

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation
Against:

Jean Gregory Howell, M.D.

Case No. 800-2023-103932

Physician's and Surgeon's
Certificate No. A 123548

Respondent.

DECISION

The attached Stipulated Surrender of License and Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on AUG 13 2025

IT IS SO ORDERED AUG 06 2025

MEDICAL BOARD OF CALIFORNIA



Reji Varghese, Executive Director

ROB BONTA
Attorney General of California
MICHAEL C. BRUMMEL
Supervising Deputy Attorney General
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BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 800-2023-103932

**JEAN GREGORY HOWELL, M.D.
180 S. Lexington Dr., Apt. 1028
Folsom, CA 95630**

OAH No. 2025020959

**Physician's and Surgeon's Certificate
No. A 123548**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

Respondent.

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled proceedings that the following matters are true:

PARTIES

1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of California (Board). He brought this action solely in his official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of California, by Ryan J. Yates, Deputy Attorney General.

2. JEAN GREGORY HOWELL, M.D. (Respondent) is represented in this proceeding by attorney David S. Kahn, whose address is: 2315 Capitol Avenue, Sacramento, CA 95816.

3. On or about November 7, 2012, the Board issued Physician's and Surgeon's Certificate No. A 123548 to Respondent. That license was in full force and effect at all times

1 relevant to the charges brought in Accusation No. 800-2023-103932 and will expire on May 31,
2 2026, unless renewed.

3 **JURISDICTION**

4 4. Accusation No. 800-2023-103932 was filed before the Board and is currently pending
5 against Respondent. The Accusation and all other statutorily required documents were properly
6 served on Respondent on February 5, 2025. Respondent timely filed his Notice of Defense
7 contesting the Accusation. A copy of Accusation No. 800-2023-103932 is attached as Exhibit A
8 and incorporated by reference.

9 **ADVISEMENT AND WAIVERS**

10 5. Respondent has carefully read, fully discussed with counsel, and understands the
11 charges and allegations in Accusation No. 800-2023-103932. Respondent also has carefully read,
12 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License
13 and Order.

14 6. Respondent is fully aware of his legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine
16 the witnesses against him; the right to present evidence and to testify on his own behalf; the right
17 to the issuance of subpoenas to compel the attendance of witnesses and the production of
18 documents; the right to reconsideration and court review of an adverse decision; and all other
19 rights accorded by the California Administrative Procedure Act and other applicable laws.

20 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
21 every right set forth above.

22 **CULPABILITY**

23 8. Respondent admits the truth of each and every charge and allegation in Accusation
24 No. 800-2023-103932, agrees that cause exists for discipline and hereby surrenders his
25 Physician's and Surgeon's Certificate No. A 123548 for the Board's formal acceptance.

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9. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Physician's and Surgeon's Certificate without further process.

CONTINGENCY

10. Business and Professions Code section 2224, subdivision (b), provides, in pertinent part, that the Medical Board “shall delegate to its executive director the authority to adopt a ... stipulation for surrender of a license.”

8 11. Respondent understands that, by signing this stipulation, he enables the Executive
9 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his
10 Physician's and Surgeon's Certificate No. A 123548 without further notice to, or opportunity to be
11 heard by, Respondent.

12 12. This Stipulated Surrender of License and Disciplinary Order shall be subject to the
13 approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated
14 Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his
15 consideration in the above-entitled matter and, further, that the Executive Director shall have a
16 reasonable period of time in which to consider and act on this Stipulated Surrender of License and
17 Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands
18 and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the
19 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

20 13. The parties agree that this Stipulated Surrender of License and Disciplinary Order
21 shall be null and void and not binding upon the parties unless approved and adopted by the
22 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full
23 force and effect. Respondent fully understands and agrees that in deciding whether or not to
24 approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive
25 Director and/or the Board may receive oral and written communications from its staff and/or the
26 Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the
27 Executive Director, the Board, any member thereof, and/or any other person from future
28 participation in this or any other matter affecting or involving respondent. In the event that the

1 Executive Director on behalf of the Board does not, in his discretion, approve and adopt this
2 Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it
3 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied
4 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees
5 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason
6 by the Executive Director on behalf of the Board, Respondent will assert no claim that the
7 Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review,
8 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or
9 of any matter or matters related hereto.

