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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 2025-2068

13 **SAMMY SEUNG PYON**
100 W Imperial Ave, Suite N
El Segundo, CA 90245

ACCUSATION

14 **Chiropractic License No. DC 23953**

15 Respondent.

16
17 **PARTIES**

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

20 2. On or about August 31, 1995, the Board issued Chiropractic License Number DC
21 23953 to Sammy Seung Pyon (Respondent). The Chiropractic License was in full force and
22 effect at all times relevant to the charges brought herein and will expire on October 31, 2026,
23 unless renewed.

24 **JURISDICTION**

25 3. This Accusation is brought before the Board, under the authority of the following
26 sections of the Chiropractic Act (Act).¹ Business and Professions Code section 1000-10(a)

27 ¹ The Chiropractic Act, an initiative measure approved by the electors on November 7,
28 1922, while not included in the Business and Professions Code by the legislature, is set out in
(continued...)

1 provides that the Board may by rule or regulation adopt, amend or repeal rules of professional
2 conduct appropriate to the establishment and maintenance of a high standard of professional
3 service and the protection of the public. The regulations adopted by the board appear in Title 16,
4 California Code of Regulations, section 300, *et seq.*

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

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

10 The suspension, expiration, or forfeiture by operation of law of a license issued by the
11 board, or its suspension, or forfeiture by order of the board or by order of a court of law, or its
12 surrender without the written consent of the board shall not, during any period in which it may be
13 renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue
14 a disciplinary proceeding against the licensee upon any ground provided by law or to enter an
15 order suspending or revoking the license

16 **STATUTORY PROVISIONS**

17 6. Business and Professions Code section 726 states:

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

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

25 7. Business and Professions Code section 805.8, subdivision (a)(5) defines sexual
26 misconduct as, “inappropriate contact or communication of a sexual nature.

27 _____
28 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 **REGULATORY PROVISIONS**

2 8. California Code of Regulations, title 16, section 316, states:

3 (a) Every licensee is responsible for the conduct of employees or other persons
4 subject to his supervision in his place of practice, and shall insure that all such
5 conduct in his place of practice conforms to the law and to the regulations herein.

6 (b) Where a chiropractic license is used in connection with any premises,
7 structure or facility, no sexual acts or erotic behavior involving patients, patrons or
8 customers, including, but not necessarily limited to, sexual stimulation, masturbation
9 or prostitution, shall be permitted on said premises, structure or facility.

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

14 ...

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

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

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

20 ...

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

23 ...

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

27 ...

28 10. California Code of Regulations, title 16, section 319.1, states:

(a) A licensed doctor of chiropractic shall verbally and in writing inform each
patient of the material risks of proposed care. "Material" shall be defined as a
procedure inherently involving known risk of serious bodily harm. The chiropractor
shall obtain the patient's written informed consent prior to initiating clinical care.
The signed written consent shall become part of the patient's record.

(b) A violation of this section constitutes unprofessional conduct and may subject the
licensee to disciplinary action.

29 **COST RECOVERY**

30 11. California Code of Regulations, title 16, section 317.5, subdivision (a), states, in
31 pertinent part:

32 In any order in resolution of a disciplinary proceeding before the Board of

1 hereby refers to and by this reference incorporates the allegations contained in paragraphs 20
2 through 23, above, as though set forth fully herein.

3 **THIRD CAUSE FOR DISCIPLINE**

4 (Unprofessional Conduct - Endangering the Public)

5 26. Respondent is subject to disciplinary action under section 10 of the Act and
6 California Code of Regulations, title 16, section 317 subdivision (e) in that Respondent engaged
7 in conduct which endangered or is likely to endanger the health, welfare, or safety of the public
8 during his treatment of Patient Y.T. Complainant hereby refers to and by this reference
9 incorporates the allegations contained in paragraphs 20 through 23, above, as though set forth
10 fully herein.

11 **FOURTH CAUSE FOR DISCIPLINE**

12 (Unprofessional Conduct - Committing Acts Involving Moral Turpitude)

13 27. Respondent is subject to disciplinary action under section 10 of the Act and
14 California Code of Regulations, title 16, section 317 subdivision (k) in that Respondent
15 committed acts involving moral turpitude, in the course of Respondent's activities as a license
16 holder, during his treatment of Patient Y.T. Complainant hereby refers to and by this reference
17 incorporates the allegations contained in paragraphs 20 through 23, above, as though set forth
18 fully herein.

19 **FIFTH CAUSE FOR DISCIPLINE**

20 (Failure to Provide Written Notification)

21 28. Respondent is subject to disciplinary action under section 10 of the Act and
22 California Code of Regulations, title 16, section 319.1, subdivision (a), in that Respondent failed
23 to provide written notification to Patient Y.T. of the potential risks associated with the usage of
24 red light therapy. Complainant refers to, and by this reference incorporates, the allegations set
25 forth above in paragraphs 17 and 18, as though set forth fully herein.

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1 **SIXTH CAUSE FOR DISCIPLINE**

2 (Failure to Obtain Informed Consent)

3 29. Respondent is subject to disciplinary action under section 10 of the Act and
4 California Code of Regulations, title 16, section 319.1, subdivision (a), in that Respondent failed
5 to obtain Patient Y.T.'s written consent prior to providing chiropractic treatment. Complainant
6 refers to, and by this reference incorporates, the allegations set forth above in paragraphs 17 and
7 19, inclusive, as though set forth fully herein.

8 **PRAYER**

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

- 11 1. Revoking or suspending Chiropractic License Number DC 23953, issued to Sammy
- 12 Seung Pyon;
- 13 2. Ordering Sammy Seung Pyon to pay the Board of Chiropractic Examiners the
- 14 reasonable costs of the investigation and enforcement of this case, pursuant to Title 16, California
- 15 Code of Regulations, section 317.5 and if placed on probation, the costs of probation monitoring;
- 16 and,
- 17 3. Taking such other and further action as deemed necessary and proper.

18
19 DATED: 1/13/2026

Signature on File
KRISTIN WALKER
Executive Officer
Board of Chiropractic Examiners
Department of Consumer Affairs
State of California
Complainant

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