECERRA
Attorney General of California
MARY CAIN-SIMON
Supervising Deputy Attorney General
CAROLYNE EVANS
Deputy Attorney General
State Bar No. 289206
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-3448
Facsimile: (415) 703-5480
*Attorneys for Complainant*

**BEFORE THE**
**MEDICAL BOARD OF CALIFORNIA**
**DEPARTMENT OF CONSUMER AFFAIRS**
**STATE OF CALIFORNIA**

| | |
|---|---|
| In the Matter of the Accusation Against:<br><br>**STANLEY K. BROWN, M.D.**<br>**11111 N. Scottsdale Road #115**<br>**Scottsdale, AZ 85254**<br><br>**Physician's and Surgeon's Certificate No. C 42176**<br><br>Respondent. | Case No. 800-2019-053044<br><br>**STIPULATED SETTLEMENT AND DISCIPLINARY ORDER** |

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

**PARTIES**

1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board of California (Board). She brought this action solely in her official capacity and is represented in this matter by Xavier Becerra, Attorney General of the State of California, by Carolyne Evans, Deputy Attorney General.

2. Respondent Stanley K. Brown, M.D. (Respondent) is represented in this proceeding by attorney Paul Giancola, whose address is: One Arizona Center, 400 E. Van Buren St., Phoenix, Arizona 85004-2202

3. On or about March 13, 1986, the Board issued Physician's and Surgeon's Certificate No. C 42176 to Stanley K. Brown, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2019-053044, and will expire on June 30, 2021, unless renewed.

## JURISDICTION

4. Accusation No. 800-2019-053044 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on May 14, 2019. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 800-2019-053044 is attached as exhibit A and incorporated herein by reference.

## ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2019-053044. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

## CULPABILITY

9. Respondent understands and agrees that the charges and allegations in Accusation No. 800-2019-053044, if proven at a hearing, constitute cause for imposing discipline upon his Physician's and Surgeon's Certificate.

10. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest those charges.

11. Respondent agrees that his Physician's and Surgeon's Certificate is subject to discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

## CONTINGENCY

12. This stipulation shall be subject to approval by the Medical Board of California. Respondent understands and agrees that counsel for Complainant and the staff of the Medical Board of California may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

13. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

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

## DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. C 42176 issued to Respondent Stanley K. Brown, M.D. shall be and is hereby publicly reprimanded pursuant to California Business and Professions Code § 2227(a)(4). This Public Reprimand, which is issued in connection with Respondent's actions as set forth in Accusation No. 800-2018-050212 is as follows:

In February 2019, the Arizona Medical Board issued an Order for Letter of Public Reprimand and Probation. The Arizona Medical Board found that Respondent, an anesthesiologist, departed from the standard of care by proceeding with a patient's surgery when an essential piece of equipment was broken, which prevented Respondent from being able to also verify placement of the trachea tube by the presence of end-title CO2 when intubating the patient. The Arizona Medical Board issued a letter of reprimand, placed Respondent on probation for six months, and required completion of continuing medical education.

MEDICAL RECORD KEEPING COURSE. Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a course in medical record keeping approved in advance by the Board or its designee. Respondent shall provide the approved course provider with any information and documents that the approved course provider may deem pertinent. Respondent shall participate in and successfully complete the classroom component of the course not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully complete any other component of the course within one (1) year of enrollment. The medical record keeping course shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

A medical record keeping course taken after the acts that gave rise to the charges in the Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board or its designee, be accepted towards the fulfillment of this condition if the course would have been approved by the Board or its designee had the course been taken after the effective date of this Decision.

Respondent shall submit a certification of successful completion to the Board or its designee not later than 15 calendar days after successfully completing the course, or not later than 15 calendar days after the effective date of the Decision, whichever is later.

If Respondent fails to enroll, participate in, or successfully complete the clinical competence assessment program within the designated time period, Respondent shall receive a notification from the Board or its designee to cease the practice of medicine within three (3) calendar days after being so notified. The Respondent shall not resume the practice of medicine until enrollment or participation in the outstanding portions of the clinical competence assessment program have been completed. If the Respondent did not successfully complete the medical recordkeeping course, the Board may file a disciplinary action and Respondent shall not resume the practice of medicine until a final decision has been rendered on the accusation.

Respondent understands that failure to submit and/or complete the medical recordkeeping course, as set forth above, would constitute unprofessional conduct and grounds for further disciplinary action.

In consideration for his agreement to complete the medical recordkeeping education course, as set forth above, Respondent shall be publicly reprimanded as set forth in the public letter of reprimand, as set forth above.

