EDMUND G. BROWN JR., Attorney General
of the State of California
GREGORY J. SALUTE
Deputy Attorney General
TERRENCE M. MASON, State Bar No. 158935
Deputy Attorney General
300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 897-6294
Facsimile: (213) 897-2804

Attorneys for Complainant

BEFORE THE
BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: CHRISTINA D. BURGOS 9938 Montgomery Ave. North Hills, CA 91343 Pharmacy Technician Registration No. TCH 36042 Respondent.	Case No. 2926 **DEFAULT DECISION AND ORDER** [Gov. Code, §11520]

FINDINGS OF FACT

1. On or about July 30, 2007, Complainant Virginia K. Herold, in her official capacity as the Executive Officer of the Board of Pharmacy, filed Accusation No. 2926 against Christina D. Burgos (Respondent) before the Board of Pharmacy.

2. On or about January 26, 2001, the Board of Pharmacy (Board) issued Pharmacy Technician Registration No. TCH 36042 to Respondent. The Pharmacy Technician Registration was in full force and effect at all times relevant to the charges brought herein and will expire on April 30, 2008, unless renewed.

3. On or about August 10, 2007, Teresa Sutton, an employee of the Department of Justice, served by Certified and First Class Mail a copy of Accusation No. 2926, Statement to Respondent, Notice of Defense, Request for Discovery, and Government Code sections 11507.5, 11507.6, and 11507.7 to Respondent's address of record with the Board, which

was and is: 9938 Montgomery Avenue, North Hills, California 91343. A copy of the Accusation and Declaration of Service are attached as "Exhibit A," and are incorporated herein by reference.

4. Service of the Accusation was effective as a matter of law under the provisions of Government Code section 11505, subdivision (c).

5. On or about August 16, 2007, a Domestic Return Receipt (Postal Service Form 3811) was returned by the U.S. Postal Service signed "Christina Burgos" and dated August 11, 2007. A copy of the Domestic Return Receipt is attached as "Exhibit B," and is incorporated herein by reference.

6. Government Code section 11506 states, in pertinent part:

> (c) The respondent shall be entitled to a hearing on the merits if the respondent files a notice of defense, and the notice shall be deemed a specific denial of all parts of the accusation not expressly admitted. Failure to file a notice of defense shall constitute a waiver of respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing.

7. Respondent failed to file a Notice of Defense within 15 days after service upon her of the Accusation, and therefore waived her right to a hearing on the merits of Accusation No. 2926.

8. California Government Code section 11520 states, in pertinent part:

> (a) If the respondent either fails to file a notice of defense or to appear at the hearing, the agency may take action based upon the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to respondent.

9. Pursuant to its authority under Government Code section 11520, the Board of Pharmacy finds Respondent is in default. The Board will take action without further hearing and, based on the evidence on file herein, finds that the allegations in Accusation No. 2926 are true.

10. The total cost for investigation and enforcement in connection with the Accusation are $13,068.75 as of February 29, 2008.

DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent Christina D. Burgos has subjected her Pharmacy Technician Registration No. TCH 36042 to discipline.

2. A copy of the Accusation is attached.

3. The agency has jurisdiction to adjudicate this case by default.

4. The Board of Pharmacy is authorized to revoke Respondent's Pharmacy Technician Registration based upon the following violations alleged in the Accusation:

a. Business and Professions Code sections 4300 and 4301(j) and (o) (unprofessional conduct for obtaining controlled substances by fraud, deceit or misrepresentation and furnishing dangerous drugs without an authorized prescription); and sections 4300 and 4301 (f), (j), and (o) (unprofessional conduct for deviation from prescription);

ORDER

IT IS SO ORDERED that Pharmacy Technician Registration No. TCH 36042, heretofore issued to Respondent Christina D. Burgos, is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on May 21, 2008.

