To: Eric T. Schneiderman[nysag@ag.ny.gov]; Sherman Bill (ATG)[bill.sherman@atg.wa.gov]; Nick Persampieri[nick.persampieri@vermont.gov]; Watson Laura (ATG)[lauraw2@atg.wa.gov]; andrea.baker@maryland.gov[andrea.baker@maryland.gov]; Goldberg Andy (AGO)[andy.goldberg@state.ma.us]; Martinez Michael C. (ENRD)[michael.c.martinez@usdoj.gov]; Erica Zilioli[Erica.Zilioli@usdoj.gov]; Pruitt, Scott[Pruitt.Scott@epa.gov]; sectyrodriquez@calepa.ca.gov[sectyrodriquez@calepa.ca.gov]; secretary@resources.ca.gov[secretary@resources.ca.gov]; brian.leahy@cdpr.ca.gov[brian.leahy@cdpr.ca.gov]; lemuel.srolovic@ag.ny.gov[lemuel.srolovic@ag.ny.gov]; maureen.leary@ag.ny.gov[maureen.leary@ag.ny.gov]; Estrada, Fabiola[Estrada.Fabiola@epa.gov]; Rodriguez, Roberto[Rodriguez.Roberto@epa.gov]; Bowles, Jack[Bowles.Jack@epa.gov]; Davis, Patrick[davis.patrick@epa.gov]; Hope, Brian[Hope.Brian@epa.gov]; Minoli, Kevin[Minoli.Kevin@epa.gov]; Richardson, RobinH[Richardson.RobinH@epa.gov]; Wagner, Kenneth[wagner.kenneth@epa.gov]; Jackson, Ryan[jackson.ryan@epa.gov]; laura.nicholson@sen.ca.gov[laura.nicholson@sen.ca.gov]; Amanda Hopper[ahopper@co.sutter.ca.us]; Ron Sullenger[rsullenger@co.sutter.ca.us]; Assemblymember Gallagher[assemblymember.gallagher@assembly.ca.gov]
From: will rogers
Sent: Fri 9/1/2017 3:25:20 PM
Subject: Fw: All Relevant Evidence
Investigation Manual 011.jpg
Investigation Manual 010.jpg
Investigation Manual 009.jpg
Investigation Manual 008.jpg
Investigation Manual 007.jpg
Investigation Manual 006.jpg
Investigation Manual 005.jpg
Investigation Manual 004.jpg
Investigation Manual 003.jpg
Investigation Manual 002.jpg
Investigation Manual 001.jpg
Investigation Manual 012.jpg

The CDPR Pesticide Investigation Manual states: " The investigation report must include ALL relevant evidence" which Sutter County CAC did not do but its also wrong for all of you not to include all relevant evidence in your lawsuits and reviews by excluding all the material regarding Sutter County CAC botching our investigation / report by not including all relevant evidence and then CAC and CDPR making excuses and false / misleading statements during a recorded meeting for botching our investigation and report.

The decision makers should see / hear all the relevant evidence regarding Chlorpyrifos use, exposes and etc including the recorded meeting so they can make the best decision.

Don't cheat justice by excluding relevant evidence.

Will Rogers

----- Forwarded Message -----
From: will rogers <willgrogers@yahoo.com>
To: Amanda Hopper <ahopper@co.sutter.ca.us>
Sent: Tuesday, February 3, 2015 5:33 AM
Subject: All Relevant Evidence

CDPR Investigation Manual states: "The investigative report must include ALL relevant evidence."

Bowden obviously didn't do that when he investigated and reported on the Jones Aviation pesticide drift on

Sept 19th 2014.

Will

Remarks: See "Standard Narrative Format" under section IV (C) to facilitate well-organized and informative investigative reports. Within the narrative report, include all available information obtained during the investigation (see section II for information to include). Remember, even negative findings have a bearing on the case. In addition, negative findings demonstrate a thorough investigation. Lack of this kind of information implies the investigator failed to examine aspects of the episode not covered in the written report.

Report Prepared By & Report Reviewed/Approved By: See instructions for PR-ENF-127.

