

1 Sara A. Skolnik (SBN: 267324)  
2 **STOCKWELL, HARRIS, WOOLVERTON & HELPHREY**  
3 **A Professional Corporation**  
4 1007 West College Avenue #301  
5 Santa Rosa, CA 95401  
6 (707) 861-9866  
7 (707) 581-2135 Fax  
8 Attorneys for Defendant

9  
10 BEFORE THE WORKERS' COMPENSATION APPEALS BOARD  
11 OF THE STATE OF CALIFORNIA  
12

13 Tiffany Anderson, ) WCAB No.: 1) ADJ7004221; 2) ADJ7004227;  
14 ) 3) ADJ7010682; 4) ADJ7976768;  
15 Applicant, ) 5) ADJ9066508  
16 vs. )  
17 ) **ADDENDUM TO PETITION FOR**  
18 San Joaquin County MVCD; AIMS Insurance, ) **SANCTIONS**  
19 )  
20 Defendant. )  
21 )  
22 )

23 COMES NOW, defendant, San Joaquin County MVCD; AIMS, by and through  
24 its attorney of record and files this Addendum to Petition for Sanctions. Previous  
25 Petitions for Sanctions have been filed in this matter and defendant will not waste the  
26 WCAB's time by repeating the allegations contained therein.

27 At this time, the defendant has received a 2/26/16 letter from the applicant  
28 directed to Dr. Bronshvag, one of the Medical-Legal evaluators in her cases. The letter is  
attached hereto as Exhibit A. This letter lists a number of allegations regarding  
comments that were made to her at work. Not only are these allegations irrelevant to her  
claim of toxic exposure in the work place, but this is clear ex parte communication with  
the PQME. The applicant is providing non-medical information to the PQME that was  
not screened by the defense. Defendant has discussed with the applicant the rules for

1 communicating with Medical-Legal evaluators and she is well aware that she is not to  
2 provide such information.

3 Further, she has provided a link to her blog at the top of Page 1 of Exhibit A.  
4 This blog contains many slanderous items regarding the Defendant, as well as a host of  
5 non-medical information about her cases. This letter is completely inappropriate and is  
6 simply one instance of the applicant's continued violations of the regulations in her cases.

7 Defendant requests that the WCAB consider this along with the prior Petitions for  
8 Sanctions in this matter.

9 I declare under penalty of perjury that the foregoing is true and correct to the best  
10 of my knowledge.

11  
12  
13  
14 Dated: April 5, 2016

Respectfully submitted,

15 **STOCKWELL, HARRIS, WOOLVERTON & HELPHREY**  
16 A Professional Corporation

17 

18  
19 \_\_\_\_\_  
Sara A. Skolnik

20  
21 cc: Please see Proof of Service/Verification  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT "A"**

Letter from applicant to Michael Bronshvag, M.D. dated 2/26/16

COPY

Tiffany Anderson  
1900 Lakeshore Drive  
Lodi, CA 95242  
209-331-0208

<http://culexpien.com>

February 26, 2016

Dr. Michael Bronshvag  
11010 White Rock Rd., Ste. 120  
Rancho Cordova, CA 95670

Regarding: My workers' compensation claims against San Joaquin County Mosquito & Vector Control District

Dear Dr. Bronshvag:

I have now reviewed your two reports from December 15, 2015, and February 3, 2016. Thank you for your attempts at getting a complete picture of my claims and the sources of my current impairments. The referrals to experts in other fields of medicine are also greatly appreciated.

I did see your note that you'd like additional information on how my demonstrated problems most probably relate to my work experiences at the San Joaquin County Mosquito District.

Here is just a partial list:

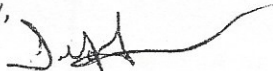
- A. I was told by a male supervisor in the first month of my employment that I didn't belong there and that I should just use my position to find a rich farmer to marry and then quit my job;
- B. I was told by that male supervisor that "I don't get paid enough to supervise you";
- C. I was offered money by that supervisor to ride in his son's bachelor party bus;
- D. I was sent home from work once because my menstrual cycle was a liability for my employer;
- E. I was repeatedly subjected to inappropriate, vulgar language from a supervisor that including references to anal sex and bestiality. I was chastised for not finding these jokes humorous;
- F. One supervisor verbally threatened another supervisor, causing him a heart attack;
- G. I personally saw the first supervisor gloating over the harm that he caused the second supervisor;
- H. I filed a sexual harassment complaint against this supervisor and management protected and tolerated his behavior. Their solution was to send us employees to an Erma training;