**ACCEPTANCE**

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Paul Giancola. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 10/18/14

STANLEY K. BROWN, M.D.
*Respondent*

I have read and fully discussed with Respondent Stanley K. Brown, M.D. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 10/21/19

PAUL GIANCOLA
*Attorney for Respondent*

**ENDORSEMENT**

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California.

DATED: 10/31/19

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
MARY CAIN-SIMON
Supervising Deputy Attorney General

DAG Caitlin Ross for DAG Carolyne Evans

CAROLYNE EVANS
Deputy Attorney General
*Attorneys for Complainant*

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## Exhibit A

Accusation No. 800-2019-053044

XAVIER BECERRA
Attorney General of California
MARY CAIN-SIMON
Supervising Deputy Attorney General
CAROLYNE EVANS
Deputy Attorney General
State Bar No. 289206
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-3448
Facsimile: (415) 703-5480
*Attorneys for Complainant*

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO May 10 2019
BY D. Richards ANALYST

**BEFORE THE**
**MEDICAL BOARD OF CALIFORNIA**
**DEPARTMENT OF CONSUMER AFFAIRS**
**STATE OF CALIFORNIA**

| In the Matter of the Accusation Against: | Case No. 800-2019-053044 |
|---|---|
| **Stanley K. Brown, M.D.**<br>**11111 N. Scottsdale Road #115**<br>**Scottsdale, AZ 85254**<br><br>**Physician's and Surgeon's Certificate No. C 42176,**<br><br>Respondent. | **ACCUSATION** |

Complainant alleges:

**PARTIES**

1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official capacity as the Executive Director of the Medical Board of California, Department of Consumer Affairs (Board).

2. On or about March 13, 1986, the Medical Board issued Physician's and Surgeon's Certificate Number C 42176 to Stanley K. Brown, M.D. (Respondent). The Physician's and

Surgeon's Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on June 30, 2019, unless renewed.

## JURISDICTION

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 unless otherwise indicated.

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

5. Section 2227 of the Code provides, in part, that a licensee who is found guilty under the Medical Practice Act may have his or her license revoked, suspended for a period not to exceed one year, placed on probation and required to pay the costs of probation monitoring, be publicly reprimanded, or such other action taken in relation to discipline as the Board deems proper.

6. Section 2234 of the Code provides that the Board shall take action against a licensee who is charged with unprofessional conduct.

7. Section 2305 of the Code states:

"The revocation, suspension, or other discipline, restriction or limitation imposed by another state upon a license or certificate to practice medicine issued by that state, or the revocation, suspension, or restriction of the authority to practice medicine by any agency of the federal government, that would have been grounds for discipline in California of a licensee under this chapter shall constitute grounds for disciplinary action for unprofessional conduct against the licensee in this state."

8. Section 141 of the Code states:

"(a) For any licensee holding a license issued by a board under the jurisdiction of the department, a disciplinary action taken by another state, by any agency of the federal government, or by another country for any act substantially related to the practice regulated by the California license, may be a ground for disciplinary action by the respective state licensing board. A certified copy of the record of the disciplinary action taken against the licensee by another state,

an agency of the federal government, or another country shall be conclusive evidence of the events related therein.

"(b) Nothing in this section shall preclude a board from applying a specific statutory provision in the licensing act administered by that board that provides for discipline based upon disciplinary action taken against the licensee by another state, an agency of the federal government, or another country."

## CAUSE FOR DISCIPLINE

### (Discipline, Restriction, or Limitation Imposed by Another State)

9. On or about February 5, 2019, the Arizona Medical Board issued an Order for Letter of Reprimand and Probation (Arizona Order). The Arizona Order found that Respondent's Arizona medical license was subject to discipline because Respondent deviated from the standard of care in his care and treatment of one patient. The facts are as follows:

10. On October 17, 2013, Patient A was admitted for a biopsy of a mass on her vocal cords. Respondent, an anesthesiologist, was responsible for managing Patient A's general anesthesia. Respondent administered the anesthesia by way of a tube in Patient A's trachea. At the time the procedure was initiated, Respondent did not have a working capnograph[1] in the procedure room. During the procedure, Patient A developed sudden bradycardia (slow heart rate) and ventilation of her lungs became difficult. Patient A died during the procedure.

11. The Arizona Medical Board concluded that Respondent departed from the standard of care by proceeding with Patient A's surgery when an essential piece of anesthesia equipment was broken, which prevented Respondent from being able to verify tube placement. The Arizona Medical Board also found that actual patient harm occurred in that Patient A expired intraoperatively.

