

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

In the Matter of the Accusation Against:

Case No. 1A-2015-197

JEREMY ADAM SPEISER, L.Ac.
17068 Dearborn Street
Northridge, CA 91325

Acupuncturist License No. AC8693

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 DEC 17 2016.

It is so ORDERED NOV 17 2016.



FOR THE ACUPUNCTURE BOARD
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 E. A. JONES III
Supervising Deputy Attorney General
3 WENDY WIDLUS
Deputy Attorney General
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California Department of Justice
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Attorneys for Complainant
8

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

11 In the Matter of the Accusation Against:

Case No. 1A-2015-197

12 **JEREMY ADAM SPEISER, L.Ac.**
13 **17068 Dearborn Street**
14 **Northridge, CA 91325**

OAH No. 2016070801

15 **Acupuncturist License No. AC8693**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

16 Respondent.

17
18 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Benjamin Bodea (Complainant) is the Acting Executive Officer of the Acupuncture
22 Board (Board). He brought this action solely in his official capacity and is represented in this
23 matter by Kamala D. Harris, Attorney General of the State of California, by Wendy Widlus,
24 Deputy Attorney General.

25 2. Jeremy Adam Speiser, L.Ac. (Respondent) is represented in this proceeding by
26 attorney James E. Blatt, whose address is: The Law Offices of James E. Blatt, 10100 Santa
27 Monica Boulevard., Suite 300, Los Angeles, California 90067.

28 3. On or about October 2, 2002, the Board issued Acupuncturist License No. AC8693

1 to Jeremy Adam Speiser, L.Ac. The Acupuncturist License was in full force and effect at all
2 times relevant to the charges brought in Accusation No. 1A-2015-197 and will expire on January
3 31, 2018, unless renewed.

4 **JURISDICTION**

5 4. Accusation No. 1A-2015-197 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 17, 2016. Respondent timely filed his Notice of Defense
8 contesting the Accusation. A copy of Accusation No. 1A-2015-197 is attached as Exhibit A and
9 incorporated by reference.

10 **ADVISEMENT AND WAIVERS**

11 5. Respondent has carefully read, fully discussed with counsel, and understands the
12 charges and allegations in Accusation No. 1A-2015-197. Respondent also has carefully read,
13 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License
14 and Order.

15 6. Respondent is fully aware of his legal rights in this matter, including the right to a
16 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine
17 the witnesses against him; the right to present evidence and to testify on his own behalf; the right
18 to the issuance of subpoenas to compel the attendance of witnesses and the production of
19 documents; the right to reconsideration and court review of an adverse decision; and all other
20 rights accorded by the California 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 understands that the charges and allegations in Accusation No. 1A-2015-
25 197, if proven at a hearing, constitute cause for imposing discipline upon his Acupuncturist
26 License.

27 9. For the purpose of resolving the Accusation without the expense and uncertainty of
28 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual

1 basis for the charges in the Accusation and that those charges constitute cause for discipline.
2 Respondent hereby gives up his right to contest that cause for discipline exists based on those
3 charges.

4 10. Respondent agrees that cause exists for discipline for each and every charge and
5 allegation in Accusation No. 1A-2015-197, that his Acupuncturist License is subject to discipline,
6 and he hereby surrenders his Acupuncturist License No. AC8693 for the Board's formal
7 acceptance.

8 11. Respondent understands that by signing this stipulation he enables the Board to issue
9 an order accepting the surrender of his Acupuncturist License without further process.

10 12. Respondent agrees that if he ever petitions for reinstatement of his Acupuncture
11 License No. AC8693, all of the charges and allegations contained in Accusation No. 1A-2015-
12 197 shall be deemed true, correct and fully admitted by Respondent for purposes of that
13 reinstatement proceeding or any other licensing proceeding involving respondent in the State of
14 California.

15 **CONTINGENCY**

16 13. This stipulation shall be subject to approval by the Board. Respondent understands
17 and agrees that counsel for Complainant and the staff of the Board may communicate directly
18 with the Board regarding this stipulation and surrender, without notice to or participation by
19 Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that he
20 may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board
21 considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order,
22 the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this
23 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
24 be disqualified from further action by having considered this matter.