It is so ORDERED April 21, 2008

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By William Powers
WILLIAM POWERS
Board President

60286085.wpd
DOJ docket number:LA2005600893

Attachments:

Exhibit A: Accusation No.2926 and Declaration of Service

Exhibit B: Domestic Return Receipt

Exhibit A

Accusation No. 2926

EDMUND G. BROWN JR., Attorney General
of the State of California
GLORIA A. BARRIOS
Supervising Deputy Attorney General
TERRENCE M. MASON, State Bar No. 158935
Deputy Attorney General
California Department of Justice
300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 897-6294
Facsimile: (213) 897-2804

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BEFORE THE
BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: CHRISTINA D. BURGOS 9938 Montgomery Ave. North Hills, CA 91343 Pharmacy Technician Registration No. TCH 36042 Respondent.	Case No. 2926 **ACCUSATION**

Complainant alleges:

PARTIES

1. Virginia K. Herold (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.

2. On or about January 26, 2001, the Board of Pharmacy issued Pharmacy Technician Registration No. TCH 36042 to Christina D. Burgos (Respondent). The Pharmacy Technician Registration was in full force and effect at all times relevant to the charges brought herein and will expire on April 30, 2008, unless renewed.

JURISDICTION

3. This Accusation is brought before the Board of Pharmacy (Board),

Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 4300 of the Code permits the Board to take disciplinary action to suspend or revoke a license issued by the Board.

5. Section 118, subdivision (b) states:

"The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender without the written consent of the board, shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending ore revoking the license or otherwise taking disciplinary action against the licensee on any such ground."

6. Section 4301 of the Code states:

"The board shall take action against any holder of a license who is guilty of unprofessional conduct or whose license has been procured by fraud or misrepresentation or issued by mistake. Unprofessional conduct shall include, but is not limited to, any of the following:

. . . .

"(f) The commission of any act involving moral turpitude, dishonesty, fraud, deceit, or corruption, whether the act is committed in the course of relations as a licensee or otherwise, and whether the act is a felony or misdemeanor or not.

. . . .

"(j) The violation of any of the statutes of this state or of the United States regulating controlled substances and dangerous drugs.

. . . .

"(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of or conspiring to violate any provision or term of this chapter or of the applicable federal and state laws and regulations governing pharmacy, including regulations

established by the board."

7. Section 4059 of the Code states, in pertinent part, that a person may not furnish any dangerous drug except upon the prescription of a physician, dentist, podiatrist, optometrist, or veterinarian. A person may not furnish any dangerous device, except upon the prescription of a physician, dentist, podiatrist, optometrist, or veterinarian.

8. Section 4070 of the Code states, in pertinent part, that except as provided in Section 4019, an oral or an electronic data transmission prescription as defined in subdivision (c) of section 4040 shall as practicable be reduced to writing by the pharmacist and shall be filled by, or under the direction of, the pharmacist.

9. California Code of Regulations, title 16, section 1717, states:

. . . .

"(b) In addition to the requirements of Business and Professions Code section 4040, the following information shall be maintained for each prescription on file and shall be readily retrievable:

. . . .

"(4) A new prescription must be created if there is a change in the drug, strength, prescriber or directions for use, unless a complete record of all such changes is otherwise maintained.

. . . .

"(c) Promptly upon receipt of an orally transmitted prescription, the pharmacist shall reduce it to writing, and initial it, and identify it as an orally transmitted prescription. If the prescription is then dispensed by another pharmacist, the dispensing pharmacist shall also initial the prescription to identify him or herself. All orally transmitted prescriptions shall be received and transcribed by a pharmacist prior to compounding, filling, dispensing, or furnishing. Chart orders as defined in section 4019 of the Business and Professions Code are not subject to the provisions of this subsection."

10. Section 11173 of the Health and Safety Code states:

"(a) No person shall obtain or attempt to obtain controlled substances, or procure

or attempt to procure the administration of or prescription for controlled substances, (1) by fraud, deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact.

"(b) No person all make a false statement in any prescription, order, report, or record, required by the division."

11. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

12. CONTROLLED SUBSTANCES

a. "Librium", brand name for chlordiazepoxide, is a Schedule IV controlled substance as defined by Health and Safety Code section 11057(d)(5) and is categorized as a dangerous drug pursuant to section 4022 of the Code.

b. "Norco", brand name for hydrocodone with acetaminophen, is a Schedule III controlled substance as defined in Health and Safety Code section 11056(e)(4) and is categorized as a dangerous drug pursuant to section 4022 of the Code.

c. "Oxycontin", brand name for Oxycodone is a schedule II controlled substance pursuant to Health and Safety Code section 11055(b)(1)(N) and is categorized as a dangerous drug pursuant to section 4022 of the Code.

d. "Tylenol with Codeine #3" brand name for Acetaminophen with Codeine, 30 mg. Acetaminophen with Codeine is a Schedule III controlled substance as designated by Health and Safety Code section 11056(e)(2) and is categorized as a dangerous drug pursuant to section 4022 of the Code.

e. "Valium", a trade name for the chemical substance diazepam, a benzodiazepam derivative, is a Schedule IV controlled substance as designated by Health and Safety Code section 11057(d)(9) and is categorized as a dangerous drug pursuant to section 4022 of the Code.

f. "Vicodin", "Vicodin ES" and "Vicodin HP" brand names for Hydrocodone and Acetaminophen, is a Schedule III controlled substance as designated by Health

and Safety Code section 11056(e)(4) and is classified as a dangerous drugs pursuant to Business and Professions Code section 4022 (c).

13. DANGEROUS DRUGS

a. "Lasix" brand name for furosemide, is classified as a dangerous drugs pursuant to Business and Professions Code section 4022 (c).

b. "Lisinopril", generic for the brand name Zestril, is classified as a dangerous drugs pursuant to Business and Professions Code section 4022 (c).

c. "Metformin", generic for the brand name Glucophage, is classified as a dangerous drugs pursuant to Business and Professions Code section 4022 (c).

d. "Naproxen", generic for the brand name Naprosyn, is classified as a dangerous drugs pursuant to Business and Professions Code section 4022 (c).

FIRST CAUSE FOR DISCIPLINE

(Obtained Controlled Substances by Fraud, Deceit or Misrepresentation)

14. Respondent is subject to disciplinary action under sections 4300 and 4301, subdivisions (j) and (o) of the Code on the grounds of unprofessional conduct for violating Health and Safety Code section 11173, subdivision (a), in that Respondent obtained controlled substances by fraud, deceit, or misrepresentation. From on or about January 16, 2003 to on or about December 29, 2004, while employed as a pharmacy technician at All Med Drugs in Thousand Oaks, California, Respondent filled and dispensed her relatives' prescriptions at All Med Drugs, as follows:

R. C. - Dr. Darakjian, Prescriber

a. On or about January 16, 2003, prescription 845198 was written as a telephoned order for Vicodin ES, 60 tablets, for R. C., Respondent's stepfather. The prescription was refilled on February 4, 2003. The prescription history listed "CB" or Christina Burgos as the initials of the person processing the prescription. This prescription was a transferred prescription from Holy Cross Pharmacy, No. 229475, with no refills.

b. On or about February 20, 2003, prescription 845198 was renewed as

prescription 847738, with one (1) refill for Vicodin ES, 360 tablets, an increase from 60 tablets with a change in directions stating to take 2 tablets every 4 to 6 hours as needed for pain. The initials on the patient profile listed "CB" (Respondent) as the person processing the prescription. On March 7, 2003, the prescription was refilled for another 360 tablets. This prescription was not written by the physician nor a telephone order reduced to writing.

c. On or about February 21, 2003, prescription 846718 was dispensed for 40 tablets of Vicodin HP 10mg/660mg. The prescription was refilled on or about March 12, 2003 and March 26, 2003, for 40 tablets each refill. The quantity on the prescription was changed from 40 tablets to 100 tablets and refilled on June 26, 2003. The initials on the patient profile indicating who processed the prescription when the quantity was increased to 100 tablets were those of Respondent ("CB").

d. On or about July 22, 2003, prescription 846718 was "renewed" as prescription 859159, with two (2) refills for Hydrocodone with Acetaminophen 10mg/660mg., 100 tablets. Prescription 859159 was refilled on January 20, 2004; February 4, 2004; and April 8, 2004, for 100 tablets each. On or about April 28, 20094, the prescription was refilled for 150 tablets. The initials on the patient profile indicating whom processed the prescription were those of Respondent.

