

**STATE OF ILLINOIS  
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois,	)				
	)				
v.	)	Complainant,	)	No. 2013-10177	
MICHEL YVON ROY, D.C.,	)				
License No.038.011609,	)	Respondent.	)		

ILL. DEPT. OF FINANCIAL AND PROFESSIONAL REGULATION  
15 JUN 12 PM 2:27  
CLERK OF THE COURT

**COMPLAINT**

NOW COMES THE DIVISION OF PROFESSIONAL REGULATION of the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois (“Department”), by Laura E. Forester, Chief of Medical Prosecutions, through Kristina Waldron, Staff Attorney, and as its Complaint against MICHEL YVON ROY, D.C. (“Respondent”), complains as follows:

**COUNT I**

1. Respondent is presently the holder of a Certificate of Registration as a Chiropractor in the State of Illinois, License No. 038.011609, issued by the Department.
  - a. Respondent’s Chiropractor License was first issued by the Department on January 14, 2010.
  - b. Respondent’s license is currently in active status.
2. The Department has jurisdiction to investigate complaints and to bring this action pursuant to 20 ILCS 2105/2105-15(a)(5) and 225 ILCS 60/36.
3. At all times mentioned herein, Respondent practiced medicine as a Chiropractor in the State of Illinois.
4. At all times mentioned herein, Respondent provided chiropractic and wellness services at his practice, Health Solutions, located at 5550 West Touhy Avenue, Suite 202, Skokie, Illinois.

5. Between in or about January and February of 2012, Respondent placed or caused to be placed on the Craigslist website an advertisement seeking a receptionist for Health Solutions.
6. The advertisement provided the following:
  - a. "Highly energetic individual for rapidly expanding natural health clinic;"
  - b. "Preferred you have seven legs, four arms and the ability to do ten things at once;"
  - c. "In [*sic.*] Skokie;" and
  - d. "\$12-\$16 per [*sic.*] hour depending on experience."
7. Between in or about January 2012 and February of 2012, approximately 300 people applied for the job.
8. Between in or about January 2012 and February of 2012, Respondent invited approximately 90 of the job applicants to the office of Health Solutions for job interviews, including but not limited to the following:
  - a. A.F.;
  - b. S.G.;
  - c. A.V.P.;
  - d. L.C.; and
  - e. C.M.
9. Between on or about January 13, 2012 and February 7, 2012, Respondent conducted interviews of the job applicants in groups of approximately 3 to 13 persons.
10. Between on or about January 13, 2012 and February 7, 2012, Respondent's group interviews lasted for approximately an hour and a half.
11. At the group interviews, Respondent asked each interviewee to complete an Application for Employment.

12. The Application for Employment asked for the following:

- a. Personal identifiable information, including
  - i. Name;
  - ii. Address;
  - iii. Telephone number;
  - iv. Date of birth; and
  - v. Social security number;
- b. Chiropractic experience, including
  - i. Whether the interviewee or any family member had received chiropractic care?
  - ii. If so, what the problem and result were? and
  - iii. Whether there was any reason that the interviewee could or would not receive chiropractic care?
- c. Education; and
- d. Employment history.

13. At the group interviews, Respondent devoted most of the time to presenting the following:

- a. A description of his professional background;
- b. The chiropractic services offered by Health Solutions;
- c. The wellness services offered by Health Solutions;
- d. The need for periodic chiropractic services;
- e. The need for wellness screening;
- f. The importance of chiropractic care for the interviewees and their families; and
- g. The importance of wellness care for the interviewees and their families.

14. At the group interviews, Respondent devoted little time to the following:

- a. Talking about the requirements of the purported position; and
  - b. Obtaining the professional background of the interviewees.
15. At the group interviews, Respondent gave the interviewees gift certificates for a “comprehensive wellness screening (\$200 value).”
16. The gift certificates expired in 30 days.
17. At the group interviews, Respondent encouraged each interviewee the following:
- a. To redeem the gift certificates for wellness screening at Health Solutions;
  - b. To provide the gift certificate to his or her family member if the interviewee did not wish to obtain a complimentary wellness screening; and
  - c. To schedule the complimentary wellness screening before the interviewee departed from the office of Health Solutions.
18. At the end of the group interviews, Respondent asked each interviewee to complete and return a “Pre-Interview Form,” which contained the following 5 questions:
- a. “What is the Doctor’s purpose with Chiropractic?”
  - b. “What is chiropractic?”
  - c. “How long has this clinic been here?”
  - d. “What kind of position are we trying to fill?” and
  - e. “Does the Doctor prescribe drugs?”
19. At the group interviews, Respondent asked each interviewee to designate on his or her Application for Employment or Pre-interview Form the following information:
- a. Whether the interviewee was interested in receiving a complimentary wellness screening or other chiropractic services from Health Solutions; and
  - b. Whether the interviewee wished to be contacted by health Solutions at a later date to schedule a complimentary wellness screening or other chiropractic services.

20. After the group interviews, Respondent contacted the interviewees by telephone to encourage them to obtain the wellness screening at the office of Health Solutions, regardless of whether they had requested to be contacted.
21. Some of the interviewees believed that obtaining the wellness screening would increase the likelihood of being hired for the purported position.
22. Some of the interviewees subsequently redeemed their gift certificates for wellness screenings from Respondent, at the office of Health Solutions.
23. At the wellness screenings, Respondent recommended to the interviewees further chiropractic and wellness services from Health Solutions for an additional fee.
24. After the wellness screenings, some interviewees believed that obtaining further care from Respondent for a fee would increase the likelihood of being hired for the purported position.
25. After the wellness screenings, some interviewed obtained further chiropractic and wellness services for an additional fee from Respondent at the office of Health Solutions.
26. At all times mentioned herein, Respondent never assured interviewees that their likelihood of being hired was conditioned on their acceptance of care from Respondent.
27. At all times mentioned herein, Respondent never conducted a subsequent interview for any of the interviewees.
28. At all times mentioned herein, Respondent never hired a receptionist.
29. At all times mentioned herein, Respondent never informed job applicants of their status.
30. On or about late February of 2012, Respondent withdrew the offer to hire a new receptionist for Health Solutions.
31. Respondent committed acts and/or omissions which constitute violations of the Medical Practice Act, 225 ILCS 60/1 et seq., including but not limited to engaging in dishonorable, unethical or unprofessional conduct of a character likely to deceive, defraud or harm the

public because Respondent solicited persons for the chiropractic and wellness services by placing fraudulent job recruitment advertisement on the Craigslist website.

32. The foregoing acts and/or omissions are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 ILCS 60/22(A)(5), relying on the Rules for the Administration of the Medical Practice Act, 68 Ill. Admin. Code 1285.240, 20 ILCS 2105/2015-130, and 225 ILCS 60/22(A)(6).

WHEREFORE, based on the foregoing allegations, the Department of Financial and Professional Regulation, Division of Professional Regulation of the State of Illinois, by Laura E. Forester, Chief of Medical Prosecutions, through Kristina Waldron, Staff Attorney, prays that the Chiropractor License of MICHEL YVON ROY, D.C. be revoked, suspended, placed on probation or otherwise disciplined.

**DEPARTMENT OF FINANCIAL AND  
PROFESSIONAL REGULATION, DIVISION OF  
PROFESSIONAL REGULATION, of the State of  
Illinois**

By: \_\_\_\_\_

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