

1
2
3
4
5
6
7
8
9

**BEFORE THE
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Petition to Revoke Probation
Filed Against:

Case No.: 6930

CAROLYN E. CONE
1749 Eaton Road, #64
Chico, CA 95973

**DEFAULT DECISION
AND ORDER**

Vocational Nurse License No. VN 16776

Respondent.

10
11
12
13
14

Carolyn E. Cone ("Respondent") was served Petition to Revoke Probation No. 6930; Statement to Respondent; Notice of Defense form; copies of Government Code sections 11507.5, 11507.6 and 11507.7; and Request for Discovery by both first class and certified mail on November 10, 2009 at her address of record as provided in sections 11503 and 11505 of the Government Code of the State of California.

15
16

Respondent failed to file a Notice of Defense within the time specified in Government Code section 11506.

17
18
19
20

The Board of Vocational Nursing and Psychiatric Technicians ("Board") has determined that respondent has waived her rights to a hearing to contest the merits of the Petition to Revoke Probation and that the Board will take action on the Petition to Revoke Probation without a hearing, pursuant to Government Code section 11520.

21

The Board makes the following findings of fact:

22

FINDINGS OF FACT

23
24

1. Teresa Bello-Jones, J.D., M.S.N., R.N., made and filed the Petition to Revoke Probation solely in her capacity as the Board's Executive Officer.

25
26

2. On September 6, 1961, the Board issued Vocational Nurse License Number VN 16776 to Respondent. Said license will expire on November 30, 2010, unless renewed.

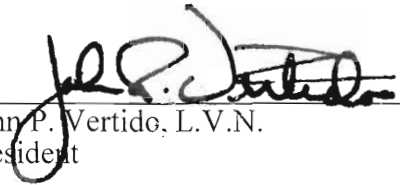
27
28

3. Pursuant to Business and Professions Code section 2875, the Board may discipline any licensed vocational nurse for any reason provided in Article 3 of the Vocational Nursing Practice Act.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

This Default Decision shall become effective on April 7, 2010.

Dated and signed this March 8, 2010.



John P. Vertide, L.V.N.
President

Attachments: Exhibit "1", Petition to Revoke Probation No. 6930 and Declaration of Service

Exhibit "1"

Petition to Revoke Probation No. 6930 and Declaration of Service

FILED

NOV 10 2009

**Board of Vocational Nursing
and Psychiatric Technicians**

1 EDMUND G. BROWN JR.
 Attorney General of California
 2 ARTHUR D. TAGGART
 Supervising Deputy Attorney General
 3 JEFFREY M. PHILLIPS
 Deputy Attorney General
 4 State Bar No. 154990
 1300 I Street, Suite 125
 5 P.O. Box 944255
 Sacramento, CA 94244-2550
 6 Telephone: (916) 324-6292
 Facsimile: (916) 327-8643
 7 *Attorneys for Complainant*

8 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
 9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Petition to Revoke
 Probation Against,
 12
 13 **CAROLYN E. CONE**
1749 Eaton Road, #64
Chico, California 95973
 14 **Vocational Nurse License No. VN 16776**
 15 Respondent.

Case No. 6930

PETITION TO REVOKE PROBATION

17 Complainant alleges:

18 **PARTIES**

19 1. Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") brings this Petition to
 20 Revoke Probation solely in her official capacity as the Executive Officer of the Board of
 21 Vocational Nursing and Psychiatric Technicians ("Board"), Department of Consumer Affairs.

22 **Vocational Nurse License**

23 2. On or about September 6, 1961, the Board issued Vocational Nurse License Number
 24 VN 16776 to Carolyn E. Cone ("Respondent"). The vocational nurse license was in effect at all
 25 times relevant to the charges brought herein and will expire on November 30, 2010, unless
 26 renewed.