3. Episode Witness/Injured/Complainant Report (PR-ENF-127B)

Use the following as a guide when completing the Episode Witness/Injured/Complainant supplement (PR-ENF-127B) of the Pesticide Episode Investigation Report. Use this report form to record information about other people involved in the episode.

A face sheet (PR-ENF-127) must be submitted with the report even when using this form.

Bowden didn't do this, he left out my son.

The Witness/Injured/Complainant section must be completed for each injured person. For the first person identified, complete this information on the face sheet. All other people should be put on the Episode/Witness/Injured/Complaint form (PR-ENF-127B). DPR will return Pesticide Episode Investigation Reports submitted without this section completed for those injured.

Page: Indicate where in the sequence of the report this sheet is located.

For all other sections of this form, refer to the corresponding instructions for PR-ENF-127.

4. Episode Site Diagram (PR-ENF-127C)

Use the following information as a guide when completing the Episode Site Diagram supplement (PR-ENF-127C) of the Pesticide Episode Investigation Report.

Page, Location/Subject, Priority/WHS No., Other I.D. No., County of Occurrence & Date of Occurrence: See instructions for PR-ENF-127A.

Site Diagram: Draw or sketch a clear diagram or map of the area that shows all pertinent information. Be sure to indicate the direction and all pertinent landmarks. For episodes occurring on farms, field maps showing the fields can be substituted.

Legend and Comments: Include any information that will make the map readable.

Report Prepared By & Report Reviewed/Approved By: See instructions for PR-ENF-127.

d. Private Citizen Exposed to Pesticide Drift

1. When did the exposure occur?
2. Where did the exposure occur?
3. Did you smell, see, taste, or feel anything unusual during or after exposure?
4. What did it smell, taste, or feel like?
5. Did you see any pesticide application taking place nearby?
6. Where did the application occur?
7. What was the distance between you and the application?
8. Describe the application equipment.
9. Describe the weather conditions on that day.
10. When did you start feeling sick?
11. What were your symptoms?
12. How long did your symptoms last?
13. Did you seek medical attention? Where? When?
14. Did you notify anyone of the problem? Who?
15. Do you know if anyone else was exposed?
16. Do you know if they sought medical attention?

Bowden didn't ask me anything about test. I did taste it and feel it in my mouth and throat

e. Private Citizen Exposed to Pesticide Residue

1. When did the exposure occur?
2. Where did the exposure occur?
3. Was a pesticide application made on or near the property?
4. What pesticides were applied?
5. Who made the application?
6. When was it made?
7. Where was it made?
8. Did you smell or taste anything unusual?
9. When did you first notice the unusual smell or taste?
10. What did it smell or taste like?
11. When did you start feeling ill?
12. What were your symptoms?
13. How long did your symptoms last?
14. Did you seek medical attention? When? Where?
15. Do you know if anyone else was exposed?
16. Did you notify anyone of the problem? Who?

Communication and cooperation between the two jurisdictions is critical. DPR and US EPA should be involved whenever appropriate. Consult with your EBL whenever there is a cross jurisdictional episode.

F. Investigative Plan

Start Promptly

Initiate investigations promptly upon notification of an episode. Do not wait for a physician's report or written complaint. The physician may not file a report even though Health and Safety Code section 105200 requires it. Prompt initiation reduces the amount of investigative time needed to locate and interview people directly or indirectly involved in the episode, especially when the episode involves migratory/seasonal workers. Early witness contact improves the factual information obtained for the investigative report.

Formulate Plan

Before starting the investigation, the investigator should formulate a general investigative plan based upon the initial information provided in documents such as the PIR, DFROII, and Pesticide Episode Notification Record, or the complaint referral. **The investigative plan should focus on the circumstances of the episode and any potential violations, as well as the kinds of evidence needed to prove the violations.** In developing the plan, the investigator must consider such things as type of episode, priority status, elapsed time since occurrence, collection of evidence, and resources needed.

