

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

In the Matter of the Accusation Against:

Lucas Hedrick
7940 44th Place South
Seattle, WA 98118

Acupuncture License No. AC 11399

Respondent

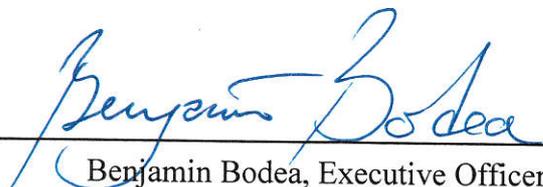
Case No. 1A-2017-144

DECISION AND ORDER

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

This Decision shall become effective on June 10, 2019.

IT IS SO ORDERED May 31, 2019.



Benjamin Bodea, Executive Officer
Acupuncture Board
Department of Consumer Affairs
State of California

1 XAVIER BECERRA
Attorney General of California
2 STEVEN D. MUNI
Supervising Deputy Attorney General
3 JOHN S. GATSCHET
Deputy Attorney General
4 State Bar No. 244388
California Department of Justice
5 1300 I Street, Suite 125
P.O. Box 944255
6 Sacramento, CA 94244-2550
Telephone: (916) 210-7546
7 Facsimile: (916) 327-2247

8 *Attorneys for Complainant*

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

14 In the Matter of the Accusation Against:

Case No. 1A-2017-144

15 LUCAS HEDRICK
7940 44th Place South
16 Seattle, WA 98118

OAH No. 2019021094

17 Acupuncturist License No. AC 11399

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

18 Respondent.

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

22 **PARTIES**

23 1. Benjamin Bodea ("Complainant") is the Executive Officer of the Acupuncture Board
24 ("Board"). He brought this action solely in his official capacity and is represented in this matter
25 by Xavier Becerra, Attorney General of the State of California, by John S. Gatschet, Deputy
26 Attorney General.

27 2. Lucas Hedrick ("Respondent") is representing himself in this proceeding and has
28 chosen not to exercise his right to be represented by counsel.

1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's
2 license history with the Board.

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

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

7 4. If Respondent ever files an application for licensure or a petition for reinstatement in
8 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
9 comply with all the laws, regulations and procedures for reinstatement of a revoked or
10 surrendered license in effect at the time the petition is filed, and all of the charges and allegations
11 contained in Accusation No. 1A-2017-144 shall be deemed to be true, correct and admitted by
12 Respondent when the Board determines whether to grant or deny the petition.

13 5. Respondent shall pay the agency its costs of investigation and enforcement in the
14 amount of \$2,152.00 prior to issuance of a new or reinstated license.

15 6. If Respondent should ever apply or reapply for a new license or certification, or
16 petition for reinstatement of a license, by any other health care licensing agency in the State of
17 California, all of the charges and allegations contained in Accusation, No. 1A-2017-144 shall be
18 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
19 Issues or any other proceeding seeking to deny or restrict licensure.

20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

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:

5/10/2019



LUCAS HEDRICK
Respondent

ENDORSEMENT

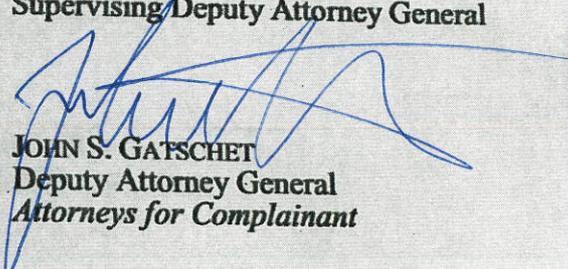
The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Acupuncture Board of the Department of Consumer Affairs.

Dated:

5/10/2019

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
STEVEN D. MUNI
Supervising Deputy Attorney General



JOHN S. GATSCHET
Deputy Attorney General
Attorneys for Complainant

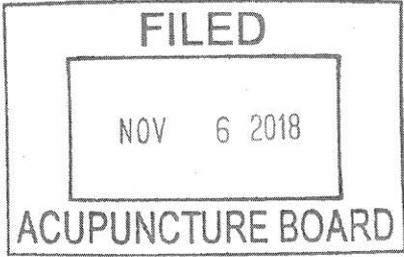
SA2018302730
13633522.docx

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit A

Accusation No. 1A-2017-144

1 XAVIER BECERRA
Attorney General of California
2 MATTHEW M. DAVIS
Supervising Deputy Attorney General
3 JOHN S. GATSCHET
Deputy Attorney General
4 State Bar No. 244388
California Department of Justice
5 1300 I Street, Suite 125
P.O. Box 944255
6 Sacramento, CA 94244-2550
Telephone: (916) 210-7546
7 Facsimile: (916) 327-2247



8 *Attorneys for Complainant*

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

14 In the Matter of the Accusation Against:
15 **LUCAS HEDRICK**
16 3904 42nd Avenue S.
17 Seattle, WA 98118
18 Acupuncturist License No. AC 11399
19 Respondent.

