

A Professional Corporation

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November 29, 2014

Ms. Tiffany Anderson 2 N. Avena Ave Lodi, CA 95240

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LIEN SPECIALISTS

RE: ANDERSON, TIFFANY VS. SAN JOAQUIN COUNTY MOSQUITO & VECTOR CONTROL

WCAB NO.:

1) ADJ7004221; 2) ADJ7004227; 3) ADJ7010682; 4)

* CERTIFIED SPECIALIST WORKERS COMPENSATION LAW THE STATE BAR OF CALIFORNIA BOARD OF LEDAL SI † ALSO LICENSED IN THE STATE OF ILLINOIS 11 ALSO LICENSED IN THE STATE OF NEW YORK 111 ALSO LICENSED IN THE STATE OF NEW ADA 1111 ALSO LICENSED IN THE STATE OF TOOLUMBIA AND STATE OF WASHINGTON 1111 ALSO LICENSED IN THE DISTRICT OF COLUMBIA AND STATE OF WASHINGTON 1111 ALSO LICENSED IN THE STATE OF PENNSYLVANIA 1111 ALSO LICENSED IN THE STATE OF PENNSYLVANIA 1111 ALSO LICENSED IN THE STATE OF PENNSYLVANIA

ADJ7976768; 5) ADJ9066508

CLAIM NO .:

VE0700184

OUR FILE NO.:

300141-040

DATE OF LOSS:

1) 6/19/2008; 2) 7/2/2009; 3) 3/26/2009; 4)

6/29/2011; 5) CT - 11/30/11

Dear Ms. Anderson:

Enclosed please find your vaccination records. Please recall that you had thought there were pre-employment vaccination records. These are actually dated after your date of hire. Yet, I believe this is what you were looking for.

Additionally, I received your e-mail following your non-appearance at the MSC on 11/25/14. I am sorry for your loss. However, in the future, you must contact me prior to an appearance to notify me of this sort of thing rather than after. This is the second time in a row you have failed to appear for a conference. If this continues, I will have to seek costs from the WCAB for my continued appearance.

LOS ANGELES OFFICE 3580 Wilshire Boulevard, 19TH Floor Los Angeles, California 90010 (323) 935-6669

ORANGE COUNTY OFFICE 701 South Parker Street, Suite 2200 Orange, California 92868-4736 (714) 479-1180

SAN DIEGO OFFICE 750 "B" Street, Suite 2340 San Diego, California 92101 (619) 696-1436

SAN FRANCISCO OFFICE 222 Kearny Street, 9TH Floor San Francisco, California 94108 (415) 734-9310

SAN BERNARDING OFFICE 735 East Carnegie Drive, Suite 270 San Bernardino, California 92408 (909) 381-5553

SAN LUIS OBISPO OFFICE 1150 Osos Street, Suite 202 San Luis Obispo, California 93401-3692 (805) 541-0440

VENTURA OFFICE 2021 Sperry Avenue, Suite 46 Ventura, California 93003-7417 (805) 654-8994

FRESNO OFFICE 8080 N. Palm Avenue, Suite 101 Fresno, California 93711 (559) 226-9030

ANDERSON, TIFFANY VS. SAN JOAQUIN COUNTY MOSQUITO & VECTOR CONTROL

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November 29, 2014

Thank you for your attention to the above.

Very truly yours,

STOCKWELL, HARRIS, WOOLVERTON & MUEHL A Professional Corporation

SARA A. SKOLNIK

SAS:dk

cc: Mr. David Gutierrez, AIMS Insurance (Sacramento)

Mr. Eddie Lucchesi, San Joaquin County Mosquito & Vector Control

District

Enclosure: Vaccination records

PLEASE Dameron Hospital Assocation Tax ID:94-1201197

REMIT TO:

PO Box 4266 Stockton, CA 95204

Phone: (209) 461-3196 Fax : (209) 461-3123



Page 1 of 1

INVOICE

889-24

Amount Due:

