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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 2026-2083

13 **SHAWN DAEYOUNG LEE**
5001 Wilshire Blvd. #114
Los Angeles, CA 90036

ACCUSATION

14 Chiropractic License No. DC 29789

15 Respondent.

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21 **PARTIES**

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

25 2. On or about July 16, 2005, the Board issued Chiropractic License Number DC 29789
26 to Shawn Daeyoung Lee (Respondent). The Chiropractic License was in full force and effect at
27 all times relevant to the charges brought herein and will expire on January 31, 2027, unless
28 renewed.

1 **JURISDICTION**

2 3. This Accusation is brought before the Board, under the authority of the following
3 sections of the Chiropractic Act (Act).¹ Business and Professions Code section 1000-10(a)
4 provides that the Board may by rule or regulation adopt, amend or repeal rules of professional
5 conduct appropriate to the establishment and maintenance of a high standard of professional
6 service and the protection of the public. The regulations adopted by the board appear in Title 16,
7 California Code of Regulations, section 300, et seq.

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

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

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

19 **STATUTORY AND REGULATORY PROVISIONS**

20 6. California Code of Regulations, title 16, section 314, states:

21 It shall be the duty of every licensee to notify the Executive Officer or his or her designee
22 of any violation of the act, or of these rules and regulations, in order that the board may take
23 appropriate disciplinary action.

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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
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 7. California Code of Regulations, title 16, section 316 states, in pertinent part:

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

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

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

13 8. California Code of Regulations, title 16, section 317, states, in pertinent part:

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

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

18 ...

19 (b) Repeated negligent acts;

20 ...

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

23 ...

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

27 ...

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1 9. California Code of Regulations, title 16, section 318, states, in pertinent part:

2 (a) Chiropractic Patient Records. Each licensed chiropractor is required to maintain all
3 active and inactive chiropractic patient records for five years from the date of the doctor's last
4 treatment of the patient unless state or federal laws require a longer period of retention. Active
5 chiropractic records are all chiropractic records of patients treated within the last 12 months.
6 Chiropractic patient records shall be classified as inactive when there has elapsed a period of
7 more than 12 months since the date of the last patient treatment.

8 All chiropractic patient records shall be available to any representative of the Board upon
9 presentation of patient's written consent or a valid legal order. Active chiropractic patient records
10 shall be immediately available to any representative of the Board at the chiropractic office where
11 the patient has been or is being treated. Inactive chiropractic patient records shall be available
12 upon ten days notice to any representative of the Board. The location of said inactive records shall
13 be reported immediately upon request.

14 Active and inactive chiropractic patient records must include all of the following:

15 (1) Patient's full name, date of birth, and social security number (if available);

16 (2) Patient gender, height and weight. An estimated height and weight is acceptable where
17 the physical condition of the patient prevents actual measurement;

18 (3) Patient history, complaint, diagnosis/analysis, and treatment must be signed by the
19 primary treating doctor. Thereafter, any treatment rendered by any other doctor must be signed or
20 initialed by said doctor;

21 (4) Signature of patient;

22 (5) Date of each and every patient visit;

23 (6) All chiropractic X-rays, or evidence of the transfer of said X-rays;

24 (7) Signed written informed consent as specified in Section 319.1.

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

26 (a) A licensed doctor of chiropractic shall verbally and in writing inform each patient of the
27 material risks of proposed care. "Material" shall be defined as a procedure inherently involving
28 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.

COST RECOVERY

11. California Code of Regulations, title 16, section 317.5, subsection (a), states:

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

FACTUAL ALLEGATIONS

12. At all times relevant herein, Respondent was the owner of The Joint Chiropractic franchise location located at 5001 Wilshire Blvd. #114, Los Angeles, CA 90036 (Wilshire Clinic). C.C. was a male chiropractor who worked at the Wilshire Clinic. K.S. was a female employee who worked at the front desk of the Wilshire Clinic as a Wellness Coordinator.