Bowden didn't do this because he ignored violations, evidence or sampl and witnesses

The investigative plan should briefly:

1. List the potential violations by element.
2. List persons who need to be interviewed (by role, e.g., applicator, supervisor, injured person, bystander, etc.).
3. List the type and number of samples to be collected.
4. List other evidence necessary to prove particular elements of violations (e.g., Restricted Materials Permit, Notice(s) of Intent (NOI), and Pesticide Use Report(s), training records, diagrams, photographs, etc.).
5. List probable inspection activities (e.g., headquarters inspection).
6. Summarize the findings of fact to date, and planned activities.
7. List of persons who need to be provided with periodic updates.
8. Address agreements with other agencies and legal mandates.

Amend the Plan

As the investigation proceeds, amend the plan as you gather new evidence. An up-to-date plan usually has all of the information necessary to provide preliminary findings of the priority episode investigation to the regional offices within 15 days of notification.

To determine current safety conditions, consider performing appropriate inspections in conjunction with the investigation.

Symptoms. Do not assume the information given in the PIR/DFROII is accurate. Ask the affected person what symptoms he/she experienced. How much time elapsed between exposure and the onset of symptoms? When more than one person is involved in an episode, record each individual's symptoms separately. Each person may react differently to similar exposures.

Medical care. Determine if the employer or supervisor had the employee taken to an appropriate medical care facility in a timely manner as required by 3CCR section 6726. Did the employee refuse to be taken for medical care? How much time elapsed between onset of symptoms and medical treatment? What treatment was provided to the victim? Were medical tests completed? If so, what were the results?

Was medical supervision required? If so, were the regulatory requirements and physician's recommendations followed? If not, document what tests were required, but not performed and/or what recommendations were not followed. For cases involving lowered cholinesterase levels, was the employer required to investigate the employee's work practices pursuant to 3CCR section 6728(d)? If the employer conducted a work practices investigation, include a copy of the report with your investigation.

Medical Records. For all priority human effects episodes, obtain the medical records and attach them to the investigative report. For non-priority human episodes, obtain the medical records if you believe they may provide necessary information relevant to the episode. Medical records, especially relevant test results, often play a critical role in evaluating the illness. To obtain medical records, take a Medical Information Authorization form (PR-ENF-133 (English) or PR-ENF-133x (Spanish)) for release of medical records and get it signed, by the victim, at the time of the interview. If you are unable to obtain the medical records, contact WH&S for assistance. If the records are not attached, document the reason(s) in the investigative report.

Bowden didn't get my son's medical records.

For episodes involving cholinesterase-inhibiting pesticides where the physician requested cholinesterase testing, obtain a copy of the laboratory test results, including the laboratory normal range for each test, and any baseline or prior cholinesterase tests available.

The physican messed up with this, but CAC should have told us it was needed

Application method and application equipment. Describe how the pesticide(s) was applied. What type of equipment (be specific) was used? Note items such as air or ground equipment, boom placement on the spray rig, type and effectiveness of closed system used, type of cab on the tractor, air conditioning or filtering system in use on enclosed cabs, type of hand-held application device, use of electrostatic spray equipment, etc. Is the equipment well-maintained and has it been calibrated? What is the size of the nozzle orifice? Evaluation of drift and residue (field and structural) episodes especially benefit from this type of information.

6. **Sample Site**

   a. **Evaluate the Site**

   Along with your review of interview notes and records, evaluate the episode site to provide a better picture of what happened. Get a complete view of the episode site. This will be the basis for the episode site diagram. Remember not to contaminate yourself walking through the treated area.

   b. **Diagrams**

Bowden didn't include this

Record the following on the episode diagram: episode site, treatment site, landmarks such as buildings and roads, crops and their acreages, location of witnesses, sample sites and numbers, and the site and direction of photographs. Diagrams should indicate the dimensions and orientation. Other useful information is row orientation of the field, wind direction, application pattern and direction. **Remember, the person reading your report may not be familiar with the situation. Diagrams and photographs are a great help in understanding local conditions.**

7. **Sampling Procedures**

   a. **General Information** Bowden failed

   Different types of sample analyses (such as soil to grass) are difficult to compare. Similar materials should be used for comparison samples, such as in cases where treated and untreated areas are to be compared. In drift cases, swab samples will yield a cleaner sample than foliage samples.

