

BEFORE THE
ACUPUNCTURE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:
ZHONG LIANG TANG, L.AC.
13623 Hidden Forest Cir.
Orlando, FL 32828

Case No. 1A-2019-82

Acupuncture License No. AC 16370

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 **April 22, 2023**.

It is ~~so~~ ORDERED on **March 23, 2023**.

Original Signature on File with the Board

FOR THE ACUPUNCTURE BOARD
DEPARTMENT OF CONSUMER AFFAIRS

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2 MARY CAIN-SIMON
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10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

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12 In the Matter of the Accusation Against:
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13 **13623 Hidden Forest Cir.**
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14 **Acupuncture License No. AC 16370**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

15 Respondent.
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17 In the interest of a prompt and speedy settlement of this matter, consistent with the public
18 interest and the responsibility of the Acupuncture Board of the Department of Consumer Affairs,
19 the parties hereby agree to the following Stipulated Surrender and Disciplinary Order which will
20 be submitted to the Board for approval and adoption as the final disposition of the Accusation.

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 Rob Bonta, Attorney General of the State of California, by Kimiko Akiya, Deputy Attorney
25 General.

26 2. Zhong Liang Tang, L.Ac. (Respondent) is representing himself in this proceeding and
27 has chosen not to exercise his right to be represented by counsel.
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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 understands that by signing this stipulation he enables the Board to issue
5 an order accepting the surrender of his Acupuncture License without further process.

6 **RESERVATION**

7 11. The admissions made by Respondent herein are only for the purposes of this
8 proceeding, or any other proceedings in which the Acupuncture Board or other professional
9 licensing agency is involved, and shall not be admissible in any other criminal or civil
10 proceeding.

11 **CIRCUMSTANCES IN MITIGATION**

12 12. Respondent represents that he relied in good faith upon a third party's representations
13 and that Respondent did not knowingly submit a fraudulent application for licensure.

14 13. Respondent represents he did not knowingly refuse to participate in the Board's
15 investigation.

16 **CONTINGENCY**

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

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

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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: February 27, 2023

Respectfully submitted,
ROB BONTA
Attorney General of California
MARY CAIN-SIMON
Supervising Deputy Attorney General

/s/ Kimiko L. Akiya
KIMIKO AKIYA
Deputy Attorney General
Attorneys for Complainant

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Stipulated Surrender of License and Order - Tang (1).docx

Exhibit A

Accusation No. 1A-2019-82