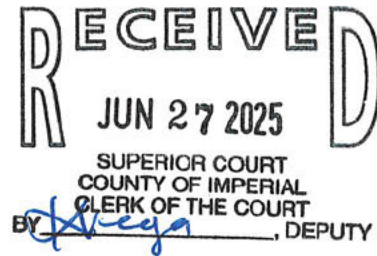


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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF IMPERIAL

14 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

15 Plaintiff,

16 v.

17 **WILLIAM DODSON CREIGHTON,**
18 (DOB: [REDACTED])

19 Defendant.

Case No.:

FELONY COMPLAINT

20 The Attorney General of the State of California by this felony complaint hereby accuses
21 Defendant WILLIAM DODSON CREIGHTON, of the following felonies:

22 **COUNT 1**
Insurance Fraud
23 **Penal Code Section 550(b)(1)**

24 From on or about October 11, 2023, to on or about April 8, 2024, in or around the County
25 of Imperial, WILLIAM DODSON CREIGHTON, presented or caused to be presented a written
26 and oral statement as part of, and in support and opposition to, a claim for payment and other
27 benefit pursuant to an insurance policy, knowing that the statement contained false or misleading
28 information concerning a material fact, in violation of Penal Code section 550, subdivision (b)(1),

1 a felony.

2
3 **Factors in Aggravation**
4 **Penal Code Section 1170(b)**

5 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
6 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
7 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
8 subdivision (a)(8).

9 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
10 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
11 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

12 **COUNT 2**
13 **Healthcare Fraud**
14 **Welfare and Institutions Code Section 14107(b)(3)**

15 From on or about October 11, 2023, to on or about April 8, 2024, in or around the County
16 of Imperial, WILLIAM DODSON CREIGHTON, did knowingly submit false information for the
17 purpose of obtaining authorization for furnishing services or merchandise under the Medi-Cal
18 program, in violation of Welfare & Institutions Code section 14107, subdivision (b)(3), a felony.

19 **Factors in Aggravation**
20 **Penal Code Section 1170(b)**

21 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
22 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
23 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
24 subdivision (a)(8).

25 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
26 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
27 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

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1 **COUNT 3**
2 **Knowingly Prescribing a Controlled Substance for Other Than a Legitimate Medical**
3 **Purpose**
4 **Health and Safety Code Section 11153**

5 On or about October 11, 2023, in or around the County of Imperial, WILLIAM DODSON
6 CREIGHTON, knowingly issued a prescription for Promethazine with Codeine, a controlled
7 substance, that was not for a legitimate medical purpose, in violation of Health and Safety Code
8 section 11153, a felony.

9 **Factors in Aggravation**
10 **Penal Code Section 1170(b)**

11 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
12 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
13 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
14 subdivision (a)(8).

15 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
16 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
17 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

18 **COUNT 4**
19 **Knowingly Prescribing a Controlled Substance for Other Than a Legitimate Medical**
20 **Purpose**
21 **Health and Safety Code Section 11153**

22 On or about October 11, 2023, in or around the County of Imperial, WILLIAM DODSON
23 CREIGHTON, knowingly issued a prescription for Promethazine with Codeine, a controlled
24 substance, that was not for a legitimate medical purpose, in violation of Health and Safety Code
25 section 11153, a felony.

26 **Factors in Aggravation**
27 **Penal Code Section 1170(b)**

28 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
subdivision (a)(8).

1 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
2 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
3 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

4 **COUNT 5**
5 **Knowingly Prescribing a Controlled Substance for Other Than a Legitimate Medical**
6 **Purpose**
7 **Health and Safety Code Section 11153**

8 On or about December 11, 2023, in or around the County of Imperial, WILLIAM
9 DODSON CREIGHTON, knowingly issued a prescription for Promethazine with Codeine, a
10 controlled substance, that was not for a legitimate medical purpose, in violation of Health and
11 Safety Code section 11153, a felony.

12 **Factors in Aggravation**
13 **Penal Code Section 1170(b)**

14 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
15 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
16 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
17 subdivision (a)(8).

18 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
19 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
20 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

21 **COUNT 6**
22 **Knowingly Prescribing a Controlled Substance for Other Than a Legitimate Medical**
23 **Purpose**
24 **Health and Safety Code Section 11153**

25 On or about December 11, 2023, in or around the County of Imperial, WILLIAM
26 DODSON CREIGHTON, knowingly issued a prescription for Promethazine with Codeine, a
27 controlled substance, that was not for a legitimate medical purpose, in violation of Health and
28 Safety Code section 11153, a felony.

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1 **Factors in Aggravation**
2 **Penal Code Section 1170(b)**

3 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
4 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
5 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
6 subdivision (a)(8).