   Before entering a treated area, the inspector should determine what has been sprayed, whether a restricted entry interval or other reentry restriction is in effect and what PPE should be used. ✓ was it posted

   Always wear new disposable gloves, the required PPE, and use uncontaminated tools for each sample. For multiple samples, wear new disposable gloves for each sample, and decontaminate the tools between sampling.
   Collect samples in previously unused paper bags or clean glass jars. New jars do not need to be cleaned. Sample material should never come in contact with metal or plastic. Metal lids for glass jars should be lined with aluminum foil or Teflon®.

   Generally, for each sample, collect a minimum of one pound[1] of material per chemical or screen for the laboratory to analyze. If samples are underweight, they may not be analyzed, or analyzed for fewer chemicals than requested. (Exceptions:

[1] The laboratory needs one pound of material for a 50-gram test for the following reason: One pound or somewhat less than 500 grams (454.5 grams). The initial screening takes 50 grams. The confirmation check takes 50 more grams for a total of 100 grams. The split samples for other laboratories to check (if requested) doubles that to 200 grams. Approximately 200 additional grams are needed for the "Spiked for validation" tests. Spiking tests are a further method of assuring the validity of laboratory practices by spiking the sample with a known amount of the pesticide in question.

When collecting DFR samples, always collect two to four samples from each field or sample site. DFR can be quite variable throughout a field or sample site. Therefore, more than one sample from the site is required to get a good estimate of the residue. Collect the DFR samples from different areas of the sample site, noting the location of each sample on the **Sample Analysis Report**.

For multiple analyses, sampling should be repeated as described above for each analysis or screen requested. Because you cannot sample from the same area, collect duplicate samples adjacent to each other. The locations should always be the same size and of the same material. Use a separate jar for each duplicate sample per analysis and identify with consecutive numbers. The duplicate samples should represent one sample site. Contact your EBL to determine if duplicate samples are necessary.

Bowden knew he should do this, but he didn't do it ↙

ii. Surface (Swab) Samples

Conduct surface or swab sampling to establish drift, uniform or partial contamination, or the presence of a pesticide on a surface. Surface samples can be taken indoors or out and in patterns, such as a grid or gradient, or in groups to support other sample analyses. Surface sampling should not be used to determine whether or not a hazard exists.

Sample areas may vary in size depending upon the estimated concentration of the contaminant. Direct application to a surface would require a smaller sample area than drift from greater distances. As a general rule, sample a 500 cm square area (20 cm x 25 cm). Smooth "inert" surfaces, such as a windshield, are the preferred area to sample. However, follow the same methods for sampling uneven surfaces such as rugs, furniture, walls, walkways, or counters.

Prepare ahead of time several same sized disposable templates from manila folders to use to delimit the area to be sampled. In situations where a template cannot be used, string, pins, or tape can be used for outlining the sample areas.

Sample each surface area using two sterile gauze pads or sheets of sharkskin paper[2] moistened with a solvent. Use gauze pads that are no larger than two inches square. Fold the sharkskin sheets into quarters. To prevent contamination of the sharkskin sheets, store two sheets in each of several sealed sandwich bags or within folded aluminum foil in your sampling equipment.

[2] Sharkskin paper is used in the laboratory as filtering material during the analysis process. It can be used as an alternative to cotton gauze when sampling for residues of chlorpyrifos or other organophosphate pesticides to reduce the likelihood of false positives from residues found in the cotton itself. There are various sizes of sharkskin paper, 15 cm, 16.3 cm, and 18.5 cm. The sharkskin paper comes in boxes of 100 sheets. It can be purchased from E & K Scientific 1085 Florence Way, Campbell, CA 95008 (telephone 408-378-2013) or other laboratory supply companies.

Isopropyl alcohol is typically used as the solvent, however, distilled water may be used when sampling for some water-soluble pesticides such as glyphosate or paraquat. Do not contaminate the solvent by placing the gauze pad over the mouth of the solvent bottle. While wearing clean or disposable gloves, pour the solvent over the gauze/paper without touching the bottle.

A control sample must always accompany swab samples. **Take the control sample before entering the episode site.** For the control sample, moisten two sterile gauze pads or sharkskin sheets as above with the same solvent to be used for the actual sample and place them in a foil-sealed glass jar.

