

BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation and  
Petition to Revoke Probation Against:

LISA MAFFEI

Registered Nurse License No. 444582

Respondent.

Case No. 2017-212

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 23, 2016.

IT IS SO ORDERED this 23rd day of November, 2016.

*for*   
Joseph Morris, PhD, MSN, RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 KENT D. HARRIS  
Supervising Deputy Attorney General  
3 DAVID E. BRICE  
Deputy Attorney General  
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*Attorneys for Complainant*  
8

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

11 In the Matter of the Accusation and Petition to  
12 Revoke Probation Against:

Case No. 2017-212

13 **LISA MAFFEI**  
10373 E Ravenswood Street  
14 Tucson, AZ 85747

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

15 Registered Nurse License No. 444582

16 Respondent.  
17

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

20 PARTIES

21 1. Joseph L. Morris, PhD, MSN, RN (Complainant) is the Executive Officer of the  
22 Board of Registered Nursing (Board). He brought this action solely in his official capacity and is  
23 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by  
24 David E. Brice, Deputy Attorney General.

25 2. Lisa Maffei (Respondent) is representing herself in this proceeding and has chosen  
26 not to exercise her right to be represented by counsel.

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ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 444582, issued to Respondent Lisa Maffei, is surrendered and accepted by the Board of Registered Nursing.

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

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

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

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation and Petition to Revoke Probation No. 2017-212 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. If and when Respondent's license is reinstated, she shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of \$1,571.50. Respondent shall be permitted to pay these costs in a payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the Board from reducing the amount of cost recovery upon reinstatement of the license.

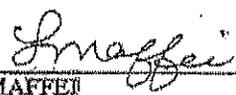
6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation and Petition to Revoke Probation, No. 2017-212 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

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

3 ACCEPTANCE

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

8  
9 DATED: 11/21/16   
10 LISA MAFFEI  
11 Respondent

12 ENDORSEMENT

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

15 Dated: 11/22/2016 Respectfully submitted,  
16 KAMALA D. HARRIS  
17 Attorney General of California  
18 KENT D. HARRIS  
19 Supervising Deputy Attorney General  
20   
21 DAVID E. BRICE  
22 Deputy Attorney General  
23 Attorneys for Complainant

**Exhibit A**

**Accusation and Petition to Revoke Probation No. 2017-212**

1 KAMALA D. HARRIS  
Attorney General of California  
2 KENT D. HARRIS  
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7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation and Petition to  
12 Revoke Probation Against:

Case No. 2017-212

13 **LISA MAFFEI**  
10373 E Ravenswood Street  
14 Tucson, AZ 85747

**ACCUSATION AND PETITION TO  
REVOKE PROBATION**

15 **Registered Nurse License No. 444582**

16 Respondent.

17 Joseph L. Morris, PhD, MSN, RN ("Complainant") alleges:

18 **PARTIES**

19 1. Complainant brings this Accusation and Petition to Revoke Probation solely in his  
20 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),  
21 Department of Consumer Affairs.

22 **Registered Nurse License**

23 2. On or about August 31, 1989, the Board issued Registered Nurse License Number  
24 444582 to Lisa Maffei ("Respondent"). The Registered Nurse License expired on March 31,  
25 2013, and has not been renewed.

26 **Prior Discipline**

27 3. Effective February 7, 2011, pursuant to the *Decision and Order* in *In the Matter of*  
28 *the Accusation Against: Lisa Maffei, Registered Nurse License No. 444582, Case No. 2008-88,*

1 the Board revoked Respondent's Registered Nurse License No. 444582. However, the revocation  
2 was stayed and Respondent's license was placed on probation for a period of three (3) years with  
3 certain terms and conditions. Respondent's probation has been tolled because she has resided and  
4 practiced as a licensed registered nurse in the State of Arizona since the order became effective  
5 on February 7, 2011.

6 ACCUSATION

7 JURISDICTION AND STATUTORY PROVISIONS FOR ACCUSATION

8 4. This Accusation is brought before the Board, Department of Consumer Affairs, under  
9 the authority of the following laws. All section references are to the Business and Professions  
10 Code ("Code") unless otherwise indicated.

11 5. Code section 2750 provides, in pertinent part, that the Board may discipline any  
12 licensee, including a licensee holding a temporary or an inactive license, for any reason provided  
13 in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.

14 6. Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
15 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
16 to render a decision imposing discipline on the license.

