

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

**In the Matter of the First Amended
Accusation Against:**

Satwant Singh Dhillon, M.D.

**Physician's and Surgeon's
Certificate No. G 76370**

Respondent.

Case No. 800-2020-068734

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 October 1, 2023.

IT IS SO ORDERED June 29, 2023.

MEDICAL BOARD OF CALIFORNIA



**Reji Varghese
Executive Director**

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 MARIANNE A. PANSA
Deputy Attorney General
4 State Bar No. 270928
California Department of Justice
5 2550 Mariposa Mall, Room 5090
Fresno, CA 93721
6 Telephone: (559) 705-2329
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7 *Attorneys for Complainant*

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

12 In the Matter of the First Amended Accusation
Against:

Case No. 800-2020-068734

13 **SATWANT SINGH DHILLON, M.D.**
14 **229 W. Cherry Ave.**
Porterville, CA 93257-3401

OAH No. 2021070555

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

15 **Physician's and Surgeon's Certificate No. G**
16 **76370**

17 Respondent.

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Reji Varghese (Complainant) is the Interim Executive Director of the Medical Board
23 of California (Board). He brought this action solely in his official capacity¹ and is represented in
24 this matter by Rob Bonta, Attorney General of the State of California, by Marianne A. Pansa,
25 Deputy Attorney General.

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¹ The original Accusation was brought by former Executive Director, William Prasifka.

2. Satwant Singh Dhillon, M.D. (Respondent) is represented in this proceeding by attorney Dennis R. Thelen, Esq., whose address is: 5001 E. Commerce Center Dr. Ste 300, Bakersfield, CA 93309-1687.

3. On or about November 18, 2014, the Board issued Physician's and Surgeon's Certificate No. G 76370 to Satwant Singh Dhillon, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in First Amended Accusation No. 800-2020-068734 and will expire on October 31, 2024, unless renewed.

JURISDICTION

4. Accusation No. 800-2020-068734 was filed before the Board on June 21, 2021, and was superseded when First Amended Accusation No. 800-2020-068734 was filed before the Board on June 8, 2023. The original Accusation, the First Amended Accusation, and all other statutorily required documents were properly served on Respondent. Respondent timely filed his Notice of Defense contesting the Accusation. The First Amended Accusation No. 800-2020-068734 was deemed controverted in light of Respondent's filing of the Notice of Defense to the original pleading.

5. A copy of First Amended Accusation No. 800-2020-068734 is attached as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in First Amended Accusation No. 800-2020-068734. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

7. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of

1 documents; the right to reconsideration and court review of an adverse decision; and all other
2 rights accorded by the California Administrative Procedure Act and other applicable laws.

3 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
4 every right set forth above.

5 CULPABILITY

6 9. Respondent does not contest that, at an administrative hearing, Complainant could
7 establish a prima facie case with respect to the charges and allegations in First Amended
8 Accusation No. 800-2020-068734, a true copy of which is attached hereto as Exhibit A, and that
9 he has thereby subjected his Physician's and Surgeon's Certificate No. G 76370 to disciplinary
10 action.

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

14 CONTINGENCY

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

18 12. Respondent understands that, by signing this stipulation, he enables the Interim
19 Executive Director of the Board to issue an order, on behalf of the Board, accepting the surrender
20 of his Physician's and Surgeon's Certificate No. G 76370 without further notice to, or opportunity
21 to be heard by, Respondent.

22 13. This Stipulated Surrender of License and Disciplinary Order shall be subject to the
23 approval of the Interim Executive Director on behalf of the Board. The parties agree that this
24 Stipulated Surrender of License and Disciplinary Order shall be submitted to the Interim
25 Executive Director for his consideration in the above-entitled matter and, further, that the Interim
26 Executive Director shall have a reasonable period of time in which to consider and act on this
27 Stipulated Surrender of License and Disciplinary Order after receiving it. By signing this
28 stipulation, Respondent fully understands and agrees that he may not withdraw his agreement or

1 seek to rescind this stipulation prior to the time the Interim Executive Director, on behalf of the
2 Medical Board, considers and acts upon it.