27 ///

28 ///

1 **FIRST CAUSE TO REVOKE PROBATION**

2 **(Failure to Comply with the Probation Program and Quarterly Report Requirements)**

3 8. At all times after the effective date of Respondent's probation, Condition 2 states:

4 Respondent shall fully comply with terms and conditions of the probation
5 established by the Board and shall cooperate with the representatives of the Board in
6 its monitoring and investigation of the Respondent's compliance with the Probation
7 Program. Respondent shall submit quarterly reports, under penalty of perjury, in a
8 form required by the Board. The reports shall certify and document compliance with
9 all the conditions of probation.

8 9. Respondent's probation is subject to revocation because she failed to comply with
9 Probation Condition 2, referenced above. The facts and circumstances regarding this violation
10 are as follows:

11 a. Respondent failed to submit quarterly reports in a timely fashion for the reporting
12 period October – December 2007, by submitting her report 36 days late.

13 b. Respondent failed to comply with the terms of probation, as more particularly set
14 forth in this paragraph and in paragraphs 11 and 13, below.

15 **SECOND CAUSE TO REVOKE PROBATION**

16 **(Failure to Comply with Employer Notifications)**

17 10. At all times after the effective date of Respondent's probation, Condition 5 states:

18 When currently employed or applying for employment in any capacity in
19 any health care profession, Respondent shall notify her employer of the probationary
20 status of Respondent's license. This notification to the Respondent's current health
21 care employer shall occur no later than the effective date of the Decision.
22 Respondent shall notify any prospective health care employer of her probationary
23 status with the Board prior to accepting such employment. This notification shall be
24 by providing the employer or prospective employer with a copy of the Board's
25 Accusation and Disciplinary Decision.

23 The Health Care Profession includes, but is not limited to: Licensed
24 Vocational Nurse, Psychiatric Technician, Registered Nurse, Medical Assistant,
25 Paramedic, Emergency Medical Technician, Certified Nursing Assistant, Home
26 Health Aide, and all other ancillary technical health care positions.

25 Respondent shall cause each health care employer to submit quarterly
26 reports to the Board. The reports shall be on a form provided by the Board, shall
27 include a performance evaluation and such other information as may be required by
28 the Board.

28 Respondent shall notify the Board, in writing, within five (5) days of any
change in employment status. Respondent shall notify the Board, in writing, if she is

1 terminated from any nursing or health care related employment with a full
2 explanation of the circumstances surrounding the termination.

3 11. Respondent's probation is subject to revocation because she failed to comply with
4 Probation Condition 5, referenced above. The facts and circumstances regarding this violation
5 are that Respondent failed to provide the Board with Work Performance Reports for the following
6 reporting periods: August-September 2007; October-December 2007; January-March 2008;
7 April-June 2008; July-September 2008; October-December 2008; January-March 2009; April-
8 June 2009; and July - September 2009.

9 **THIRD CAUSE TO REVOKE PROBATION**

10 **(Failure to Comply with Employment Requirements)**

11 12. At all times after the effective date of Respondent's probation, Condition 7 states, in
12 pertinent part:

13 During probation, Respondent shall work in her licensed capacity in the
14 State of California. This practice shall consist of no less than six (6) continuous
15 months and of no less than twenty (20) hours per week.

16 While on probation, Respondent shall not work for a nurses' registry or in
17 any private duty position, a temporary nurse placement agency, as a faculty member
18 in an accredited or approved school of nursing, or as an instructor in a Board
19 approved continuing education course except as approved in writing, by the Board.
20 Respondent shall work only on a regularly assigned, identified and predetermined
21 work site(s) and shall not work in a float capacity except as approved, in writing, by
22 the Board.

23 13. Respondent's probation is subject to revocation because she failed to comply with
24 Probation Condition 7, referenced above. The facts and circumstances regarding this violation
25 are that Respondent has failed to provide the Board with proof that she has worked in her licensed
26 capacity from October 12, 2007 to the present.

