EDMUND G. BROWN JR.
Attorney General of California
THOMAS S. LAZAR
Supervising Deputy Attorney General
BETH FABER JACOBS
Deputy Attorney General
State Bar No. 89145
110 West "A" Street, Suite 1100
San Diego, CA 92101
P.O. Box 85266
San Diego, CA 92186-5266
Telephone: (619) 645-2069
Fax: (619) 645-2061
Attorneys for Appearing Agency, Acupuncture Board of California

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
HARBOR JUSTICE CENTER
NOV 16 2010
ALAN CARLSON, Clerk of the Court
BY R. HUME, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE, HARBOR JUSTICE CENTER

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, v. WILLIAM JAMES GOIT, Defendant. ACUPUNCTURE BOARD OF CALIFORNIA, DEPARTMENT OF CONSUMER AFFAIRS, STATE OF CALIFORNIA, Appearing Agency.	Case No. 10 SM 01604 ~~OCSO 10-072164~~ **STIPULATION FOR RESTRICTION OF ACUPUNCTURE LICENSE AS CONDITION OF RELEASE; ORDER** [Penal Code, § 23]

Defendant, William James Goit, and Janelle Wedge, the Executive Officer of the Acupuncture Board of California ("Acupuncture Board"), by and through their respective counsel, hereby stipulate to the following:

1. Defendant William James Goit, L.Ac., is a licensed acupuncturist in the State of California. He is represented in this proceeding by Ron Chrislip, Esq.

///

2. The Acupuncture Board is the state agency charged with protecting the public through the licensing and discipline of acupuncturists in the State of California. The Acupuncture Board is represented by Edmund G. Brown Jr., Attorney General of the State of California, by Beth Faber Jacobs, Deputy Attorney General.

3. On April 27, 2010, a Complaint was filed in *People v. William James Goit,* Orange County Superior Court, Harbor Justice Center, Case No. OCSO 10-072164, charging defendant with one count of misdemeanor sexual battery [a violation of Penal Code section 243.4, subdivision (e)(1)], on a patient identified as Jane Doe.

4. Penal Code section 23 authorizes a state agency to voluntarily appear in a criminal proceeding and make a recommendation to the Court to promote the interests of justice and protect the interests of the public if the crime charged is substantially related to the qualifications, functions, or duties of the licensee.

5. Defendant Goit maintains a solo acupuncture practice entitled "La Paz Acupuncture and Herbs," located at 25260 La Paz Road, No. F, Laguna Hills, California.

6. The purpose of this Stipulation is to restrict defendant Goit's acupuncture license as a condition of his continued release until the conclusion of the above-entitled criminal proceedings against defendant Goit, and to do so without a formal hearing under Penal Code section 23.

7. Therefore, the parties request the Court order the following conditions of continued release, which are also memorialized in the attached Order for the Court's signature, be added for Defendant Goit pending the conclusion of this criminal case, :

The Acupuncture License of Defendant William James Goit, Acupuncture License No. AC 2716, issued by the California Acupuncture Board, shall be restricted as follows:

A. Defendant Goit shall not consult with, examine, or provide treatment to any female patient, as authorized under his acupuncture license, unless all of the following occurs:

1. Defendant has a third party chaperone present during any consultation, examination, or treatment;

2. The chaperone has been approved by the Board, has read the criminal complaint on file in this matter, and has been advised by the Board of the role of chaperone prior to serving as chaperone under this Order;

3. The chaperone initials and dates each patient medical record at the time the chaperone's services are provided;

4. Defendant Goit maintains a separate log of all patients seen for whom a third party chaperone is required. The log shall contain the patient name, address and telephone number and the date and nature of the treatment or service provided. Defendant Goit shall make this log available for immediate inspection and copying on the premises by the Acupuncture Board or its designee; and

5. The consultation, examination, or treatment takes place at Defendant Goit's current place of business, the La Paz Acupuncture and Herbs ~~Massage~~, 25260 La Paz Road, No. F, Laguna Hills, California.

8. Defendant Goit shall post this Stipulation and attached Order in a conspicuous location accessible to the public at his current place of business, the La Paz Acupuncture and Herbs ~~Massage~~, 25260 La Paz Road, No. F, Laguna Hills, California.