3 14. The parties agree that this Stipulated Surrender of License and Disciplinary Order
4 shall be null and void and not binding upon the parties unless approved and adopted by the
5 Interim Executive Director on behalf of the Board, except for this paragraph, which shall remain
6 in full force and effect. Respondent fully understands and agrees that in deciding whether or not
7 to approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Interim
8 Executive Director and/or the Board may receive oral and written communications from its staff
9 and/or the Attorney General's Office. Communications pursuant to this paragraph shall not
10 disqualify the Interim Executive Director, the Board, any member thereof, and/or any other
11 person from future participation in this or any other matter affecting or involving respondent. In
12 the event that the Interim Executive Director on behalf of the Board does not, in his discretion,
13 approve and adopt this Stipulated Surrender of License and Disciplinary Order, with the
14 exception of this paragraph, it shall not become effective, shall be of no evidentiary value
15 whatsoever, and shall not be relied upon or introduced in any disciplinary action by either party
16 hereto. Respondent further agrees that should this Stipulated Surrender of License and
17 Disciplinary Order be rejected for any reason by the Interim Executive Director on behalf of the
18 Board, Respondent will assert no claim that the Interim Executive Director, the Board, or any
19 member thereof, was prejudiced by its/his/her review, discussion and/or consideration of this
20 Stipulated Surrender of License and Disciplinary Order or of any matter or matters related hereto.

21 15. The parties understand and agree that Portable Document Format (PDF) and facsimile
22 copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures
23 thereto, shall have the same force and effect as the originals.

24 16. In consideration of the foregoing admissions and stipulations, the parties agree that
25 the Board may, without further notice or formal proceeding, issue and enter the following Order:

26 **ORDER**

27 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 76370, issued
28 to Respondent Satwant Singh Dhillon, M.D., is surrendered and accepted by the Board.

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

5 2. Respondent shall lose all rights and privileges as a physician and surgeon in
6 California as of October 1, 2023.

7 3. Respondent shall cause to be delivered to the Board his pocket license and, if one was
8 issued, his wall certificate on or before October 1, 2023.

9 4. Respondent shall be subject to the Stipulation and Order for Interim Suspension
10 Order Imposing License Restrictions dated May 30, 2023 until the effective date of the surrender.
11 These restrictions are as follows:

12 a) Respondent is prohibited from providing medical care and/or treatment to female
13 patients unless two (2) chaperones are present at all times;

14 b) Respondent is prohibited from providing medical care and/or treatment to patients
15 at any locations other than at a bona fide hospital or at Defendant's bona fide medical
16 offices located at 362 N. Porter Rd., Porterville and 229 W. Cherry Ave., Porterville;

17 c) Respondent is prohibited from personally providing, supervising, or assisting in
18 ThermIVa therapy, or any other form of vaginal rejuvenation therapy and/or any other form
19 of therapy involving the female genitalia and/or gastrointestinal (GI) tract;

20 d) Respondent must disclose in writing to all female patients that Respondent may not
21 provide any medical care/treatment or any other professional services to female patients
22 unless two (2) chaperones are present at all times. The patients are required to sign a copy
23 of the disclosure, confirming acknowledgement and receipt. Respondent must keep copies
24 of signed disclosures and make them available for inspection by the Medical Board of
25 California within five (5) business days of the request; and

26 e) A violation of any of the above terms will result in an immediate revocation of
27 Respondent's Physician's and Surgeon's Certificate.

28 ///

5. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the petition is filed, and all of the charges and allegations contained in First Amended Accusation No. 800-2020-068734 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

6. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$48,962.50 (forty-eight thousand nine hundred sixty-two dollars and fifty cents) prior to issuance of a new or reinstated license.


7. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in First Amended Accusation No. 800-2020-068734 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney Dennis R. Thelen, Esq. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED:

6/28/23


SATWANT SINGH DHILLON, M.D.
Respondent

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1 I have read and fully discussed with Respondent Satwant Singh Dhillon, M.D. the terms
2 and conditions and other matters contained in this Stipulated Surrender of License and Order. I
3 approve its form and content.

4
5 DATED: 6-28-23


6 DENNIS R. THELEN, ESQ.
7 Attorney for Respondent

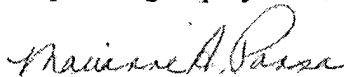
8 **ENDORSEMENT**

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

11
12 DATED: June 28, 2023

Respectfully submitted,

13 ROB BONTA
14 Attorney General of California
15 STEVE DIEHL
16 Supervising Deputy Attorney General



17 MARIANNE A. PANSA
18 Deputy Attorney General
19 Attorneys for Complainant

Exhibit A

First Amended Accusation No. 800-2020-068734

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 MARIANNE A. PANSA
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Attorneys for Complainant

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10 **BEFORE THE**
11 **MEDICAL BOARD OF CALIFORNIA**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
13 **STATE OF CALIFORNIA**

14 In the Matter of the First Amended Accusation
15 Against:

16 **Satwant Singh Dhillon, M.D.**
17 **P.O. Box 833**
Porterville, CA 93258-0833

18 **Physician's and Surgeon's Certificate**
19 **No. G 76370,**

20 **Respondent.**

Case No. 800-2020-068734

FIRST AMENDED ACCUSATION

21 **PARTIES**

22 1. Reji Varghese (Complainant) brings this First Amended Accusation solely in his
23 official capacity as the Interim Executive Director of the Medical Board of California,
24 Department of Consumer Affairs (Board).

25 2. On or about November 18, 2014, the Medical Board issued Physician's and
26 Surgeon's Certificate Number G 76370 to Satwant Singh Dhillon, M.D. (Respondent). The
27 Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the
28 charges brought herein and will expire on October 31, 2024, unless renewed.

JURISDICTION

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

4. Section 2227 states:

(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:

(1) Have his or her license revoked upon order of the board.

(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.

(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that are agreed to with the board and successfully completed by the licensee, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board pursuant to Section 803.1.

5. Section 2228.1 states:

(a) On and after July 1, 2019, except as otherwise provided in subdivision (c), the board 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 Web site, 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:

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

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

4 (C) Criminal conviction directly involving harm to patient health.

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

6 (2) An accusation or statement of issues alleged that the licensee committed any
7 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
8 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
9 would serve to protect the public interest.

10 (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,
11 signed copy of that disclosure.

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

13 (1) The patient is unconscious or otherwise unable to comprehend the
disclosure and sign the copy of the disclosure pursuant to subdivision (b) and a
14 guardian or health care surrogate is unavailable to comprehend the disclosure and
sign the copy.

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

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

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

20 (d) On and after July 1, 2019, the board shall provide the following
information, with respect to licensees on probation and licensees practicing under
21 probationary licenses, in plain view on the licensee's profile page on the board's
online license information Internet Web site.

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

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

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

27 (4) The length of the probation and end date.
28

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

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

3 **STATUTORY PROVISIONS**

4 6. Section 726 states:

5 (a) The commission of any act of sexual abuse, misconduct, or relations with a
6 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.

7 (b) This section shall not apply to consensual sexual contact between a licensee
8 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
9 domestic relationship.

10 7. Section 729 states:

11 (a) Any physician and surgeon, psychotherapist, alcohol and drug abuse
12 counselor or any person holding himself or herself out to be a physician and surgeon,
13 psychotherapist, or alcohol and drug abuse counselor, who engages in an act of sexual
14 intercourse, sodomy, oral copulation, or sexual contact with a patient or client, or
15 with a former patient or client when the relationship was terminated primarily for the
16 purpose of engaging in those acts, unless the physician and surgeon, psychotherapist,
or alcohol and drug abuse counselor has referred the patient or client to an
independent and objective physician and surgeon, psychotherapist, or alcohol and
drug abuse counselor recommended by a third-party physician and surgeon,
psychotherapist, or alcohol and drug abuse counselor for treatment, is guilty of sexual
exploitation by a physician and surgeon, psychotherapist, or alcohol and drug abuse
counselor.