Notice of Chiropractor C.C.'s Misconduct

13. Between on or about May and August 2024, K.S. and Respondent discussed the following:

- a. On or about May 3, 2024, K.S. reported to Respondent that patient S.S. cancelled her membership because C.C. sexually harassed her by "flirt[ing] with her, saying how he loved her white toe nail polish and how he really likes women who wear white toenail polish and he 'shouldn't say what it makes him think about doing' and he made comments about her body and it was creepy to her to have him put hands on her." K.S. then suggested that Respondent call patient S.S. to apologize and refund her payment. Respondent responded: "are you telling me what to do? Unless I say something you should just stay put. Do not create drama."
- b. On or about May 3, 2024, K.S. reported to Respondent that "[C.C.] has verbally sexually harassed me every day for the past month of working with him, using a lot

1 of the same language [patient S.S.] quoted. (literally he joked today that I should ‘sit
2 on his face’ and I should wear a skirt so he could eat me, and why was I ‘so covered
3 up today’ because I’m not wearing tight jeans (which I now specifically don’t wear
4 on days he works).”

- 5 c. On or about May 22, 2024, K.S. reported to Respondent a negative review of the
6 Wilshire Clinic on Yelp by patient C.V., who wrote that C.C. cupped her butt
7 cheeks and touched her thighs inappropriately.
- 8 d. On or about June 18, 2024, K.S. reported to Respondent that C.C. grabbed K.S.’s
9 shoulder and physically pushed or shoved her out of the back office while
10 screaming at her. This incident was video recorded. Three days after the incident,
11 Respondent informed K.S. that he was going to replace C.C., that finding a
12 replacement may take two to three weeks, and that C.C. would continue to work at
13 the Wilshire Clinic until he finds a replacement.
- 14 e. On or about June 29, 2024, K.S. reported to Respondent that three female patients
15 had complained about sexual misconduct by C.C.
- 16 f. On or about August 21, 2024, Respondent confirmed to K.S. that he had not found a
17 replacement for C.C. yet. K.S. texted Respondent: “It can’t possibly take this long I
18 mean aren’t you concerned about all the women, including myself, he traumatized
19 and keeps traumatizing? You said you would fire him and he keeps being allowed to
20 terrorize women.” Respondent responded: “...stop complaining about others and
21 think about yourself.”

22 14. In or about September 2024, K.S. resigned from the Wilshire Clinic because she did
23 not feel safe.

24 15. Between on or about April and October 2024, A.L., a chiropractor who worked at the
25 Wilshire Clinic, texted Respondent the following:

- 26 a. “I shouldn’t have to do damage control and have patients come to me terrified of
27 [C.C.] because of whatever he’s doing. Please, for other patients and for my sanity,
28 find someone else fast or get rid of him. This is crazy.”

- 1 b. "I'm tired of walking in here every day for the past 2 or 3 weeks hearing a new
2 female tell me about how [C.C.] made them feel uncomfortable."
- 3 c. "I've had multiple patients come to me with issues about [C.C.] because of his poor
4 bedside manner and his attitude. This isn't something you can sweep under the rug,
5 and this isn't the first time something like this has happened."
- 6 d. "[K.S.] is telling me that [C.C.] is hitting on her, giving her compliments and asking
7 her to massage him and things of that nature. It's making her uncomfortable."
- 8 e. "I've had more patients come to me about [C.C.], one of whom I am close with and
9 what she told me disgusted me. There is no denying that these patients are having
10 terrible experiences with him and even if he's 'gotten better,' the damage is already
11 done, and keeping him on is unacceptable. I can't just stand by and continue to let
12 this happen. You need to find a replacement. We are there to take care of patients. I
13 don't want to have to worry about sending people there when I'm not around for
14 fear of him violating them. I feel like you've made a series of bad decisions, and it's
15 affecting me mentally and I don't appreciate that. I don't know why you would
16 defend him at this point. I'm disappointed in how all of this has been handled, and
17 I'm really frustrated."

18 16. In or about June 2024, K.S. reported C.C.'s misconduct to The Joint Chiropractic
19 corporate office (corporate office), including multiple instances of sexually inappropriate
20 behaviors/comments, reports of molestation of patients, and a report of assault.

21 17. On or about July 2, 2024, the Senior Director of Human Resources at the corporate
22 office, R.L., instructed Respondent on multiple steps to address the allegations against C.C.,
23 including "look into these allegations as soon as possible" and "may warrant reporting to the
24 California Board of Chiropractic Examiners." R.L. further requested Respondent's response on
25 "what steps [he has] taken to resolve this situation."

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18. On or about July 17, 2024, Respondent responded to R.L. and characterized the allegations as an “employee dispute” between C.C. and K.S. Respondent further stated that he was “looking for a new doctor to possibly replace [C.C.]” and that he was “interviewing new doctors.”

