

LOUISIANA PROFESSIONAL ENGINEERING
AND LAND SURVEYING BOARD
9643 BROOKLINE AVENUE, SUITE 121
BATON ROUGE, LOUISIANA 70809-1443
(225) 925-6291

IN THE MATTER OF:)	CASE NO. 2013-77
)	
ROBERT C. STEWART)	
)	
RESPONDENT)	
)	
)	
)	

CONSENT ORDER

The Louisiana Professional Engineering and Land Surveying Board [hereinafter the “Board”], by and through its Executive Director, pursuant to authorization by the Board, and Robert C. Stewart [hereinafter “Respondent”], hereby agree to the following:

At all times material hereto, Respondent was certified in the State of Louisiana as a land surveyor intern, number LSI-597.

An investigation was opened based upon the Board’s receipt of information and documents which suggested that Respondent may have violated the Board’s laws and/or rules in connection with applying to the Board for licensure as a professional land surveyor. The investigation disclosed that during the process of applying to the Board for licensure as a professional land surveyor in 2013, Respondent knowingly and intentionally forged the contents of and forged the signatures on numerous documents which he submitted to the Board in connection with his application for licensure. These documents included verification of experience forms, personal reference forms and associated envelopes.

Additionally, the investigation disclosed that during the same process Respondent knowingly and intentionally included false employment history information on numerous documents which he submitted to the Board in connection with his application for licensure. These documents included the application for licensure form, verification of experience forms and personal reference forms.

La. R.S. 37:698(A)(1) prohibits certificate holders from committing any fraud, deceit, material misstatement or perjury and from giving any false or forged evidence in applying for a license. La. R.S. 37:698(H) permits the Board to take disciplinary action against persons who violate La. R.S. 37:698(A)(1), upon a finding of guilt following the preferral of charges, notice

and hearing and a majority vote of its entire membership authorized to participate in the proceeding. La. R.S. 37:698(A)(1) and (H) were in effect at all times material hereto.

It is undisputed that in 2013 Respondent committed fraud, deceit and perjury, made material misstatements and submitted false and forged information and documents to the Board in connection with his application for licensure as a professional land surveyor.

By letter dated August 14, 2014, the Board gave notice to Respondent that it was considering the preferral of charges against Respondent on the grounds that he may have violated La. R.S. 37:698(A)(1), relative to committing any fraud, deceit, material misstatement or perjury or the giving of any false or forged evidence in applying for a license.

Wishing to dispense with the need for further disciplinary action and to conclude the instant proceeding without further delay and expense, for the purpose of this proceeding only, Respondent and the Board do hereby enter into this Consent Order, in which Respondent of his own free will consents to the issuance of a Consent Order by the Board, wherein Respondent agrees to (a) the revocation of his Louisiana land surveyor intern certificate and (b) the publication of this Consent Order on the Board's website and a summary of this matter in the Board's official journal, the *Louisiana Engineer and Surveyor Journal*, and the reporting of this matter to the National Council of Examiners for Engineering and Surveying (NCEES), identifying Respondent by name.

Respondent admits that his conduct as set forth above constitutes violations of the above referenced laws and/or rules as stated herein. Respondent acknowledges awareness of said laws and/or rules and states that he will comply with all applicable laws and rules henceforth. Respondent has been advised of his right to be represented by counsel before the Board and/or to appear at any hearing personally or by counsel and present witnesses and evidence in his own behalf, and he hereby waives this right and his right to appeal; and he states affirmatively that he has been afforded all administrative remedies due him under the law. Respondent further acknowledges awareness of the fact that the signed original of this Consent Order will remain in the custody of the Board as a public record and will be made available for public inspection and copying upon request.

Therefore, in consideration of the foregoing and by signing this Consent Order, Respondent does hereby waive his right to a hearing before the Board, to the presenting of

evidence and witnesses in his behalf, to Findings of Fact and Conclusions of Law in this case, and to judicial review of this Consent Order.

Respondent hereby represents (a) that he fully understands the meaning and intent of this Consent Order, including but not limited to its final and binding effect, (b) that he has voluntarily entered into this Consent Order and that no other promise or agreement of any kind has been made to or with him by any person whatsoever to cause the execution of this instrument and (c) that the sanctions set forth in this Consent Order do not prevent the Board from taking further disciplinary or enforcement action against Respondent on matters not specifically addressed in this Consent Order.

WHEREFORE, the Louisiana Professional Engineering and Land Surveying Board and Respondent agree that:

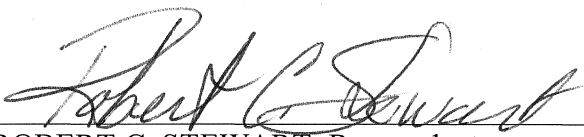
1. Respondent's Louisiana land surveyor intern certificate, number LSI-597, is hereby revoked, and Respondent shall immediately return to the Board his Louisiana land surveyor intern certificate; and
2. This Consent Order shall be published on the Board's website and a summary of this matter shall be printed in the official journal of the Board, the *Louisiana Engineer and Surveyor Journal*, and reported to the National Council of Examiners for Engineering and Surveying (NCEES), identifying Respondent by name; and
3. This Consent Order shall not become effective unless and until it is accepted and signed by and on behalf of the Board. Should the Board not accept and sign this Consent Order, it is agreed that presentation of this matter to the Board shall not prejudice the Board or any of its members, staff, attorneys or representatives from further participation, consideration, or resolution of any further proceedings herein.

LOUISIANA PROFESSIONAL ENGINEERING
AND LAND SURVEYING BOARD

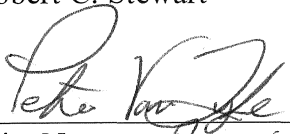
DATE: Sept. 15, 2014

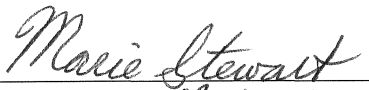
BY: Donna D. Sentell
DONNA D. SENTELL, Executive Director

DATE: 8/20/2014


ROBERT C. STEWART, Respondent

Witnesses to the signature of
Robert C. Stewart


Print Name: Peter Van Dyke


Print Name: Marie Stewart