120.00

Invoice Date: 07/06/2004

SJ Mosquito and Vector Control 7759 S Airport Way Stockton, CA 95206

| Service Date/Total | Description | Code | Charge |
|--------------------|--|--------------|--------|
| 06/11/2004 | Proc - Hepatitis Case: 55607 Procedures Case: 55607 | 79320 | 50.0 |
| Total: \$ 60.00 | Injection Fee | 84566 | 10.0 |
| 06/11/2004 | Anderson, Tiffany K Proc - Hepatitis Procedures Hepatitis B Vaccine | 79320 | 50.0 |
| Total: \$ 60.00 | Injection Fee | 84566 | 10.0 |
| | Halet Halet Hisa Enr RECEIVE | - P. 200 - 1 | |

PLEASE

Dameron Hospital Assocation Tax ID:94-1201197

REMIT TO:

PO Box 4266 Stockton, CA 95204

Phone: (209) 461-3196 : (209) 461-3123



SJ Mosquito and Vector Control 7759 S Airport Way Stockton, CA 95206

Page 1 of

INVOICE

889-28

Amount Due:

173.00

Invoice Date:

01/06/2005

| Service Date | e/Total | Description | Code | Charge |
|--------------|---------|--|----------------------------------|----------------------------------|
| 12/01/2004 | | Proc - Hepatitis Case: 55607 Procedures | | |
| Total: \$ | 20.00 | Hepatitis B HBsAb Specimen Handling Fee | 34162 84657 | 10.00 10.00 |
| 12/01/2004 | | Anderson, Tiffany K 549-23-5133 Proc - Hepatitis Case: 55609 Procedures | | |
| Total: \$ | 20.00 | Hepatitis B HBsAb Specimen Handling Fee | 34162 84657 | 10.00 10.00 |
| 12/17/2004 | | Exam - Pre-placement Case: 65030 | | |
| | | Limited Non-DOT Panel Urine Drug Screen Collection Back Evaluation | 84129 84517 84459 87015 | 40.00 13.00 20.00 60.00 |
| Total: \$ | 133.00 | Back Evaluation | 07010 | |
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| Anderson, Tiffany K | Y X | 02/02/2005 | 2005 | | | | | | |
|--------------------------------------|---------------------|-----------------|------------|--------|---------------|--------------|-------------------------------|----------|-------|
| Case# 55609 | DC | DOB: 08/22/1970 | 1970 | | Dam | ameror | eron Hospital | tal | |
| SJ MIOSQUITO and Vector Control MRN: | ector Control MR | N: 626041 | - | Imm | Immune Status | tus and | and Vaccination Record | ation Re | cord |
| 1 | Titer Results | | | | | MMR Va | MMR Vaccination | | |
| | Date | Immune | Non-immune | Date | Manufacturer | Lot# | Exp. Date | Arm | Staff |
| Rubeola (immune >1.0) | | | (3 | | | | | | |
| Rubella (immune >10) | | | | | | | | | |
| Varicella (immune ≥1.1) | | | | | | | | | |
| | | | | | | | | | |
| | Test Result | | | | | Varicella \ | Varicella Vaccination | | |
| | Date | Positive | Negative | Date | Manufacturer | Lot# | Exp. Date | Arm | Staff |
| HBsAg | | | | | | | | | |
| HBsAb (≥10 mIU/mI) | | | | | | | | | |
| HBsAb (≥10 mIU/ml) | | | | | | Hepatitis B | Hepatitis B Vaccination | | |
| HBsAb (≥10 mIU/ml) | | | | Date | Manufacturer | Lot# | Exp. Date | Arm | Staff |
| | | | | | | | | | |
| Hepatitis C Ab | | | | | | | | | |
| Hepatitis C - RIBA | | | | | | | | | |
| Hepatitis C - RNA | | | | | | HEP, | B | | |
| | sale | | | 2/2/05 | O K | VHATSOM4-1 | 4 1)30/08 | 7 | 2 |
| | | | | | | | | | |
| RPR | | | | | 1 | etanus/Dipth | Tetanus/Diptheria Vaccination | on I | |
| PPD - 1st Step | | | | Date | Manufacturer | Lot# | Exp. Date | Arm | Staff |
| PPD - 2nd Step | | | | 2/2/05 | etwention | W. 1961M | 90/52/0g | D | 20% |
| Chest X-ray | | | | | | | | | |

Memo

To:

FILE

From: Eddie Lucchesi, Manager

Date: April 17, 2014

C

Re:

T Anderson 3/8/2014 e-mail referencing four individual exposure claims.