27 **PRAYER**

28 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians
issue a decision:

1. Revoking the probation that was granted by the Board of Vocational Nursing and
Psychiatric Technicians in Case No. 6930 and imposing the disciplinary order that was stayed
thereby revoking Vocational Nurse License No. VN 16776 issued to Carolyn E. Cone;

- 1 2. Revoking or suspending Vocational Nurse License No. VN 16776, issued to Carolyn
2 E. Cone; and,
3 3. Taking such other and further action as deemed necessary and proper.

4
5 DATED: November 10, 2009.



6 TERESA BELLO-JONES, J.D., M.S.N., R.N.
7 Executive Officer
8 Board of Vocational Nursing and Psychiatric Technicians
9 Department of Consumer Affairs
10 State of California
11 *Complainant*

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SA2009309641
10495516.doc

Exhibit A

Decision and Order

Board of Vocational Nursing and Psychiatric Technicians Case No. 6930

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEFORE THE
BOARD OF VOCATIONAL NURSING
AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation
Against:

Case No. 6930

CAROLYN E. CONE
276 Conners Avenue
Chico, CA 95926

OAH No. 2007030956

Vocational Nurse License No.
VN 16776

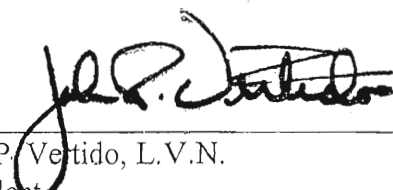
Respondent.

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Vocational Nursing and Psychiatric Technicians as the Final Decision in the above entitled matter.

This Decision shall become effective on August 18, 2007.

IT IS SO ORDERED this 19TH day of July, 2007.



John P. Vertido, L.V.N.
President

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 ARTHUR D. TAGGERT, Supervising
Deputy Attorney General
3 JEFFREY M. PHILLIPS, State Bar No. 154990
Deputy Attorney General
4 California Department of Justice
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 324-6292
Facsimile: (916) 327-8643

7 Attorneys for Complainant
8

9
10 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12
13 In the Matter of the Accusation Against:

14 CAROLYN E. CONE
276 Conners Avenue
15 Chico, California 95926

16 Vocational Nurse License No. VN 16776

17 Respondent.
18

Case No. 6930

OAH No. 2007030956

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

19 In the interest of a prompt and speedy settlement of this matter, consistent with the
20 public interest and the responsibility of the Board of Vocational Nursing and Psychiatric
21 Technicians ("Board"), the parties hereby agree to the following Stipulated Settlement and
22 Disciplinary Order which will be submitted to the Board for approval and adoption as the final
23 disposition of the Accusation and First Amended Accusation.

24 PARTIES

25 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) is the Executive
26 Officer of the Board of Vocational Nursing and Psychiatric Technicians. She brought this action
27 solely in her official capacity and is represented in this matter by Edmund G. Brown Jr., Attorney
28 General of the State of California, by Jeffrey M. Phillips, Deputy Attorney General.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in First Amended Accusation No. 6930.

9. Respondent agrees that her Vocational Nurse License is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

RESERVATION

10. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Board or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

CONTINGENCY

11. This stipulation shall be subject to approval by the Board of Vocational Nursing and Psychiatric Technicians. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Vocational Nursing and Psychiatric Technicians may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw this agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

OTHER MATTERS

12. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

//
//
//

1 DISCIPLINARY ORDER

2 In consideration of the foregoing admissions and stipulations, the parties agree
3 that the Board, without further notice or formal proceeding, issue and enter the following
4 Disciplinary Order:

5 IT IS HEREBY ORDERED that Vocational Nurse License No. VN 16776 issued
6 to Respondent CAROLYN E. CONE (Respondent) is revoked. However, the revocation is
7 stayed and Respondent is placed on probation for three (3) years on the following terms and
8 conditions.