9. As public documents reflecting a restriction on Defendant Goit's acupuncture licensee, this Stipulation and the attached Order of the Court restricting Defendant Goit's acupuncture license shall be posted on the Acupuncture Board's website.

10. This Order shall remain in effect as a condition of continued release, or, if bail is ordered, as a condition of bail, until the completion of the criminal proceedings.

11. This Stipulation will be void and unenforceable if the Superior Court does not adopt the Stipulation or sign the attached Order.

Dated: 11-16-10

William James Goit L.Ac.

WILLIAM JAMES GOIT, L.AC.
Defendant

Dated: 11/16/10

RON CHRISLIP, ESQ.
Attorney for Defendant

Dated: November 10, 2010

EDMUND G. BROWN JR.
Attorney General of California
THOMAS S. LAZAR
Supervising Deputy Attorney General

BETH FABER JACOBS
Deputy Attorney General
Attorneys for Appearing Agency
Acupuncture Board

ORDER

GOOD CAUSE APPEARING, the Stipulation is adopted as the Court's Order.

DATED: NOV 16 2010

CRAIG E. ROBISON
JUDGE OF THE SUPERIOR COURT

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
HARBOR JUSTICE CENTER
NOV 16 2010
ALAN CARLSON, Clerk of the Court
BY R. HUME, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE, HARBOR JUSTICE CENTER

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, v. WILLIAM JAMES GOIT, Defendant. ACUPUNCTURE BOARD OF CALIFORNIA, DEPARTMENT OF CONSUMER AFFAIRS, STATE OF CALIFORNIA, Appearing Agency.	Case No. 10SM 01604 ~~OCSO 10-072164~~ **ORDER RESTRICTING DEFENDANT GOIT'S ACUPUNCTURE LICENSE AS A CONDITION OF CONTINUED RELEASE** [Penal Code, § 23]

GOOD CAUSE APPEARING, and pursuant to Penal Code section 23, and Stipulation of the parties, the Court hereby ORDERS the following additional conditions of continued release for Defendant Goit pending the conclusion of the above-entitled criminal case:

The Acupuncture License of Defendant William James Goit, Acupuncture License No. AC 2716, issued by the California Acupuncture Board, shall be restricted as follows:

A. Defendant Goit shall not consult with, examine, or provide treatment to any female patient, as authorized under his acupuncture license, unless all of the following occurs:

1. Defendant has a third party chaperone present during any consultation, examination, or treatment;

2. The chaperone has been approved by the Board, has read the criminal complaint on file in this matter, and has been advised by the Board of the role of chaperone prior to serving as chaperone under this Order;

3. The chaperone initials and dates each patient medical record at the time the chaperone's services are provided;

4. Defendant Goit maintains a separate log of all patients seen for whom a third party chaperone is required. The log shall contain the patient name, address and telephone number and the date and nature of the treatment or service provided. Defendant Goit shall make this log available for immediate inspection and copying on the premises by the Acupuncture Board or its designee; and

5. The consultation, examination, or treatment takes place at Defendant Goit's current place of business, the La Paz Acupuncture and Herbs, 25260 La Paz Road, No. F, Laguna Hills, California.

CRAIG E. ROBISON

DATED: NOV 16 2010

JUDGE OF THE SUPERIOR COURT

DECLARATION OF PERSONAL SERVICE

Case Name: **People v. William James Goit**

No.: Orange County Superior Court, Case No. 10SM01604

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is: 110 West A Street, Suite 1100, P.O. Box 85266, San Diego, CA 92186-5266.

On November 16, 2010, I served the attached **Stipulation For Restriction of Acupuncture License as Condition of Release; Order,** and **Order Restricting Defendant Goit's Acupuncture License as a Condition of Continued Release** by personally delivering a true copy of each to the following person at the address as follows:

William James Goit, L.Ac.
La Paz Acupuncture and Herbs
25260 La Paz Road, No. F
Laguna Hills, California

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on November 17, 2010, at San Diego, California.

Beth Faber Jacobs
Declarant

Beth Faber Jacobs
Signature

SD2010800734
70387882.doc