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8 **BEFORE THE**
9 **BOARD OF CHIROPRACTIC EXAMINERS**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. AC 2024-2033

13 **RICHARD CARNOW**
322 N. San Dimas Avenue
San Dimas, CA 91773-2601

ACCUSATION

14 **Chiropractic License No. DC 16299**

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Kristin Walker (“Complainant”) brings this Accusation solely in her official capacity
20 as the Executive Officer of the Board of Chiropractic Examiners, Department of Consumer
21 Affairs.

22 2. On or about January 1, 1985, the Board issued Chiropractic License Number DC
23 16299 to Richard Carnow (“Respondent”). The Chiropractic License was in full force and effect
24 at all times relevant to the charges brought herein and will expire on October 31, 2026, unless
25 renewed.

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JURISDICTION

3. This Accusation is brought before the Board of Chiropractic Examiners (Board), Department of Consumer Affairs, under the authority of the following sections of the Chiropractic Act (Act).¹

4. Section 10 of the Act states, in pertinent part, that the Board may suspend or revoke a license to practice chiropractic or may place the licensee on probation for violations of the rules and regulations adopted by the Board or for any cause specified in the Chiropractic Initiative Act.

5. Under Business and Professions Code (Code) section 1000-10, subdivision (a), the Board may by rule or regulation adopt, amend or repeal rules of professional conduct appropriate to the establishment and maintenance of a high standard of professional service and the protection of the public. The regulations adopted by the Board in title 16, California Code of Regulations, section 301, et seq.

6. California Code of Regulations, title 16, section 372 states:

“The suspension, expiration, or forfeiture by operation of law of a license issued by the board, or its suspension, or forfeiture by order of the board or by order of a court of law, or its surrender without the written consent of the board shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the licensee on any such ground.”

STATUTORY PROVISIONS

7. Section 490 of the Code states:

“(a) In addition to any other action that a board is permitted to take against a licensee, a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications,

¹ The Chiropractic Act, an initiative measure approved by the electors on November 7, 1922, while not included in the Business and Professions Code by the legislature, is set out in West's Annotated California Codes as sections 1000-1 to 1000-19, and is included in Deering's California Codes as Appendix I, for convenient reference.

1 functions, or duties of the business or profession for which the license was issued.

2 “(b) Notwithstanding any other provision of law, a board may exercise any
3 authority to discipline a licensee for conviction of a crime that is independent of the
4 authority granted under subdivision (a) only if the crime is substantially related to the
5 qualifications, functions, or duties of the business or profession for which the licensee's
6 license was issued.

7 “(c) A conviction within the meaning of this section means a plea or verdict of
8 guilty or a conviction following a plea of nolo contendere. Any action that a board is
9 permitted to take following the establishment of a conviction may be taken when the
10 time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal,
11 or when an order granting probation is made suspending the imposition of sentence,
12 irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal
13 Code.”

14 **REGULATORY PROVISIONS**

15 8. California Code of Regulations, title 16, section 316, states in relevant part:

16 “(c) The commission of any act of sexual abuse, sexual misconduct, or sexual relations by a
17 licensee with a patient, client, customer or employee is unprofessional conduct and cause for
18 disciplinary action. This conduct is substantially related to the qualifications, functions, or duties
19 of a chiropractic license.”

20 9. California Code of Regulations, title 16, section 317, states in pertinent part:

21 “The board shall take action against any holder of a license who is guilty of unprofessional
22 conduct which has been brought to its attention, or whose license has been procured by fraud or
23 misrepresentation or issued by mistake.

24 Unprofessional conduct includes, but is not limited to, the following:

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26 “(e) Any conduct which has endangered or is likely to endanger the health, welfare, or
27 safety of the public;

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1 “(g) Conviction of a crime which is substantially related to the qualifications, functions or
2 duties of a chiropractor;

3 “(h) Conviction of any offense, whether felony or misdemeanor, involving moral turpitude,
4 dishonesty, physical violence or corruption. The board may inquire into the circumstances
5 surrounding the commission of the crime in order to fix the degree of discipline or to determine if
6 such conviction was of an offense involving moral turpitude, dishonesty, physical violence or
7 corruption. A plea or verdict of guilty, or a plea of nolo contendere is deemed to be a conviction
8 within the meaning of the board's disciplinary provisions, irrespective of a subsequent order under
9 the provisions of Section 1203.4 of the Penal Code. The board may order a license to be
10 suspended or revoked, or may decline to issue a license upon the entering of a conviction or
11 judgement in a criminal matter.

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13 “(k) The commission of any act involving moral turpitude, dishonesty, or corruption,
14 whether the act is committed in the course of the individual's activities as a license holder, or
15 otherwise;

16 ...

17 “(m) Violating or attempting to violate, directly or indirectly, or assisting in or abetting in
18 the violation of, or conspiring to violate any provision or term of the Act or the regulations
19 adopted by the board thereunder;

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1 **COST RECOVERY**

2 10. California Code of Regulations California Code of Regulations, title 16, section
3 317.5, subdivision (a), provides:

4 "In any order in resolution of a disciplinary proceeding before the Board of Chiropractic
5 Examiners, the board may request the administrative law judge to direct a licensee found to
6 have committed a violation or violations of the Chiropractic Initiative Act to pay a sum not to
7 exceed the reasonable costs of the investigation and enforcement of the case."