e. On December 19, 2003, one additional refill was added to prescription 859159 and processed as prescription 868000. The initials on the patient profile indicating whom processed the prescription were those of Respondent. On or about January 20, 2004; February 4, 2004; and April 8, 2004, prescription 868000 was refilled for 100 tablets each. On or about April 28, 2004, the prescription was refilled for 150 tablets. The initials of the technician who processed the prescription, increasing the quantity to 150 tablets were those of Respondent.

f. On April 28, 2004, prescription 868000 was "renewed" as prescription 879372. Prescription 879372 was filled on or about June 2, 2004 for 150 tablets. A notation on the label adhered to the prescription had "#150" crossed out by hand and changed to "100 " tablets with "owe 50" written in. The initials of the person who processed the prescription were

those of Respondent. On or about July 27, 2004; August 25, 2004; October 19, 2004; and December 29, 2004, the prescription was refilled for 100 tablets each. The initials of the person who processed the prescription were those of Respondent.

g. On or about January 16, 2003, prescription 845199 was written as an additional refill for prescription 229477, for Soma 350mg., 60 tablets. On or about January 16, 2003; March 26, 2003; April 15, 2003; May 8, 2003; and May 29, 2003, prescription 845199 was refilled for Soma 350mg., 60 tablets each. The initials of the person processing the additional refills were those of Respondent.

h. On or about May 7, 2003, a prescription for Soma, 350mg., 60 tablets, was written with no indication that refills were authorized. On or about June 24, 2003, the prescription was processed as prescription 853283. On or about July 22, 2003; August 15, 2003; September 25, 2003; October 20, 2003; October 31, 2003; December 2, 2003; December 19, 2003; January 7, 2004; and April 5, 2004, the prescription was refilled for 60 tablets each date. With the exception of the July 22 and September 25 prescriptions, all the refills had Respondent's initials. On April 28, 2004 and on June 2, 2004, more than a year after the prescription was originally written, the quantity of prescription 853223 was increased to 100 tablets each and processed with Respondent's initials.. On or about June 17, 2004, July 27, 2004 and August 25, 2004, the prescription was refilled for 90 tablets each with the initials of Respondent. Prescription 853283 was dispensed a total of 16 times for approximately 1,130 tablets over a fifteen-month period.

R. C. - Dr. Lo, Prescriber

i. On or about May 12, 2003, a prescription for Diovan 160mg., 30 tablets, with five (5) refills written by Dr. Lo for patient R. C. was processed as prescription 853286. On or about July 22, 2003; August 29, 2003; September 25, 2003; October 29, 2003; December 2, 2003; January 5, 2004; February 4, 2004; and March 25, 2004 prescription 853286 was refilled for 30 tablets each. On or about April 28, 2004, it was refilled for 60 tablets, and on or about June 22, 2004, July 28, 2004 and October 19, 2004, prescription 853286 was refilled for 30 tablets each. The initials of the person processing the original prescription and each of the twelve

refills were those of Respondent. Prescription 853286 was used to dispense Diovan over a seventeen-month period. On or about November 18, 2004, prescription 853286 was "refilled" as prescription 889272 with Respondent's initials, "CB".

j. On or about January 22, 2003, prescription 845621 was dispensed for hydrocodone with acetaminophen 10mg/325mg., (Norco), 50 tablets, with two (2) refills authorized. Prescription 845621 was refilled on February 27, 2003; April 16, 2003; and June 16, 2003 for 50 tablets with Respondent's initials, for each date.

k. On or about June 16, 2003 "Renew 845621, 2x" was written on a telephone prescription form as prescription 857440 for hydrocodone BIT/APAP, for100 tablets. On or about July 17, 2003, prescription 857440 was dispensed for hydrocodone BIT/APAP 10mg./325mg., 100 tablets and refilled on or about August 15, 2003 and September 9, 2003 for 100 tablets, each time with Respondent's initials, "CB".

l. On or about September 9, 2003, a telephone prescription was written "Renew 857440, 2x." On or about October 20, 2003, the prescription was filled as prescription 863317 for hydrocodone BIT/APAP 10mg./325 mg., 100 tablets. Prescription 863317 was renewed on November 6, 2003; December 2, 2003; and December 19, 2003 for 100 tablets, each time with Respondent's initials, "CB".