17 7. Code section 2761 states, in pertinent part:

18 The board may take disciplinary action against a certified or licensed nurse or  
19 deny an application for a certificate or license for any of the following:

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

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

24 COST RECOVERY

25 8. Code section 125.3 provides, in pertinent part, that the Board may request the  
26 administrative law judge to direct a licentiate found to have committed a violation or violations of  
27 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
28 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being

1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
2 included in a stipulated settlement.

3 **CAUSE FOR DISCIPLINE**

4 (Out-of-State Discipline)

5 9. Respondent is subject to discipline pursuant to Code section 2761(a)(4), on the  
6 grounds of unprofessional conduct, in that in a disciplinary action before the Arizona State Board  
7 of Nursing ("Arizona Board") entitled *In the Matter of Registered Nurse License No. RNI02575*  
8 *Issued to: Lisa Maffei Respondent*, effective July 7, 2016, pursuant to *Consent Agreement and*  
9 *Order No. 1302070*, Respondent's license to practice nursing in the State of Arizona was placed  
10 on probation with terms and conditions for a minimum of 24 months, and, if found to have a  
11 substance abuse disorder or need for treatment, 36 months. The basis of the disciplinary action is  
12 as follows. In or around January 2013, while working as a registered nurse at HealthSouth  
13 Rehabilitation Hospital in Tucson, Arizona, Respondent removed approximately 45 doses of  
14 oxycodone and hydrocodone, controlled substances, and failed to document if the medications  
15 were given, returned, or wasted. The Arizona Board found that Respondent's conduct constituted  
16 a violation of A.R.S. section 1633(D) (unprofessional conduct), as defined by A.R.S. section 32-  
17 1601(24)<sup>1</sup> and A.A.C. section 3R4-19-403 (including, but not limited to, conduct or practice that  
18 is harmful or dangerous to health of a patient or the public, including a failure to maintain  
19 minimum standards of acceptable and prevailing nursing practice; failing to maintain accurate  
20 patient records; falsifying or making materially incorrect, inconsistent, or unintelligible entries in  
21 records pertaining to controlled substances; and, practicing in a manner that gives the Arizona  
22 Board reasonable cause to believe the health of a patient or the public may be harmed).

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27 <sup>1</sup> The Arizona Board's order sets forth the language of A.R.S. section 32-1601(24)  
28 (defining unprofessional conduct), but cites to A.R.S. section 32-1601(22), which defines the  
term "nurse registry".

1 PETITION

2 JURISDICTION FOR PETITION TO REVOKE PROBATION

3 10. This Petition to Revoke Probation is brought before the Board under Condition  
4 Number 12 of the *Decision and Order in In the Matter of the Accusation Against: Lisa Maffei,*  
5 *Registered Nurse License No. 444582, Case No. 2008-88,* which states, in pertinent part:

6  
7 If a respondent violates the conditions of her probation, the Board, after giving  
8 respondent notice and an opportunity to be heard, may set aside the stay order and  
9 impose the stayed discipline (revocation) of respondent's license.

10 If, during the period of probation, an accusation or petition to revoke probation  
11 has been filed against respondent's license or the Attorney General's Office has been  
12 requested to prepare an accusation or petition to revoke probation against  
13 respondent's license, the probationary period shall automatically be extended and  
14 shall not expire until the accusation or petition has been acted upon by the Board.

15 11. Grounds exist for revoking the probation and reimposing the order of revocation of  
16 Respondent's Registered Nurse License No. 444582, in that she violated probation as set forth  
17 below:

18 FIRST CAUSE TO REVOKE PROBATION

19 (Failure to Provide Information Regarding Change of Status of Out-Of-State License)

20 12. At all times after the effective date of Respondent's probation, Condition 4 stated, in  
21 pertinent part:

22 Respondent shall provide a list of all states and territories where she has ever  
23 been licensed as a registered nurse, vocational nurse, or practical nurse. Respondent  
24 shall further provide information regarding the status of each license and any changes  
25 in such license status during the term of probation. Respondent shall inform the  
26 Board if she applies for or obtains a new nursing license during the term of probation.

27 13. Respondent's probation is subject to revocation for failure to comply with Probation  
28 Condition 4, referenced above. The facts and circumstances regarding this violation are that on or  
about Respondent failed to notify the Board of the discipline imposed by the Arizona State  
Nursing Board.