17 (b) Sexual exploitation by a physician and surgeon, psychotherapist, or alcohol
18 and drug abuse counselor is a public offense:

19 (1) An act in violation of subdivision (a) shall be punishable by imprisonment
20 in a county jail for a period of not more than six months, or a fine not exceeding one
thousand dollars (\$1,000), or by both that imprisonment and fine.

21 "..."

22 For purposes of subdivision (a), in no instance shall consent of the patient or
23 client be a defense. However, physicians and surgeons shall not be guilty of sexual
24 exploitation for touching any intimate part of a patient or client unless the touching is
outside the scope of medical examination and treatment, or the touching is done for
sexual gratification.

25 (c) For purposes of this section:

26 "..."

27 (3) "Sexual contact" means sexual intercourse or the touching of an intimate
part of a patient for the purpose of sexual arousal, gratification, or abuse.

28 (4) "Intimate part" and "touching" have the same meanings as defined in

Section 243.4 of the Penal Code.

"..."

8. Section 2234 states, in pertinent part:

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

(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.

"..."

9. Section 2236 of the Code states:

(a) The conviction of any offense substantially related to the qualifications, functions, or duties of a physician and surgeon constitutes unprofessional conduct within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record of conviction shall be conclusive evidence only of the fact that the conviction occurred.

"..."

(d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is deemed to be a conviction within the meaning of this section and Section 2236.1. The record of conviction shall be conclusive evidence of the fact that the conviction occurred.

REGULATORY PROVISIONS

10. California Code of Regulations, title 16, section 1360, states:

(a) For the purposes of denial, suspension or revocation of a license, certificate or permit pursuant to Division 1.5 (commencing with Section 475) of the code, a crime or act shall be considered to be substantially related to the qualifications, functions or duties of a person holding a license, certificate or permit under the Medical Practice Act if to a substantial degree it evidences present or potential unfitness of a person holding a license, certificate or permit to perform the functions authorized by the license, certificate or permit in a manner consistent with the public health, safety or welfare. Such crimes or acts shall include but not be limited to the following: Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate any provision of the Medical Practice Act.

COST RECOVERY

11. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and

1 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
2 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
3 included in a stipulated settlement.

4 FACTUAL ALLEGATIONS

5 12. Patient A¹ sought ThermiVa² treatment from Respondent on or about June 9, 2020.
6 She had been Respondent's patient for approximately two years and had received numerous prior
7 medical procedures from him throughout that time, including several prior ThermiVa procedures.
8 All prior procedures were performed at Respondent's office with a female chaperone present.

9 13. In addition to being a patient, Patient A was also a medical supply sales
10 representative and had a professional relationship with Respondent, which had developed into a
11 casual friendship over the years. When Patient A scheduled her last appointment on or about June
12 9, 2020, Respondent informed her that he no longer worked at his prior medical office and had
13 moved the ThermiVa equipment to his residence. Patient A agreed to have the ThermiVa
14 treatment at Respondent's residence without a chaperone present, at approximately 6:30 p.m., on
15 or about June 9, 2020. When Patient A arrived at Respondent's residence, Respondent was not
16 there. He previously told her that he may be late, but to let herself in the house and wait for him.
17 She entered the residence and noted that no one else was home. The house had minimal furniture
18 and appeared to be a makeshift doctor's office.

19 14. Respondent eventually arrived at the house and led Patient A into a bedroom. The
20 bedroom contained a medical bed/table and a ThermiVa machine and they proceeded with the
21 ThermiVa procedure. The procedure began in the usual manner; however, during the course of
22 the treatment, Respondent removed the wand from Patient A's vagina and placed it on her
23 clitoris. Respondent told Patient A that "some women orgasm when I do this," and that she could
24

25 ¹ The patient's name has been redacted to protect her privacy.