10 **ADDITIONAL PROVISIONS**

11 14. This Stipulated Surrender of License and Disciplinary Order is intended by the parties
12 herein to be an integrated writing representing the complete, final and exclusive embodiment of
13 the agreements of the parties in the above-entitled matter.

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

17 16. In consideration of the foregoing admissions and stipulations, the parties agree the
18 Executive Director of the Board may, without further notice to or opportunity to be heard by
19 Respondent, issue and enter the following Disciplinary Order on behalf of the Board:

20 **ORDER**

21 **IT IS HEREBY ORDERED** that Physician's and Surgeon's Certificate No. A 123548,
22 issued to Respondent JEAN GREGORY HOWELL, M.D., is surrendered and accepted by the
23 Board.

24 1. The surrender of Respondent's Physician's and Surgeon's Certificate and the
25 acceptance of the surrendered license by the Board shall constitute the imposition of discipline
26 against Respondent. This stipulation constitutes a record of the discipline and shall become a part
27 of Respondent's license history with the Board.

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1 2. Respondent shall lose all rights and privileges as a physician and surgeon in
2 California as of the effective date of the Board's Decision and Order.

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

5 4. If Respondent ever files an application for licensure or a petition for reinstatement in
6 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
7 comply with all the laws, regulations and procedures for reinstatement of a revoked or
8 surrendered license in effect at the time the petition is filed, and all of the charges and allegations
9 contained in Accusation No. 800-2023-103932 shall be deemed to be true, correct and admitted
10 by Respondent when the Board determines whether to grant or deny the petition.

11 5. Respondent shall pay the agency its costs of investigation and enforcement in the
12 amount of \$19,500.00 (nineteen thousand five hundred dollars) prior to issuance of a new or
13 reinstated license.

ACCEPTANCE

15 I have carefully read the above Stipulated Surrender of License and Order and have fully
16 discussed it with my attorney David S. Kahn. I understand the stipulation and the effect it will
17 have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of
18 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the
19 Decision and Order of the Medical Board of California.

23 I have read and fully discussed with Respondent JEAN GREGORY HOWELL, M.D. the
24 terms and conditions and other matters contained in this Stipulated Surrender of License and
25 Order. I approve its form and content.

27 DATED: August 1, 2025 
28 DAVID S. KAHN
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs.

DATED: August 1, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
MICHAEL C. BRUMMEL
Supervising Deputy Attorney General

MB

Michael C. Brummel for Ryan J. Yates
RYAN J. YATES
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 800-2023-103932

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4 Supervising Deputy Attorney General
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Attorneys for Complainant

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against: Case No. 800-2023-103932
13 **JEAN GREGORY HOWELL, M.D.** ACCUSATION
14 **180 S. Lexington Dr., Apt. 1028**
Folsom, CA 95630
15 Physician's and Surgeon's Certificate
16 No. A 123548,
Respondent

PARTIES

19 1. Reji Varghese (Complainant) brings this Accusation solely in his official capacity as
20 the Executive Director of the Medical Board of California, Department of Consumer Affairs
21 (Board).

22 2. On or about November 7, 2012, the Medical Board issued Physician's and Surgeon's
23 Certificate Number A 123548 to Jean Gregory Howell, M.D. (Respondent). The Physician's and
24 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
25 herein and will expire on May 31, 2026, unless renewed.

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JURISDICTION

2 3. This Accusation is brought before the Board, under the authority of the following
3 laws. All section references are to the Business and Professions Code (Code) unless otherwise
4 indicated.

5 4. Section 2234 of the Code states:

6 The board shall take action against any licensee who is charged with
7 unprofessional conduct. In addition to other provisions of this article, unprofessional
conduct includes, but is not limited to, the following:

8 (a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the violation of, or conspiring to violate any provision of this chapter.

(b) Gross negligence.

15 (2) When the standard of care requires a change in the diagnosis, act, or
16 omission that constitutes the negligent act described in paragraph (1), including, but
17 not limited to, a reevaluation of the diagnosis or a change in treatment, and the
licensee's conduct departs from the applicable standard of care, each departure
constitutes a separate and distinct breach of the standard of care.

18 (d) Incompetence.

(f) Any action or conduct that would have warranted the denial of a certificate.

22 (g) The failure by a certificate holder, in the absence of good cause, to attend
23 and participate in an interview by the board no later than 30 calendar days after being
notified by the board. This subdivision shall only apply to a certificate holder who is
the subject of an investigation by the board.

