

1 ROB BONTA  
Attorney General of California  
2 JUDITH T. ALVARADO  
Supervising Deputy Attorney General  
3 REBECCA L. SMITH  
Deputy Attorney General  
4 State Bar No. 179733  
300 South Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6475  
6 Facsimile: (916) 731-2117  
*Attorneys for Complainant*  
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8 **BEFORE THE**  
9 **ACUPUNCTURE BOARD**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation and Petition to  
Revoke Probation Against:

13 **PAUL A. SLIDDERS, L.Ac.**  
14 **2657 Kentia Street**  
**Oxnard, CA 93036**

15 **Acupuncturist License No. AC 12278,**

16 Respondent.  
17

Case No. D1-2010-145

**ACCUSATION AND PETITION TO  
REVOKE PROBATION**

18  
19 **PARTIES**

20 1. Benjamin Bodea (Complainant) brings this Accusation and Petition to Revoke  
21 Probation solely in his official capacity as the Executive Officer of the Acupuncture Board,  
22 Department of Consumer Affairs.

23 2. On or about March 17, 2008, the Acupuncture Board issued Acupuncturist License  
24 Number AC 12278 to Paul A. Slidders, L.Ac. (Respondent). That license expired on January 31,  
25 2022, and has not been renewed.

26 3. In a disciplinary action entitled *In the Matter of the Accusation Against Paul A.*  
27 *Slidders, L.Ac.*, Case Number 1A-2010-145, the Acupuncture Board, issued a Decision, effective  
28 January 16, 2014, in which Respondent's Acupuncturist License was revoked. However, the

1 revocation was stayed and Respondent’s Acupuncturist License was placed on probation for a  
2 period of five (5) years, or until Respondent tendered full payment of all money owed in cost  
3 recovery, whichever is longer, along with certain terms and conditions. A copy of that Decision  
4 is attached as Exhibit A and is incorporated by reference.

5 **JURISDICTION**

6 4. This Accusation and Petition to Revoke Probation is brought before the Acupuncture  
7 Board (Board), under the authority of the following laws. All section references are to the  
8 Business and Professions Code (Code) unless otherwise indicated.

9 5. Section 118 of the Code states:

10 (a) The withdrawal of an application for a license after it has been filed with a  
11 board in the department shall not, unless the board has consented in writing to such  
12 withdrawal, deprive the board of its authority to institute or continue a proceeding  
13 against the applicant for the denial of the license upon any ground provided by law or  
14 to enter an order denying the license upon any such ground.

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

23 (c) As used in this section, “board” includes an individual who is authorized by  
24 any provision of this code to issue, suspend, or revoke a license, and “license”  
25 includes “certificate,” “registration,” and “permit.”

26 6. Section 4928.1 of the Code states:

27 Protection of the public shall be the highest priority of the Acupuncture Board  
28 in exercising its licensing, regulatory, and disciplinary functions. Whenever the  
protection of the public is inconsistent with other interest sought to be promoted, the  
protection of the public shall be paramount.

**STATUTORY PROVISIONS**

7. Section 4955 of the Code states:

The board may deny, suspend, or revoke, or impose probationary conditions  
upon, the license of any acupuncturist who is guilty of unprofessional conduct.

Unprofessional conduct shall include, but not be limited to, the following:

///  
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...

(b) Conviction of a crime substantially related to the qualifications, functions, or duties of an acupuncturist, the record of conviction being conclusive evidence thereof.

(d) Aiding or abetting in, or violating or conspiring in, directly or indirectly, the violation of the terms of this chapter or any regulation adopted by the board pursuant to this chapter.

...

(i) Any action or conduct that would have warranted the denial of the acupuncture license.

...

8. Section 4956 of the Code states:

A plea or verdict of guilty or a conviction following a plea of nolo contendere made to a charge which is substantially related to the qualifications, functions, or duties of an acupuncturist is deemed to be a conviction within the meaning of this chapter.

The board may order a license suspended or revoked, or may deny a license, or may impose probationary conditions upon a license, when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code allowing the person to withdraw his or her pleas of guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or dismissing the accusation, complaint, information, or indictment.

9. Section 490 of the Code states:

(a) In addition to any other action that a board is permitted to take against a licensee, a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued.

(b) Notwithstanding any other provision of law, a board may exercise any authority to discipline a licensee for conviction of a crime that is independent of the authority granted under subdivision (a) only if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the licensee's license was issued.

(c) A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action that a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.

(d) The Legislature hereby finds and declares that the application of this section has been made unclear by the holding in *Petropoulos v. Department of Real Estate*

1 (2006) 142 Cal.App.4th 554, and that the holding in that case has placed a significant  
2 number of statutes and regulations in question, resulting in potential harm to the  
3 consumers of California from licensees who have been convicted of crimes.  
4 Therefore, the Legislature finds and declares that this section establishes an  
5 independent basis for a board to impose discipline upon a licensee, and that the  
6 amendments to this section made by Chapter 33 of the Statutes of 2008 do not  
7 constitute a change to, but rather are declaratory of, existing law.

### 8 **COST RECOVERY**

9 10. Section 4959 of the Code states:

11 (a) The board may request the administrative law judge, under his or her  
12 proposed decision in resolution of a disciplinary proceeding before the board, to  
13 direct any licensee found guilty of unprofessional conduct to pay to the board a sum  
14 not to exceed actual and reasonable costs of the investigation and prosecution of the  
15 case.

16 (b) The costs to be assessed shall be fixed by the administrative law judge and  
17 shall not in any event be increased by the board. When the board does not adopt a  
18 proposed decision and remands the case to an administrative law judge, the  
19 administrative law judge shall not increase the amount of any costs assessed in the  
20 proposed decision.

21 (c) When the payment directed in the board's order for payment of costs is not  
22 made by the licensee, the board may enforce the order for payment in the superior  
23 court in the county where the administrative hearing was held. This right of  
24 enforcement shall be in addition to any other rights the board may have as to any  
25 licensee directed to pay costs.

26 (d) In any judicial action for the recovery of costs, proof of the board's decision  
27 shall be conclusive proof of the validity of the order of payment and the terms for  
28 payment.

(e) All costs recovered under this section shall be considered a reimbursement  
for costs incurred and shall be deposited in the Acupuncture Fund.

### 29 **FIRST CAUSE FOR DISCIPLINE**

#### 30 **(Convictions of Substantially Related Crimes)**

31 11. Respondent is subject to disciplinary action for unprofessional conduct under Code  
32 section 4955, section 4955, subdivision (b), section 4956, and section 490 in that he was  
33 convicted of crimes substantially related to the qualifications, functions, or duties of an  
34 acupuncturist. The circumstances are as follows:

#### 35 August 25, 2020 Arrest and September 27, 2022 Conviction

36 12. On or about August 25, 2020, Santa Barbara police officers were dispatched to  
37 Mission Park Rose Garden, a community park in Santa Barbara, to investigate a report of a man  
38

1 stating he was going to die. The officers arrived on the scene and learned that Respondent had  
2 asked three park patrons for something to drink. One of the victims directed Respondent to a  
3 water fountain. When the victims refused to give Respondent a can of beer, he took a can of beer  
4 and physically fought with the victims. Respondent grabbed the female victim by the neck and  
5 threw her on the ground. One of the male victims attempted to intervene and Respondent  
6 punched that victim several times. The third victim then approached Respondent to try to calm  
7 him down at which time Respondent struck the third victim in the head with a can of beer causing  
8 injury. Respondent attempted to leave the scene with a black purse belonging to the female  
9 victim. The third victim managed to force Respondent to lie on the ground where he remained  
10 until the police arrived. Respondent told the police that he felt like he was having a heart attack.  
11 Respondent was taken to a local hospital's emergency department. When asked if he had any  
12 injuries, Respondent stated that he thought that he broke his fingers when he assaulted one of the  
13 victims. Once medically cleared, Respondent was placed under arrest for robbery and assault  
14 with a deadly weapon likely to cause great bodily injury and taken to the Santa Barbara County  
15 Jail.

16 13. On or about August 26, 2020, in a criminal complaint entitled *The People of the State*  
17 *of California v. Paul Alexander Slidders*, Case Number 20CR06100, filed in the Superior Court  
18 of California, County of Santa Barbara, Respondent was charged with the following two felony  
19 counts: (1) second degree robbery, in violation of Penal Code section 211, a serious felony  
20 within the meaning of Penal Code section 1192.7, subdivision (c)(19) and a violent felony  
21 pursuant to Penal Code section 667.5, subdivision (c)(9), and (2) assault with a deadly weapon, in  
22 violation of Penal Code section 245, subdivision (a)(1), a serious felony within the meaning of  
23 Penal Code section 1192.7, subdivision (c)(23). The criminal complaint included special  
24 allegations for a prior serious/violent felony conviction in violation of Penal Code section 667,  
25 subdivision (a)(1) and a second strike in violation of Penal Code section 667, subdivision (e)(1).

26 14. On or about September 20, 2020, Respondent notified the Board of his August 25,  
27 2020 arrest.

28 ///

1           15. On or about September 27, 2022, in the Superior Court of California, County of Santa  
2 Barbara, the charges against Respondent were amended to add a third felony count: assault with  
3 force likely to produce great bodily injury, in violation of Penal Code section 245, subdivision  
4 (a)(4). Respondent, upon his guilty plea, was convicted of assault with force likely to produce  
5 great bodily injury in violation of Penal Code section 245, subdivision (a)(4), a felony.