In response to T Anderson e-mail that references four individual exposures, the following information was obtained from District WC information.

6/04 Information obtained from DWC Form 1 dated 6-8-04. States she was exposed to poison oak on her legs and ankles while working on the McGurk Property located east of Linden, CA.

Diagnosis from Dameron Occupational Health confirms Dermatitis, contact irritant released to full work duties.

 1/05 Information obtained from DWC Form 1 dated 1-26-05. States she was unloading brush / weeds into dumpster at Stockton Yard located at 7759 S Airport Way, Stockton, CA

Diagnosis from Dameron Occupational Health confirms an allergic reaction. Off balance of shift; return to full work next day.

* 10/05 Information obtained from DWC Form 1 dated 10-13-05. States she had a rash on midsection of body, spreading to head and sore throat while working on McDonald Island, Holt, CA. Was dipping for mosquito larvae in flooded area, slipped down into water. Something irritated her skin developed rash.

Diagnosis from Dameron Occupatonal Health confirms Dermatitis, Contact Allergic off balance of shift; return to full work next day.

6/11 Information obtained from DWC Form 1 dated 7-1-11. States she walked into metal stake that was hidden in grass around pond. Driven thru right knee and lower incision of prior surgery.

Diagnosis from US Healthworks indicated a contusion of right knee - first aid case return to work without restrictions.

Eddie Lucchesi

From:

Tiffany Anderson [tiffanyanderson@me.com]

Sent:

Saturday, March 08, 2014 2:37 AM

To: Cc:

Eddie Lucchesi; Kyle Hansen; MALINDA TUAZON les mahler; belliott@sjgov.org; styrrell@sjgov.org

Subject:

Is potassium permanganate better than formalin?

Attachments:

Backup of Dear Kyle12_10_12.docx; ATT00063.htm; Kyle Hanson Doc Re-Request 2 28 2014.docx; ATT00066.htm; WebPage.pdf; ATT00069.htm; scott1.pdf; ATT00072.htm; scott2.pdf; ATT00075.htm; scott1.pdf; ATT00078.htm; scott2.pdf; ATT00081.htm

Eddie-

Your refusal to provide me with my medical records and all promised documents has left me without medical, income and the ability to move on. I have canceled two QME appointments because I have been lied to. This is my life you are dragging out.

I have endured 4 individual exposures 6/04, 1/05, 10/05, 6/11

6/04, 1/05, 10/05 within my first year of employment under your license

1/05 occurred at your White Slough Facility and my medical records are missing and you refuse to give them to me

6/11 John Stroh refused to allow me a DWC-1 claim form

After filing a sexual harassment complaint 7/07 against Bob Durham and now wife Janine Esau Finely Durham I was immediately relocated to a new job assignment that you knew was prone to knee injuries

During this time period I was subjected to discrimination by you

I endured retaliation by Bob Durham with a retaliatory evaluation 1/08

I endured retaliation by management by method of Keith Neinhuis with a second evaluation 1/08

I was required to be in hostile conditions daily with Janine alone in our locker room and in field operations 2005 to 2011

I was blackballed as employees were told to not help or speak to me

I was intimidated by you, John and employees who yelled and berated me

I documented everything Eddie

I suffered 3 knee injuries requiring surgery

claims of meniscal tears

knee 1 6/08

knee 2 7/09

knee 3 6/11

The 7/09 injury I called the Whistle Blower hotline posted on our break room wall looking for protection. John smugly referred employees to the option on 4-1-08 in our General Meeting to use if we had a problem with him.

11-9-09 Letter from John Stroh offers 30 days of light duty to me

11-16-09 I return to and work for John doing a made up nothing job isolated in the board room and watched by the office staff

11-17-09 Letter from Chris Eley informing me he is investigating my Whistle Blower complaint of

12-11-09 I am required to meet with Chris Eley unrepresented. Chris Eley can not look me in the eyes

12-12-09 The annual board and employee lunch. I hand Mike Manna 10 binders filled with my employee file for each board member. The board refused to meet with me regarding John Stroh, but did vote themselves in health care benefits.