- I. I was relocated to a new work zone as punishment for my complaint. I was unprepared the type of zone I was transferred to;
- J. I was thereafter loudly called "Erma" and intentionally stressed by one of my co-workers and despite requests by me to a supervisor, I'm told "he can't get involved";
- K. A live snake was put on the hood of my work truck;
- L. When I turned in an insect to the laboratory, I'm intentionally humiliated in front of my co-workers as the insect turns out not to be a mosquito;
- M. I called the employee protection hotline and my complaints were directed right back to the district's own legal counsel and his investigation was bogus;
- N. I was exposed to products containing formaldehyde for years without my knowledge;
- O. A female co-worker threatened to beat me up because she began dating a male supervisor and despite flaunting the relationship at work expected no one to say a word about it;
- P. My employer has failed to maintain my complete medical records as required by law;
- Q. I was repeatedly given bad reviews on my employee performance evaluations due to my being sick all the time when my employer knew that they were the source of making me sick;
- R. In one employee performance review, my only redeeming quality was my ability to clean up the area being used for a Christmas party;
- S. The "training" for my pesticide applicator position was completely inadequate and the job description failed to match the actual work duties;
- T. My employer failed to provide safety training to protect us from repeated injuries;
- U. We were constantly understaffed and much of the staff were unlicensed, so we were out of compliance with California requirements and stressed out;
- V. My employer and their agents have employed private investigators to spy on me at my home;
- W. I've had co-workers move in right next to me who also spied on me;
- X. I was kicked out of a work carpool that I started after my co-workers were instructed by management not to talk to me;
- Y. My employer used co-workers in an attempt to fire me for stealing company time;
- Z. My employer posted in the employee break room their board's minutes in which I was a litigation item to be discussed when I was no more than a worker's compensation claim;
- AA. My employer also posted a faked letter of praise for my replacement as it was written by a co-worker's landlady;
- BB. The property on which I was last injured was the same property over which I was reprimanded for spending too much time on; I was too slow and that property is 100 acres large;
- CC. I was forced out of my job and went for years without any salary compensation or medical coverage;
- DD. My first supervisor who was dear to me passed away at age 59 from unknown medical reasons, under a year after he retired;
- EE. The widow of this first supervisor who expressed to me a great amount of anger at the district reportedly committed suicide just over one year ago;

- FF. Many of my co-workers have suffered injuries and harms similar to my own and my employer responds with retaliation;
- GG. My employer has used the worker's compensation system as a shield to protect itself from its wrongdoing;
- HH. As my pre-employment medical records would show, prior to working for the mosquito district I was a healthy person. But now my immune system is shot, I get sick very easily. My former employer refuses to produce these pre-employment records.

I leave this incomplete list for now. I hope it is useful for you in seeing the bigger picture of my workplace harms.

Sincerely,



Tiffany Anderson

PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF SAN JOAQUIN

I Am in the County of San Joaquin, State of California. I am over the age of 18 years.

My residence is 1900 Lakeshore Drive, Lodi, CA 95240.

I served the foregoing document described as:

**Letter to Dr. Bronshvag** dated February 26, 2016, on all parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon, prepaid in the United States mailed at Lodi, California, addressed as:

Sara Skolnik  
STOCKWELL HARRIS  
1545 River Park Drive, Suite 330  
Sacramento, CA 95815

WCAB  
31 E. Channel Street, #344  
Stockton, CA 95202

I certify, under penalty of perjury, that the foregoing is true and correct.

Executed on February 26, 2016, at Lodi, California.

By: \_\_\_\_\_



Tiffany Anderson

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

WCAB NO.: 1) ADJ7004221; 2) ADJ7004227; 3)

ADJ7010682; 4) ADJ7976768; 5) ADJ9066508

CLAIM NO.: VE0700184

OUR FILE NO.: 300141-040

**VERIFICATION**

**STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

I have read the foregoing **ADDENDUM TO PETITION FOR SANCTIONS** and know its contents.

I am one of the attorneys for a party to this action. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on April 5, 2016, at Sacramento, California.

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



\_\_\_\_\_  
SARA SKOLNIK

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

I am in the County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action. My business address is 1545 River Park Drive, Suite 330, Sacramento, California 95815-4616.

On April 5, 2016, I served the foregoing document described as: **ADDENDUM TO PETITION FOR SANCTIONS** on all interested parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mailed at Sacramento, California, addressed as follows:

Workers' Compensation Appeals Board (Stockton)  
31 E. Channel Street, Room 344  
Stockton, CA 95202  
\*E-FILE\*

ARS Legal (Whittier)  
13925 Whittier Boulevard  
Whittier, CA 90605



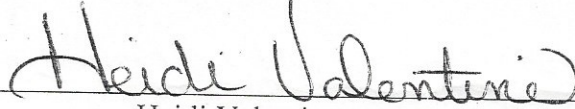
Ms. Nancy Urton  
AIMS Insurance (Sacramento)  
P.O. Box 269120  
Sacramento, CA 95826  
BY FAX ONLY (916) 563-1919

Ms. Tiffany Anderson  
1900 Lakeshore Drive  
Lodi, Ca 95242

I certify, under penalty of perjury, that the foregoing is true and correct.

Executed on April 5, 2016, at Sacramento, California.

By:

A handwritten signature in cursive script that reads "Heidi Valentine". The signature is written in black ink and is positioned above a horizontal line.

Heidi Valentine