

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

In the Matter of the Accusation Against:)	Case No. 1A-2016-184
)	
SEUNG YUEB HAN, L.AC.)	
525 S. Berendo Street, # 301)	
Los Angeles, CA 90020)	
)	
Acupuncture License No. AC 12521)	
)	
Respondent.)	
_____)	

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Acupuncture Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on January 18, 2018.

It is so ORDERED December 19, 2017.



Amy Matecki, MD, L.Ac., Chair
Acupuncture Board
Department of Consumer Affairs
State of California

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9 **BEFORE THE**
ACUPUNCTURE BOARD
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Amended Accusation
12 Against:
13 **SEUNG YUEB HAN, L.Ac.**
14 **3251 West 6th Street Suite 400 B.**
Los Angeles, CA 90020
15 **Acupuncturist License No. AC 12521,**
16 Respondent.

Case No. 1A-2016-184

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

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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. Benjamin Bodea (Complainant) is the Executive Officer of the Acupuncture Board
23 (Board). He brought this action solely in his official capacity and is represented in this matter by
24 Xavier Becerra, Attorney General of the State of California, by Wendy Widlus, Deputy Attorney
25 General.

26 2. Respondent Seung Yueb Han, L.Ac. (Respondent) is represented in this proceeding
27 by attorney Kevin D. Cauley, Esq., whose address is: 624 South Grand Avenue, 22nd Floor,
28 Los Angeles, California, 90017.

1 10. Respondent agrees that his Acupuncturist License is subject to discipline and he
2 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

3 **CONTINGENCY**

4 11. This stipulation shall be subject to approval by the Acupuncture Board. Respondent
5 understands and agrees that counsel for Complainant and the staff of the Acupuncture Board may
6 communicate directly with the Board regarding this stipulation and settlement, without notice to
7 or participation by Respondent or his counsel. By signing the stipulation, Respondent
8 understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation
9 prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation
10 as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or
11 effect, except for this paragraph, it shall be inadmissible in any legal action between the parties,
12 and the Board shall not be disqualified from further action by having considered this matter.

13 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
14 copies of this Stipulated Settlement and Disciplinary Order shall have the same force and effect as
15 the originals.

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

19 **DISCIPLINARY ORDER**

20 **IT IS HEREBY ORDERED** that Acupuncturist License No. AC 12521 issued to
21 Respondent Seung Yueb Han, L.Ac. is revoked. However, the revocation is stayed and
22 Respondent is placed on probation for three (3) years on the following terms and conditions.

23 1. **OBEY ALL LAWS** - Respondent shall obey all laws and all regulations
24 governing the practice of acupuncture in California. A full and detailed account of any and all
25 violations of law shall be reported by the Respondent to the Board or its designee in writing
26 within seventy-two (72) hours of occurrence.

27 2. **COURSEWORK** - Respondent shall take and successfully complete not less than
28 12 hours of coursework in Ethics. The coursework shall be taken as approved by the Board.

1 Classroom attendance must be specifically required. Course content shall be pertinent to the
2 violation and all coursework must be completed within the first year of probation. The required
3 coursework must be in addition to any continuing education courses that may be required for
4 license renewal.

5 Within 90 days of the effective date of this decision, Respondent shall submit a plan,
6 including date(s) of course(s), Continuing Education Provider (CEP), course title, instructor, and
7 course description, for the Board's prior approval for meeting the educational requirements. All
8 costs of the coursework shall be borne by the Respondent.

9 3. **QUARTERLY REPORTS** - Respondent shall submit quarterly declarations
10 under penalty of perjury on forms provided by the Board or its designee, stating whether there has
11 been compliance with all the conditions of probation. If the final probation report is not submitted
12 as directed, probation shall be extended automatically until such time as the final report is
13 submitted and accepted by the board or its designee.

14 4. **SURVEILLANCE PROGRAM** - Respondent shall comply with the Board's
15 probation surveillance program and shall, upon reasonable notice, report to the assigned
16 investigative district office. Respondent shall contact the assigned probation surveillance monitor
17 regarding any questions specific to the probation order. Respondent shall not have any
18 unsolicited or unapproved contact with 1) victims or complainants associated with the case;
19 2) Board members or members of its staff; or 3) persons serving the Board as expert examiners.

20 5. **INTERVIEW WITH THE BOARD OR ITS DESIGNEE** - Respondent shall
21 appear in person for interviews with the Board or its designee upon request at various intervals
22 and with reasonable notice.

23 6. **CHANGES OF EMPLOYMENT** - Respondent shall notify the Board in writing,
24 through the assigned probation surveillance compliance officer of any and all changes of
25 employment, location and address within 30 days of such change.

26 7. **TOLLING FOR OUT-OF-STATE PRACTICE OR RESIDENCE** - In the
27 event Respondent should leave California to reside or to practice outside the State, Respondent
28 must notify the Board in writing of the dates of departure and return. Periods of residency or

1 practice outside California will not apply to the reduction of this probationary period.

2 8. **EMPLOYMENT AND SUPERVISION OF TRAINEES** - Respondent shall not
3 employ or supervise or apply to employ or supervise acupuncture trainees during the course of
4 this probation. Respondent shall terminate any such supervisory relationship in existence on the
5 effective date of this probation. Respondent shall not teach at any Board approved training
6 program during the course of this probation.

7 9. **COST RECOVERY** - Respondent shall pay to the Board its costs of investigation
8 and enforcement in the amount of \$1,047.50. Respondent shall be permitted to pay these costs in
9 a payment plan approved by the Board or its designee, with payments to be completed no later
10 than three months prior to the end of the probation term. Cost recovery will not be tolled.

11 At Respondent's request, if Respondent has not complied with this condition during the
12 probationary term, and Respondent has presented sufficient documentation of his good faith
13 efforts to comply with this condition, and if no other conditions have been violated, the Board or
14 its designee, in its discretion, may grant an extension of Respondent's probation period up to two
15 years without further hearing in order to comply with this condition. During the two years'
16 extension, all original conditions of probation will apply. The filing of bankruptcy by
17 Respondent shall not relieve Respondent of his/her responsibility to reimburse the Board for its
18 investigation and prosecution costs.

19 10. **PROBATION MONITORING COSTS** - Respondent shall reimburse the Board
20 for the hourly costs it incurs in monitoring the probation to ensure compliance for the duration of
21 the probation period, including but not limited to travel and quarterly reviews.

22 11. **NOTIFICATION OF NAME, ADDRESS, TELEPHONE NUMBER or E-**
23 **MAIL ADDRESS CHANGES.** - Respondent shall notify the assigned probation monitor, in
24 writing within ten (10) days, of any and all name, address, telephone and/or e-mail address
25 changes.

26 12. **MAINTENANCE OF VALID LICENSE** - Respondent shall, at all times,
27 maintain an active current license with the Board, including any period of suspension or tolled
28 probation.


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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Acupuncture Board.

Dated: *October 23, 2017*

Respectfully submitted,
XAVIER BECERRA
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General


WENDY WIDLUS
Deputy Attorney General
Attorneys for Complainant

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Stipulated Settlement & Disciplinary Order Han.PDF.docx

Exhibit A

Amended Accusation No. 1A-2016-184