12-16-09 John Stroh informs me my last day of accommodations are 12-18-09

On the 6/11 injury I walked into a metal t-post. It struck me right on my two post op knee scars. Your new occupational US Health Works (2010) (Dameron Occupational 2004-2010) provider spoke with Stroh violating HIPPA. It was the first time I was seen at this clinic and clearly unaware of the districts long history with injured employees. My injury minimized and not properly treated. I was forced to work until I found a physician to report to your insurance company the reality of my injury. As a result of neglect I was required to go back to my field duties where contaminated water consisting of manure water and pesticides (Vectobac & BVA oil) I sprayed prior entered my wound while treating the flooded pasture with more chemical (Vectolex). I felt sick for many days while working. I called a co worker and asked him to pick me up in my zone because I was too dizzy to drive back and I was told no. That was the last day I returned until I was able to seek my own medical and help to understand my rights.

I was sick for over 6 months of multiple rounds of antibiotics. Paid for by me while using my sick leave. From 8-17-11 to 9-20-11

I was offered modified duty and returned on 9-21-11

9-22-11

I was followed by a private eye while on my way to work.
Required to work in Ripon not my area, no map provided
The opposite of modified duty was required retaliation
I left that day 1 hour early to attend a Work Comp appointment

9-23-11

I was interrogated by Eddie regarding my daily activities on 9-22-11 I asked if I needed representation for disciplinary action. Eddie lied and said no.

10-5-11

Eddie Lucchesi creates a conspiracy with employees to force me out of my job.

Shaoming Huang, district entomologist-on visa from China, recieved 17% raise in pay, responsible for reporting all West Nile virus to the State of CA for emergency funding (9 M surplus?)

Deanna Hopkins-Promoted as my assistant supervisor to fire me. Deanna receives benefits others do not. Emily Pope-tech 1 hired while I was out on surgery. Assigned to my zone and given my work truck #32 unheard of. Refused to talk to me, treated me with hostility and used to fire me.

Steve Azavedo-Instructed me to put my 2007 compliant of Bob Durham in writing because you had a history of protecting Bob and allowing Bob to retaliate. My shop steward for union grievances. I complained to him that morning about work concerns.

Conclusion from Eddie's Investigation

Dishonesty Being Wasteful of Working Time

For a 5 day suspension. And a 6 month probation

10-13-11

Skelly Hearing John Stroh, my union rep and myself. My union rep told John Eddie is a liar. To date unresolved.

11-23-11

My last day of modified duty prior to surgery #3

1

To date

I have not received work comp benefits

I have been denied medical care for exposure

I owe money to the district for my insurance

Formalin is a cancer causing agent. You negligently violated my rights on every level. You want to publicly report you are the victim of a disgruntled employee? I want to publicly report behavior I think is criminal.

2003-2010 Formalin was used.

You did not comply with OSHA standards. OSHA states they could only go back two years. First complaint filed with OSHA 2009

Ag Department reported you were exempt from reporting to their office because the treatments were used as medicine.

The Grand Jury reported no wrong doing found by DA. Exempt? Complaint filed 2009

2011 Was the first time I was informed of formalin treatments by DA investigator Mike Morris. He was asking about my exposure at White Slough. Since that time I have been doing my own research and I am convinced that you are responsible for neglecting the medical needs of your employees.

Duane Bridgewater's wife and son would have appreciated a MSDS label to take to the hospital during the Gi testing. Duane was 59 years old. Are we dispensable? I have a list of employees with illnesses.

Formalin is not all you expose your employees to and you know this. It is my hope that my efforts will bring awareness to the health risks required as a field technician at the district.

I want my medical records. I want you to tell your insurance company to get me what I need and you will provide it because I have suffered enough. You are holding up my life. 8 injuries in 10 years under your watch. You are self insured with a 9 million dollar surplus. I have lost over a quarter of a million in wages. You have exceeded that on legal fees.

The treatment I have endured is despicable and I will stand on principal alone.

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