26 ² ThermiVa is an in-office, non-surgical procedure for labia and vaginal tightening and
27 rejuvenation. A wand is placed inside the vaginal cavity and on the soft tissue surrounding the vagina and
28 uses radio frequency energy to gently heat the tissue to increase the collagen in the skin. It is used to treat
urinary incontinence and also to enhance sexual pleasure.

1 if she wanted to. Patient A reported that she was suddenly aware she was in a bad situation and
2 she froze.

3 15. During the course of the treatment, Respondent began rubbing Patient A's clitoris
4 with his ungloved fingers without Patient A's permission. Respondent placed his mouth on
5 Patient A's vagina and began performing oral sex. Respondent also attempted to French kiss
6 Patient A. Respondent told Patient A that "he felt like a baker in a bakery that makes treats but
7 does not get to try them." Respondent asked Patient A if she wanted to have anal sex while he
8 was rushing to undo his pants. Patient A finally had enough courage to say "no," and the
9 procedure ended. She got off the medical table and began to get dressed.

10 16. After Patient A got dressed, she stated that she was extremely nice to Respondent and
11 that she tried to minimize what had just happened. Patient A stayed at the residence for a second
12 procedure (an Esmella chair treatment)³ for approximately 30 minutes. Patient A returned home
13 and then called a friend, who encouraged her to report the incident to the police.

14 17. Patient A reported the incident to law enforcement the next day, on or about June 10,
15 2020. On or about June 10, 2020, during a pre-text phone call with Respondent (and with the
16 authorities listening), Patient A directly confronted Respondent about having sexual contact with
17 her during the ThermiVa medical procedure. When Patient A asked why Respondent touched her
18 vagina with her fingers and why he put his mouth on her vagina, Respondent asked what he could
19 do to "make things better." Respondent did not deny that he had had sexual contact with the
20 Patient A.

21 18. On or about June 11, 2020, while executing a search warrant, law enforcement
22 officers found medical machines and furniture inside Respondent's residence, including but not
23 limited to, a CoolSculpting machine⁴ and an Esmella chair in the kitchen/dining room area. A
24 back bedroom also contained an examination table and a ThermiVa machine.

25 ³ An Emsella chair treatment uses high intensity focused electromagnetic energy to stimulate and
26 strengthen the pelvic floor muscles. The patient sits in the chair fully clothed and the Esmella chair
27 generates thousands of pelvic floor muscle contractions to strengthen the pelvic floor muscles. An
Emsella chair treatment is used to treat urinary incontinence and to increase sexual pleasure.

28 ⁴ CoolSculpting is the brand name for a fat freezing method that aims to get rid of stubborn fat in
certain parts of the body.

1 19. That same day, during an interview with officers, Respondent admitted that sexual
2 acts occurred between him and Patient A. Specifically, Respondent admitted to orally copulating
3 Patient A's vagina during the ThermiVa procedure. Respondent further admitted to stimulating
4 Patient A's clitoris with his ungloved fingers. Respondent stated he asked Patient A if she wanted
5 to have anal sex. Respondent claimed that when he began to pull on the drawstring to remove his
6 pants, Patient A said no and Respondent stopped. Respondent admitted to officers that during the
7 procedure he made the statement to Patient A that he felt like he was like a baker in a bakery
8 because he makes cakes and pastries, but that he was not able to taste them. Respondent was
9 adamant that all of the sexual acts between himself and Patient A were consensual.

10 20. On or about January 5, 2021, a felony complaint was filed against Respondent in the
11 Tulare County Superior Court, case number PCF407383, alleging one count of sexual penetration
12 by fraud, a felony, in violation of Penal Code section 289, subdivision (d)(3); a second count of
13 sexual battery, a misdemeanor, in violation of Penal Code section 243.4, subdivision (e)(1); and a
14 third count of sexual exploitation of a patient by a physician, a misdemeanor, in violation of
15 Business and Professions Code section 729, subdivision (a).

