



1 being voluntarily waived by RESPONDENT in exchange for the BOARD'S acceptance of  
2 this Consent Decree.

3 If the Consent Decree is not accepted by the BOARD, no member of the BOARD will  
4 be disqualified from further hearing of this matter, by reason of his or her consideration of  
5 the Consent Decree. RESPONDENT hereby waive any claim of bias or prejudice based  
6 upon said consideration by any member of the BOARD in any subsequent disciplinary  
7 hearing conducted by the BOARD. Further, RESPONDENT is allowed to contest any and  
8 all issues and dispute all facts in the event the board does not accept the Consent Decree.

### 9 JURISDICTION

10 RESPONDENT acknowledges that the BOARD has jurisdiction over him, and the  
11 conduct alleged in the Complaint. RESPONDENT acknowledges that the BOARD has the  
12 legal power and authority to take disciplinary action, including, but not limited to, the  
13 revocation of licenses to practice as a funeral director and embalmer in Nevada.

14 RESPONDENT acknowledges that the BOARD will retain jurisdiction over this  
15 matter until all terms and conditions set forth in this Consent Decree have been met to the  
16 satisfaction of the BOARD.

### 17 PUBLICATION OF CONSENT DECREE

18 RESPONDENT acknowledges that at the time this Consent Decree becomes  
19 effective, it also becomes a public document and will be reported to the State of Nevada,  
20 Legislative Council Bureau, Disciplinary Action Reporting System; and such other national  
21 databases as required by law. It is also understood that any meeting during which the  
22 BOARD considers and accepts or rejects this Consent Decree is open to the public and that  
23 the minutes of the BOARD meeting are a public document, available for inspection by any  
24 person so requesting.

### 25 INDEMNIFICATION

26 RESPONDENT, for himself, his heirs, executors, administrators, successors and  
27 assigns, hereby indemnify and hold harmless the State of Nevada, the BOARD, the Nevada  
28 Attorney General's Office and each of its members, agents and employees in their

1 individual and representative capacities against any and all claims, suits, demands,  
2 actions, debts, damages, costs, charges, and expenses, including court costs and attorney's  
3 fees against any persons entities as well as all liability, losses, and damages of any nature  
4 whatsoever that the persons and entities named in this paragraph shall have or may at  
5 any time sustain or suffer by reason of this investigation, this disciplinary action, this  
6 settlement or its administration.

### 7 STIPULATED FACTS AND CONCLUSIONS OF LAW

8 RESPONDENT understands the nature of the allegations under consideration by  
9 the BOARD. He acknowledges that the conduct alleged in the Complaint, if proven,  
10 constitutes violations of the Nevada Board of Funeral and Cemetery Services Practice Act  
11 (NRS and NAC 642) and NRS Chapter 451. He further recognizes that if this matter were  
12 to be taken to a disciplinary hearing before the BOARD, there is a substantial likelihood  
13 that the following allegations could be proven as true, and that as a result he would be  
14 subject to disciplinary action by the BOARD. As such, RESPONDENT does not contest the  
15 following allegations:

16 1. RESPONDENT held a valid funeral director license and embalmer license at  
17 all times relevant to this Complaint.

18 2. The BOARD initiated a complaint on or about October 1, 2021, alleging  
19 that on May 29, 2019, RESPONDENT was granted a funeral director and embalmer  
20 license during a public meeting due to the fact that he self-reported he had a pending  
21 criminal matter in the State of Idaho.

22 3. At the time of licensure, RESPONDENT had not been convicted of any crime,  
23 but there was a possibility of a future conviction.

24 4. During the public meeting, the BOARD conditioned RESPONDENT's license  
25 by requiring him to submit quarterly updates regarding the status of the case.

26 5. RESPONDENT complied with this requirement for the last two (2) years.

27 6. On or about October 1, 2021, RESPONDENT self-reported that he had  
28 entered into a plea bargain whereby he plead guilty to GRAND THEFT in the State of

1 Idaho and one count of TAX EVASION for not paying for the Idaho State Income Tax on  
2 the sums of money allegedly taken. Sentencing is pending.

3 7. NRS 642.130(2) states that the Board may take disciplinary action against a  
4 person who is licensed to practice the profession of embalming pursuant to this chapter for  
5 unprofessional, unethical, or dishonest conduct.

6 8. NRS 642.5174(6) states that unprofessional conduct includes gross  
7 immorality.

8 9. NRS 642.5174(6) states that unprofessional conduct includes unethical  
9 practices contrary to the public interest as determined by the Board.