12. As a result of Respondent's unprofessional conduct, the Arizona Medical Board disciplined Respondent by issuing a letter of reprimand and placing him on probation for a period

[1] A medical device used to verify tube placement, monitor ventilation, and monitor the concentration of carbon dioxide in the respiratory gases.

of six months. The Arizona Medical Board ordered that Respondent complete 10 hours of continuing medical education regarding medical recordkeeping.

13. Respondent's conduct and the actions of the Arizona Medical Board, as set forth in paragraphs 9 through 12 above, constitute unprofessional conduct within the meaning of 2305 and conduct subject to discipline within the meaning of section 141(a). The Arizona Medical Board's Order is attached as Exhibit A.

## PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Medical Board of California issue a decision:

1. Revoking or suspending Physician's and Surgeon's Certificate Number C 42176, issued to Respondent;

2. Revoking, suspending or denying approval of Respondent's authority to supervise physician assistants and advanced practice nurses;

3. Ordering Respondent, if placed on probation, to pay the Board the costs of probation monitoring; and

4. Taking such other and further action as deemed necessary and proper.

DATED: May 10, 2019

KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
*Complainant*

EXHIBIT A

**Arizona Medical Board**
1740 W Adams St. Suite 4000 Phoenix, AZ 85007 • website: www.azmd.gov
Phone (480) 551-2700 • Toll Free (877) 255-2212 • Fax (480) 551-2702

Governor

Douglas A. Ducey

Members

R. Screven Farmer, M.D.
Chair
Physician Member

James Gillard, M.D.
Vice-Chair
Physician Member

Edward G. Paul, M.D.
Secretary
Physician Member

Jodi Bain, Esq.
Public Member

Bruce A. Bethancourt, M.D.
Physician Member

David C. Beyer, M.D.
Physician Member

Teresa Connolly, D.N.P.
Public Member

Laura Dorrell, M.S.N., RN.
Public Member

Gary R. Figge, M.D.
Physician Member

Pamela E. Jones
Public Member

Lois E. Krahn, M.D.
Physician Member

Executive Director

Patricia E. McSorley

I, Michelle Robles, of the Arizona Medical Board, hereby certify that I am the official custodian of the records of the agency; and that the attached documents are true and complete copies of the documents requested regarding:

Physician Name: Stanley K. Brown, M.D.

License Number: 14729

Attached are the following document(s):

**Document Name:**
Physician Profile

Order for Letter of Reprimand and Probation; and Consent to the Same
Dated: February 6th, 2019

**Document #10 of Pages:**

**Dated this 08th, March, 2019**

ARIZONA MEDICAL BOARD

Michelle Robles

**Michelle Robles**
**Custodian of Records**

MD PROFILE PAGE

Arizona Medical Board

gls.azmd.gov
Printed on 03/07/19 @ 08:36

## General Information

**Stanley Kent Brown MD**
Sensational Skin, PLLC
11111 N. Scottsdale Rd. Ste 115
Scottsdale AZ 85254
Phone: (480) 596-9111

License Number: 14729
License Status: Active
Licensed Date: 06/01/1984
License Renewed: 05/30/2017
Due to Renew By: 06/24/2019
If not Renewed, License Expires: 10/24/2019

## Education and Training

| | |
|---|---|
| Medical School: | UNIV OF OK COLL OF MED<br>OKLAHOMA CITY, Oklahoma |
| Graduation Date: | 12/22/1981 |
| Internship: | 01/06/1982 - 01/05/1983<br>LUBBOCK GENERAL HOSPITAL<br>LUBBOCK , TX |
| Residency: | 01/24/1983 - 02/24/1985 (Anesthesiology)<br>MARICOPA MEDICAL CENTER<br>PHOENIX , AZ |
| Area of Interest | Anesthesiology |
| Area of Interest | Dermatologic Surgery |

The Board does not verify current specialties. For more information please see the American Board of Medical Specialties website at http://www.abms.org to determine if the physician has earned a specialty certification from this private agency.

# Board Action

02/05/2019 Letter of Reprimand W Probation

A person may obtain additional public records related to any licensee, including dismissed complaints and non-disciplinary actions and orders, by making a written request to the Board. The Arizona Medical Board presents this information as a service to the public. The Board relies upon information provided by licensees to be true and correct, as required by statute. It is an act of unprofessional conduct for a licensee to provide erroneous information to the Board. The Board makes no warranty or guarantee concerning the accuracy or reliability of the content of this website or the content of any other website to which it may link. Assessing accuracy and reliability of the information obtained from this website is solely the responsibility of the user. The Board is not liable for errors or for any damages resulting from the use of the information contained herein.