SECOND CAUSE FOR DISCIPLINE

(Furnish Dangerous Drugs Without an Authorized Prescription)

15. Respondent is subject to disciplinary action under sections 4300 and 4301, subdivisions (j) and (o) of the Code on the grounds of unprofessional conduct for violating section 4059, in that Respondent furnished dangerous drugs without authorized prescriptions. From on or about January 2, 2003 to on or about September 8, 2004, while employed as a pharmacist technician at All Med Drugs in Thousand Oaks, California, Respondent filled and dispensed her relatives' prescriptions at All Med Drugs without authorized prescriptions, as follows:

///

M. M., Dr. Scarborough, Prescriber

a. On or about January 2, 2003, Prescription 844083 for Naproxen 250mg., 60 tablets was filled for M. M., Respondent's grandmother, listing Dr. Scarborough as the prescriber. On or about April 8, 2003, prescriber 844083 was refilled and increased to 100 tablets of Naproxen 250mg. "CB" was listed as the person who processed the prescription. Dr. Scarborough stated that she has been practicing out of state since June 2000, her California licensed expired on March 31, 2002, and she did not authorize the prescription, the refill, or the quantities dispensed.

M. M., Dr. Baghoumian, Prescriber

b. On or about January 6, 2003, prescription 844333 for Lisinopril 10mg., 30 tablets, was dispensed for M. M. Prescription 844333 was refilled on February 3, 2003 and March 7, 2003 for 30 tablets, and on or about April 3, 2003, it was refilled and increased to100 tablets. "CB" was listed as the person who processed the original dispensing and each of the refills.

c. On or about April 29, 2003, prescription 852471 was dispensed for Metformin 500mg.,100 tablets, and refilled on June 21, 2003. Each time "CB" was listed as the person who processed the dispensing. In response to a letter to Dr. Baghoumian, he stated that he did not authorize the prescriptions for these medications. He further stated that during this time period he was obtaining his training in surgery at County USC Medical Center and that these medications would have been prescribed by Internal Medicine and not by a surgeon.

M. M., Dr. Wong, Prescriber

d. Prescription 844506 was prescribed for Lasix 20mg., 30 tablets, with four (4) refills. On or about January 8, 2003, prescription 844506 was filled for 60 tablets, processed by "CB". The prescription was refilled on April 3, 2003; July 23, 2003; and October 17, 2003 and increased to100 tablets each, for a total of 360 tablets. Dr. Wong did not authorize the dispensing of 210 tablets of the medication.

e. Prescription 850914 was prescribed for Lisinopril 10mg., 30 tablets, with five (5) refills. On or about July 14, 2003, prescription 850914 was dispensed and increased to

100 tablets, processed by "CB". It was refilled on September 24, 2003 and January 12, 2004 for 100 tablets each. The medication was dispensed for an extra 120 tablets not authorized by Dr. Wong.

f. Prescription 855939 was a faxed prescription for Metformin 500mg., 60 tablets, with four (4) refills. On or about July 23, 2003 the prescription was dispensed and increased to100 tablets and refilled on September 24, 2003; November 11, 2003; and January 12, 2004 for 100 tablets each. The medication was dispensed for an extra 100 tablets not authorized by Dr. Wong. "CB" was listed as the person who processed each of the dispensings.

g. Prescription 872252 was a faxed prescription for Metformin 500mg.,60 tablets, with five (5) refills. On February 16, 2004 prescription 872252 was dispensed and increased to120 tablets, and refilled on May 5, 2004; July 8, 2004; and September 8, 2004 for 120 tablets each. The medication was dispensed for an extra 120 tablets not authorized by Dr. Wong. "CB" was listed as the person who processed each of the dispensings.

