

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

In the Matter of the First Amended Accusation
Against:

Case No. 7002015000704

KATRINA DENIECE AGUILAR
25910 Juanita Street
Bryn Mawr, CA 92313

Respiratory Care Practitioner License No. 34977

DECISION AND ORDER

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

This Decision shall become effective on November 26, 2015.

It is so ORDERED November 16, 2015.

Original signed by: _____

STEPHANIE NUNEZ
EXECUTIVE OFFICER, RESPIRATORY CARE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

1 KAMALA D. HARRIS
Attorney General of California
2 JOSE R. GUERRERO
Supervising Deputy Attorney General
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7 *Attorneys for Complainant*

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

11 **In the Matter of the Accusation Against:**
12 **KATRINA DENIECE AGUILAR**

13 25910 Juanita Street
Bryn Mawr, CA 92318

14 **Respiratory Care Practitioner License No.**
15 **34977**

16 Respondent.

Case No. 7002015000704

OAH No. 2015080680

STIPULATED SURRENDER OF
LICENSE AND ORDER

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18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings 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 Kamala D. Harris, Attorney General of the State of California, by Emily L.
24 Brinkman, Deputy Attorney General.

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

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1 3. On or about September 27, 2013, the Respiratory Care Board of California issued
2 Respiratory Care Practitioner License No. 34977 to Katrina Deniece Aguilar (Respondent). The
3 Respiratory Care Practitioner was in full force and effect at all times relevant to the charges
4 brought in Accusation No. 7002015000704 and will expire on November 30, 2016, unless
5 renewed.

6 4. Respondent was previously issued Respiratory Care Practitioner License No. 20181
7 on August 11, 1998 but that license was cancelled on November 30, 2009 based on Respondent's
8 non-renewal of the license for three consecutive years.

9 5. On or about September 4, 2015, a limited interim suspension order was issued against
10 Respondent. Respondent is permitted to continue practicing as a respiratory care provider under
11 the following terms and conditions: a) Respondent is prohibited from consuming alcohol; b)
12 Respondent is prohibited from working with a measurable amount of alcohol in her blood; c)
13 Respondent shall submit to biological fluid testing; d) Respondent shall began an alcohol
14 treatment program, including attending at least three counseling or AA sessions per week no later
15 than September 11, 2015. Furthermore, Respondent shall cease practicing as a respiratory care
16 therapist until she has complete three treatment sessions and provided documentation to the Board
17 within 24 hours of any request; e) Respondent shall only work in a supervised setting; and f)
18 Respondent shall keep the Board apprised of her current street address.

19 6. On or about September 18, 2015, a decision was issued following the issuance of the
20 Interim Suspension Order. Respondent is permitted to continue practicing as a respiratory care
21 provider under the following modified terms and conditions: a) Respondent is prohibited from
22 consuming alcohol; b) Respondent is prohibited from working with a measurable amount of
23 alcohol in her blood; c) Respondent shall submit to biological fluid testing; d) Respondent shall
24 began an alcohol treatment program within 48 hours of receipt of the decision, including
25 attending at least three counseling or AA sessions per week. Furthermore, Respondent shall
26 cease practicing as a respiratory care therapist until she has complete three treatment sessions or
27 three AA sessions and provided documentation to the Board; e) Respondent shall only work in a
28

1 supervised setting; f) Respondent shall keep the Board apprised of her current street address; and
2 g) Respondent shall provide a copy of the order to all employers and provide proof to the Board.

3 **JURISDICTION**

4 7. Accusation No. 7002015000704 was filed before the Respiratory Care Board (Board),
5 Department of Consumer Affairs, and is currently pending against Respondent. The Accusation
6 and all other statutorily required documents were properly served on Respondent on September
7 25, 2015. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of
8 Accusation No. 7002015000704 is attached as Exhibit A and incorporated by reference.

9 **ADVISEMENT AND WAIVERS**

10 8. Respondent has carefully read, and understands the charges and allegations in
11 Accusation No. 7002015000704. Respondent also has carefully read, and understands the effects
12 of this Stipulated Surrender of License and Order on her Respiratory Care Practitioner License
13 No. 34977.

14 9. 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 10. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
22 every right set forth above.

23 **CULPABILITY**

24 11. Respondent admits the truth of each and every charge and allegation in Accusation
25 No. 7002015000704, agrees that cause exists for discipline and hereby surrenders her Respiratory
26 Care Practitioner No. 34977 for the Board's formal acceptance.

1 its/his/her review, discussion and/or consideration of this Stipulated Surrender of License and
2 Order or of any matter or matters related hereto.

3 **ADDITIONAL PROVISIONS**

4 15. This Stipulated Surrender of License and Order is intended by the parties herein to be
5 an integrated writing representing the complete, final and exclusive embodiment of the
6 agreements of the parties in the above-entitled matter.

7 16. The parties agree that copies of this Stipulated Surrender of License and Order,
8 including copies of the signatures of the parties, may be used in lieu of original documents and
9 signatures and, further, that such copies shall have the same force and effect as originals.

10 17. In consideration of the foregoing admissions and stipulations, the parties agree the
11 Executive Officer may, without further notice to or opportunity to be heard by respondent, issue
12 and enter the following Order on behalf of the Board:

13 **ORDER**

14 IT IS HEREBY ORDERED that Respiratory Care Practitioner License No. 34977, issued to
15 Respondent Katrina Deniece Aguilar, is surrendered and accepted by the Respiratory Care Board.

16 1. The surrender of Respondent's Respiratory Care Practitioner License No. 34977 and
17 the acceptance of the surrendered license by the Board shall constitute the imposition of
18 discipline against Respondent. This stipulation constitutes a record of the discipline and shall
19 become a part of Respondent's license history with the Respiratory Care Board of California.

20 2. Respondent shall lose all rights and privileges as a Respiratory Care Practitioner in
21 California as of the effective date of the Board's Decision and Order.

22 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
23 issued, her wall certificate on or before the effective date of the Decision and Order.

24 4. If Respondent ever files an application for licensure or a petition for reinstatement in
25 the State of California, the Board shall treat it as a petition for reinstatement of a revoked license.
26 Respondent must comply with all the laws, regulations and procedures for reinstatement of a
27 revoked license in effect at the time the petition is filed, and all of the charges and allegations
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1 contained in Accusation No. 7002015000704 shall be deemed to be true, correct and admitted by
2 Respondent when the Board determines whether to grant or deny the petition.

3 5. If Respondent should ever apply or reapply for a new license or certification, or
4 petition for reinstatement of a license, by any other health care licensing agency in the State of
5 California, all of the charges and allegations contained in Accusation No. 7002015000704 shall
6 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
7 Issues or any other proceeding seeking to deny or restrict licensure.

8 6. Respondent shall pay the Board its costs of investigation and enforcement, prior to
9 issuance of a new or reinstated license, in the amount of \$13,660.00, which encompasses the
10 following expenditures: \$325.00 (Board investigation costs), \$9,917.50 (Attorney General Costs
11 associated with Interim Suspension Order), and estimated \$3,417.50 (Attorney General Costs
12 associated with Accusation).

13 ACCEPTANCE

14 I have carefully read the Stipulated Surrender of License and Order. I understand the
15 stipulation and the effect it will have on my Respiratory Care Practitioner License No. 34977. I
16 enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and
17 intelligently, and agree to be bound by the Decision and Order of the Respiratory Care Board.

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DATED: 11/10/15


KATRINA DENIECE AGUILAR
Respondent

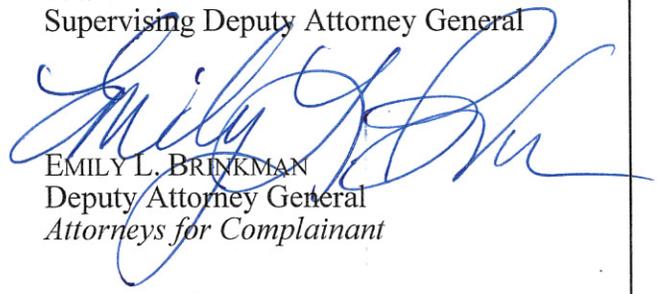
ENDORSEMENT

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: 11/10/2015

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
JOSE R. GUERRERO
Supervising Deputy Attorney General



EMILY L. BRINKMAN
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 7002015000704

FILED
STATE OF CALIFORNIA
RESPIRATORY CARE BOARD
SACRAMENTO November 20 15
BY [Signature] ANALYST

1 KAMALA D. HARRIS
Attorney General of California
2 JOSE R. GUERRERO
Supervising Deputy Attorney General
3 EMILY L. BRINKMAN
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7 *Attorneys for Complainant*

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

11 In the Matter of the First Amended Accusation
12 Against:

13 **KATRINA DENIECE AGUILAR**
25910 Juanita Street
14 Bryn Mawr, CA 92318

15 **Respiratory Care Practitioner License No.**
34977

16 Respondent.

Case No. 7002015000704

OAH No. 2015100964

FIRST AMENDED ACCUSATION

17
18 Complainant alleges:

19 **PARTIES**

20 1. Stephanie Nunez (Complainant) brings this First Amended Accusation solely in her
21 official capacity as the Executive Officer of the Respiratory Care Board of California (Board),
22 Department of Consumer Affairs.

23 2. On or about September 27, 2013, the Respiratory Care Board issued Respiratory Care
24 Practitioner License Number 34977 to Katrina Deniece Aguilar (Respondent). The Respiratory
25 Care Practitioner License was in full force and effect at all times relevant to the charges brought
26 herein and will expire on November 30, 2016, unless renewed.

27 \\\

28 \\\

1 3. Respondent was previously issued Respiratory Care Practitioner License No. 20181
2 on August 11, 1998 but that license was cancelled on November 30, 2009 based on Respondent's
3 non-renewal of the license for three consecutive years.

4 4. On or about September 4, 2015, a limited interim suspension order was issued against
5 Respondent. Respondent is permitted to continue practicing as a respiratory care provider under
6 the following terms and conditions: a) Respondent is prohibited from consuming alcohol; b)
7 Respondent is prohibited from working with a measurable amount of alcohol in her blood; c)
8 Respondent shall submit to biological fluid testing; d) Respondent shall began an alcohol
9 treatment program, including attending at least three counseling or AA sessions per week no later
10 than September 11, 2015. Furthermore, Respondent shall cease practicing as a respiratory care
11 therapist until she has complete three treatment sessions and provided documentation to the Board
12 within 24 hours of any request; e) Respondent shall only work in a supervised setting; and f)
13 Respondent shall keep the Board apprised of her current street address.

14 5. On or about September 18, 2015, a decision was issued following the issuance of the
15 Interim Suspension Order. Respondent is permitted to continue practicing as a respiratory care
16 provider under the following modified terms and conditions: a) Respondent is prohibited from
17 consuming alcohol; b) Respondent is prohibited from working with a measurable amount of
18 alcohol in her blood; c) Respondent shall submit to biological fluid testing; d) Respondent shall
19 began an alcohol treatment program within 48 hours of receipt of the decision, including
20 attending at least three counseling or AA sessions per week. Furthermore, Respondent shall cease
21 practicing as a respiratory care therapist until she has complete three treatment sessions or three
22 AA sessions and provided documentation to the Board; e) Respondent shall only work in a
23 supervised setting; f) Respondent shall keep the Board apprised of her current street address; and
24 g) Respondent shall provide a copy of the order to all employers and provide proof to the Board.

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JURISDICTION

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2 6. This First Amended Accusation is brought before the Board, Department of
3 Consumer Affairs, under the authority of the following laws. All section references are to the
4 Business and Professions Code unless otherwise indicated.

5 7. Section 3710 of the Code states: "The Respiratory Care Board of California, hereafter
6 referred to as the board, shall enforce and administer this chapter [Chapter 8.3, the Respiratory
7 Care Practice Act]."

8 8. Section 3718 of the Code states: "The board shall issue, deny, suspend, and revoke
9 licenses to practice respiratory care as provided in this chapter."

10 9. Section 3750 of the Code states, in relevant part:

11 "The board may order the denial, suspension or revocation of, or the imposition of
12 probationary conditions upon, a license issued under this chapter, for any of the following causes:

13 "(f) Negligence in his or her practice as a respiratory care practitioner.

14 "(g) . . . violating, or attempting to violate, directly or indirectly, . . . to violate
15 any provision or term of this chapter or of any provision of Division 2 (commencing
16 with Section 500.)

17 "(o) Incompetence in his or her practice as a respiratory care practitioner."

18 10. Section 3750.5 of the Code states, in relevant part:

19 "In addition to any other grounds specified in this chapter, the board may deny, suspend,
20 place on probation, or revoke the license of any applicant or license holder who has done any of
21 the following:

22 "(a) Obtained or possessed, used, or administered to himself or herself in violation of law,
23 or furnished or administered to another any controlled substance as defined in Division 10
24 (commencing with Section 11000) of the Health and Safety Code, or any dangerous drug as
25 defined in Article 2 (commencing with Section 4015) of Chapter 9, except as directed by a
26 licensed physician and surgeon, dentist, podiatrist or other authorized health care provider."

27 "(b) Used any controlled substance as defined in Division 10 (commencing with Section
28 11000) of the Health and Safety Code, or any dangerous drug as defined in Article 2

1 (commencing with Section 4015) of Chapter 9 of this code, or alcoholic beverages, to an extent or
2 in a manner dangerous or injurious to himself or herself, or to others, or that impaired his or her
3 ability to conduct with safety the practice authorized by his or her license.

4 “(c) Applied for employment or worked in any health care profession or environment while
5 under the influence of alcohol.”

6 11. Section 3755 of the Code states:

7 “The board may take action against any respirator care practitioner who is charged with
8 unprofessional conduct in administering, or attempting to administer, direct or indirect respiratory
9 care. Unprofessional conduct includes, but is not limited to, repeated acts of clearly administering
10 directly or indirectly inappropriate or unsafe respiratory care procedures, protocols, therapeutic
11 regimens, or diagnostic testing or monitoring techniques, and violation of any provision of
12 Section 3750. The board may determine unprofessional conduct involving any and all aspects of
13 respiratory care performed by anyone licensed as a respiratory care practitioner. Any person who
14 engages in repeated acts of unprofessional conduct shall be guilty of a misdemeanor and shall be
15 punished by a fine of not more than one thousand (\$1,000), or by imprisonment for a term not to
16 exceed six months, or by both that fine and imprisonment.”

17 **COST RECOVERY**

18 12. Section 3753.5, subdivision (a) of the Code states:

19 “In any order issued in resolution of a disciplinary proceeding before the board, the board or
20 the administrative law judge may direct any practitioner or applicant found to have committed a
21 violation or violations of law or any term and condition of board probation to pay to the board a
22 sum not to exceed the costs of the investigation and prosecution of the case. A certified copy of
23 the actual costs, or a good faith estimate of costs where actual costs are not available, signed by
24 the official custodian of the record or his or her designated representative shall be prima facie
25 evidence of the actual costs of the investigation and prosecution of the case.”

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1 approximately 10:55 p.m., the supervisor smelled a strong odor of alcohol from Respondent, she
2 had watery eyes, her speech was slow, she was walking very slowly, she was nervous, and her
3 appearance was messy. The report further stated that the Respondent was walking around the unit
4 "slowly – aimlessly." At this point, the supervisor contacted the House Supervisor and a decision
5 was made to test Respondent for alcohol and/or drugs.

6 19. The supervisor required Respondent complete a form titled "Questions for Employee
7 Suspected of Alcohol/Drug Impairment" before testing her for alcohol and/or drugs. Respondent
8 indicated that she felt fine and believed she was able to perform her job duties. Respondent
9 denied taking any illegal drugs and stated she drank "a few" "Barcardi 1 [sic]." She stated her last
10 drink was at 2:00 a.m. on April 5, 2015.

11 20. DRMC contacted CAL-TEST to perform the alcohol and/or drug testing of
12 Respondent.

13 21. At approximately 12:24 a.m., the CAL-TEST employee conducted a breathalyzer test
14 of Respondent. Respondent blew a 0.108% breath alcohol concentration, indicating the presence
15 of alcohol in Respondent's system.

16 22. At approximately 12:41 a.m., the CAL-TEST employee conducted a second
17 breathalyzer test of Respondent. The Respondent blew a 0.100% breath alcohol content. The
18 CAL-TEST employee informed Respondent of the second positive sample. Respondent stated, "I
19 don't know how this happened."

20 23. Given these positive breathalyzer test results, the CAL-TEST employee began the
21 process for collecting a urine sample from Respondent. At approximately 12:49 a.m. Respondent
22 made her first attempt to provide a urine sample, but she was unable to provide a sample.

23 24. At approximately 12:58 a.m., the CAL-TEST employee requested that Respondent try
24 a second time to provide a urine sample. When Respondent handed the CAL-TEST employee the
25 urine sample cup, the urine sample registered 90 degrees, which is below the normal sample
26 temperature. The CAL-TEST employee informed Respondent that the sample did not register the
27 normal temperature and it was considered an invalid sample.

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1 25. Respondent tried three more times to provide a valid urine sample but was unable to
2 provide one. During the third attempt, at approximately 1:53 a.m., Respondent asked the CAL-
3 TEST employee if she could go home and come back because her family wanted to know where
4 she was. He told her that she still had two hours to provide a valid urine sample and asked that
5 she remain outside her supervisor's office until she was ready to provide a sample. The CAL-
6 TEST employee then requested that a guard stay with Respondent while he went into the
7 supervisor's office to update her on the status of the testing.

8 26. At approximately 2:00 a.m., after spending about ten minutes in the supervisor's
9 office, the CAL-TEST employee went to check on Respondent but she was not outside the
10 supervisor's office. The guard said she had gone to the restroom. Respondent was not in the
11 restroom/collection site and she was not located in DRMC. DRMC staff checked security
12 cameras and saw Respondent leaving the hospital through the main entrance. Respondent's
13 failure to provide a valid sample in the three hour window was classified as a refusal to test.

14 27. DRMC cancelled its employment of Respondent based on the positive alcohol testing.

15 28. On or about September 4, 2015, a partial Interim Suspension Order was issued,
16 requiring Respondent to undergo biological fluid testing.

17 29. On or about September 15, 2015, Respondent underwent biological fluid testing,
18 which was positive for methadone¹, hydrocodone, and hydromorphone.

19 30. On or about September 23, 2015, Respondent spoke with her probation monitor for
20 the Board about the positive test result. Respondent stated that she broke her pinkie finger on
21 Sunday September 14, 2015 and ingested a Percocet² prescribed to her daughter because she was
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23 ¹ Methadone hydrochloride is a synthetic narcotic analgesic that acts similar to morphine.
24 It is a dangerous drug as defined in section 4022 and a Schedule II controlled substance and
25 narcotic as defined by Health and Safety Code section 11055, subdivision (c). Methadone can
26 produce drug dependence of the morphine type and has the potential for abuse. Psychic
27 dependence, physical dependence, and tolerance may develop with repeated administration, and it
28 should be prescribed with the same caution as morphine.

² Percocet is a trade name for oxycodone and acetaminophen. It is a dangerous drug as
defined in section 4022 and a Schedule II controlled substance and narcotic as defined by Health
and Safety Code section 11055, subdivision (b). Oxycodone can produce drug dependence of the
morphine type and has the potential for abuse. Repeated administration of Percocet may result in
psychic and physical dependence.

1 unable to get to an urgent care clinic. Initially, Respondent indicated she did not know why tested
2 positive for methadone, but then stated that she might have obtained methadone from her
3 daughter rather than Percocet.

4 **FIRST CAUSE FOR DISCIPLINE**

5 **(Negligence)**

6 31. Respondent's Respiratory Care Practitioner License No. 34977 is subject to
7 disciplinary action under section 3750, as defined by 3750, subdivision (f) of the Code, in that she
8 was negligent in her practice as a respiratory care practitioner as more particularly alleged in
9 paragraphs 16 through 30, above, which are hereby incorporated by reference and realleged as if
10 fully set forth herein.

11 **SECOND CAUSE FOR DISCIPLINE**

12 **(Incompetence)**

13 32. Respondent's Respiratory Care Practitioner License No. 34977 is further subject to
14 disciplinary action under section 3750, as defined by 3750, subdivision (o) of the Code, in that
15 she was incompetent in her practice as a respiratory care practitioner as more particularly alleged
16 in paragraphs 16 through 30, above, which are hereby incorporated by reference and realleged as
17 if fully set forth herein.

18 **THIRD CAUSE FOR DISCIPLINE**

19 **(Unprofessional Conduct)**

20 33. Respondent's Respiratory Care Practitioner License No. 34977 is subject to
21 disciplinary action under section 3755 of the Code, in that she committed unprofessional conduct
22 in her practice as a respiratory care practitioner as more particularly alleged in paragraphs 16
23 through 30, above, which are hereby incorporated by reference and realleged as if fully set forth
24 herein.

25 **FOURTH CAUSE FOR DISCIPLINE**

26 **(Obtained, Possessed, Used, and/or Administered to Herself a Controlled Substance)**

27 34. Respondent's Respiratory Care Practitioner License No. 34977 is further subject to
28 disciplinary action under section 3750.5, as defined by 3750.5, subdivision (a) of the Code, in that

1 Respondent used controlled substances/dangerous drugs (methadone and Percocet) that were not
2 prescribed to her as more particularly alleged in paragraphs 16 through 30, above, which are
3 hereby incorporated by reference and realleged as if fully set forth herein.

4 **FIFTH CAUSE FOR DISCIPLINE**

5 **(Used Alcohol and Any Controlled Substance to an Extent or in a Manner Dangerous or**
6 **Injurious to Herself or Others)**

7 35. Respondent's Respiratory Care Practitioner License No. 34977 is further subject to
8 disciplinary action under section 3750.5, as defined by 3750.5, subdivision (b) of the Code, in that
9 she used alcohol and/or a controlled substance (methadone and Percocet) to an extent or in a
10 manner dangerous or injurious to herself or others as more particularly alleged in paragraphs 16
11 through 30, above, which are hereby incorporated by reference and realleged as if fully set forth
12 herein.

13 **SIXTH CAUSE FOR DISCIPLINE**

14 **(Worked in any Health Care Profession or Environment While**
15 **Under the Influence of Alcohol)**

16 36. Respondent's Respiratory Care Practitioner License No. 34977 is further subject to
17 disciplinary action under section 3750.5, as defined by 3750.5, subdivision (c) of the Code, in that
18 she worked while under the influence of alcohol as more particularly alleged in paragraphs 16
19 through 30, above, which are hereby incorporated by reference and realleged as if fully set forth
20 herein.

21 **SEVENTH CAUSE FOR DISCIPLINE**

22 **(Violation of a Provision or Provisions of the Respiratory Care Practice Act)**

23 37. Respondent's Respiratory Care Practitioner License No. 34977 is further subject to
24 disciplinary action under section 3750, as defined by 3750, subdivision (g) of the Code, and
25 section 1399.370, subdivision (a), of title 16 of the California Code of Regulations, in that she has
26 violated a provision or provisions of the Respiratory Care Practice Act, as more particularly
27 alleged in paragraphs 16 through 36, above, which are hereby incorporated by reference and
28 realleged as if fully set forth herein.

PRAYER

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

1. Revoking or suspending Respiratory Care Practitioner License Number 34977, issued to Katrina Deniece Aguilar.

2. Ordering Katrina Deniece Aguilar to pay the Respiratory Care Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring;

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

DATED: November 3, 2015



STEPHANIE NUNEZ
Executive Officer
Respiratory Care Board of California
Department of Consumer Affairs
State of California
Complainant

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