7 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
8 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
9 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

10 **COUNT 7**
11 **Knowingly Prescribing a Controlled Substance for Other Than a Legitimate Medical**
12 **Purpose**
13 **Health and Safety Code Section 11153**

14 On or about December 20, 2023, in or around the County of Imperial, WILLIAM
15 DODSON CREIGHTON, knowingly issued a prescription for Promethazine with Codeine, a
16 controlled substance, that was not for a legitimate medical purpose, in violation of Health and
17 Safety Code section 11153, a felony.

18 **Factors in Aggravation**
19 **Penal Code Section 1170(b)**

20 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
21 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
22 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
23 subdivision (a)(8).

24 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
25 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
26 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

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1 **COUNT 8**
2 **Knowingly Prescribing a Controlled Substance for Other Than a Legitimate Medical**
3 **Purpose**
4 **Health and Safety Code Section 11153**

5 On or about December 20, 2023, in or around the County of Imperial, WILLIAM
6 DODSON CREIGHTON, knowingly issued a prescription for Promethazine with Codeine, a
7 controlled substance, that was not for a legitimate medical purpose, in violation of Health and
8 Safety Code section 11153, a felony.

9 **Factors in Aggravation**
10 **Penal Code Section 1170(b)**

11 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
12 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
13 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
14 subdivision (a)(8).

15 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
16 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
17 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

18 **COUNT 9**
19 **Knowingly Prescribing a Controlled Substance for Other Than a Legitimate Medical**
20 **Purpose**
21 **Health and Safety Code Section 11153**

22 On or about April 8, 2024, in or around the County of Imperial, WILLIAM DODSON
23 CREIGHTON, knowingly issued a prescription for Promethazine with Codeine, a controlled
24 substance, that was not for a legitimate medical purpose, in violation of Health and Safety Code
25 section 11153, a felony.

26 **Factors in Aggravation**
27 **Penal Code Section 1170(b)**

28 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
subdivision (a)(8).

1 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
2 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
3 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

4 **COUNT 10**
5 **Knowingly Prescribing a Controlled Substance for Other Than a Legitimate Medical**
6 **Purpose**
7 **Health and Safety Code Section 11153**

8 On or about April 8, 2024, in or around the County of Imperial, WILLIAM DODSON
9 CREIGHTON, knowingly issued a prescription for Promethazine with Codeine, a controlled
10 substance, that was not for a legitimate medical purpose, in violation of Health and Safety Code
11 section 11153, a felony.

12 **Factors in Aggravation**
13 **Penal Code Section 1170(b)**

14 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
15 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
16 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
17 subdivision (a)(8).

18 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
19 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
20 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

21 **COUNT 11**
22 **Furnishing a Controlled Substance**
23 **Health and Safety Code Section 11352(a)**

24 On or about October 11, 2023, in or around the County of Imperial, WILLIAM DODSON
25 CREIGHTON, did unlawfully furnish a controlled substance, to wit, Promethazine with Codeine,
26 in violation of Health and Safety Code section 11352, subdivision (a), a felony.

27 **Factors in Aggravation**
28 **Penal Code Section 1170(b)**

It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,

1 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
2 subdivision (a)(8).

3 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
4 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
5 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

6 **COUNT 12**
7 **Furnishing a Controlled Substance**
8 **Health and Safety Code Section 11352(a)**

9 On or about October 11, 2023, in or around the County of Imperial, WILLIAM DODSON
10 CREIGHTON, did unlawfully furnish a controlled substance, to wit, Promethazine with Codeine,
11 in violation of Health and Safety Code section 11352, subdivision (a), a felony.

12 **Factors in Aggravation**
13 **Penal Code Section 1170(b)**

14 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
15 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
16 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
17 subdivision (a)(8).

18 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
19 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
20 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

21 **COUNT 13**
22 **Furnishing a Controlled Substance**
23 **Health and Safety Code Section 11352(a)**

24 On or about December 11, 2023, in or around the County of Imperial, WILLIAM
25 DODSON CREIGHTON, did unlawfully furnish a controlled substance, to wit, Promethazine
26 with Codeine, in violation of Health and Safety Code section 11352, subdivision (a), a felony.

27 **Factors in Aggravation**
28 **Penal Code Section 1170(b)**

It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,

1 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
2 subdivision (a)(8).

3 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
4 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
5 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

6 **COUNT 14**
7 **Furnishing a Controlled Substance**
8 **Health and Safety Code Section 11352(a)**

9 On or about December 11, 2023, in or around the County of Imperial, WILLIAM
10 DODSON CREIGHTON, did unlawfully furnish a controlled substance, to wit, Promethazine
11 with Codeine, in violation of Health and Safety Code section 11352, subdivision (a), a felony.

12 **Factors in Aggravation**
13 **Penal Code Section 1170(b)**

14 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
15 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
16 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
17 subdivision (a)(8).

