

1 KAMALA D. HARRIS
Attorney General of California
2 JOSE R. GUERRERO
Supervising Deputy Attorney General
3 VIVIEN H. HARA (State Bar No. 84589)
BRENDA P. REYES (State Bar No. 129718)
4 Deputy Attorneys General
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-5513 (Hara)
6 (415) 703-5541 (Reyes)
Facsimile: (415) 703-5480
7 E-mail: vivien.hara@doj.ca.gov
brenda.reyes@doj.ca.gov

8
9 *Attorneys for Linda K. Whitney, Executive Director,
Medical Board of California*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF MARIN**

12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

14 Plaintiff

15 v.

16 **RAYMOND SEVERT,**

17 Defendant

18
19 **LINDA K. WHITNEY, Executive Director**
MEDICAL BOARD OF CALIFORNIA,

20 Applicant

Case No. SC183894

STIPULATION AND ORDER

(Penal Code § 23)

FILED

MAR 04 2013

KIM TURNER, Court Executive Officer
MARIN COUNTY SUPERIOR COURT
By: *S. Peterson* Deputy

21
22 1. Defendant Raymond Severt, M.D., is a physician and surgeon licensed to practice
23 medicine in the State of California. Defendant Severt is an orthopedic surgeon practicing in and
24 about Santa Rosa, California. Defendant Severt has been charged with felony violations of Penal
25 Code § 664/288 (a) [attempting a lewd act upon a child under the age of fourteen (14) years];
26 Penal Code § 288.2 (a) [distribution of lewd material to a minor]; Penal Code § 288.3 (a)
27 [contacting and communicating with a minor for the purpose of engaging in lewd and lascivious
28

1 behavior]; and, Penal Code § 288.4 (b) [arrangement of meeting with minor for purpose of
2 engaging in lewd and lascivious behavior]. The charges, if proven at trial, are substantially
3 related to the qualifications, functions, or duties of a physician.

4 2. Defendant Severt is represented in this criminal proceeding by Attorney L.
5 Stephen Turer.

6 3. The Medical Board of California is the state agency charged with protecting the
7 public through the licensing and discipline of physicians and surgeons in the State of California.
8 Linda K. Whitney is the Executive Director of the Medical Board of California (hereinafter
9 "Medical Board") and is represented by Kamala D. Harris, Attorney General of the State of
10 California, by Vivien H. Hara and Brenda P. Reyes, Deputy Attorneys General.

11 4. Penal Code section 23 provides, in pertinent part:

12 In any criminal proceeding against a person who has been issued a license to
13 engage in a business or profession by a state agency pursuant to provisions of the
14 Business and Professions Code ... the state agency which issued the license may
15 voluntarily appear to furnish pertinent information, make recommendations regarding
16 specific conditions of probation, or provide any other assistance necessary to promote
17 the interests of justice and protect the interests of the public. or may be ordered by the
18 court to do so, if the crime charged is substantially related to the qualifications, functions,
19 or duties of a licensee.

20 5. The Medical Board, by Deputy Attorney General Reyes, provided notice to
21 Defendant of appearance and application to the Court herein, under Penal Code § 23, for an order
22 prohibiting Defendant from engaging in the practice of medicine during the pendency of the
23 criminal action contending that such a prohibition is in the interest of the public safety.

24 Defendant does not contest the application of the Medical Board.

25 6. Defendant and the Medical Board hereby stipulate and request that the Court enter
26 an order as follows:

27 Defendant Raymond Severt, holder of Physician's and Surgeon's Certificate No. G 63482,
28 is prohibited from practicing as a physician and surgeon throughout the pendency of this criminal
action. Defendant is prohibited from:

(a) Practicing or attempting to practice as a physician and surgeon.

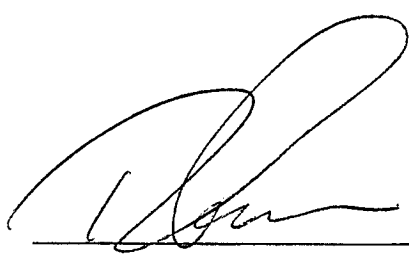
1 (b) Possessing, prescribing, dispensing, furnishing, administering or otherwise
2 distributing any controlled substances or any dangerous drugs, except pursuant to a valid and
3 legitimate prescription issued by a licensed California physician;

4 (c) Possessing or holding his physician's and surgeon's wall and wallet certificates,
5 any and all prescription pads and regular prescription blanks, Drug Enforcement Administration
6 Drug Order Forms, and any and all Drug Enforcement Administration permits, which documents
7 shall be surrendered by him to the Medical Board pending adjudication of this matter.

8 (d) Defendant shall, upon demand, turn over to the Medical Board of California for
9 safekeeping all prescription pads and prescription blanks in his possess or under his custody or
10 control.

11 SO STIPULATED.

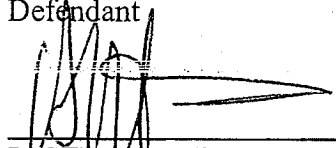
12
13 Dated: 3/4/13



RAYMOND SEVERT, M.D.

Defendant

14
15
16 Dated: 3/4/13



STEPHEN TURER, Esq.
Attorney for Defendant

17
18
19 Dated: 3/4/2013

KAMALA D. HARRIS, Attorney General

20
21 By Brenda P. Reyes

BRENDA P. REYES
Deputy Attorney General
Attorney for State Agency
Medical Board of California,
Linda K. Whitney, Executive Director

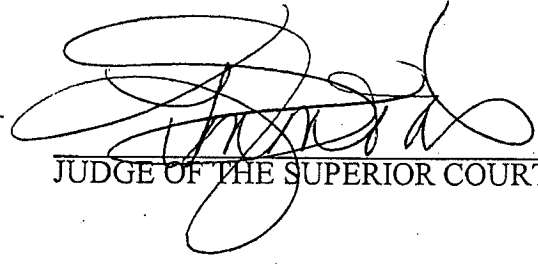
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

GOOD CAUSE APPEARING, the Stipulation is adopted as the Court's Order and Defendant Raymond Severt, M.D., shall comply with the terms as set forth in Paragraph 6, above.

Dated: 3/4/13



JUDGE OF THE SUPERIOR COURT