19. On or about October 9, 2024, the corporate office forwarded to Respondent a voicemail from patient E.L., who alleged that she was sexually assaulted by a chiropractor at the Wilshire Clinic, and instructed Respondent to “reach out within 24 hours and resolve quickly.” The corporate office did not receive any response from Respondent regarding this voicemail.

20. On or about August 21, 2025, during an interview with the Board investigator, Respondent admitted that he did not speak to any of the patients who complained about C.C. about their allegations, that he did not report C.C. to the Board, and that C.C. was still working at the Wilshire Clinic.

FIRST CAUSE FOR DISCIPLINE

(Failure to Notify the Board)

21. Respondent is subject to disciplinary action under section 10 of the Act, in conjunction with California Code of Regulations, title 16, section 317, subsection (m), in that Respondent violated California Code of Regulations, title 16, section 314. Respondent failed to comply with his duty to notify the Board of C.C.'s misconduct and violations of California Code of Regulations, title 16, section 316, subsections (b) and (c). Paragraphs 12 to 20 are re-alleged as if fully set forth herein.

SECOND CAUSE FOR DISCIPLINE

(Failure to Ensure Compliance with the Chiropractic Act)

22. Respondent is subject to disciplinary action under section 10 of the Act, in conjunction with California Code of Regulations, title 16, section 317, subsection (m), in that Respondent violated California Code of Regulations, title 16, section 316, subsections (a) and (b). Respondent failed to ensure that C.C.'s conduct at the Wilshire Clinic conformed to the Act and failed to ensure that no sexual acts or erotic behavior involving patients, patrons or customers occurred at the Wilshire Clinic. Paragraphs 12 to 21 are re-alleged as if fully set forth herein.

1 **THIRD CAUSE FOR DISCIPLINE**

2 **(Endangering the Public)**

3 23. Respondent is subject to disciplinary action under section 10 of the Act, in
4 conjunction with California Code of Regulations, title 16, section 317, subsection (e), in that
5 Respondent engaged in conduct which has endangered or is likely to endanger the health, welfare,
6 or safety of the public. Paragraphs 12 to 22 are re-alleged as if fully set forth herein.

7 **FOURTH CAUSE FOR DISCIPLINE**

8 **(Repeated Negligent Acts)**

9 24. Respondent is subject to disciplinary action under section 10 of the Act, in
10 conjunction with California Code of Regulations, title 16, section 317, subsection (b), in that
11 Respondent committed repeated negligent acts. Paragraphs 12 to 23 are re-alleged as if fully set
12 forth herein.

13 **FIFTH CAUSE FOR DISCIPLINE**

14 **(Failure to Obtain Written Informed Consent)**

15 25. Respondent is subject to disciplinary action under section 10 of the Act, in
16 conjunction with California Code of Regulations, title 16, section 317, subsection (m), for
17 violation of California Code of Regulations, title 16, section 316, subsection (a). In or around
18 2024, K.S. received chiropractic treatments from C.C. at the Wilshire Clinic on multiple
19 occasions. K.S.'s written informed consent was not obtained before initiating clinical care as
20 required by California Code of Regulations, title 16, section 319.1, subsection (a). Paragraphs 12
21 to 24 are re-alleged as if fully set forth herein.

22 **SIXTH CAUSE FOR DISCIPLINE**

23 **(Failure to Maintain Patient Records)**

24 26. Respondent is subject to disciplinary action under section 10 of the Act, in
25 conjunction with California Code of Regulations, title 16, section 317, subsection (m), for
26 violation of California Code of Regulations, title 16, section 316, subsection (a). In or around
27 2024, K.S. received chiropractic treatments from C.C. at the Wilshire Clinic on multiple
28 occasions. K.S.'s patient records were not maintained as required by California Code of

1 Regulations, title 16, section 318, subsection (a). Paragraphs 12 to 25 are re-alleged as if fully set
2 forth herein.

3 **SEVENTH CAUSE FOR DISCIPLINE**

4 **(Unprofessional Conduct)**

5 27. Respondent is subject to disciplinary action under section 10 of the Act, in
6 conjunction with California Code of Regulations, title 16, section 317, in that Respondent
7 committed unprofessional conduct. Paragraphs 12 to 26 are re-alleged as if fully set forth 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 29789, issued to Shawn
12 Daeyoung Lee;

13 2. Ordering Shawn Daeyoung Lee 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: 6/24/2026

Signature on File

KRISTIN WALKER

Executive Officer

Board of Chiropractic Examiners

Department of Consumer Affairs

State of California

Complainant

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