Select a sample site. Try to avoid areas known to contain waxes, as these may interfere with the analysis. Tape the template to the surface area or carefully measure and outline the area to be sampled. Record the surface area and sample location on the **Sample Analysis Report**, on the incident diagram, and in your investigative notes. Use a new disposable template for each sample area. If string, pins, or tape are used instead of a disposable template, they should be discarded before another use.

Use two sterile gauze pads or sheets of folded sharkskin per sample. Moisten one pad or sheet with solvent as described above. Wipe lightly horizontally across the measured area with the first pad or sheet, folding the contaminated portion , so that a clean surface of the pad or sheet is exposed to make another wipe of the area, and continuing until the whole area has been wiped horizontally. Place that pad/sheet in a glass jar. Moisten the second pad/sheet with solvent and wipe the entire area again vertically with a clean surface. Place the second pad/sheet in the same jar as the first.

If multiple analyses are required, the sampling should be repeated on samples from adjacent areas as described above for each analysis or screen requested. The locations should always be the same size and of the same surface material. Use a separate jar for each duplicate sample per analysis and identify with consecutive numbers. The duplicate samples should represent one sample site.

Store the samples in the refrigerator and ship them, including the control, on "blue ice."

iii. Clothing Samples Bowden ignored this or he would have had the shirt tested.

Be selective when collecting clothing samples. Be sure the resulting data will be useful in the investigation or for exposure assessment purposes. Coordinate with your EBL and WH&S for clothing samples collected for exposure assessment purposes. Generally, clothing samples only tell the investigator that a pesticide exposure occurred and possibly the extent of the exposure, not whether the exposure resulted in a health hazard. Generally, foliage or other samples are collected in conjunction with clothing samples.

Inform the people involved that the clothing will not be returned. To show consent, have them sign a **Release of Clothing** form (see form DPR-071 in the Associated Forms section).

Collect clothing only from people who were allegedly contaminated. Consideration must be given to the type of incident involved. Garments, such as shoes, could be collected if an applicator was allegedly exposed to a pesticide because of failure to wear protective equipment. Shirts, scarves, or jackets could be collected if they were exposed to pesticide drift.

Clothing samples are usually collected away from the episode site. The best results are obtained when the clothing is clean at the start of the day and should be collected the day of the episode (or the next day and ensure it was not washed). Document what is known about the clothing. Do not collect the clothing if it has been washed unless special circumstances dictate sampling.

If the affected area of the clothing is known, the investigator should note that on the **Sample Analysis Report**.

Place each sample in a clean, unused paper bag to prevent cross-contamination, then place the bagged samples in properly sealed plastic bags for shipment. Chill the samples as they are collected. If the samples cannot be shipped immediately, store the samples in the freezer. See section page 54 for shipping directions.

Why wasn't the shirt shipped immediately? Why wasn't it shipped at all? It was a very important piece of evidence

iv. Soil Samples

Some pesticides are difficult to detect in the soil, and oftentimes other sample types yield more useful information. Contact your EBL regarding the appropriateness of taking soil samples. If soil samples are appropriate, usually one or two soil samples from the most affected area are sufficient, in conjunction with other sample types. Soil samples, however, may be taken in a grid or gradient pattern when other sample types are not possible or appropriate.

a. Surface Soil Sampling

Surface soil samples are best for misapplication of herbicides and soil-applied insecticides and can be used to prove an area was contaminated. For pesticides incorporated or otherwise located below the soil surface, take subsurface samples, as described later.

Use a clean spatula, trowel, or other tool to scrape the surface soil down to a depth of one-half inch. Each sample site should represent approximately a two to four-foot square (i.e., 4 to 16 $ft.^2$ area), depending on the size of the episode site, the concentration of the pesticide residues, and the number of analyses required. Collect approximately one pound of soil per analysis or screen from the top half inch of soil and place in a clean, labeled one-quart glass jar sealed with a Teflon® or foil-lined lid. If the episode site is large, the suspected pesticide concentration is relatively low, or if several pesticide analyses are requested, you may want to enlarge the sample area. Measure the sample area and depth and record it on the

use the probe when a band or side dress treatment was made, as it is difficult to determine where the band treatment is located. You could get misleading results.

c. Soil Sampling (Known Depth, Furrowed Field)

Chemicals may have been applied in bands or side dressed in furrowed fields. In order to sample from the appropriate area, use a shovel to cut across sections perpendicular to the direction of furrow at each sample site. For single rows, start at the center of the furrow and sample across the bed to the center of the opposite furrow. For double row beds, sample from the center of the furrow to the center of the bed.