24 (h) Any action of the licensee, or another person acting on behalf of the
25 licensee, intended to cause their patient or their patient's authorized representative to
26 rescind consent to release the patient's medical records to the board or the
Department of Consumer Affairs, Health Quality Investigation Unit.

27 (i) Dissuading, intimidating, or tampering with a patient, witness, or any person in an attempt to prevent them from reporting or testifying about a licensee.

5. Section 726 of the Code states:

(a) The commission of any act of sexual abuse, misconduct, or relations with a patient, client, or customer constitutes unprofessional conduct and grounds for disciplinary action for any person licensed under this or under any initiative act referred to in this division.

(b) This section shall not apply to consensual sexual contact between a licensee and his or her spouse or person in an equivalent domestic relationship when that licensee provides medical treatment, to his or her spouse or person in an equivalent domestic relationship.

6. Section 2228.1 states:

(a) On and after July 1, 2019, except as otherwise provided in subdivision (c), the board and the Podiatric Medical Board of California shall require a licensee to provide a separate disclosure that includes the licensee's probation status, the length of the probation, the probation end date, all practice restrictions placed on the licensee by the board, the board's telephone number, and an explanation of how the patient can find further information on the licensee's probation on the licensee's profile page on the board's online license information internet website, to a patient or the patient's guardian or health care surrogate before the patient's first visit following the probationary order while the licensee is on probation pursuant to a probationary order made on and after July 1, 2019, in any of the following circumstances:

(1) A final adjudication by the board following an administrative hearing or admitted findings or *prima facie* showing in a stipulated settlement establishing any of the following:

(a) The commission of any act of sexual abuse, misconduct, or relations with a patient or client as defined in Section 726 or 729.

(b) Drug or alcohol abuse directly resulting in harm to patients or the extent that such use impairs the ability of the licensee to practice safely.

(c) Criminal conviction directly involving harm to patient health.

(d) Inappropriate prescribing resulting in harm to patients and a probationary period of five years or more.

(2) An accusation or statement of issues alleged that the licensee committed any of the acts described in subparagraphs (A) to (D), inclusive, of paragraph (1), and a stipulated settlement based upon a nolo contendere or other similar compromise that does not include any *prima facie* showing or admission of guilt or fact but does include an express acknowledgment that the disclosure requirements of this section would serve to protect the public interest.

(b) A licensee required to provide a disclosure pursuant to subdivision (a) shall obtain from the patient, or the patient's guardian or health care surrogate, a separate, signed copy of that disclosure.

(c) A licensee shall not be required to provide a disclosure pursuant to subdivision (a) if any of the following applies:

(1) The patient is unconscious or otherwise unable to comprehend the

1 disclosure and sign the copy of the disclosure pursuant to subdivision (b) and a
2 guardian or health care surrogate is unavailable to comprehend the disclosure and
3 sign the copy.

4 (2) The visit occurs in an emergency room or an urgent care facility or the visit
5 is unscheduled, including consultations in inpatient facilities.

6 (3) The licensee who will be treating the patient during the visit is not known to
7 the patient until immediately prior to the start of the visit.

8 (4) The licensee does not have a direct treatment relationship with the patient.

9 (d) On and after July 1, 2019, the board shall provide the following
10 information, with respect to licensees on probation and licensees practicing under
11 probationary licenses, in plain view on the licensee's profile page on the board's
12 online license information internet website.

13 (1) For probation imposed pursuant to a stipulated settlement, the causes
14 alleged in the operative accusation along with a designation identifying those causes
15 by which the licensee has expressly admitted guilt and a statement that acceptance of
16 the settlement is not an admission of guilt.

17 (2) For probation imposed by an adjudicated decision of the board, the causes
18 for probation stated in the final probationary order.

19 (3) For a licensee granted a probationary license, the causes by which the
20 probationary license was imposed.

21 (4) The length of the probation and end date.

22 (5) All practice restrictions placed on the license by the board.

23 (e) Section 2314 shall not apply to this section.

24 7. Section 2266 of the Code states: The failure of a physician and surgeon to maintain
25 adequate and accurate records relating to the provision of services to their patients constitutes
26 unprofessional conduct.

27 8. Section 2227 of the Code provides that a licensee who is found guilty under the
28 Medical Practice Act may have his or her license revoked, suspended for a period not to exceed
one year, placed on probation and required to pay the costs of probation monitoring, or such other
action taken in relation to discipline as the Board deems proper.