9 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws,
10 including all statutes and regulations governing the license. Respondent shall submit, in writing,
11 a full and detailed account of any and all violations of the law to the Board within five (5) days of
12 occurrence. To ensure compliance with this term, respondent shall submit two (2) completed
13 fingerprint cards and the applicable fingerprint processing fees to the Board within thirty (30)
14 days of the effective date of the decision, unless the Board determines that fingerprint cards were
15 already submitted by Respondent as part of her licensure application process effective July 1,
16 1996. Respondent shall also submit a recent 2" x 2" photograph of her within thirty (30) days of
17 the effective date of the decision.

18 2. **Compliance With Probation Program And Quarterly Report**
19 **Requirements.** Respondent shall fully comply with terms and conditions of the probation
20 established by the Board and shall cooperate with the representatives of the Board in its
21 monitoring and investigation of the Respondent's compliance with the Probation Program.
22 Respondent shall submit quarterly reports, under penalty of perjury, in a form required by the
23 Board. The reports shall certify and document compliance with all the conditions of probation.

24 3. **Notification of Address And Telephone Number Change(s).**
25 Respondent shall notify the Board, in writing, within five (5) days of a change of residence or
26 mailing address, of her new address and any change in her work and/or home telephone numbers.

27 4. **Notification of Residency or Practice Outside of State.** Respondent
28 shall notify the Board, in writing, within five (5) days, if she leaves California to reside or

1 practice in another state. Respondent shall notify the Board, in writing, within five (5) days,
2 upon her return to California. The period of probation shall not run during the time Respondent
3 is residing or practicing outside California.

4 **5. Notification to Employer(s).** When currently employed or applying for
5 employment in any capacity in any health care profession, Respondent shall notify her employer
6 of the probationary status of Respondent's license. This notification to the Respondent's current
7 health care employer shall occur no later than the effective date of the Decision. Respondent
8 shall notify any prospective health care employer of her probationary status with the Board prior
9 to accepting such employment. This notification shall be by providing the employer or
10 prospective employer with a copy of the Board's Accusation and Disciplinary Decision.

11 The Health Care Profession includes, but is not limited to: Licensed Vocational
12 Nurse, Psychiatric Technician, Registered Nurse, Medical Assistant, Paramedic, Emergency
13 Medical Technician, Certified Nursing Assistant, Home Health Aide, and all other ancillary
14 technical health care positions.

15 Respondent shall cause each health care employer to submit quarterly reports to
16 the Board. The reports shall be on a form provided by the Board, shall include a performance
17 evaluation and such other information as may be required by the Board.

18 Respondent shall notify the Board, in writing, within five (5) days of any change
19 in employment status. Respondent shall notify the Board, in writing, if she is terminated from
20 any nursing or health care related employment with a full explanation of the circumstances
21 surrounding the termination.

22 **6. Interviews/meetings With Board Representative(s).** Respondent,
23 during the period of probation, shall appear in person at interviews/meetings as directed by the
24 Board, or its designated representatives.

25 **7. Employment Requirements And Limitations.** During probation,
26 Respondent shall work in her licensed capacity in the State of California. This practice shall
27 consist of no less than six (6) continuous months and of no less than twenty (20) hours per week.

28 While on probation, Respondent shall not work for a nurses' registry or in any

1 private duty position, a temporary nurse placement agency, as a faculty member in an accredited
2 or approved school of nursing, or as an instructor in a Board approved continuing education
3 course except as approved, in writing, by the Board. Respondent shall work only on a regularly
4 assigned, identified and predetermined work site(s) and shall not work in a float capacity except
5 as approved, in writing, by the Board.

6 8. **Supervision Requirements.** Respondent shall obtain prior approval from
7 the Board, before commencing any employment, regarding the level of supervision provided to
8 Respondent while employed as a licensed vocational nurse or psychiatric technician.

9 Respondent shall not function as a charge nurse (i.e., work in any healthcare
10 setting as the person who oversees or directs licensed vocational nurses, psychiatric technicians,
11 certified nursing assistants or unlicensed assistive personnel) or supervising psychiatric
12 technician during the period of probation except as approved, in writing, by the Board.

