

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

In the Matter of the Accusation Against

Case No. 1A-2016-290

**SU CHEN LEE, L.Ac.
1817 A Clark Lane, Unit A
Redondo Beach, CA 90278**

Acupuncturist License No. AC 16228

Respondent.

DECISION AND ORDER

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

This Decision shall become effective on October 14, 2022.

It is so ORDERED October 04, 2022.

Original Signature on File
FOR THE ACUPUNCTURE BOARD
DEPARTMENT OF CONSUMER AFFAIRS

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

In the Matter of the Accusation Against

Case No. 1A-2016-290

SU CHEN LEE, L.Ac.
1817 A Clark Lane, Unit A
Redondo Beach, CA 90278

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

Acupuncturist License No. AC 16228,

Respondent.

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

PARTIES

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

2. Su Chen Lee, L.Ac. (Respondent) is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about September 29, 2014, the Board issued Acupuncturist License No. AC

1 16228 to Respondent. The Acupuncturist License was in full force and effect at all times relevant
2 to the charges brought in Accusation No. 1A-2016-290 and will expire on March 31, 2024, unless
3 renewed.

4 JURISDICTION

5 4. Accusation No. 1A-2016-290 was filed before the Board, and is currently pending
6 against Respondent. The Accusation and all other statutorily required documents were properly
7 served on Respondent on June 1, 2022. Respondent timely filed her Notice of Defense contesting
8 the Accusation. A copy of Accusation No. 1A-2016-290 is attached as Exhibit A and
9 incorporated by reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read, and understands the charges and allegations in
12 Accusation No. 1A-2016-290. Respondent also has carefully read, and understands the effects of
13 this Stipulated Surrender of License and Order.

14 6. Respondent is fully aware of her legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
16 her own expense; the right to confront and cross-examine the witnesses against her; the right to
17 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
18 compel the attendance of witnesses and the production of documents; the right to reconsideration
19 and court review of an adverse decision; and all other rights accorded by the California
20 Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
22 every right set forth above.

23 CULPABILITY

24 8. Respondent admits the truth of each and every charge and allegation in Accusation
25 No. 1A-2016-290, agrees that cause exists for discipline and hereby surrenders her Acupuncturist
26 License No. AC 16228 for the Board's formal acceptance.

27 9. Respondent understands that by signing this stipulation she enables the Board to issue
28 an order accepting the surrender of her Acupuncturist License without further process.

1 2. Respondent shall lose all rights and privileges as an Acupuncturist in California as of
2 the effective date of the Board's Decision and Order.

3 3. Respondent shall cause to be delivered to the Board her wall certificate and, if one
4 was issued, her pocket license on or before the effective date of the Decision and Order.

5 4. If Respondent ever files an application for licensure or a petition for reinstatement in
6 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
7 comply with all the laws, regulations and procedures for reinstatement of a revoked or
8 surrendered license in effect at the time the petition is filed, and all of the charges and allegations
9 contained in Accusation No. 1A-2016-290 shall be deemed to be true, correct and admitted by
10 Respondent when the Board determines whether to grant or deny the petition.

11 5. Respondent shall pay the agency its costs of investigation and enforcement in the
12 amount of \$\$10,542.25 prior to issuance of a new or reinstated license.

13 6. If Respondent should ever apply or reapply for a new license or certification, or
14 petition for reinstatement of a license, by any other health care licensing agency in the State of
15 California, all of the charges and allegations contained in Accusation, No. 1A-2016-290 shall be
16 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
17 Issues or any other proceeding seeking to deny or restrict licensure.

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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Acupuncturist License. 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 Acupuncture Board.

DATED: 8/16/2022 S. U. Lee
SU CHEN LEE, L.Ac.
Respondent
In Pro Per

ENDORSEMENT

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

DATED: 8/22/2022

Respectfully submitted,
ROB BONTA
Attorney General of California
ROBERT MCKIM BELL
Supervising Deputy Attorney General

Wendy Widlus
WENDY WIDLUS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 1A-2016-290