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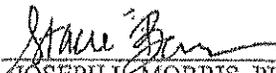
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PRAYER

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

1. Revoking the probation that was granted by the Board of Registered Nursing in Case No. 2008-88 and imposing the disciplinary order that was stayed thereby revoking Registered Nurse License No. 444582 issued to Lisa Maffei;
2. Revoking or suspending Registered Nurse License No. 444582, issued to Lisa Maffei;
3. Ordering Lisa Maffei to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Code section 125.3; and,
4. Taking such other and further action as deemed necessary and proper.

DATED: September 22, 2016

*for*   
JOSEPH L. MORRIS, PHD, MSN, RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**LISA MAFFEI**  
10373 e. Ravenswood St  
Tucson, AZ 85747

Registered Nurse License No. 444582

Respondent.

Case No. 2008-88

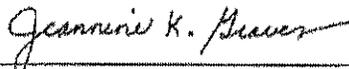
OAH No. 2010020935

**DECISION**

The attached proposed decision of the Administrative Law Judge is hereby adopted by the Board of Registered Nursing as its Decision in the above-entitled matter.

This Decision shall become effective on **February 7, 2011.**

IT IS SO ORDERED this **7th** day of **January, 2011.**



\_\_\_\_\_  
President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of Accusation Against:  
LISA MAFFEI,

Registered Nurse License No. 444582,

Respondent.

Case No. 2008-88

OAH No. 2010020935

**PROPOSED DECISION**

Karl S. Engeman, Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter in Sacramento, California, on September 9, 2010.

Deputy Attorney General Arthur D. Taggart appeared on behalf of complainant.

Lisa Maffei appeared by telephone and represented herself.

Evidence was received and the matter was submitted on September 9, 2010.

**FACTUAL FINDINGS**

1. Ruth Ann Terry, M.P.H., R.N., (Complainant), Executive Officer, Board of Registered Nursing (Board), Department of Consumer Affairs, State of California, brought the accusation solely in her official capacity.
2. On or about August 31, 1989, the Board issued Registered Nursing License number 444582 to respondent. The license expired on March 31, 2009, and has not been renewed.
3. On or about September 11, 2006, respondent entered into a Consent Agreement and Order with the Arizona State Board of Nursing. The Order became effective October 10, 2006. Respondent agreed with factual findings including that she had used Cocaine two to three times a week between February of 2004 and April 23, 2004, that she had used Cocaine on prior occasions, and that she appeared for duty as a registered nurse on or about April 23, 2004, too exhausted to work because of

6. At hearing, respondent readily acknowledged her long history of substance abuse. Her drug of choice in adulthood was methamphetamine. It was her methamphetamine addiction that caused her to seek treatment the first time. She did not believe that alcohol was a problem because she had consumed it in moderation since she was a teenager. She came to realize that she has a susceptibility to all products to which one can become addicted. She has no current compulsion to return to any of the addictive substances and attributes her continuing recovery to several factors including her maturation, resolution of underlying issues through counseling, coming to grips with the fact that she is not different from other addicts as she once believed, and the care of her two-year-old son as a single mother. She describes herself as much happier now with no excuses left for her addictive behavior.

7. Respondent would like to retain her California license because she may wish to move here someday. She had licenses in Oregon and New York which she obtained when she traveled as a nurse, including to California. The Oregon and New York nursing licenses have not been renewed. Respondent could accept a probationary license with the understanding that the terms and conditions would be tolled until she decided to move to California to work as a nurse, although she expressed that additional restrictions seemed somewhat punitive given her successful completion of the Arizona requirements to full restore her license. Respondent acknowledged that she can afford the approximately \$600 in costs sought by the Board.

8. Deputy Attorney General Taggart submitted a declaration establishing that the actual costs of investigation and prosecution of this matter up to the administrative hearing were \$566.50. The reasonableness of such costs is addressed in the Legal Conclusions.

#### LEGAL CONCLUSIONS

1. Business and Professions Code section 27643 reads:

The lapsing or suspension of a license by operation of law or by order or decision of the board or a court of law, or the voluntary surrender of a license by a licentiate shall not deprive the board of jurisdiction to proceed with any investigation of or action or disciplinary proceeding against such license, or to render a decision suspending or revoking such license.

2. Business and Professions Code section 2761, subdivision (a)(4), reads:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

fails to make a finding on costs requested pursuant to subdivision (a).