13 9. **Completion of Educational Course(s).** Respondent, at her own expense,
14 shall enroll and successfully complete a course(s) substantially related to the violation(s) no later
15 than the end of the first year of probation; or Respondent shall be suspended from practice, until
16 she has enrolled in and has successfully completed the specified coursework.

17 The coursework shall be in addition to that required for license renewal. The
18 Board shall notify Respondent of the course content and number of contact hours required.
19 Within thirty (30) days of the Board's written notification of assigned coursework, Respondent
20 shall submit a written plan to comply with this requirement. The Board shall approve such plan
21 prior to enrollment in any course of study.

22 Upon successful completion of the course, Respondent shall cause the instructor
23 to furnish proof to the Board within thirty (30) days of course completion.

24 10. **Maintenance of Valid License.** Respondent shall, at all times while on
25 probation, maintain an active current license with the Board, including any period during which
26 suspension or probation is tolled.

27 Should respondent's license, by operation of law or otherwise, expire, upon
28 renewal or reinstatement respondent's license shall be subject to any and all terms of this

1 probation not previously satisfied.

2 11. **Cost Recovery Requirements.** Respondent shall pay to the Board
3 pursuant to Business and Professions Code Section 125.3 the costs of investigation and
4 enforcement in this matter in the amount of \$3,541.50. Respondent shall be permitted to pay
5 these costs in a payment plan approved by the Board, with the payments to be completed no later
6 than three months prior to the end of the probation term. Failure to complete payment of cost
7 recovery within this time frame shall constitute a violation of probation which may subject
8 Respondent's license to outright revocation.

9 The Board may conditionally renew or reinstate, for a maximum of one year, the
10 license of any respondent who demonstrates financial hardship. Respondent shall enter into a
11 formal agreement with the Board to reimburse the unpaid costs within that one year period.

12 Except as provided above, the Board shall not renew or reinstate the license of any
13 Respondent who has failed to pay all the costs as directed in a Decision.

14 12. **Violation of Probation.** If Respondent violates the conditions of her
15 probation, the Board after giving Respondent notice and an opportunity to be heard, may set
16 aside the stay order and impose the stayed discipline (revocation) of the Respondent's license. If
17 during the period of probation, an accusation or petition to revoke has been filed against the
18 Respondent's license or the Attorney General's Office has been requested to prepare an
19 accusation or petition to revoke probation against the Respondent's license, the probationary
20 period shall automatically be extended and shall not expire until the accusation or petition has
21 been acted upon by the Board. Upon successful completion of probation, the Respondent's
22 license will be fully restored.

23 13. **Chemical Dependency Support/recovery Groups.** Within five (5) days
24 of the effective date of the Decision, Respondent shall begin attendance at a chemical
25 dependency support group (e.g. Alcoholics Anonymous, Narcotics Anonymous, Nurse Support
26 Group). Verified documentation of attendance shall be submitted by Respondent with each
27 quarterly report. Respondent shall continue attendance in such a group for the duration of
28 probation.


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Vocational Nursing and Psychiatric Technicians.

DATED: 5.21.07

EDMUND G. BROWN JR., Attorney General
of the State of California



JEFFREY M. PHILLIPS
Deputy Attorney General
Attorneys for Complainant

DOJ Matter ID: SA2006100162
10341924.wpd

Exhibit A

First Amended Accusation

Board of Vocational Nursing and Psychiatric Technicians Case No. 6930

FILED

OCT 18 2006

Board of Vocational Nursing
and Psychiatric Technicians

1 BILL LOCKYER, Attorney General
of the State of California
2 JEFFREY M. PHILLIPS, State Bar No. 154990
Deputy Attorney General
3 California Department of Justice
1300 I Street, Suite 125
4 P.O. Box 944255
Sacramento, CA 94244-2550
5 Telephone: (916) 324-6292
Facsimile: (916) 327-8643
6
7 Attorneys for Complainant

8
9 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 6930

13 **CAROLYN E. CONE**
276 Conners Avenue
14 Chico, California 95926

FIRST AMENDED ACCUSATION

15 Vocational Nurse License No. VN 16776

16 Respondent.

17
18 Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the
21 Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians ("Board"),
22 Department of Consumer Affairs.

