

**BEFORE THE
RESPIRATORY CARE BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 1H 2012 616

WILLIAM GREGORY BRAGG
2420 Sanctuary Drive
Fairfield, CA 94534

Respiratory Care Practitioner License No. 27770

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Respiratory Care Board of California, Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision is hereby effective forthwith.

It is so ORDERED May 30, 2013.

Original Signed by: _____

STEPHANIE NUNEZ
EXECUTIVE OFFICER, RESPIRATORY CARE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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8 **BEFORE THE**
9 **RESPIRATORY CARE BOARD**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 1H 2012 616

13 **WILLIAM GREGORY BRAGG**
2420 Sanctuary Drive
Fairfield, CA 94534

14 **STIPULATED SURRENDER OF**
15 **LICENSE AND ORDER**

16 **Respiratory Care Practitioner License No.**
17 **27770**

Respondent

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
19 proceeding that the following matters are true:

20 **PARTIES**

21 1. Stephanie Nunez (Complainant) is the Executive Officer of the Respiratory Care
22 Board (Board) of California. She brought this action solely in her official capacity and is
23 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
24 Catherine E. Santillan, Senior Legal Analyst.

25 2. William Gregory Bragg (Respondent) is represented in this proceeding by attorney
26 Anthony Gibbs, Esq., whose address is 655 Middlefield Rd., Redwood City, California, 94063.

27 3. On or about August 12, 2008, the Board issued Respiratory Care Practitioner License
28 No. 27770 to Respondent. The license was in full force and effect at all times relevant to the

1 charges brought herein. This license will expire, unless renewed, on September 30, 2013.
2 Disciplinary action has not been taken against this license as a result of this Accusation.

3 **JURISDICTION**

4 4. Accusation No. 1H 2012 616 was filed before the Board, Department of Consumer
5 Affairs, and is currently pending against Respondent. The Accusation and all other statutorily
6 required documents were properly served on Respondent on April 24, 2013. Respondent timely
7 filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 1H 2012 616 is
8 attached as Exhibit A and incorporated by reference.

9 **ADVISEMENT AND WAIVERS**

10 5. Respondent has carefully read, fully discussed with counsel, and understands the
11 charges and allegations in Accusation No. 1H 2012 616. Respondent also has carefully read,
12 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License
13 and Order.

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

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

23 **CULPABILITY**

24 8. Respondent admits the truth of each and every charge and allegation in Accusation
25 No. 1H 2012 616, agrees that cause exists for discipline and hereby surrenders his Respiratory
26 Care Practitioner License No. 27770 for the Board's formal acceptance.
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28

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

3 4. If he ever applies for licensure or petitions for reinstatement in the State of California,
4 the Board shall treat it as a new application for licensure. Respondent must comply with all the
5 laws, regulations and procedures for licensure in effect at the time the application or petition is
6 filed, and all of the charges and allegations contained in Accusation No. 1H 2012 616 shall be
7 deemed to be true, correct and admitted by Respondent when the Board determines whether to
8 grant or deny the application or petition.

9 5. If Respondent should ever apply or reapply for a new license or certification, or
10 petition for reinstatement of a license, by any other health care licensing agency in the State of
11 California, all of the charges and allegations contained in Accusation No. 1H 2012 616 shall be
12 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
13 Issues or any other proceeding seeking to deny or restrict licensure.

14 6. Respondent shall pay the Board its costs of investigation and enforcement in the
15 amount of \$2,000.00 within sixty (60) days of the effective date of the Decision and Order.

16 ACCEPTANCE

17 I have carefully read the above Stipulated Surrender of License and Order and have fully
18 discussed it with my attorney, Anthony Gibbs, Esq. I understand the stipulation and the effect it
19 will have on my Respiratory Care Practitioner License. I enter into this Stipulated Surrender of
20 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the
21 Decision and Order of the Respiratory Care Board.

22
23 DATED: 5/23/13

24 William G. Bragg
WILLIAM GREGORY BRAGG
Respondent

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27 |||
28 |||

1 I have read and fully discussed with Respondent William Gregory Bragg the terms and
2 conditions and other matters contained in this Stipulated Surrender of License and Order. I
3 approve its form and content.

4 DATED: 5-23-13


ANTHONY GIBBS, ESQ.
Attorney for Respondent

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7 ENDORSEMENT

8 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
9 for consideration by the Respiratory Care Board of the Department of Consumer Affairs.

10 DATED: 5/28/2013

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
JOSE R. GUERRERO
Supervising Deputy Attorney General


CATHERINE E. SANTILLAN
Senior Legal Analyst
Attorneys for Complainant

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