25 **OTHER AGREEMENTS**

26 14. The parties understand and agree that Portable Document Format (PDF) and facsimile
27 copies of this Stipulated Surrender of License and Order shall have the same force and effect as
28 the originals.

1 15. In consideration of the foregoing admissions and stipulations, the parties agree that
2 the Board may, without further notice or formal proceeding, issue and enter the following Order:

3 **ORDER**

4 **IT IS HEREBY ORDERED** that Acupuncturist License No. AC8693, issued to
5 Respondent Jeremy Adam Speiser, L.Ac., is surrendered and accepted by the Acupuncture Board.

6 1. The surrender of Respondent's Acupuncturist License and the acceptance of the
7 surrendered license by the Board shall constitute the imposition of discipline against Respondent.
8 This stipulation constitutes a record of the discipline and shall become a part of Respondent's
9 license history with the Acupuncture Board.

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

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

14 4. If Respondent ever files an application for licensure or a petition for reinstatement in
15 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
16 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
17 effect at the time the petition is filed, and all of the charges and allegations contained in
18 Accusation No. 1A-2015-197 shall be deemed to be true, correct and admitted by Respondent
19 when the Board determines whether to grant or deny the petition.

20 5. If Respondent should ever apply or reapply for a new license or certification, or
21 petition for reinstatement of a license, by any other health care licensing agency in the State of
22 California, all of the charges and allegations contained in Accusation, No. 1A-2015-197 shall be
23 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
24 Issues or any other proceeding seeking to deny or restrict licensure.

25 6. Respondent shall pay the Board its costs of investigation and enforcement in the
26 amount of \$3,622.50 prior to application for licensure or a petition for reinstatement.

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28 //

1 **ACCEPTANCE**

2 I have carefully read the above Stipulated Surrender of License and Order and have fully
3 discussed it with my attorney, James E. Blatt. I understand the stipulation and the effect it will
4 have on my Acupuncturist License. I enter into this Stipulated Surrender of License and Order
5 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
6 Acupuncture Board.

7
8 DATED: _____

JEREMY ADAM SPEISER, L.AC.
Respondent

9
10 I have read and fully discussed with Respondent Jeremy Adam Speiser, L.Ac. the terms and
11 conditions and other matters contained in this Stipulated Surrender of License and Order. I
12 approve its form and content.

13 DATED: _____

JAMES E. BLATT
Attorney for Respondent

14
15 **ENDORSEMENT**

16
17 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
18 for consideration by the Acupuncture Board of the Department of Consumer Affairs.

19 Dated:

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General

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24 WENDY WIDLUS
Deputy Attorney General
Attorneys for Complainant

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ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, James E. Blatt. 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.

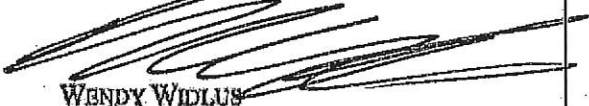
DATED: 9/29/16 
JEREMY ADAM SPEISER, L.Ac.
Respondent

I have read and fully discussed with Respondent Jeremy Adam Speiser, L.Ac. the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: _____
JAMES E. BLATT
Attorney for Respondent

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: 9/30/16 Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General

WENDY WIDLUS
Deputy Attorney General
Attorneys for Complainant

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1 ACCEPTANCE

2 I have carefully read the above Stipulated Surrender of License and Order and have fully
3 discussed it with my attorney, James E. Blatt. I understand the stipulation and the effect it will
4 have on my Acupuncturist License. I enter into this Stipulated Surrender of License and Order
5 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
6 Acupuncture Board.

7
8 DATED: _____

JEREMY ADAM SPEISER, L.A.C.
Respondent

10 I have read and fully discussed with Respondent Jeremy Adam Speiser, L.Ac. the terms and
11 conditions and other matters contained in this Stipulated Surrender of License and Order. I
12 approve its form and content.

13 DATED: _____

9/30/16
6:35 AM


JAMES E. BLATT
Attorney for Respondent

16 ENDORSEMENT

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

19 Dated:

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General

24 WENDY WIDLUS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 1A-2015-197