5. In *Zuckerman v. Board of Chiropractic Examiners* (2002) 29 Cal.4th 32, the California Supreme Court decided that in order to determine whether the actual costs of investigation and prosecution sought by a regulatory board under a statute substantially identical to Business and Professions Code 125.3 are "reasonable," the Administrative Law Judge must decide: (a) Whether the licensee has been successful at hearing in getting charges dismissed or reduced; (b) the licensee's subjective good faith belief in the merits of his or her position; (c) whether the licensee has raised a colorable challenge to the proposed discipline; (d) the financial ability of the licensee to pay; and (e) whether the scope of the investigation was appropriate to the alleged misconduct.

6. The costs sought by complainant in this matter are reasonable. Respondent did not challenge the allegations. She has the financial ability to pay the costs sought. The scope of the investigation, as reflected in the modest amount sought, was appropriate to the alleged misconduct.

7. Respondent has a very long history of abusing multiple addictive substances, including alcohol, Cocaine, and methamphetamine. She relapsed after a five year rehabilitation program and again after two more years in an intensive outpatient program. She has finally come to grips with her addictive propensities toward both drugs and alcohol and has managed to stay clean and sober for the last almost four years. She has only been free of probation for less than a year however, and has not practiced in California recently. Thus, a three year probationary term is appropriate with the ability to seek modification in the future when respondent can demonstrate a longer period of freedom from substance abuse without restrictions by her current home state.

#### ORDER

Registered Nurse License Number 560470 issued to respondent Lisa Maffei is revoked pursuant to Legal Conclusions 1 through 3, jointly and individually. However, the revocation is stayed and respondent is placed on probation for three years on the following conditions:

**SEVERABILITY CLAUSE** – Each condition of probation contained herein is a separate and distinct condition. If any condition of this order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this order, and all other applications thereof, shall not be affected. Each condition of this order shall separately be valid and enforceable to the fullest extent permitted by law.

(1) OBEY ALL LAWS - Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law

immediately execute all release of information forms as may be required by the Board or its representatives.

Respondent shall provide a copy of this decision to the nursing regulatory agency in every state and territory in which she has a registered nurse license.

(6) FUNCTION AS A REGISTERED NURSE - Respondent, during the period of probation, shall engage in the practice of registered nursing in California for a minimum of 24 hours per week for six consecutive months or as determined by the Board.

For purposes of compliance with this section, "engage in the practice of registered nursing" may include, when approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care position that requires licensure as a registered nurse.

The Board may require that advanced practice nurses engage in advanced practice nursing for a minimum of 24 hours per week for six consecutive months or as determined by the Board.

If respondent has not complied with this condition during the probationary term, and respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of respondent's probationary period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation shall apply.

(7) EMPLOYMENT APPROVAL AND REPORTING REQUIREMENTS - Respondent shall obtain prior approval from the Board before commencing or continuing any employment, paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all performance evaluations and other employment related reports as a registered nurse upon request of the Board.

Respondent shall provide a copy of this decision to her employer and immediate supervisors prior to commencement of any nursing or other health care-related employment.

In addition to the above, respondent shall notify the Board in writing within 72 hours after she obtains any nursing or other health care-related employment. Respondent shall notify the Board in writing within 72 hours after she is terminated or separated, regardless of cause, from any nursing, or other health care-related employment with

Respondent shall not work for a licensed home health agency as a visiting nurse unless the registered nursing supervision and other protections for home visits have been approved by the Board. Respondent shall not work in any other registered nursing occupation whose home visits are required.

Respondent shall not work in any health care setting as a supervisor of registered nurses. The Board may additionally restrict respondent from supervising licensed vocational nurses and/or unlicensed assistive personnel on a case-by-case basis.

Respondent shall not work as a faculty member in an approved school of nursing or as an instructor in a Board-approved continuing education program.

Respondent shall work only on a regularly assigned, identified and predetermined worksite(s) and shall not work in a float capacity.

If respondent is working or intends to work in excess of 40 hours per week, the Board may request documentation to determine whether these should be restrictions on the hours of work.

(10) COMPLETE A NURSING COURSE(S) - Respondent, at her own expense, shall enroll in and successfully complete a course(s) relevant to the practice of registered nursing no later than six months prior to the end of her probationary term. Respondent shall obtain prior approval from the Board before enrolling in the course(s). Respondent shall submit to the Board the original transcripts or certificates of completion for the above-required course(s). The Board shall return the original documents to respondent after photocopying them for its records.

(11) COST RECOVERY - Respondent shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of \$566.50. Respondent shall be permitted to pay these costs in a payment plan approved by the Board, with payments to be completed no later than three months prior to the end of the probation term.

(12) VIOLATION OF PROBATION - If respondent violates the conditions of her probation, the Board, after giving respondent notice and an opportunity to be heard, may set aside the stay order and impose the stayed discipline (revocation) of respondent's license.