10 10. NRS 642.5175 states that the Board may take disciplinary action against any  
11 person who holds a license, permit or certificate issued by the Board pursuant to this  
12 chapter or chapter 451 or 452 of NRS for conviction of a crime involving moral turpitude.

13 11. NRS 642.5175 states that the Board may take disciplinary action against any  
14 person who holds a license, permit or certificate issued by the Board pursuant to this  
15 chapter or chapter 451 or 452 of NRS for conviction of a felony relating to the practice of  
16 funeral directors.

17 12. That pursuant to Nevada Revised Statute (NRS) 642.5175:  
18 The following acts are grounds for which the Board may take  
19 disciplinary action against a person who holds a license, permit,  
20 or certificate issued by the Board pursuant to this chapter or  
21 chapter 451 or chapter 452 of NRS, or may refuse to issue such a  
22 license, permit, or certificate to an applicant therefor:  
23 1) Conviction of a crime involving moral turpitude.  
24 2) Unprofessional conduct.  
25 3) False or misleading advertising.  
26 4) Conviction of a felony relating to the practice of funeral  
27 directors or funeral arrangers.  
28 5) Conviction of a misdemeanor that is related directly to the  
business of a funeral establishment, direct cremation facility,  
cemetery, or crematory.

25 13. That pursuant to Nevada Revised Statute (NRS) 642.5176:  
26 If the Board determines that a person who holds a license, permit  
27 or certificate issued by the Board pursuant to this chapter or  
28 chapter 451 or 452 of NRS has committed any of the acts set forth  
in NRS 642.5175 the Board may:  
1) Refuse to renew the license or permit;  
2) Revoke the license or permit;

1 3) Suspend the license or permit for a definite period or until  
further order of the Board;

2 4) Impose a fine of not more than \$5,000 for each act that  
constitutes a ground for disciplinary action;

3 5) Place the person on probation for a definite period subject to  
any reasonable conditions imposed by the Board;

4 6) Administer a public reprimand; or

5 7) Impose any combination of disciplinary actions set forth in  
paragraphs (a) to (f), inclusive.

6 a) The Board shall not administer a private reprimand.

7 b) An order that imposes discipline and the findings of fact  
and conclusions of law supporting that order are public records.

8 14. RESPONDENT does not contest the allegations in the Complaint, and  
9 acknowledges that as a consequence they are subject to discipline pursuant to the above  
10 charges and statutory provisions.

11 **STIPULATED ADJUDICATION**

12 RESPONDENT stipulates that pursuant to the authority of NRS 642.5176, the  
13 BOARD will impose a suspension of his funeral director license and embalmer license for  
14 one (1) year. This suspension will be stayed, and RESPONDENT will be placed on  
15 probation for five (5) years. During the term of the probation, RESPONDENT agrees to  
16 comply with the following conditions:

17 1. Within thirty (30) days of the approval and execution of this Consent Decree,  
18 RESPONDENT shall pay seven hundred seventeen and 20/100 dollars (\$717.20) in  
19 attorney's fees and costs. RESPONDENT may contact the BOARD within thirty (30) days  
20 and submit a proposal in writing and propose a reasonable request for a monthly payment  
21 plan to reimburse the BOARD. Any proposed reasonable payment plan must have the  
22 balance paid-in-full within one (1) year of the executed consent decree and must be  
23 approved by the BOARD'S Executive Director. Failure to remit payment to the BOARD  
24 for the attorney's fees shall be viewed as non-compliance by RESPONDENT as it pertains  
25 to this Consent Decree, with the BOARD engaging in the option to pursue collection of this  
26 unreimbursed cost.

27 2. Should RESPONDENT be charged with any crimes of moral turpitude during  
28 the term of the five (5) year probation, his license shall be suspended immediately.

1           3.       RESPONDENT shall complete ten (10) hours of BOARD approved Continuing  
2 Education in ethics by December 31, 2023. Documentation of completion of continuing  
3 education must be submitted to the BOARD. The ten (10) hours of continuing education  
4 course(s) cannot be used towards continuing education already required for continued  
5 licensure as a funeral director and embalmer by the BOARD.

6           4.       RESPONDENT shall provide a copy of the consent decree to each employer  
7 until all requirements of the Consent Decree have been met. Such notification shall be  
8 signed by each employer. RESPONDENT shall submit, upon request by the BOARD or its  
9 designee, satisfactory evidence of compliance with the terms of this Consent Decree.

