College of
COMPLEMENTARY HEALTH
PROFESSIONALS OF BC

REQUEST FOR CITATION

BETWEEN:

The College of Complementary Health Professionals
of British Columbia ("the College")

AND:

Gang Shen, traditional Chinese medicine practitioner
(the "Respondent")

This proposed citation is submitted to the Director of Discipline for approval pursuant to section 136 (2) (b) of the *Health Professions and Occupations Act*, [SBC 2022] c 43 (the "HPOA").

The College requests the Director of Discipline to issue a citation to the Respondent based on the following:

1. At all times material to the events and matters described in this Request for Citation, the Respondent was a licensee of the College and practiced as a traditional Chinese medicine practitioner and acupuncturist.

2. The Complainant submitted a complaint to the College on March 29, 2023, in relation to the provision of acupuncture and traditional Chinese medicine services by the Respondent to a patient in Richmond, B.C. on April 23 and April 26, 2022.

3. On February 11, 2026, an Inquiry Committee of the College convened and directed the Registrar to issue a citation pursuant to section 33(6)(d) of the *Health Professions Act*, in force at the time.

4. The Respondent's alleged conduct may constitute professional misconduct contrary to the following sections of the HPOA:
    a. Section 11(1)(d)(i)
    b. Section 11(2).

Dated at Vancouver, British Columbia, this 21st day of September 2026.

Marta Kumor Fane, Deputy Registrar
College of Complementary Health
Professions of British Columbia