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6 Attorney for Defendant  
7 SAN JOAQUIN COUNTY MOSQUITO  
8 AND VECTOR CONTROL DISTRICT

9 WORKERS' COMPENSATION APPEALS BOARD  
10 STATE OF CALIFORNIA

11 TIFFANY ANDERSON, ) CASE NO: ADJ 7976768  
12 )  
13 Applicant, )  
14 vs ) ANSWER TO APPLICATION FOR  
15 ) DISCRIMINATION BENEFITS UNDER  
16 ) LABOR CODE § 132(a)  
17 SAN JOAQUIN COUNTY MOSQUITO )  
18 AND VECTOR CONTROL DISTRICT )  
19 )  
20 )  
21 )  
22 Defendant. )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

29 COMES NOW the defendant and employer San Joaquin County Mosquito and Vector  
30 Control District who answers the allegations of Tiffany Anderson as follows:

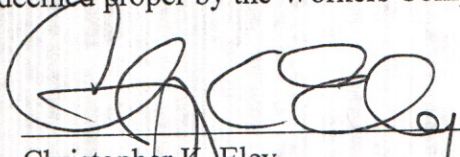
- 31 1. District admits that Ms. Anderson did previously file an application with the WCAB,  
32 that the application was resolved by settlement and that applicant returned to work on August 30,  
33 2010.
- 34 2. District admits that applicant was not required to perform fishing duties in July 2011  
35 but continued to perform her usual work duties.
- 36 3. Except as specifically admitted, District denies the allegation of wrongdoing alleged in  
37 the application. Specifically, District denies that it discriminated against Ms. Anderson based on  
38

1 her filing of an application with the WCAB or based on her receiving a rating or award for work  
2 related injury. District denies that it conspired with others to discriminate against Ms. Anderson  
3 based on her filing of an application with the WCAB or based on her receiving a rating or award  
4 for work-related injury. District denies that it instructed its employees to discriminate against Ms.  
5 Anderson based on her filing of an application with the WCAB or based on her receiving a rating  
6 or award for work related injury.

7 4. As an affirmative defense, District asserts that the application does not allege that the  
8 District discharged or threatened to discharge or discriminated in any manner to cause any  
9 economic injury to Ms. Anderson. The application alleges that other employees were instructed  
10 not to talk to her, that her litigation against the District was listed on the board meeting agenda  
11 and other miscellaneous charges. While denying any wrongdoing, District asserts that this  
12 petition does not state a cause of action as Applicant does not allege any financial or otherwise  
13 compensable damage.

14 WHEREFORE defendant SJMVCD prays that applicant take nothing by her petition and  
15 that Defendant be awarded any other relief deemed proper by the Workers Compensation  
16 Appeals Board.

17 Dated: September 14, 2011

  
\_\_\_\_\_  
Christopher K. Eley  
Attorney for Defendant

**PROOF OF SERVICE**

I am over the age of eighteen years, not a part to this action, and employed in San Joaquin County at 343 E. Main Street, Stockton, California 95202, (209) 466-8511.

On September 15, 2011, I served the following document(s):

**ANSWER TO APPLICATION FOR DISCRIMINATION BENEFITS UNDER  
LABOR CODE § 132(a)**

  xx   BY MAIL: I caused such envelope to be deposited in the mail at my business address, addressed to the addressee(s) designated. I am readily familiar with the collection and processing of correspondence and pleadings for mailing of this office. It is deposited with the United States Service on that same day in the ordinary course of business.

       BY FACSIMILE: I caused a true copy of the above documents to be transmitted to the facsimile machine number(s) of the addressee(s) designated.

       (BY FEDERAL EXPRESS) by placing a true copy thereof enclosed in a sealed envelope, prepaid, deposited with the Federal Express carrier/box at Stockton, California, addressed as indicated above.

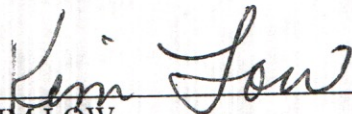
       (BY PERSONAL SERVICE) by hand delivering and leaving a true copy with the person and/or secretary at the address indicated above.

       BY ELECTRONIC MAIL: I caused a true copy of the above documents to be transmitted via email to the. Email addresses below.

**Tiffany Anderson  
2 N. Avena Avenue  
Lodi, CA 95240**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 15, 2011 at Stockton, California.

  
KIM LOW