

TULARE COUNTY SUPERIOR COURT DISTRICT
TULARE COUNTY SUPERIOR COURT DIVISION, STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

DA No. 16-004279

vs.

Court No.

HOWARD KERR RAGLAND DOB:06/12/1962

FELONY COMPLAINT

Defendant(s).

The undersigned is informed and believes that:

COUNT 1

On or about and between April 1, 2013 and November 19, 2013, in the County of Tulare, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a FELONY, was committed by **HOWARD KERR RAGLAND**, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of UNLAWFUL REBATES, in violation of Section 650(a), of the BUSINESS AND PROFESSIONS Code, a Felony and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said DEFENDANT committed the following overt act and acts at and in the County of TULARE:

1. OBTAINED PATENT INFORMATION
2. ENTERED PATIENT INFORMATION INTO GREENLIFE
3. OBTAINED MONEY FROM CAPPER
4. PROVIDED MEDICAL MARIJUANA RECOMMENDATIONS

COUNT 2

On or about and between April 1, 2013 and April 30, 2013, in the County of Tulare, the crime of PRACTICING MEDICINE WITHOUT CERTIFICATION, in violation of BUSINESS & PROFESSIONS CODE SECTION 2052(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did unlawfully violate this section without valid certification or authority.

COUNT 3

On or about and between April 1, 2013 and April 30, 2013, in the County of Tulare, the crime of UNLAWFUL REBATES, in violation of BUSINESS & PROFESSIONS CODE 650(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did, while licensed under Division 2 of the California Business and Professions Code, unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to a person.

COUNT 4

On or about and between May 1, 2013 and May 31, 2013, in the County of Tulare, the crime of PRACTICING MEDICINE WITHOUT CERTIFICATION , in violation of BUSINESS & PROFESSIONS CODE SECTION 2052(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did unlawfully violate this section without valid certification or authority.

COUNT 5

On or about and between May 1, 2013 and May 31, 2013, in the County of Tulare, the crime of UNLAWFUL REBATES, in violation of BUSINESS & PROFESSIONS CODE 650(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did, while licensed under Division 2 of the California Business and Professions Code, unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to a person.

COUNT 6

On or about and between June 1, 2013 and June 30, 2013, in the County of Tulare, the crime of PRACTICING MEDICINE WITHOUT CERTIFICATION , in violation of BUSINESS & PROFESSIONS CODE SECTION 2052(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did unlawfully violate this section without valid certification or authority.

COUNT 7

On or about and between June 1, 2013 and June 30, 2013, in the County of Tulare, the crime of UNLAWFUL REBATES, in violation of BUSINESS & PROFESSIONS CODE 650(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did, while licensed under Division 2 of the California Business and Professions Code, unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to a person.

COUNT 8

On or about and between July 1, 2013 and July 31, 2013, in the County of Tulare, the crime of PRACTICING MEDICINE WITHOUT CERTIFICATION , in violation of BUSINESS & PROFESSIONS CODE SECTION 2052(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did unlawfully violate this section without valid certification or authority.

COUNT 9

On or about and between July 1, 2013 and July 31, 2013, in the County of Tulare, the crime of UNLAWFUL REBATES, in violation of BUSINESS & PROFESSIONS CODE 650(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did, while licensed under Division 2 of the California Business and Professions Code, unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to a person.

COUNT 10

On or about and between August 1, 2013 and August 31, 2013, in the County of Tulare, the crime of PRACTICING MEDICINE WITHOUT CERTIFICATION, in violation of BUSINESS & PROFESSIONS CODE SECTION 2052(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did unlawfully violate this section without valid certification or authority.

COUNT 11

On or about and between August 1, 2013 and August 31, 2013, in the County of Tulare, the crime of UNLAWFUL REBATES, in violation of BUSINESS & PROFESSIONS CODE 650(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did, while licensed under Division 2 of the California Business and Professions Code, unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to a person.

COUNT 12

On or about and between September 1, 2013 and September 30, 2013, in the County of Tulare, the crime of PRACTICING MEDICINE WITHOUT CERTIFICATION, in violation of BUSINESS & PROFESSIONS CODE SECTION 2052(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did unlawfully violate this section without valid certification or authority.

COUNT 13

On or about and between September 1, 2013 and September 30, 2013, in the County of Tulare, the crime of UNLAWFUL REBATES, in violation of BUSINESS & PROFESSIONS CODE 650(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did, while licensed under Division 2 of the California Business and Professions Code, unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to a person.

COUNT 14

On or about and between October 1, 2013 and October 31, 2013, in the County of Tulare, the crime of PRACTICING MEDICINE WITHOUT CERTIFICATION , in violation of BUSINESS & PROFESSIONS CODE SECTION 2052(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did unlawfully violate this section without valid certification or authority.

COUNT 15

On or about and between October 1, 2013 and October 31, 2013, in the County of Tulare, the crime of UNLAWFUL REBATES, in violation of BUSINESS & PROFESSIONS CODE 650(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did, while licensed under Division 2 of the California Business and Professions Code, unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to a person.

COUNT 16

On or about and between November 1, 2013 and November 19, 2013, in the County of Tulare, the crime of PRACTICING MEDICINE WITHOUT CERTIFICATION , in violation of BUSINESS & PROFESSIONS CODE SECTION 2052(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did unlawfully violate this section without valid certification or authority.

COUNT 17

On or about and between November 1, 2013 and November 19, 2013, in the County of Tulare, the crime of UNLAWFUL REBATES, in violation of BUSINESS & PROFESSIONS CODE 650(a), a Felony, was committed by **HOWARD KERR RAGLAND**, who did, while licensed under Division 2 of the California Business and Professions Code, unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to a person.

* * * * *

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

Pursuant to People v. Cunningham, the People hereby put the defendant on notice that the aggravated sentence may be sought in this case.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 17 COUNT(S).

Executed at VISALIA DIVISION, California, on March 8, 2016.

ADAM CLARE
DEPUTY DISTRICT ATTORNEY

Agency: TCSO

<u>DEFENDANT NAME</u>	<u>SEX</u>	<u>RACE</u>	<u>HGT</u>	<u>WGT</u>	<u>EYES</u>	<u>HAIR</u>	<u>COURT DATE</u>	<u>INTAKE STATUS</u>
HOWARD KERR RAGLAND	M	X	603	300	BRO	BRO		WA

COMPLAINT PROCESSED BY: JLD