Please note that some Board Actions may not appear until a few weeks after they are taken, due to appeals, effective dates and other administrative processes.

Board actions taken against physicians in the past 24 months are also available in a chronological list.

Credentials Verification professionals, please click here for information on use of this website.

BEFORE THE ARIZONA MEDICAL BOARD

| In the Matter of<br>**STANLEY K. BROWN, M.D.**<br>Holder of License No. 14729<br>For the Practice of Allopathic Medicine<br>In the State of Arizona. | **Case No. MD-17-0133A**<br><br>**ORDER FOR LETTER OF REPRIMAND AND PROBATION; AND CONSENT TO THE SAME** |
|---|---|

Stanley K. Brown, M.D. ("Respondent") elects to permanently waive any right to a hearing and appeal with respect to this Order for Letter of Reprimand and Probation; admits the jurisdiction of the Arizona Medical Board ("Board"); and consents to the entry of this Order by the Board.

## FINDINGS OF FACT

1. The Board is the duly constituted authority for the regulation and control of the practice of allopathic medicine in the State of Arizona.

2. Respondent is the holder of license number 14279 for the practice of allopathic medicine in the State of Arizona.

3. The Board initiated case number MD-17-0133A after receiving notification of a malpractice settlement regarding Respondent's care and treatment of a 68 year-old female patient ("GR") alleging failure to monitor the patient while she was undergoing biopsy of vocal cords, with subsequent death

4. On October 17, 2013, GR was admitted for biopsy of a mass on the vocal cords. GR's history included type 2 diabetes, high blood pressure, and heart disease. GR was a non-smoker whose medications included atenolol, diovan, hydrochlorthiazide, byetta, metformin, levothyroxine, and simvastatin. A preoperative ECG taken in September 2013 showed a regular rhythm and non-specific ST wave abnormalities.

5. GR received general anesthesia with a tube in the trachea, which was managed by Respondent. At the time the procedure was initiated, Respondent did not

have a working capnograph for assessing end-tidal CO2 in the procedure room. The surgeon then performed direct laryngoscopy to view and biopsy the laryngeal mass 6 minutes after induction of anesthesia according to the anesthesia record. At this time, GR developed sudden bradycardia and ventilation of her lungs became difficult. The surgeon removed his device and Respondent began efforts to treat the profound bradycardia and bronchospasm including intravenous epinephrine and subsequent chest compressions. GR developed pulseless electrical activity ("PEA") then asystole, and resuscitation was unsuccessful.

6. In correspondence provided to Board staff during the course of the investigation, the surgeon stated that he and Respondent independently verified tube placement using their respective scope and laryngoscopes. The surgeon stated that after Respondent reassessed the position of the endotracheal tube, it was found to be still in the trachea.

7. On October 18, 2013, an autopsy was performed, which determined that the cause of death was anoxic encephalopathy due to intractable bronchospasm. Chronic beta blocker use by GR had been considered a significant contributing factor to her demise. The cause of death was determined to be natural.

The standard of care when an essential piece of anesthesia equipment, such as end-tidal capnography is broken requires an anesthesiologist to delay the surgery until functioning equipment could be used. Respondent deviated from the standard of care by proceeding with surgery when an essential piece of anesthesia equipment was broken which prevented him from being able to also verify tube placement by the presence of end-tidal CO2 when intubating the patient.

8. Actual patient harm was identified by the Board's Medical Consultant in that the patient expired intraoperatively. Respondent denies that the deviations identified herein caused the patient's death.

9. From August 6 to 8, 2018, Respondent completed the UC San Diego Physician Assessment and Clinical Education Program ("PACE"). PACE concluded that Respondent demonstrated sufficient medical knowledge and clinical judgement overall. However, the PACE evaluators concluded that he would likely benefit from improving his medical records by adding more detail and/or using an electronic health record ("EHR") in his practice as his writing was barely legible. PACE also opined that Respondent would benefit from independent review of the protocol for intubation of an uncooperative trauma patient.

## CONCLUSIONS OF LAW

a. The Board possesses jurisdiction over the subject matter hereof and over Respondent.

b. The conduct and circumstances described above constitute unprofessional conduct pursuant to A.R.S. § 32-1401(27)(e)("Failing or refusing to maintain adequate records on a patient.")

c. The conduct and circumstances described above constitute unprofessional conduct pursuant to A.R.S. § 32-1401(27)(r)("Committing any conduct or practice that is or might be harmful or dangerous to the health of the patient or the public.").