18 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
19 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
20 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

21 **COUNT 15**
22 **Furnishing a Controlled Substance**
23 **Health and Safety Code Section 11352(a)**

24 On or about December 20, 2023, in or around the County of Imperial, WILLIAM
25 DODSON CREIGHTON, did unlawfully furnish a controlled substance, to wit, Promethazine
26 with Codeine, in violation of Health and Safety Code section 11352, subdivision (a), a felony.

27 **Factors in Aggravation**
28 **Penal Code Section 1170(b)**

It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,

sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(8).

It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM DODSON CREIGHTON took advantage of a position of trust or confidence to commit the offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

COUNT 16
Furnishing a Controlled Substance
Health and Safety Code Section 11352(a)

On or about December 20, 2023, in or around the County of Imperial, WILLIAM DODSON CREIGHTON, did unlawfully furnish a controlled substance, to wit, Promethazine with Codeine, in violation of Health and Safety Code section 11352, subdivision (a), a felony.

Factors in Aggravation
Penal Code Section 1170(b)

It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning, sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(8).

It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM DODSON CREIGHTON took advantage of a position of trust or confidence to commit the offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

COUNT 17
Furnishing a Controlled Substance
Health and Safety Code Section 11352(a)

On or about April 8, 2024, in or around the County of Imperial, WILLIAM DODSON CREIGHTON, did unlawfully furnish a controlled substance, to wit, Promethazine with Codeine, in violation of Health and Safety Code section 11352, subdivision (a), a felony.

Factors in Aggravation
Penal Code Section 1170(b)

It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,

1 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
2 subdivision (a)(8).

3 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
4 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
5 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

6 **COUNT 18**
7 **Furnishing a Controlled Substance**
8 **Health and Safety Code Section 11352(a)**

8 On or about April 8, 2024, in or around the County of Imperial, WILLIAM DODSON
9 CREIGHTON, did unlawfully furnish a controlled substance, to wit, Promethazine with Codeine,
10 in violation of Health and Safety Code section 11352, subdivision (a), a felony.

11 **Factors in Aggravation**
12 **Penal Code Section 1170(b)**

13 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
14 in which the crime was carried out by WILLIAM DODSON CREIGHTON indicates planning,
15 sophistication, or professionalism, within the meaning of California Rules of Court, rule 4.421,
16 subdivision (a)(8).

17 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that WILLIAM
18 DODSON CREIGHTON took advantage of a position of trust or confidence to commit the
19 offense, within the meaning of California Rules of Court, rule 4.421, subdivision (a)(11).

20 **NOTICE:** Pursuant to Evidence Code section 1101, subdivision (b), the People hereby
21 give notice that they intend to use what is known as section 1101, subdivision (b) evidence to
22 show "motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake or
23 accident," and/or to attack the credibility of any witness.

24 **NOTICE:** Pursuant to Penal Code section 1170, subdivision (b), the People hereby give
25 notice that they intend to present evidence and seek jury findings regarding all applicable
26 circumstances and factors in aggravations. (*Cunningham v. California* (2007) 549 U.S. 270).

27 **NOTICE:** Pursuant to Penal Code section 296, subdivision (a)(1), any conviction or plea
28 to one or more felonies will require that Defendants provide buccal swab samples, right

1 thumbprints, and a full palm print impression of each hand, and any blood specimens or other
2 biological samples to law enforcement. Pursuant to Penal Code section 296.1, subdivision
3 (a)(1)(A), any defendant arrested for a felony shall provide said samples during the "booking or
4 intake" process or any time "prior to release" from custody. Willful refusal to provide the samples
5 and impressions is a crime under Penal Code section 298.1, subdivision (a).

6 **NON-DISCLOSURE OF DISCOVERY**

7 Pursuant to Penal Code section 1054.2, "no attorney shall disclose or permit to be
8 disclosed to a Defendant, members of the Defendant's family, or anyone else, the personal
9 identifying information of a victim or witness whose name is disclosed to the attorney pursuant to
10 subdivision (a) of section 1054.1, other than the name of the victim or witness, unless specifically
11 permitted to do so by the court after a hearing and a showing of good cause." Any and all
12 investigation reports, attachments, records, documents, audio and video recordings, photographs,
13 diagrams, evidence, and other materials, provided in discovery in this case may contain personal
14 identifying information of victims or witnesses and shall not be disclosed without court order.

15 **REQUEST FOR DISCOVERY**

16 Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request
17 from defense counsel all materials and information whose disclosure is required by Penal Code
18 section 1054.3.

19 **DECLARATION**

20 I verify under information and belief, pursuant to Penal Code section 806, the foregoing is
21 true and correct.

22 Dated: June 25, 2025

Respectfully submitted,

23 ROB BONTA
24 Attorney General of California

25 

26 SAMUEL S. KIM
27 Deputy Attorney General
28 *Attorneys for People of the State of California*