6           16. On or about November 15, 2022, Respondent was sentenced to two years' probation  
7 under the following conditions:

8                 a. Serve 16 days in the Santa Barbara County Jail, with credit for time served of 8  
9 actual days plus 8 days good time/work time, for a total of 16 days from August 25, 2020 to  
10 September 2, 2020.

11                 b. Payment of restitution, fees, and fines.

12                 c. Obey all laws and not associate with known criminals.

13                 d. Report to his probation officer within 72 hours of sentencing.

14                 e. Follow all orders of his probation officer, including report at the times, in the  
15 place, and in the manner directed and participate in any treatment interventions including classes  
16 or other programs at Respondent's expense.

17                 f. Maintain residence approved by Probation and keep his probation officer advised  
18 of place of residence and employment.

19                 g. Not change place of residence, nor leave the County of Santa Barbara or the State  
20 of California without the permission of his probation officer.

21                 h. Seek and maintain regular employment when not a full-time student.

22                 i. Maintain a standard of personal appearance that will not impede obtaining  
23 employment.

24                 j. Not own, possess, or have under custody and control any weapon, including  
25 firearms, or any ammunition.

26                 k. Submit person, property and vehicles to search and seizure at any time of day or  
27 night by a peace officer or probation officer with or without warrant and with or without cause.

28                 l. Not associate with known illegal drug users or sellers.

1 m. Not become an undercover agent or confidential operator for any law enforcement  
2 agency.

3 n. Not use or possess any drugs or narcotics controlled by law, unless prescribed by a  
4 licensed physician, and then only in the amounts prescribed.

5 o. Submit to standardized tests to determine illegal use of drugs, narcotics and  
6 alcohol.

7 p. Participate in an alcohol/drug treatment screening and assessment process and  
8 complete an alcohol/drug treatment program as determined by the needs assessment if directed by  
9 his probation officer.

10 q. Do not drink or possess any alcoholic beverages and stay out of places where they  
11 are the chief item of sale. Stay out of bars and liquor stores.

12 r. Submit specimens, samples and print impressions pursuant to Penal Code section  
13 296.

14 s. Participate in mental health treatment and take all prescribed medications. Do not  
15 stop medication/treatment without permission of mental health clinician and notification to his  
16 probation officer.

17 t. Do not contact, molest, annoy, threaten or harass the three victims.

18 u. Stay away from the Mission Park Rose Garden.

19 v. Enter and complete the Mental Health Treatment Court program, if accepted.

20 July 11, 2021 Arrest and September 27, 2022 Conviction

21 17. On or about July 11, 2021, Santa Barbara Police Officers were dispatched to a  
22 business on State Street for a disturbance involving Respondent, who had been inside the  
23 business' restroom yelling at the business owner. Respondent, who had previously been wearing  
24 a blue Hawaiian shirt, was shirtless. The business owner had told Respondent he needed to leave  
25 and called 911. Respondent stated that "My wife and I are going to come in here and kill  
26 everybody." As Respondent left the premises, he stuck his fist in the face of the business owner's  
27 son and stated "get out of my way." After Respondent left the business, he went to De La Guerra  
28 Plaza, a community park. He sat down with a group of three transient males. When Respondent

1 was approached by officers regarding the disturbance at the business on State Street, the other  
2 three individuals requested that they be permitted to leave the area since they were not associated  
3 with Respondent and did not agree with his poor behavior. The three individuals left the area and  
4 Respondent was questioned by the officers. Respondent denied being at the business where the  
5 disturbance occurred. While detained by the officers for questioning, Respondent was  
6 uncooperative and belligerent. The business owner was interviewed regarding the incident and  
7 filled out the form for a citizen's arrest. A statement was also taken by one of the three males  
8 sitting near Respondent at the time the officers initially approached Respondent. This individual  
9 stated that Respondent asked if he could have a bite of the individual's burrito that he was eating  
10 and the individual said no. The individual stated that Respondent was then aggressive towards  
11 him and stated something similar to "I'll f- -king kill you if you don't give me your f- -king  
12 burrito." The individual, who was unfamiliar with Respondent and uncertain as to whether  
13 Respondent would harm him, removed a lighter and folding knife device to defend himself.  
14 Respondent told the individual that his knife was bigger. Respondent's pocket knife was  
15 collected and subsequently booked into evidence due to the threat of physical violence.  
16 Respondent was arrested and transported to Santa Barbara County Jail where he was booked for  
17 trespassing and obstructing a business in violation of Penal Code section 602.1, subdivision (a),  
18 disturbing the peace, in violation of Penal Code section 415, subdivision (2), and criminal threats  
19 in violation of Penal Code section 422.