If during the period of probation, an accusation or petition to revoke probation has been filed against respondent's license or the Attorney General's Office has been requested to prepare an accusation or petition to revoke probation against respondent's license, the

additional 12-step meeting or equivalent shall be added. Respondent shall submit dated and signed documentation confirming such attendance to the Board during the entire period of probation. Respondent shall continue with the recovery plan recommended by the treatment/rehabilitation program or a licensed mental health examiner and/or other ongoing recovery groups.

(15) ABSTAIN FROM USE OF PSYCHOTROPIC (MOOD-ALTERING) DRUGS -

Respondent shall completely abstain from the possession, injection or consumption by any route of all psychotropic (mood altering) drugs, including alcohol, except when the same are ordered by a health care professional legally authorized to do so as part of documented medical treatment. Respondent shall have sent to the Board, in writing and within fourteen (14) days, by the prescribing health professional, a report identifying the medication, dosage, the date the medication was prescribed, the respondent's prognosis, the date the medication will no longer be required, and the effect on the recovery plan, if appropriate. Respondent shall identify for the Board a single physician, nurse practitioner or physician assistant who shall be aware of respondent's history of substance abuse and will coordinate and monitor any prescriptions for respondent for dangerous drugs, controlled substances or mood-altering drugs. The coordinating physician, nurse practitioner, or physician assistant shall report to the Board on a quarterly basis respondent's compliance with this condition. If any substances considered addictive have been prescribed, the report shall identify a program for the time limited use of any such substances. The Board may require the single coordinating physician, nurse practitioner, or physician assistant to be a specialist in addictive medicine, or to consult with a specialist in addictive medicine.

(16) SUBMIT TO TESTS AND SAMPLES - Respondent, at her expense, shall participate in a random, biological fluid testing or a drug screening program which the Board approves. The length of time and frequency will be subject to approval by the Board. The respondent is responsible for keeping the Board informed of respondent's current telephone number at all times. Respondent shall also ensure that messages may be left at the telephone number when she is not available and ensure that reports are submitted directly by the testing agency to the Board, as directed. Any confirmed positive finding shall be reported immediately to the Board by the program and the respondent shall be considered in violation of probation. In addition, respondent, at any time during the period of probation, shall fully cooperate with the Board or any of its representatives, and shall, when requested, submit to such tests and samples as the Board or its representatives may

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of the State of California  
2 ALFREDO TERRAZAS  
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3 ARTHUR D. TAGGART, State Bar No. 83047  
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4 California Department of Justice  
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Attorneys for Complainant  
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9 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2008-88

13 **LISA MAFFEI**  
10373 East Ravenswood Street  
14 Tucson, Arizona 85747

**ACCUSATION**

15 Registered Nurse License No. 444582

16 Respondent.

17  
18 Ruth Ann Terry, M.P.H., R.N. ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the  
21 Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer  
22 Affairs.

23 2. On or about August 31, 1989, the Board issued Registered Nurse License  
24 Number 444582 to Lisa Maffei ("Respondent"). The license expired on March 31, 2009, and has  
25 not been renewed.

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1 FIRST CAUSE FOR DISCIPLINE

2 (Out-of-State Discipline)

3 8. Respondent is subject to discipline under Code section 2761(a)(4), in that  
4 effective October 10, 2006, before the Arizona State Board of Nursing, in a matter entitled, *In*  
5 *The Matter of Professional Nurse License No. RN102575, Issued to: Lisa Maffei*, Respondent  
6 was disciplined by the Arizona Board resulting in the revocation of Professional Nurse License  
7 No. RN102575, as more particularly set forth in the Findings of Fact of the Consent Agreement  
8 and Order, attached hereto as Exhibit A.

9 PRAYER

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

- 12 1. Revoking or suspending Registered Nurse License Number 444582, issued  
13 to Lisa Maffei;
- 14 2. Ordering Lisa Maffei to pay the Board of Registered Nursing the  
15 reasonable costs of the investigation and enforcement of this case, pursuant to Code  
16 section 125.3; and,
- 17 3. Taking such other and further action as deemed necessary and proper.

18 DATED: 9/19/07

19   
20 RUTH ANN TERRY, M.P.H., R.N.  
21 Executive Officer  
22 Board of Registered Nursing  
23 Department of Consumer Affairs  
24 State of California  
25 Complainant

25 SA2006103698  
26 Accusation (kdg) 8/30/07