## ORDER

IT IS HEREBY ORDERED THAT:

1. Respondent is issued a Letter of Reprimand.

2. Respondent is placed on Probation for a period of six months with the following terms and conditions:

a. **Continuing Medical Education**

Respondent shall within 6 months of the effective date of this Order obtain no less than 10 hours of Board Staff pre-approved Category I Continuing Medical Education ("CME") in an intensive, in-person course regarding medical recordkeeping. Respondent shall within **thirty days** of the effective date of this Order submit his request for CME to the Board for pre-approval. Upon completion of the CME, Respondent shall provide Board staff with satisfactory proof of attendance. The CME hours shall be in addition to the hours required for the biennial renewal of medical licensure. The Probation shall terminate upon Respondent's proof of successful completion of the CME.

b. **Obey All Laws**

Respondent shall obey all state, federal and local laws, all rules governing the practice of medicine in Arizona, and remain in full compliance with any court ordered criminal probation, payments and other orders.

b. **Tolling**

In the event Respondent should leave Arizona to reside or practice outside the State or for any reason should Respondent stop practicing medicine in Arizona, Respondent shall notify the Executive Director in writing within ten days of departure and return or the dates of non-practice within Arizona. Non-practice is defined as any period of time exceeding thirty days during which Respondent is not engaging in the practice of medicine. Periods of temporary or permanent residence or practice outside Arizona or of non-practice within Arizona, will not apply to the reduction of the probationary period.

3. The Board retains jurisdiction and may initiate new action against Respondent based upon any violation of this Order. A.R.S. § 32-1401(27)(s)

DATED AND EFFECTIVE this 5th day of February, 2019.

ARIZONA MEDICAL BOARD

By Patricia E. McSorley
Patricia E. McSorley
Executive Director

## CONSENT TO ENTRY OF ORDER

1. Respondent has read and understands this Consent Agreement and the stipulated Findings of Fact, Conclusions of Law and Order ("Order"). Respondent acknowledges he has the right to consult with legal counsel regarding this matter.

2. Respondent acknowledges and agrees that this Order is entered into freely and voluntarily and that no promise was made or coercion used to induce such entry.

3. By consenting to this Order, Respondent voluntarily relinquishes any rights to a hearing or judicial review in state or federal court on the matters alleged, or to challenge this Order in its entirety as issued by the Board, and waives any other cause of action related thereto or arising from said Order.

4. The Order is not effective until approved by the Board and signed by its Executive Director.

5. All admissions made by Respondent are solely for final disposition of this matter and any subsequent related administrative proceedings or civil litigation involving the Board and Respondent. Therefore, said admissions by Respondent are not intended or made for any other use, such as in the context of another state or federal government regulatory agency proceeding, civil or criminal court proceeding, in the State of Arizona or any other state or federal court.

6. Upon signing this agreement, and returning this document (or a copy thereof) to the Board's Executive Director, Respondent may not revoke the consent to the entry of the Order. Respondent may not make any modifications to the document. Any modifications to this original document are ineffective and void unless mutually approved by the parties.

7. This Order is a public record that will be publicly disseminated as a formal disciplinary action of the Board and will be reported to the National Practitioner's Data Bank and on the Board's web site as a disciplinary action.

8. If any part of the Order is later declared void or otherwise unenforceable, the remainder of the Order in its entirety shall remain in force and effect.

9. If the Board does not adopt this Order, Respondent will not assert as a defense that the Board's consideration of the Order constitutes bias, prejudice, prejudgment or other similar defense.

10. Any violation of this Order constitutes unprofessional conduct and may result in disciplinary action. A.R.S. § § 32-1401(27)(s) ("Violating a formal order, probation, consent agreement or stipulation issued or entered into by the board or its executive director under this chapter.") and 32-1451.

11. Respondent acknowledges that, pursuant to A.R.S. § 32-2501(16), he cannot act as a supervising physician for a physician assistant while her/his license is on probation.

12. ***Respondent has read and understands the conditions of probation.***

S. Brown M.D.

STANLEY K. BROWN, M.D.

DATED: 01/16/2019

EXECUTED COPY of the foregoing mailed this 10th day of February, 2019 to:

Paul Giancola, Esq.
Counsel for Respondent
Address of Record

ORIGINAL of the foregoing filed this 10th day of February, 2019 with:

Arizona Medical Board
1740 West Adams, Suite 4000
Phoenix, Arizona 85007

Michelle Rogers
Board staff