20 18. On or about October 20, 2021, Respondent notified the Board of his July 11, 2021  
21 arrest.

22 19. On or about June 22, 2022, in a criminal information entitled *The People of the State*  
23 *of California v. Paul Alexander Slidders*, Case Number 21CR04410, filed in the Superior Court  
24 of California, County of Santa Barbara, Respondent was charged with the following three  
25 misdemeanor counts: (1) criminal threats in violation of Penal Code section 422; (2) obstructing  
26 or intimidating business operators or customers, in violation of Penal Code section 602.1,  
27 subdivision (a); and (3) disturbing the peace by loud noise, in violation of Penal Code section  
28 415, subdivision (2).





1 acupuncture license. Complainant refers to and, by this reference, incorporates herein,  
2 paragraphs 11 through 22, above, as though fully set forth herein.

3 **FIRST CAUSE TO REVOKE PROBATION**

4 **(Failure to Comply with Probation Condition Number 6: Obey all Laws)**

5 25. Condition 6 of the January 16, 2014 Decision states:

6 “6. Obey All Laws. Respondent shall obey all federal, state and local laws, all  
7 rules governing the practice of acupuncture in California. A full and detailed account of  
8 any and all violations of law shall be reported by the Respondent to the Board in writing  
9 within seventy-two (72) hours of occurrence.”

10 26. Respondent’s probation is subject to revocation because he failed to comply with  
11 Condition 6 of the January 16, 2014 Decision, referenced above. The facts and circumstances  
12 regarding this violation are set forth in paragraphs 11 through 22, above, and incorporated herein  
13 by this reference.

14 **SECOND CAUSE TO REVOKE PROBATION**

15 **(Failure to Comply with Probation Condition Number 13: Cost Recovery)**

16 27. Condition 13 of the January 16, 2014 Decision states:

17 “13. Cost Recovery. Respondent shall pay to the board its costs of investigation and  
18 enforcement in the amount of \$10,000.00. The cost recovery amount may be paid in installments  
19 over the period of probation, five (5) years, and may be paid ahead of time without penalty.  
20 Payment must be tendered in full at the conclusion of the probationary period. Failure to tender  
21 full payment of the amount owed will extend the probationary period in accordance with this  
22 Decision and Order.”

23 28. Respondent’s probation is subject to revocation because he failed to comply with  
24 Condition 11 of the January 16, 2014 Decision, referenced above. The facts and circumstances  
25 regarding this violation are as follows:

26 a. Respondent’s last cost recovery payment was in the amount of \$50.00, paid on  
27 March 15, 2021. The remaining balance of the cost recovery owed by Respondent is in the  
28 amount of Five Thousand Two Hundred Five Dollars and No Cents (\$5,205.00).

1 **DISCIPLINE CONSIDERATIONS**

2 29. To determine the degree of discipline, if any, to be imposed on Respondent,  
3 Complainant alleges that on or about April 20, 2011, in a prior criminal law proceeding entitled  
4 *The People of the State of California vs. Paul Alexander Slidders*, Case Number SC171342, in the  
5 Superior Court of the State of California, Marin County, Respondent was convicted of one count  
6 of battery causing serious bodily injury in violation of Penal Code sections 243, subdivision (d)  
7 and one felony count of criminal threats in violation of Penal Code section 422. Respondent was  
8 placed on probation for a period of five years under terms and conditions, including psychiatric  
9 treatment with reports provided to the criminal probation department and compliance with a  
10 protective order prohibiting Respondent from all contact with the two victims.

11 **PRAYER**

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
13 and that following the hearing, the Acupuncture Board issue a decision:

14 1. Revoking the probation that was granted by the Board in Case Number 1A-2010-145  
15 and imposing the disciplinary order that was stayed, thereby revoking Acupuncturist License  
16 Number AC 12278, issued to Paul A. Slidders, L.Ac.;

17 2. Revoking or suspending Acupuncturist License Number AC 12278, issued to Paul A.  
18 Slidders, L.Ac.;

19 3. Ordering Paul A. Slidders, L.Ac. to pay the Acupuncture Board the reasonable costs  
20 of the investigation and enforcement of this case, pursuant to Business and Professions Code  
21 section 4959; and,

22 4. Taking such other and further action as deemed necessary and proper.

23 DATED: AUGUST 22, 2023

Original Signature on File

24 \_\_\_\_\_  
25 BENJAMIN BODEA  
26 Executive Officer  
27 Acupuncture Board  
28 Department of Consumer Affairs  
State of California  
*Complainant*

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