Case No. 1A-2017-144

20 **ACCUSATION**

21 Complainant alleges:

22 **PARTIES**

- 23 1. Benjamin Bodea ("Complainant") brings this Accusation solely in his official
24 capacity as the Executive Officer of the Acupuncture Board, Department of Consumer Affairs
25 ("Board").
- 26 2. On or about October 18, 2006, the Acupuncture Board issued Acupuncturist License
27 Number AC 11399 to Lucas Hedrick ("Respondent"). That license expired on August 31, 2016,
28 has not been renewed and it is currently in delinquent status and therefore not valid.

1
2 JURISDICTION

3 3. This Accusation is brought before the Board under the authority of the following
4 laws. All section references are to the Business and Professions Code (“Code”) unless otherwise
5 indicated.

6 4. Section 4955 of the Code states, in pertinent part:

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

9 “Unprofessional conduct shall include, but not be limited to, the following:

10 “...

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

13 “...

14 “(d) Aiding or abetting in, or violating or conspiring in, directly or indirectly, the
15 violation of the terms of this chapter or any regulation adopted by the board pursuant to this
16 chapter.

17 “...”

18 5. Section 4955.1 of the Code states, in pertinent part:

19 “The board may deny, suspend, revoke, or impose probationary conditions upon the license
20 of any acupuncturist if he or she is guilty of committing a fraudulent act including, but not be
21 limited to, any of the following:

22 “...

23 “(b) Committing a fraudulent or dishonest act as an acupuncturist.

24 “(c) Committing any act involving dishonesty or corruption with respect to the
25 qualifications, functions, or duties of an acupuncturist.

26 “...”

27 ///

28 ///

1 criminal investigation revealed that Respondent had received \$14,560.25 in welfare benefits that
2 he was not entitled to receive.

3 11. On May 18, 2017, pursuant to a plea agreement, Respondent pled no contest to a
4 single misdemeanor violation of Welfare and Institutions Code section 10980, subdivision (c)(2),
5 which involved the use of false statements, misrepresentations, and other fraudulent devices to
6 obtain and retain aid that he was not entitled to an amount of \$14,560.25. All other counts and
7 charges were dismissed. Respondent was sentenced to three years' informal probation, ordered to
8 perform 150 hours of community service, and enroll in a theft class.

9 **SECOND CAUSE FOR DISCIPLINE**

10 (Commission of a Dishonest and Corrupt Act)

11 12. Respondent is subject to disciplinary action under section 4955.1 of the Code in that
12 he committed multiple dishonest and corrupt acts to obtain money that he was not entitled to
13 receive from a government benefits program. The circumstances are as follows:

14 13. Complainant realleges paragraphs 10 through 11, and those paragraphs are
15 incorporated by reference as if fully set forth herein.

16 **THIRD CAUSE FOR DISCIPLINE**

17 (Failure to Report a Conviction to the Board)

18 14. Respondent is subject to disciplinary action under Title 16, California Code of
19 Regulations section 1399.469.2 in that Respondent failed to report his arrest and conviction to the
20 Board within 30 days of occurrence. The circumstances are as follows:

21 15. Complainant realleges paragraphs 10 through 11, and those paragraphs are
22 incorporated by reference as if fully set forth herein.

23 16. On or about June 11, 2017, the Board received a subsequent arrest notification from
24 the Department of Justice that Respondent had been booked and released on a misdemeanor
25 violation of Welfare and Institutions Code section 10980, subdivision (c)(2). On or about July
26 21, 2017, the Board sent Respondent a letter notifying him that the Board had received the
27 subsequent arrest notification, that the Board requested a written explanation, and reminded the
28 Respondent of his reporting obligations under Title 16 California Code of Regulations section

1 1399.469.2. On or about February 18, 2018, the Board received a subsequent disposition
2 notification from the Department of Justice that Respondent had been convicted of a
3 misdemeanor violation of Welfare and Institutions Code section 10980, subdivision (c)(2) and
4 placed on probation. On or about April 17, 2018, the Board sent Respondent a letter notifying
5 him that the Board had received the subsequent disposition notification, that the Board requested
6 a written explanation, and reminded the Respondent of his reporting obligations under Title 16
7 California Code of Regulations section 1399.469.2. Respondent never responded to the Board's
8 two written requests for information and failed to report both his arrest and conviction to the
9 Board within 30 days as required by law.

10 **PRAYER**

11 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,
12 and that following the hearing, the Acupuncture Board issue a decision:

- 13 1. Revoking or suspending Acupuncturist License Number AC 11399, issued to Lucas
14 Hedrick;
- 15 2. Ordering Lucas Hedrick to pay the Acupuncture Board the reasonable costs of the
16 investigation and enforcement of this case, pursuant to Business and Professions Code section
17 4959; and,
- 18 3. Taking such other and further action as deemed necessary and proper.

19
20
21 DATED: NOV 06 2018


22 BENJAMIN BODEA
23 Executive Officer
24 Acupuncture Board
25 Department of Consumer Affairs
26 State of California
27 Complainant

28 SA2018302730
33619773.docx