8 **FIRST CAUSE FOR DISCIPLINE**

9 **(Conviction of a Substantially Related Crime)**

10 11. Respondent is subject to disciplinary action under section 10 of the Act, in
11 accordance with California Code of Regulations, title 16, section 317, subdivision (g), and Code
12 section 490, in that Respondent was convicted of a crime substantially related to the
13 qualifications, functions, or duties of a chiropractor, as follows:

14 a. On or about January 28, 2026, Respondent was convicted, following a jury trial, of
15 five felony counts of violating Penal Code section 243.4(c) [sexual battery of an unconscious
16 person], and one felony count of violation Penal Code section 287(f)(4) [oral copulation of an
17 unconscious person], in the criminal proceeding entitled *The People of the State of California v.*
18 *Richard Carnow* (Super. Ct. Los Angeles, 2023, No. 23PSCF00087).

19 b. The circumstances surrounding the conviction are that on June 21, 2023, June 23,
20 2023, and August 11, 2023, Respondent sexually assaulted three female patients, L.C., C.S., and
21 F.L., in the course of treatments at his chiropractic practice. During each of the incidents, the
22 victims were not cognizant of the nature of the touching because Respondent falsely represented
23 that the touching served a therapeutic purpose.

24 **SECOND CAUSE FOR DISCIPLINE**

25 **(Unprofessional Conduct – Endangering Health, Welfare, or Safety of Public)**

26 12. Respondent's license is subject to disciplinary action under section 10 of the Act, in
27 accordance with California Code of Regulations, title 16, section 317, subdivision (e), on the
28 grounds of unprofessional conduct, in that Respondent endangered the welfare of the public by

1 sexually assaulting three patients in the course of chiropractic treatments. Complainant hereby
2 refers to, and by this reference incorporates, the allegations set forth above in paragraph 11,
3 inclusive, as though set forth fully.

4 **THIRD CAUSE FOR DISCIPLINE**

5 **(Conviction Involving Moral Turpitude, Dishonesty, Physical Violence or Corruption)**

6 13. Respondent's license is subject to disciplinary action under section 10 of the Act, in
7 conjunction with California Code of Regulations, title 16, section 317, subdivision (h), on the
8 grounds of unprofessional conduct, Respondent's conviction involved moral turpitude.
9 Complainant hereby refers to, and by this reference incorporates, the allegations set forth above in
10 paragraph 11, inclusive, as though set forth fully

11 **FOURTH CAUSE FOR DISCIPLINE**

12 **(Unprofessional Conduct – Acts Involving Moral Turpitude/Dishonesty/Corruption)**

13 14. Respondent's license is subject to disciplinary action under section 10 of the Act, in
14 conjunction with California Code of Regulations, title 16, section 317, subdivision (k) on the
15 grounds of unprofessional conduct, Respondent committed acts involving moral turpitude,
16 dishonesty and/or corruption by sexually assaulting three female patients in the course of
17 chiropractic visits. Complainant hereby refers to, and by this reference incorporates, the
18 allegations set forth above in paragraph 11, inclusive, as though set forth fully.

19 **FIFTH CAUSE FOR DISCIPLINE**

20 **(Unprofessional Conduct – Sexual Abuse of a Patient)**

21 15. Respondent's license is subject to disciplinary action under section 10 of the Act, in
22 conjunction with California Code of Regulations, title 16, section 316, subdivision (c) on the
23 grounds of unprofessional conduct, in that Respondent sexually abused three female patients in
24 the course of chiropractic visits. Complainant hereby refers to, and by this reference incorporates,
25 the allegations set forth above in paragraph 11, inclusive, as though set forth fully.

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1 **SIXTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Violating Any Provisions of the Act/Regulations)**

3 16. Respondent's license is subject to disciplinary action under section 10 of the Act, in
4 conjunction with California Code of Regulations, title 16, section 317, subdivision (m), on the
5 grounds of unprofessional conduct, Respondent violated or attempted to violate, directly or
6 indirectly, assisting in or abetting in the violation of, or conspiring to violation any provision or
7 terms of the Act or regulations adopted by the Board. Complainant hereby refers to, and by this
8 reference incorporates, the allegations set forth above in paragraphs 11 through 15, inclusive, as
9 though set forth fully.

10 **PRAYER**

11 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
12 and that following the hearing, the Board of Chiropractic Examiners issue a decision:

- 13 1. Revoking or suspending Chiropractic License Number DC 16299, issued to Richard
14 Carnow;
- 15 2. Ordering Richard Carnow to pay the Board of Chiropractic Examiners the reasonable
16 costs of the investigation and enforcement of this case, pursuant to Title 16, California Code of
17 Regulations, section 317.5 and if placed on probation, the costs of probation monitoring;
18 and,
- 19 3. Taking such other and further action as deemed necessary and proper.

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21 DATED: 6/4/2026

Signature on File

22 KRISTIN WALKER
23 Executive Officer
24 Board of Chiropractic Examiners
25 Department of Consumer Affairs
26 State of California
27 *Complainant*

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