

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

In the Matter of the Accusation Against:

GEORGE HUANG CHI KU, L.Ac.

21117 East Valley View Drive  
Walnut, California 91789

Acupuncturist License No. AC 11602,

Respondent.

Case No. 1A-2017-229

OAH No. 2021080828

**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     AUG 25, 2022    .

**IT IS SO ORDERED**     AUG 15, 2022    .

Original Signature on File

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FOR THE ACUPUNCTURE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

1 ROB BONTA  
Attorney General of California  
2 ROBERT MCKIM BELL  
Supervising Deputy Attorney General  
3 WENDY WIDLUS  
Deputy Attorney General  
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*Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:  
13 GEORGE HUANG CHI KU, L.Ac.  
14 21117 East Valley View Drive  
15 Walnut, California 91789  
16 Acupuncturist License No. AC 11602,  
17 Respondent.

Case No. 1A-2017-229  
OAH No. 2021080828  
**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

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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 by  
25 Rob Bonta, Attorney General of the State of California, by Wendy Widlus, Deputy Attorney  
26 General.

27 2. George Huang Chi Ku, L.Ac. (Respondent) is represented in this proceeding by  
28 attorney Peter R. Osinoff of Bonne Bridges Mueller O'Keefe & Nichols, 355 South Grand

1 Avenue, Suite 1750; Los Angeles, California 90071-1562.

2 3. On February 23, 2007, the Board issued Acupuncturist License No. AC 11602 to  
3 George Huang Chi Ku, L.Ac. (Respondent). That license was in full force and effect at all times  
4 relevant to the charges brought in Accusation No. 1A-2017-229 and will expire on May 31, 2022,  
5 unless renewed.

6 **JURISDICTION**

7 4. A First Amended Accusation No. 1A-2017-229 was filed before the Board, and is  
8 currently pending against Respondent. The First Amended Accusation and all other statutorily  
9 required documents were properly served on Respondent on June 29, 2021. Respondent timely  
10 filed his Notice of Defense contesting the First Amended Accusation. A copy of First Amended  
11 Accusation No. 1A-2017-229 is attached as Exhibit A and is incorporated by reference.

12 **ADVISEMENT AND WAIVERS**

13 5. Respondent has carefully read, fully discussed with counsel, and understands the  
14 charges and allegations in the First Amended Accusation in case No. 1A-2017-229. Respondent  
15 also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
16 Surrender of License and Order.

17 6. Respondent is fully aware of his legal rights in this matter, including the right to a  
18 hearing on the charges and allegations in the First Amended Accusation; the right to confront and  
19 cross-examine the witnesses against him; the right to present evidence and to testify on his own  
20 behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the  
21 production of documents; the right to reconsideration and court review of an adverse decision;  
22 and all other rights accorded by the California Administrative Procedure Act and other applicable  
23 laws.

24 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
25 every right set forth above.

26 **CULPABILITY**

27 8. Respondent understands that the charges and allegations in First Amended  
28 Accusation No. 1A-2017-229, if proven at a hearing, constitute cause for imposing discipline

1 upon his Acupuncturist License.

2 9. For the purpose of resolving the First Amended Accusation without the expense and  
3 uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could  
4 establish a factual basis for the charges in the First Amended Accusation and that those charges  
5 constitute cause for discipline. Respondent hereby gives up his right to contest that cause for  
6 discipline exists based on those charges.

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

9 **CONTINGENCY**

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

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

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

24 **ORDER**

25 **IT IS HEREBY ORDERED THAT** Acupuncturist License No. AC 11602, issued to  
26 Respondent George Huang Chi Ku, L.Ac., is surrendered and accepted by the Board.

27 1. The surrender of Respondent's Acupuncturist License and the acceptance of the  
28 surrendered license by the Board shall constitute the imposition of discipline against Respondent.

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 License 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 First Amended Accusation No. 1A-2017-229 shall be deemed to be true, correct and  
12 admitted by 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 \$55,000.00 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 First Amended Accusation, No. 1A-  
18 2017-229 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any  
19 Statement of Issues or any other proceeding seeking to deny or restrict licensure.

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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 Peter Osinoff. 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: 3/24/2022   
GEORGE HUANG CHI KU, L.Ac.  
*Respondent*

I have read and fully discussed with Respondent George Huang Chi Ku, 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: 3/24/2022   
PETER OSINOFF  
*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: March 25, 2022 Respectfully submitted,  
ROB BONTA  
Attorney General of California  
ROBERT MCKIM BELL  
Supervising Deputy Attorney General  
  
WENDY WIDLUS  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**First Amended Accusation No. 1A-2017-229**