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COST RECOVERY

2 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
6 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
7 included in a stipulated settlement.

FIRST CAUSE FOR DISCIPLINE

(Sexual Abuse and Misconduct)

10 10. Respondent, Jean Gregory Howell, M.D., is subject to disciplinary action under
11 Sections 2234 and 726 of the Code, in that he committed an act or acts of sexual abuse and
12 misconduct with Patient A. The facts are as follows:

13 11. Respondent was formerly a Family Physician at a large medical provider in Northern
14 California, where he practiced addiction medicine. Patient A,¹ was a then 31-year-old female,
15 who, on or about July 27, 2023, began seeing Respondent to manage her alcohol abuse disorder.
16 Following the appointment, Patient A attended and self-discharged early from a 30-day alcohol
17 abuse treatment at a residential facility. Following Patient A's discharge, Respondent began
18 contacting Patient A from his Kaiser phone number, to check up on her progress and make sure
19 she was still sober. He also made telephonic contacts to Patient A's fiancé and mother. He would
20 leave voicemails and send her messages through the facility website to ask her how she was
21 doing. This continued through on or about November 6, 2023; however, Patient A's medical
22 records only indicate contacts on or about October 10, 2023, and November 6, 2023.

23 12. Between on or about October 10, 2023, and on or about November 20, 2023,
24 Respondent began contacting Patient A from his personal number. From that point on he
25 regularly contacted her on his personal phone, both telephonically and via text message. There is
26 no documentation of said contacts in Patient A's medical record.

¹ Patient names and information have been redacted to protect privacy. All witnesses will be identified in discovery.

1 13. On or about November 15, 2023, at Respondent's initiation, Respondent and
2 Patient A began exchanging explicit and lewd messages back and forth. The conversation
3 included discussions about oral sex and sexual intercourse. Patient A sent Respondent a photo of
4 herself in a swimsuit. Respondent sent Patient A a picture of his penis and a picture of a woman
5 performing oral sex on him.

6 **SECOND CAUSE FOR DISCIPLINE**

7 **(Repeated Negligent Acts)**

8 14. Respondent's license is subject to discipline under section 2234, subdivision (c), of
9 the Code, in that he committed repeated negligent acts during the care and treatment of Patient A,
10 as more particularly alleged in paragraphs 10 through 13, above, which are hereby incorporated
11 by reference and realleged as if fully set forth herein. The circumstances are as follows:

12 a. Between on or about October 10, 2023, and on or about November 20, 2023,
13 Respondent engaged in an inappropriate relationship with Patient A, including, but not limited to
14 repeated and ongoing communications of a personal and sexual nature.

15 **THIRD CAUSE FOR DISCIPLINE**

16 **(Failure to Maintain Adequate and Accurate Records)**

17 15. Respondent's license is subject to disciplinary action under section 2266 of the Code,
18 in that he failed to maintain adequate and accurate medical records relating to his care and
19 treatment of Patient A, as more fully described in paragraphs 10 through 13 above, and those
20 paragraphs are incorporated by reference as if fully set forth herein.

21 **FOURTH CAUSE FOR DISCIPLINE**

22 **(General Unprofessional Conduct)**

23 16. Respondent Jean Gregory Howell, M.D. is further subject to disciplinary action under
24 Sections 2227 and 2234 of the Code, in that he has engaged in conduct which breaches the rules
25 or ethical code of the medical profession, or conduct which is unbecoming to a member in good
26 standing of the medical profession, and which demonstrates an unfitness to practice medicine, as
27 more fully described in paragraphs 8 through 13 above, and those paragraphs are incorporated by
28 reference 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 Medical Board of California issue a decision;

4 1. Revoking or suspending Physician's and Surgeon's Certificate Number A 123548,
5 issued to Respondent Jean Gregory Howell, M.D.;

6 2. Revoking, suspending or denying approval of Respondent Jean Gregory Howell,
7 M.D.'s authority to supervise physician assistants and advanced practice nurses;

8 3. Ordering Respondent Jean Gregory Howell, M.D., to pay the Board the costs of the
9 investigation and enforcement of this case, and if placed on probation, the costs of probation
10 monitoring;

11 4. Ordering Respondent Jean Gregory Howell, M.D., if placed on probation, to provide
12 patient notification in accordance with Business and Professions Code section 2228.1; and

13 5. Taking such other and further action as deemed necessary and proper.

DATED:

REJI VARGHESE
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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