16 21. On or about June 16, 2021, an Information was filed in the Tulare County Superior
17 Court, case number PCF407383, alleging one count of sexual penetration by a foreign object, a
18 felony, in violation of Penal Code section 289, subdivision (a)(1)(A); a second count of forcible
19 oral copulation, a felony, in violation of Penal Code section 289, subdivision (c)(2)(A); a third
20 count of sexual battery, a misdemeanor, in violation of Penal Code section 243.4, subdivision
21 (e)(1); and a fourth count of sexual exploitation of a patient by a physician, a misdemeanor, in
22 violation of Business and Professions Code section 729, subdivision (a).

23 22. On or about May 15, 2023, Respondent pled nolo contendere to count four of the
24 Information, sexual exploitation of a patient by a physician, a misdemeanor, in violation of
25 Business and Professions Code section 729, subdivision (a). On May 16, 2023, Respondent was
26 sentenced to one year of summary probation; ninety days in custody, suspended; a fine in the
27 amount of \$235.00; and a criminal protective order was issued prohibiting contact with the victim
28 for ten years.

1 **FIRST CAUSE FOR DISCIPLINE**

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

3 23. Respondent Satwant Singh Dhillon, M.D., is subject to disciplinary action under
4 section 2227, as defined by section 2234, subdivision (a), and section 2236 of the Code, and title
5 16 of the California Code of Regulations, section 1360, subdivision (a), in that Respondent was
6 convicted of an offense substantially related to the qualifications, functions, or duties of a
7 physician and surgeon. The circumstances are set forth in paragraphs 12 through 22, above, and
8 are incorporated here by reference as if fully set forth herein.

9 **SECOND CAUSE FOR DISCIPLINE**

10 **(Gross Negligence)**

11 24. Respondent Satwant Singh Dhillon, M.D., is subject to disciplinary action under
12 section 2227, as defined by section 2234, subdivision (b) of the Code, in that Respondent
13 committed gross negligence in his care and treatment of Patient A. The circumstances are set
14 forth in paragraphs 12 through 22, above, and are incorporated here by reference as if fully set
15 forth herein.

16 **THIRD CAUSE FOR DISCIPLINE**

17 **(Sexual Exploitation)**

18 25. Respondent Satwant Singh Dhillon, M.D. is subject to disciplinary action under
19 section 2227, as defined by section 729, subdivision (a) of the Code, in that he committed sexual
20 exploitation by a physician with respect to Patient A by engaging in an act of sexual intercourse,
21 sodomy, oral copulation, or sexual contact with a patient. The facts and circumstances are
22 alleged in paragraphs 12 through 22 and are incorporated here as if fully set forth.

23 **FOURTH CAUSE FOR DISCIPLINE**

24 **(Sexual Misconduct with a Patient)**

25 26. Respondent Satwant Singh Dhillon, M.D. is subject to disciplinary action under
26 section 2227, as defined by section 726, subdivision (a) of the Code, in that he committed acts of
27 sexual abuse, misconduct, or relations with Patient A. The facts and circumstances are alleged in
28 paragraphs 12 through 22 and are incorporated here as if fully set forth.

1 paragraphs 12 through 22 above, and are incorporated by here reference as if fully set forth
2 herein,

3 **PRAYER**

4 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
5 and that following the hearing, the Medical Board of California issue a decision:

6 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 76370,
7 issued to Satwant Singh Dhillon, M.D.;

8 2. Revoking, suspending or denying approval of Satwant Singh Dhillon, M.D.'s
9 authority to supervise physician assistants and advanced practice nurses;

10 3. Ordering Satwant Singh Dhillon, M.D., to pay the Board the costs of the investigation
11 and enforcement of this action, and if placed on probation, to pay the Board the costs of probation
12 monitoring;

13 4. Ordering Satwant Singh Dhillon, M.D., if placed on probation, to provide patient
14 notification in accordance with Business and Professions Code section 2228.1; and

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

16 **JUN 08 2023**
17 DATED: _____



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