23 **License History**

24 2. On or about September 6, 1961, the Board issued Vocational Nurse
25 License Number VN 16776 ("license") to CAROLYN E. CONE ("Respondent"). The license
26 will expire on November 30, 2008, unless renewed.

27 ///

28 ///

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Commission of Any Acts Involving Dishonesty)**

3 13. Respondent has subjected her vocational nurse license to disciplinary
4 action under Code section 2878, subdivision (j), in that she committed acts involving dishonesty
5 related to Respondent's duties and functions as a licensed vocational nurse, as set forth in
6 paragraph 12 (a) and as follows:

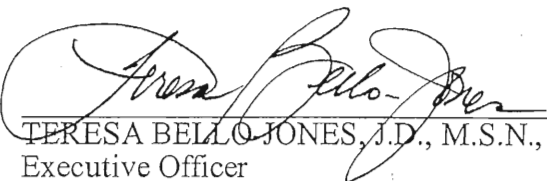
7 (a) On or about October 30, 2003, when confronted by CCHC
8 management about the theft of Vicodin from CCHC, Respondent attempted to deceive her
9 employer by producing a Walgreen's medication vial for her own prescription of Vicodin, which
10 contained 25 Vicodin tablets. However, the Vicodin tablets contained in Respondent's
11 Walgreens medication vial were subsequently identified by their markings as inventory from
12 CCHC's pharmacy supplier.

13 **PRAYER**

14 WHEREFORE, Complainant requests that a hearing be held on the matters herein
15 alleged, and that following the hearing, the Board of Vocational Nursing and Psychiatric
16 Technicians issue a decision:

- 17 1. Revoking or suspending Vocational Nurse License Number VN 16776,
18 issued to CAROLYN E. CONE aka CAROLYN ELAINE CONE;
- 19 2. Ordering CAROLYN E. CONE aka CAROLYN ELAINE CONE to pay
20 the Board the reasonable costs of the investigation and enforcement of this case pursuant to Code
21 section 125.3; and,
- 22 3. Taking such other and further action as deemed necessary and proper.

23 DATED: October 18, 2006

24 
25 _____
26 TERESA BELLO JONES, J.D., M.S.N., R.N.
27 Executive Officer
28 Board of Vocational Nursing and Psychiatric Technicians
Department of Consumer Affairs
State of California
Complainant

**DECLARATION OF SERVICE BY CERTIFIED MAIL
AND
DECLARATION OF SERVICE BY FIRST CLASS MAIL**

Case Name: In the Matter of the Petition to Revoke Probation Against:
CAROLYN E. CONE

Case No.: 6930

I declare:

I am employed in the County of Sacramento, California, I am 18 years of age or older and not a party to the within entitled cause; my business address is 2535 Capitol Oaks Drive, Suite 205, Sacramento, California 95833-2945.

On November 10, 2009 I served the attached:

PETITION TO REVOKE PROBATION, STATEMENT TO RESPONDENT, REQUEST
FOR DISCOVERY, NOTICE OF DEFENSE (2 copies), AND COPY OF GOVERNMENT
CODE SECTIONS 11507.5, 11507.6 AND 11507.7

in said cause, by placing a true copy thereof enclosed in two separate sealed envelopes with postage thereon fully prepaid by Certified Mail and First Class Mail, in the United States mail at Sacramento, California, addressed as follows:

NAME/ADDRESS

Carolyn E. Cone
1749 Eaton Road, #64
Chico, California 95973

CERTIFIED MAIL NUMBER

7009 1410 0002 2247 0803

I declare under penalty of perjury the foregoing is true and correct, and that this declaration was executed at Sacramento, California on November 10, 2009.

Heather Henderson
(Typed Name)

Heather Henderson
(Signature)

cc: Jeffrey M. Phillips, Deputy Attorney General