Collect soil from an area 3 to 6 inches wide, and 12 to 14 inches deep (or less if the application depth is known to be less), as measured from the top of the bed. Place the soil in a stainless steel bucket and mix thoroughly. Collect approximately one pound of soil per analysis or screen from the mixed soil and place in a clean, labeled, one-quart glass jar sealed with a Teflon® or foil-lined lid. Clean the bucket with soapy water, rinse with distilled water, and give a final rinse with isopropyl alcohol. Fill out a Chain of Custody for each sample. Chill samples and ship on blue ice.

v. Water Samples This should have been done

For collecting samples of surface water, use the following guidelines, which are designed to detect pesticide residues resulting from the misapplication of a pesticide to surface water. If you suspect pesticide contamination of ground water, contact your supervisor to determine the appropriate local, State, or federal agency for follow-up.

Wear shoulder-length gloves and clean chest-high waders whenever contact is made with potentially contaminated water. Use clean, one-gallon amber glass containers with an aluminum foil or Teflon® seal under lid. Do a native rinse of the bottle before collecting any sample. Fill bottles to the top, leaving no air space for pesticides to volatilize. Sample as close as possible to the apparent source of contamination. Avoid areas where water has been isolated from the main body of the stream, lake, or pond. In a flowing water body, sample facing upstream.

Wade out as far as possible into the body of water. Avoid sampling water that is disturbed by your movement. If the suspected pesticide is water soluble, then draw the sample from any depth below 18 inches. If the pesticide is oil-based, or if oil is a part of the tank mix and the alleged misapplication was made across the surface, then draw the sample from the surface layer. For samples below the surface of the water, lower the glass bottle to the desired depth before removing the cap. Allow the bottle to fill, replace the foil-lined cap, and lift the bottle out of the water. For surface samples, remove the cap and dip the bottle into the water surface. Allow it to fill completely, then put on the foil-lined cap. Take several samples distributed around ponds or lakes instead of only one sample. If only one sample is taken, draw several sub-samples from different locations around the body of water and combine in a

IV. THE INVESTIGATIVE REPORT

A. General Comments

The investigator must maintain an impartial position at all times. The investigative report must not reflect the attitudes or opinions of the investigator. The investigative report must include all relevant evidence. This includes information about farming practices, etc., that is generally accepted as common knowledge within the industry, but may not be known by DPR staff, hearing officers, and others who review the investigative reports. The reviewer cannot properly consider information the investigator knows, but excludes from the report. Remember, even negative findings can help direct the reviewer to form a valid conclusion and, in addition, demonstrates the thoroughness of the investigation. Omitting information from the report as unimportant can lead to the conclusion that the investigator failed to adequately investigate all aspects of the episode.

Bowden didn't do this

Bowden did this

Based on the information obtained during the investigation, the investigator must only draw conclusions within his/her scope of expertise. Conclusions pertaining to violations of the laws and regulations, and whether the implicated chemicals are pesticides or used as pesticides, fall within the investigator's expertise. **Do not make conclusions based on medical information uncovered during the investigation. The investigator must not draw conclusions about the relationship of the exposure and the illness.** This falls outside the scope of the investigator's expertise.

This explains some but no excuse for Bowden's failures

B. Report Writing:

Your report is the definitive record of an investigation. It is an orderly account of where you went, what you did, and all of the information and evidence you obtained relevant to the episode. It answers the questions of who, what, when, where, why and how. Concentrate on making reports logical and accurate, so they can be complete and still concise. A well-written report gives the reader confidence in your education, experience, objectivity, and professionalism, as well as reflecting positively on your department.