10          5.       RESPONDENT shall obey all federal, state and local laws, and orders of the  
11 BOARD, which are not inconsistent with this Consent Decree, pertaining to the practice of  
12 a funeral director and embalmer in this State. Any and all violations shall be reported by  
13 RESPONDENT to the BOARD in writing within seventy-two (72) hours.

14          6.       RESPONDENT agrees that it will be financially responsible for all  
15 requirements of this Consent Decree and any reasonable financial assessments by the  
16 Board for the Cost of monitoring its compliance or carrying out the provisions of this  
17 Consent Decree.

18          7.       After five (5) years from the approval and execution of the Consent Decree,  
19 RESPONDENT shall submit a written request to the BOARD for termination of the  
20 probation. RESPONDENT understands that prior to terminating the probation it must  
21 prove to the BOARD's satisfaction that it has complied with all the terms and conditions of  
22 the Consent Decree. The BOARD may request additional information from  
23 RESPONDENT to determine compliance with the terms of the Consent Decree and may  
24 require that its representative meet with the Executive Director and BOARD counsel for  
25 further evaluation of its compliance with the Consent Decree. If the BOARD does not  
26 request additional information or initiate any further investigation, the probation shall be  
27 automatically terminated.

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1 **VIOLATION OF TERMS OF CONSENT DECREE**

2 RESPONDENT understands that the BOARD may, upon thirty (30) days' notice to  
3 him, convene a hearing for the limited purpose of establishing that he violated the terms  
4 of this Consent Decree. If such a hearing results in a finding of a violation of this Consent  
5 Decree, the BOARD may impose any penalty upon RESPONDENT authorized by NRS  
6 642.5176.

7 RESPONDENT agrees to waive his rights to appeal the substantive legal basis of  
8 the original disciplinary action, which is the basis for this Consent Decree. In the event an  
9 alleged violation of the Consent Decree is taken to hearing and the facts that constitute the  
10 violation are determined to be not proven, no disciplinary action shall be taken by the  
11 BOARD.

12 **ACCEPTANCE BY THE BOARD**

13 This Consent Decree will be presented and accepted by the BOARD with a  
14 recommendation for approval from the Attorney General's Office at its next meeting.

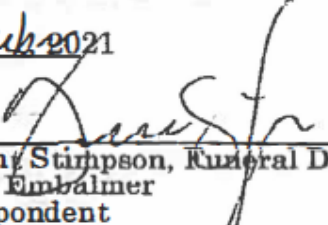
15 **COMPLETE CONSENT DECREE**

16 This Consent Decree embodies the entire agreement between the BOARD and  
17 RESPONDENT. It may not be altered, amended, or modified without the express written  
18 consent of the parties.

19  
20 DATED this 17<sup>th</sup> day of November, 2021

21 By:   
22 Robert J. Wines, Esq.  
23 Robert J. Wines, Prof. Corp.  
24 687 6<sup>th</sup> Street, Suite 1  
25 Elko, NV 89801  
26 bobwines@citlink.net  
27 775-738-3171 - Telephone  
28 775-753-9860 - Facsimile

26 DATED this 17 day of November, 2021

27 By:   
28 Trent Stimpson, Funeral Director  
and Embalmer  
Respondent

1 The foregoing Consent Decree between RESPONDENT and the STATE OF  
2 NEVADA FUNERAL AND CEMETERY SERVICES BOARD in Case Nos. FB21-40 is  
3 approved as to form and content.

4 DATED this 17th day of November, 2021.

5 AARON D. FORD  
6 Attorney General

7 By:                   /s/ Henna Rasul                    
8 HENNA RASUL  
9 Senior Deputy Attorney General  
10 Office of the Attorney General  
11 100 North Carson Street  
12 Carson City, Nevada 89701  
13 (775) 684-1100  
14 hrasul@ag.nv.gov

*Counsel to the State of Nevada, Funeral  
and Cemetery Services Board*


14 **ORDER**

15 By a majority vote on the \_\_\_\_ day of \_\_\_\_\_, 2021, the State of Nevada Board  
16 of Funeral and Cemetery Services approved and adopted the terms and conditions set forth  
17 in the attached Consent Decree with TRENT STIMPSON.

18 **IT IS HEREBY ORDERED AND MADE EFFECTIVE.**

19 DATED this 16<sup>TH</sup> day of DECEMBER, 2021

21 STATE OF NEVADA FUNERAL AND  
22 CEMETERY SERVICES BOARD

23 By:   
24 DR. RANDY SHARP  
25 Board Chairman  
26  
27  
28