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KAMALA D. HARRIS
Attorney General of California
JOSE R. GUERRERO
State Bar No. 97276
Supervising Deputy Attorney General
CATHERINE E. SANTILLAN
Senior Legal Analyst
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 703-5579
Facsimile: (415) 703-5480
Attorneys for Complainant

FILED

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ACUPUNCTURE BOARD

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

In the Matter of the Accusation Against:
KEIBUN SON
P.O. Box 700767
San Jose, CA 95170
Acupuncture License No. AC 11246
Respondent.

Case No. 1A-2010-140

ACCUSATION

Complainant alleges:

PARTIES

1. Janelle Wedge (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Acupuncture Board, Department of Consumer Affairs.
2. On or about October 2, 2006, the Acupuncture Board issued Acupuncture License Number AC 11246 to Keibun Son (Respondent). The Acupuncture License was in full force and effect at all times relevant to the charges brought herein and will expire on September 30, 2012, unless renewed.

1 JURISDICTION

2 3. This Accusation is brought before the Acupuncture Board (Board), Department of
3 Consumer Affairs, under the authority of the following laws. All section references are to the
4 Business and Professions Code unless otherwise indicated.

5 4. Section 4955 of the Code states:

6 "The board may deny, suspend, or revoke, or impose probationary conditions upon, the
7 license of any acupuncturist if he or she is guilty of unprofessional conduct.

8 "Unprofessional conduct shall include, but not be limited to, the following:

9 "(b) Conviction of a crime substantially related to the qualifications, functions,
10 or duties of an acupuncturist, the record of conviction being conclusive evidence
11 thereof."

12 COST RECOVERY

13 5. Section 4959 of the Code states:

14 "(a) The board may request the administrative law judge, under his or her
15 proposed decision in resolution of a disciplinary proceeding before the board, to
16 direct any licensee found guilty of unprofessional conduct to pay to the board a sum
17 not to exceed actual and reasonable costs of the investigation and prosecution of the
18 case.

19 "(b) The costs to be assessed shall be fixed by the administrative law judge and
20 shall not in any event be increased by the board. When the board does not adopt a
21 proposed decision and remands the case to an administrative law judge, the
22 administrative law judge shall not increase the amount of any costs assessed in the
23 proposed decision.

24 "(c) When the payment directed in the board's order for payment of costs is not
25 made by the licensee, the board may enforce the order for payment in the superior
26 court in the county where the administrative hearing was held. This right of
27 enforcement shall be in addition to any other rights the board may have as to any
28 licensee directed to pay costs.