Write reports in the first person and active voice. Keep sentences simple and direct. Use everyday language when possible. Try to think of vivid verbs to evoke the events you describe, but beware of emotionally loaded terms that could lead people to question your objectivity. Your goal is to write reports so complete and well organized that someone could base prosecutions on them, even in your absence. Brief reports often work better than lengthy ones. It takes time and effort to condense reports to their essence, but it makes your work enormously more effective.

Include enough detail that reasonably educated people can follow your report, even if they are unfamiliar with the case, local conditions and practices, and the laws and regulations. Hearing officers, district attorneys, the respondents, and the public may all use your reports, not to mention DPR and your supervisor. Help your readers find the information they need to reach their own conclusions from the logically ordered facts in your report.

Identify all the areas of regulatory concern that you investigated. Document the evidence that supports any violations, but do not exclude information that supports the individual or business being investigated. Remember DPR and your supervisors use your reports to assess the need for enforcement action. If you identify any violations, the report must identify those violations and supply information from which to gauge the degree or severity of violation.

The report should identify the source of all information and statements included in the report. When referring to people in the report, use the initial of their first name followed by their last name. Type the name in capital letters. For example, John Doe, would be referred to as J. DOE. Handling names in the report this way will assist staff in removing the names to fulfill public disclosure of records requests.

C. Standard Narrative Format

To facilitate well-organized and informative investigative reports, the report must include the following standard narrative elements. Non-priority antimicrobial investigations are exempt from this format requirement.

Summary: One paragraph summarizing the episode.

Background Information: Pertinent background information related to the episode.

Violations: List all violations of the laws, regulations, and labeling found during the investigation, including violations that did not contribute directly to the episode.

Bowden didn't do this

Witnesses: List of all witnesses involved in the episode. For each person, list his/her name, employer (if applicable), address, and telephone number.

Investigation and Statements: The narrative portion of the investigation report detailing how the episode occurred. Witness interview statements/summaries are included in this section. For each interview, state the date and time of the interview, who conducted the interview, how the investigator conducted the interview (i.e. in-person, over the telephone), where the investigator conducted the interview, the translator (if applicable), and if anyone else was present during the interview.

Findings: Summarize the investigative findings supported by the evidence. Provide summary information identifying and supporting the elements of any violations found during the investigation.

Attachments: List of supporting evidence for the episode investigation.

Remarks: See "Standard Narrative Format" under section IV (C) to facilitate well-organized and informative investigative reports. Within the narrative report, include all available information obtained during the investigation (see section II for information to include). Remember, even negative findings have a bearing on the case. In addition, negative findings demonstrate a thorough investigation. Lack of this kind of information implies the investigator failed to examine aspects of the episode not covered in the written report.

Report Prepared By & Report Reviewed/Approved By: See instructions for PR-ENF-127.

3. Episode Witness/Injured/Complainant Report (PR-ENF-127B)

Use the following as a guide when completing the Episode Witness/Injured/Complainant supplement (PR-ENF-127B) of the Pesticide Episode Investigation Report. Use this report form to record information about other people involved in the episode.

A face sheet (PR-ENF-127) must be submitted with the report even when using this form.

Bowden didn't do this, he left out my son.

The Witness/Injured/Complainant section must be completed for each injured person. For the first person identified, complete this information on the face sheet. All other people should be put on the Episode/Witness/Injured/Complaint form (PR-ENF-127B). DPR will return Pesticide Episode Investigation Reports submitted without this section completed for those injured.

Page: Indicate where in the sequence of the report this sheet is located.

For all other sections of this form, refer to the corresponding instructions for PR-ENF-127.

4. Episode Site Diagram (PR-ENF-127C)

Use the following information as a guide when completing the Episode Site Diagram supplement (PR-ENF-127C) of the Pesticide Episode Investigation Report.

Page, Location/Subject, Priority/WHS No., Other I.D. No., County of Occurrence & Date of Occurrence: See instructions for PR-ENF-127A.

Site Diagram: Draw or sketch a clear diagram or map of the area that shows all pertinent information. Be sure to indicate the direction and all pertinent landmarks. For episodes occurring on farms, field maps showing the fields can be substituted.

Legend and Comments: Include any information that will make the map readable.

Report Prepared By & Report Reviewed/Approved By: See instructions for PR-ENF-127.