THIRD CAUSE FOR DISCIPLINE

(Deviation From Prescription)

16. Respondent is subject to disciplinary action under sections 4300 and 4301, subdivisions (f), (j) and (o) of the Code on the grounds of unprofessional conduct for violating California Code of Regulations, title 16, section 1717, in that while employed as a pharmacist technician, Respondent altered, changed the quantities of the medications from the original prescriptions, as follows:

a. Prescription 845198 was written for Vicodin ES, 60 tablets, to be taken twice daily as needed for pain. It was "renewed" as prescription 847738. On or about February 20, 2003 prescription 847738 was dispensed and increased to 360 tablets without permission, with directions to take 2 tablets every 4 to 6 hours.

b. Prescription 846718 prescribed Vicodin HP 10mg/660mg, 40 tablets. On or about July 22, 2003, prescription 846718 was renewed as prescription 859159 for hydrocodone with acetaminophen 10mg./660mg., 100 tablets, with two (2) additional refills

authorized. On or about April 28, 2004 the prescription was refilled for a third time without permission and increased to 150 tablets. "CB" was listed as the person who processed the refill.

c. On or about December 19, 2003 an additional refill was added to prescription 859159, but was processed as prescription 868000. On or about April 28, 2004, prescription 868000 was refilled without permission and increased from 100 to 150 tablets. The initials of the person who processed each of the dispensings was "C.B".

d. On or about May 7, 2003, prescription 853283 was written for Soma, 350 mg., 60 tablets, with no refills. On or about August 15, 2003; October 20, 2003; October 31, 2003; December 2, 2003; December 19, 2003; January 7, 2004; and April 5, 2004 the prescription was refilled by "CB". On or about April 28, 2004 and June 2, 2004, prescription 863283 was refilled and increased to 100 tablets for each refill by "CB". On June 17, 2004; July 27, 2004; and August 24, 2004 prescription 863283 was refilled with 90 tables each refill by "CB".

e. On or about April 28, 2004, prescription 853286 was refilled for Diovan 160mg., 60 tablets, by "CB" without permission. The original prescription was written for 30 tablets of the medication.

f. On or about April 3, 2003, prescription 844333 was filled Lisinopril 10mg., 100 tablets, by "CB". The original prescription was written for Lisinopril 30 tablets.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Pharmacy issue a decision:

1. Revoking or suspending Pharmacy Technician Registration No. TCH 36042, issued to Christina D. Burgos;

2. Ordering Christina D. Burgos to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

///

3. Taking such other and further action as deemed necessary and proper.

DATED: 7/30/07

VIRGINIA HEROLD
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

LA2005600893
Burgos.wpd
CML (tmRev5/15/07)

DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL

(Separate Mailings)

Case Name: **CHRISTINA D. BURGOS**

No.: **2926**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On August 10, 2007, I served the attached **STATEMENT TO RESPONDENT, ACCUSATION, GOVERNMENT CODE SECTIONS 11507.5, 11507.6, 11507.7, NOTICE OF DEFENSE in duplicate, and REQUEST FOR DISCOVERY** by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, and another true copy of the **STATEMENT TO RESPONDENT, ACCUSATION, GOVERNMENT CODE SECTIONS 11507.5, 11507.6, 11507.7, NOTICE OF DEFENSE in duplicate, and REQUEST FOR DISCOVERY** was enclosed in a second sealed envelope as first class mail with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013, addressed as follows:

Christina D. Burgos
9938 Montgomery Avenue
North Hills, CA 91343

Certified Number
7001 0360 0003 6743 0011

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on August 10, 2007, at Los Angeles, California.

Teresa Sutton
Declarant

Signature

60237146.wpd

Exhibit B

Domestic Return Receipt

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0360 0003 6743 0011

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To
Christina D. Burgos
Street, Apt. No.; or PO Box No. 9938 Montgomery Avenue
City, State, ZIP+4 North Hills, CA 91343

PS Form 3800, January 2001 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Christina D. Burgos
9938 Montgomery Avenue
North Hills, CA 91343

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* Christina Burgos B. Date of Delivery 8-11

C. Signature
X [signature] ☐ Agent ☒ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)* 7001 0360 0003 6743 0011

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952