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8 **BEFORE THE**  
**RESPIRATORY CARE BOARD**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 1H 2008 370

11 **MARY MARGARET CHAMBERS**  
12 **247 La Mesa Drive**  
13 **Salinas, CA 93901**

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

14 **Respiratory Care Practitioner License No.**  
15 **15196**

16 Respondent.

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18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
19 proceeding that the following matters are true:

20 PARTIES

21 1. Stephanie Nunez (Complainant) is the Executive Officer of the Respiratory Care  
22 Board of California. She brought this action solely in her official capacity and is represented in  
23 this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Catherine E.  
24 Santillan, Senior Legal Analyst.

25 2. Mary Margaret Chambers (Respondent) is representing herself in this proceeding and  
26 has chosen not to exercise her right to be represented by counsel.

27 3. On or about May 14, 1992, the Respiratory Care Board of California issued  
28 Respiratory Care Practitioner License No. 15196 to Mary Margaret Chambers (Respondent). The

1 license was in full force and effect at all times relevant to the charges brought in First Amended  
2 Accusation No. 1H 2008 370 and will expire on February 28, 2010, unless renewed.

3 JURISDICTION

4 4. First Amended Accusation No. 1H 2008 370 was filed before the Respiratory Care  
5 Board (Board), Department of Consumer Affairs, and is currently pending against Respondent.  
6 The First Amended Accusation and all other statutorily required documents were properly served  
7 on Respondent on September 9, 2009. Respondent timely filed her Notice of Defense contesting  
8 the First Amended Accusation. A copy of the First Amended Accusation No. 1H 2008 370 is  
9 attached as exhibit A and incorporated herein by reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read, and understands the charges and allegations in the  
12 First Amended Accusation No. 1H 2008 370. Respondent also has carefully read, and  
13 understands the effects of this Stipulated Surrender of License and Order.

14 6. Respondent is fully aware of her legal rights in this matter, including the right to a  
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at  
16 her own expense; the right to confront and cross-examine the witnesses against her; the right to  
17 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to  
18 compel the attendance of witnesses and the production of documents; the right to reconsideration  
19 and court review of an adverse decision; and all other rights accorded by the California  
20 Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
22 every right set forth above.

23 CULPABILITY

24 8. Respondent admits the truth of each and every charge and allegation in First  
25 Amended Accusation No. 1H 2008 370, agrees that cause exists for discipline and hereby  
26 surrenders her Respiratory Care Practitioner License No. 15196 for the Board's formal  
27 acceptance.  
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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Respiratory Care Board of the Department of Consumer Affairs.

Dated: November 3, 2009

Respectfully submitted,

EDMUND G. BROWN JR.  
Attorney General of California  
JOSE R. GUERRERO  
Supervising Deputy Attorney General

Original signed by: \_\_\_\_\_  
CATHERINE E. SANTILLAN  
Senior Legal Analyst  
*Attorneys for Complainant*

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**BEFORE THE  
RESPIRATORY CARE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 1H 2008 370

**MARY MARGARET CHAMBERS  
247 La Mesa Drive  
Salinas, CA 93901**

**Respiratory Care Practitioner License No.  
15196**

Respondent.

**DECISION AND ORDER**

The attached Stipulated Surrender of License and Order is hereby adopted by the Respiratory Care Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on December 31, 2009.

It is so ORDERED December 21, 2009.

Original signed by: \_\_\_\_\_  
LARRY L. RENNER, BS, RRT, RCP, RPFT  
PRESIDENT, RESPIRATORY CARE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA