

CASH BOND  
RECOMMENDED: \$2,500.00  
CITE: 12-3-15

AGENCY#: LA152750010/RSDC

MICHAEL A. HESTRIN  
DISTRICT ATTORNEY

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE  
(Indio)

FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

NOV 19 2015

E. CATTOUSE

FCF

NOV 20 2015

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

v.

CHRISTOPHER ALLEN SCOTT

DOB:06/04/1977

Defendant.

CASE NO.

INM1508272

MISDEMEANOR COMPLAINT

Misdemeanor DEJ:

Eligible \_\_\_ Not Eligible X

COUNT 1

The undersigned, under penalty of perjury upon information and belief, declares: That the above named defendant committed a violation of Penal Code section 647, subdivision (h), disorderly conduct, a misdemeanor, in that on or about October 2, 2015, in the County of Riverside, State of California, the defendant(s) did willfully and unlawfully wander and loiter upon the private property of another without visible or lawful business with the owner or occupant thereof.

COUNT 2

That the above named defendant committed a violation of Health and Safety Code section 11377, subdivision (a), a misdemeanor, in that on or about October 2, 2015 in the County of Riverside, State of California, the defendant(s) did willfully and unlawfully have in his possession a controlled substance, to wit, methamphetamine.

COUNT 3

That the above named defendant committed a violation of Health and Safety Code section 11364, a misdemeanor, in that on or about October 2, 2015, in the County of Riverside, State of California, the defendant(s) did willfully and unlawfully possess an opium pipe and a device, contrivance, instrument, and paraphernalia used for unlawfully injecting and smoking a controlled substance.

MARSY'S LAW

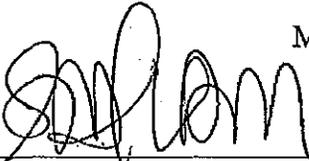
Information contained in the reports being distributed as discovery in this case may contain confidential information protected by Marsy's Law and the amendments to the California Constitution Section 28. Any victim(s) in any above referenced charge(s) is entitled to be free from intimidation, harassment, and abuse. It is unlawful for defendant(s), defense counsel, and any other person acting on behalf of the defendant(s) to use any information contained in the reports to locate or harass any victim(s) or the victim(s)'s family or to disclose any information that is otherwise privileged and confidential by law. Additionally, it is a misdemeanor violation of California Penal Code § 1054.2a(3) to disclose the address and telephone number of a victim or witness to a defendant, defendant's family member or anyone else. Note exceptions in California Penal Code § 1054.2a(a) and (2).

DISCOVERY REQUEST

Pursuant to Penal Code section 1054.5, subdivision (b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code section 1054.3.

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

Dated: November 4, 2015

  
Michael A. Hestrin  
District Attorney

By: Lisa DiMaria  
Deputy District Attorney

mdm

SUPERIOR COURT  
OF CALIFORNIA  
COUNTY OF RIVERSIDE  
15 NOV 19 AM 10:46

SHERIFF'S DEPARTMENT  
 COUNTY OF RIVERSIDE  
 NOTICE TO APPEAR

Traffic  MISDEMEANOR  
 Nontraffic

379142

Date of Violation: 10/02/15 Time: 9:00 AM Day of Week: S Case No.: LA152750010  
 Name (First, Middle, Last): CHRISTOPHER ALLEN SCOTT  
 Owner's Responsibility (Veh. Code, § 40001)

Address: 79302 NUEVO DR  
 City: LA QUINTA State: CA ZIP Code: 92253

Driver Lic. No.: A9055304 State: CA Class: C Commercial:  Yes  No Age: 38 Birth Date: 06/04/77  
 Sex: M Hair: BRO Eyes: BRO Height: 602 Weight: 180 Race: W Other Description:

Veh. Lic. No. or VIN: 3XTW399 State: CA Reg. MO/YR:  
 Yr. of Veh.: Make: Model: Body Style: Color:  
 COMMERCIAL VEHICLE (Veh. Code, § (15210)(b))  
 HAZARDOUS MATERIAL (Veh. Code, § 353)

Evidence of Financial Responsibility  
 Registered Owner or Lessee:  Same as Driver

Address:  Same as Driver  
 City: State: ZIP Code:

Correctable Violation (Veh. Code, § 40610)		<input type="checkbox"/> Booking Required (see reverse)		Misdemeanor or
Yes	No	Code and Section	Description	Infraction (Circle)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	647(h)	PC PROWLING	(M) I
<input type="checkbox"/>	<input checked="" type="checkbox"/>	11377(a)	HS POSSESSION MARIJUANA	(M) I
<input type="checkbox"/>	<input checked="" type="checkbox"/>	11364(a)	HS POSS. PARAPH.	(M) I
<input type="checkbox"/>	<input type="checkbox"/>			M I

Speed Approx.: P.F./Max. Spd.: Veh. Lmt.: Safe: Radar:  Continuation Form Issued: N

Location of violation(s): 79375 CALLE PROSPERO, LAQUINTA City/County of Occurrence: W  
 at:  Accident: S

Comments (Weather, Road & Traffic Conditions):

EDP Code: 24 P5-M EDP Code: 20 H1-M EDP Code: 20 E1-M Report Dist.: 40 A3

Violations not committed in my presence, declared on information and belief.  
 I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct.

Arresting or Citing Officer: E. MORGES I.D. #: 3629 VAC. DATES: 2  
 Date: 10/02/15 Name of Arresting Officer if different from Citing Officer: E. MORGES I.D. #: 3629 VAC. DATES: 2

WITHOUT ADMITTING GUILT, I PROMISE TO APPEAR AT THE TIME AND PLACE INDICATED BELOW.  
 X Signature: [Signature]

WHEN: ON OR BEFORE THIS DATE: 12/03/15 Time: 7:30 AM  PM  
 WHAT TO DO: FOLLOW THE INSTRUCTIONS ON THE REVERSE. Time:  AM  PM  
 WHERE: INAD10 COURT/REFEREE AT: 40200 OAKS ST  
 CITY: INAD10 92201 COURT PHONE NO:

To be notified  You may arrange with the clerk to appear at a night session of the court.



\*379142\*

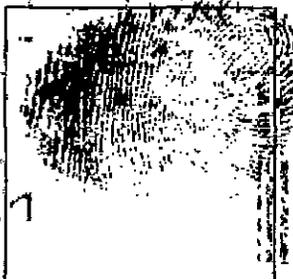
379142

1078

NO. 01

(Circle One)

RIGHT or LEFT  
THUMB PRINT



\*RUCVE\*

JUL 31 2017 RA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE  
MISDEMEANOR PLEA FORM

my

N. Jaeger

People v. Christopher Scott

Case Number: INM1508272

AUG 02 2017

A. ADVISEMENT OF RIGHTS:

- Initials
- CS 1. I have the right to a speedy and public trial by a judge or jury.
  - CS 2. At my trial, I have the right to face and cross-examine any witnesses against me.
  - CS 3. I have the right to ask the court to compel witnesses to attend my trial at no expense to me.
  - CS 4. I have the right against self-incrimination. I cannot be forced to testify against myself, but I also have the right to testify in my own defense if I choose to do so.
  - CS 5. I have the right to be represented by a lawyer at all proceedings. If I cannot afford one, the court will appoint one to represent me at no cost to me.
  - CS 6. I have the right to have a court reporter at all proceedings. If I wish one, I will advise the court in advance. If I cannot afford to pay for the court reporter, the court will provide one at no cost to me.

B. CONSEQUENCES OF PLEA:

- X 1. I will be ordered to pay restitution to the victim(s)
- X 2. I agree that the amount of victim restitution is 0. If the parties do not agree, the probation department will determine the amount. If I disagree with the amount, I may request a hearing
- CS 3. Charges and/or enhancements may have been dismissed as part of this negotiated disposition with the District Attorney's Office. I agree that I will be ordered to pay restitution to the victim(s) of the dismissed charges and/or enhancements.
- CS 4. I will be ordered to pay a restitution fine of at least \$150 and not more than \$1000. There are several other fines and fees that will be imposed as a result of this guilty plea.
- CS 5. If I am not a citizen of the United States, I understand that this conviction may have the consequences of deportation, exclusion from admission to the United States, or denial of naturalization pursuant to the laws of the United States.
- X 6. Being under the influence of alcohol or drugs, or both, impairs your ability to safely operate a motor vehicle. Therefore, it is extremely dangerous to human life to drive while under the influence of alcohol or drugs, or both. If I drive while under the influence of alcohol or drugs, or both, and as a result of that driving, someone is killed, I can be charged with murder.
- X 7. My driving privileges may be suspended or revoked by the Department of Motor Vehicles.
- X 8. I may not be able to own or possess a firearm if I am convicted of a crime involving domestic violence, assault, or a firearm violation.
- X 9. I understand that I will be ordered to register with law enforcement as a(n) \_\_\_\_\_ and that if I fail to register or to keep my registration current for any reason, new felony criminal charges may be filed against me. I understand that registration as a sex offender is a life long requirement.
- X 10. I may be required to undergo AIDS testing if I am convicted of sex crimes or an assault.
- X 11. I may be required to give a DNA sample.
- X 12. Other \_\_\_\_\_

C. DEFENDANT'S STATEMENT:

- CS 1. All the promises made to me are written on this form, or stated in open court.
- CS 2. No one has made any threats to me or anyone close to me, or placed any pressure of any kind on me in order to make me plead guilty.
- X 3. I understand that if I violate any of my probation terms, I could be sentenced to the maximum custody term possible under these charges as set forth under "Plea Agreement", Item 3.
- CS 4. If there are any dismissed charges, they may be considered in determining restitution and the appropriate sentence.
- CS 5. As part of this plea, I (circle one) do do not waive any right to appeal that I may have.
- CS 6. Factual Basis: I agree that I did the things that are stated in the charges that I am admitting.

**D. PLEA AGREEMENT:**

1. Defendant in Pro Per: I will plead guilty to the complaint as charged.
2. Per agreement with the District Attorney, I will plead guilty to the following charges: **CT1: PC 647(h)**
3. Defendant represented by an Attorney: The terms of the disposition are: **term Dispo**
4. The maximum possible custody commitment for the admitted charges may be; 1 year, **6 months**, or 90 days, depending on the charge. These are per count.
5. My guilty pleas are conditional on receiving the following considerations as to sentence:
  - a) Probation will be granted. The terms are in the Sentencing Memorandum Form which is incorporated into this Plea Form.
  - b)** Probation will be denied. The terms are in the Sentencing Memorandum Form which is incorporated into this Plea Form. **terminal disposition**

**E. SIGNATURES:**

**District Attorney:** The above is a correct statement of the Plea Agreement between defense and prosecution.

7-31-17      Annby Arnes      Annby Arnes  
 (DATE)                      (PRINT NAME)                      (SIGNATURE)

**Defendant:** I have read and understand this entire document. I waive and give up all of the rights that I have initialed. I accept this Plea Agreement. An Attorney acting as a Judge Pro Tem or a Commissioner may act as a Judge in this case.

7/31/17      Christopher Scott      CS  
 (DATE)                      (PRINT NAME)                      (SIGNATURE)

**Defense Attorney:** I am the attorney for the defendant. I am satisfied that (1) the defendant understands his/her constitutional rights and understand that a guilty plea would be a waiver of these rights; (2) the defendant has had an adequate opportunity to discuss his/her case with me, including any defenses he/she may have to the charges; and (3) the defendant understands the consequences of his/her guilty plea. I join in the decision of the defendant to enter a guilty plea.

7/31/17      Carolina Gomez      [Signature]  
 (DATE)                      (PRINT NAME)                      (SIGNATURE)

**Interpreter:** Having been duly sworn, I have translated this form to the defendant in the \_\_\_\_\_ language. The defendant has stated that he/she fully understood the contents of the form prior to signing.

\_\_\_\_\_  
 (DATE)                      (PRINT NAME)                      (SIGNATURE)

**Judge**  
11-31-17

# RIVERSIDE SUPERIOR COURT

PUBLIC ACCESS

## Minute Order

<b>Defendant Name:</b> CHRISTOPHER ALLEN SCOTT		
<b>Case Number:</b> INM1508272		<b>File Date:</b> 11/19/2015
<b>Action Date:</b> 7/31/2017	<b>Action Time:</b> 10:30 AM	<b>Department:</b> 3T
<b>Action Description:</b> Pre-Trial Hearing		
<p>Honorable Judge Charles E. Stafford, Presiding</p> <p>Courtroom Assistant: N. JAEGER</p> <p>Court Reporter: None</p> <p>People represented by Deputy District Attorney: DDA B. Von Esch.</p> <p>Defendant represented by DPD C. Gomez.</p> <p>Defendant Present.</p> <p>Defendant withdraws plea of not guilty as to count(s) 1 and is rearraigned.</p> <p>Defendant pleads Guilty to Count(s) 1.</p> <p>Counsel stipulates factual basis for the plea can be taken from Crime Report.</p> <p>Specification of Plea: Terminal Disposition.</p> <p>Misdemeanor plea form is incorporated herein and includes the following advisements and waivers:</p> <p>Defendant Advised of Constitutional Rights.</p> <p>Defendant advised of right to a speedy and public trial by judge or jury.</p> <p>Defendant advised of right to confront and cross examine witnesses; right to present evidence on own behalf.</p> <p>Defendant advised of charges and consequences of his/her plea and statutory sentencing.</p> <p>Defendant advised of privilege against self-incrimination.</p> <p>Defendant advised of right to counsel; cont. to consult counsel; assignment of counsel if unable to employ private counsel.</p> <p>Defendant advised of right to speedy trial; dismissal if no trial within 30/45 days after arraignment; effect of consent to waive time.</p> <p>Defendant Waives Constitutional Rights.</p> <p>Defendant waives right to Trial by Jury.</p> <p>Defendant waives privilege against self incrimination.</p> <p>Defendant waives right to confront and cross examine witnesses.</p> <p>Defense counsel concurs in defendant's plea and/or admissions.</p> <p>Court finds based on inquiry and examination of deft, that deft has the ability to understand and does understand his/her constitutional rights.</p> <p>Court finds defts admission of guilt and/or admission of prior conviction(s) and/or probation violation(s) if any, is the result and product of</p>		

**Defendant Name:** CHRISTOPHER ALLEN SCOTT

**Case Number:** INM1508272

**File Date:** 11/19/2015

**Action Date:** 7/31/2017

**Action Time:** 10:30 AM

**Department:** 3T

**Action Description:** Pre-Trial Hearing

the result of defendant expressly, knowingly, understandingly, and intelligently waives his/her constitutional rights including, but not limited

to: right to counsel, privilege against self-incrimination, to trial by jury, and to confront accusers, and voluntarily made with an

understanding of the nature and consequences thereof. Defendant's waiver of constitutional rights taken orally and/or in writing.

Court finds plea is free and voluntary. Court finds deft. knows and understands constitutional rights, nature of charges and consequences of plea.

Court Accepts Plea.

Defendant waives arraignment for pronouncement of judgment.

Defendant requests immediate sentence.

No legal cause why sentence should not now be pronounced.

For The Charge(s) 1.

Probation is denied and sentence is imposed as follows:(SENT)

No Time No Fine as to Count(s) 1.

Oral motion by the People Re dismiss remaining counts is called for hearing

Motion/Petition granted.

Count(s) 2 3 dismissed in the interest of justice. (1385 PC)

-- Custody Status/Information --

Defendant released.

Close Case.

Save Minute Order to case.

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

In the Matter of the Accusation Against:

**CHRISTOPHER ALLEN SCOTT**  
1800 Smoketree Lane, Apt 52  
Palm Springs, CA 92264  
Vocational Nurse License No. VN 264119

Respondent.

Case No. VN 264119

**DEFAULT DECISION AND ORDER**

[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about August 29, 2016, Complainant Kameka Brown, PhD, MBA, NP, in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians, Department of Consumer Affairs, filed Accusation No. VN 264119 against Christopher Allen Scott (Respondent) before the Board of Vocational Nursing and Psychiatric Technicians. (Accusation attached as Exhibit A.)
2. On or about January 26, 2012, the Board of Vocational Nursing and Psychiatric Technicians issued Vocational Nurse License Number VN 264119 to Christopher Allen Scott (Respondent). The Vocational Nurse License expired on July 31, 2015, and has not been renewed.

1           3.    On or about September 6, 2016, Respondent was served by Certified and First Class  
2 Mail copies of the Accusation No. VN 264119, Statement to Respondent, Notice of Defense,  
3 Request for Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6,  
4 and 11507.7) at Respondent's address of record which, pursuant to Business and Professions  
5 Code section 136, is required to be reported and maintained with the Board. Respondent's  
6 address of record was and is 1800 Smoketree Lane, Apt. 52, Palm Springs, CA 92264.

7           4.    Service of the Accusation was effective as a matter of law under the provisions of  
8 Government Code section 11505, subdivision (c) and/or Business & Professions Code section  
9 124.

10          5.    On or about September 14, 2016, the aforementioned documents were returned by the  
11 U.S. Postal Service marked "Unable to Forward."

12          6.    Government Code section 11506(c) states, in pertinent part:

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

18          7.    Respondent failed to file a Notice of Defense within 15 days after service upon him  
19 of the Accusation, and therefore waived his right to a hearing on the merits of Accusation No. VN  
20 264119.

21          8.    California Government Code section 11520(a) states, in pertinent part:

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

26          9.    Pursuant to its authority under Government Code section 11520, the Board finds  
27 Respondent is in default. The Board will take action without further hearing and, based on the  
28 relevant evidence contained in the Default Decision Evidence Packet in this matter, as well as  
taking official notice of all the investigatory reports, exhibits and statements contained therein on  
file at the Board's offices regarding the allegations contained in Accusation No. VN 264119, finds

///

1 that the charges and allegations in Accusation No. VN 264119, are separately and severally,  
2 found to be true and correct by clear and convincing evidence.

3 10. Taking official notice of its own internal records, pursuant to Business and  
4 Professions Code section 125.3, it is hereby determined that the reasonable costs for Investigation  
5 and Enforcement is \$1,085.00 as of November 1, 2016.

6 DETERMINATION OF ISSUES

7 1. Based on the foregoing findings of fact, Respondent Christopher Allen Scott has  
8 subjected his Vocational Nurse License No. VN 264119 to discipline.

9 2. The agency has jurisdiction to adjudicate this case by default.

10 3. The Board of Vocational Nursing and Psychiatric Technicians is authorized to revoke  
11 Respondent's Vocational Nurse License based upon the following violations alleged in the  
12 Accusation which are supported by the evidence contained in the Default Decision Evidence  
13 Packet in this case.:

14 a. Dangerous Use of a Controlled Substance: Business and Professions Code section  
15 2878, subdivision (a), in conjunction with 2878.5, subdivision (b);

16 b. Unlawful Possession/Administration of a Controlled Substance: Business and  
17 Professions Code section 2878, subdivision (a), in conjunction with 2878.5, subdivision (a);

18 c. Failure to Provide Requested Documents to Board: 2878, subdivision (a), in  
19 conjunction with California Code of Regulations, title 16, section 2518.8, subdivision (b);

20 d. Failure to Cooperate with Board Investigation: 2878, subdivision (a), in conjunction  
21 with California Code of Regulations, title 16, section 2518.8, subdivision (c); and

22 e. Failure to Report Arrests to Board: 2878, subdivision (a), in conjunction with  
23 California Code of Regulations, title 16, section 2518.8, subdivision (d)(2).

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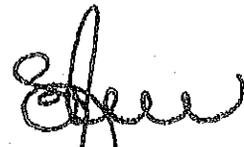
ORDER

IT IS SO ORDERED that Vocational Nurse License No. VN 264119, heretofore issued to Respondent Christopher Allen Scott, 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 JAN 22 2017.

It is so ORDERED DEC 13 2016



\_\_\_\_\_  
FOR THE BOARD OF VOCATIONAL  
NURSING AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS

52281515.DOC  
DOJ Matter ID:LA2016601330

Attachment:  
Exhibit A: Accusation

# Exhibit A

Accusation

(CHRISTOPHER ALLEN SCOTT)

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARMANDO ZAMBRANO  
Supervising Deputy Attorney General  
3 WILLIAM D. GARDNER  
Deputy Attorney General  
4 State Bar No. 244817  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2114  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*  
7

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

10 In the Matter of the Accusation Against:

Case No. VN 264119

11 **CHRISTOPHER ALLEN SCOTT**  
12 1800 Smokefree Lane, Apt 52  
13 Palm Springs, CA 92264

**ACCUSATION**

14 Vocational Nurse License No. VN 264119

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Kameka Brown, PhD, MBA, NP (Complainant) brings this Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric  
21 Technicians, Department of Consumer Affairs.

22 2. On or about January 26, 2012, the Board of Vocational Nursing and Psychiatric  
23 Technicians issued Vocational Nurse License Number VN 264119 to Christopher Allen Scott  
24 (Respondent). The Vocational Nurse License expired on July 31, 2015, and has not been  
25 renewed.

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8. California Code of Regulations, title 16, section 2504.1, provides:

"If the board or its designee asks a licensee to provide criminal history information, a licensee shall respond to that request within 30 days. The licensee shall make available all documents and other records requested and shall respond with accurate information."

9. California Code of Regulations, title 16, section 2518.8, provides in pertinent part:

"In addition to the conduct described in Section 2878(a) of the Code, 'unprofessional conduct' also includes, but is not limited to, the following:

...

"(b) Failure to provide to the board, as directed, lawfully requested copies of documents within 15 days of receipt of the request or within the time specified in the request, whichever is later, unless the licensee is unable to provide the documents within this time period for good cause, including but not limited to, physical inability to access the records in the time allowed due to illness or travel. This subsection shall not apply to a licensee who does not have access to, and control over, medical records.

"(c) Failure to cooperate and participate in any board investigation. This subsection shall not be construed to deprive a licensee of any privilege guaranteed by the Fifth Amendment to the Constitution of the United States, or any other constitutional or statutory privileges. This subsection shall not be construed to require a licensee to cooperate with a request that would require the licensee to waive any constitutional or statutory privilege or to comply with a request for information or other matters within an unreasonable period of time in light of the time constraints of the licensee's practice. Any exercise by a licensee of any constitutional or statutory privilege shall not be used against the licensee in a regulatory or disciplinary proceeding against the licensee.

"(d) Failure to report to the board within 30 days any of the following:

...

"(2) The arrest of the licensee.

....

///



1 *Christopher Allen Scott* (Super. Ct. Riverside County, 2015, No. INM1508272) Respondent  
2 sustained a three-count indictment for: (1) violation of Penal Code section 647(h) [prowling]; (2)  
3 Health and Safety code section 11377(a) [unlawful possession of controlled substance]; and (3)  
4 Health and Safety Code section 11364(a) [unlawful possession of drug paraphernalia].  
5 Respondent has failed to appear for his arraignment in that criminal proceeding on several  
6 occasions, and a bench warrant has been issued for his arrest.

7 13. Respondent failed to notify the Board of his arrest on January 28, 2015, or his arrest  
8 on October 2, 2015, within thirty (30) days of the incidents or at any time thereafter. In addition,  
9 Respondent failed to provide documents and information requested by the Board concerning those  
10 arrests or to otherwise cooperate with the Board's investigation into the incidents despite receiving  
11 written requests from the Board for such documents and information on multiple occasions.

12 **FIRST CAUSE FOR DISCIPLINE**

13 **(Dangerous Use of a Controlled Substance)**

14 14. Respondent is subject to disciplinary action under section 2878, subdivision (a), in  
15 conjunction with 2878.5, subdivision (b), in that Respondent used a controlled substance to an  
16 extent and/or in a manner dangerous or injurious to himself or others, and/or to the extent that the  
17 use impairs his or her ability to conduct with safety to the public the practice of vocational nursing.  
18 Complainant refers to, and by this reference incorporates, the allegations set forth above in  
19 paragraphs 11 and 12, inclusive, as though set forth fully.

20 **SECOND CAUSE FOR DISCIPLINE**

21 **(Unlawful Possession/Administration of a Controlled Substance)**

22 15. Respondent is subject to disciplinary action under section 2878, subdivision (a), in  
23 conjunction with 2878.5, subdivision (a), in that Respondent unlawfully possessed and/or  
24 administered to himself a controlled substance. Complainant refers to, and by this reference  
25 incorporates, the allegations set forth above in paragraphs 11 and 12, inclusive, as though set forth  
26 fully.

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28 **THIRD CAUSE FOR DISCIPLINE**



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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 or suspending Vocational Nurse License Number VN 264119, issued to Christopher Allen Scott;
2. Ordering Christopher Allen Scott to pay the Board of Vocational Nursing and Psychiatric Technicians 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: 08/29/16



KAMEKA BROWN, PHD, MBA, NP  
Executive Officer  
Board of Vocational Nursing and Psychiatric Technicians  
Department of Consumer Affairs  
State of California  
*Complainant*

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