

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

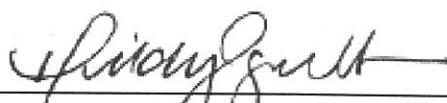
In the Matter of the Accusation Against:)	Case No. 1A-2015-7
)	
YONG BUM BAE, L.AC.)	
338 S. Western Avenue, #201)	
Los Angeles, CA 90020)	
)	
Acupuncture License No. AC 12253)	
)	
Respondent.)	
_____)	

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Acupuncture Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on August 17, 2017.

It is so ORDERED July 18, 2017.



Hildegard Agumaldo, Board President
Acupuncture Board
Department of Consumer Affairs
State of California

1 XAVIER BECERRA
Attorney General of California
2 JUDITH T. ALVARADO
Supervising Deputy Attorney General
3 NICHOLAS B.C. SCHULTZ
Deputy Attorney General
4 State Bar No. 302151
California Department of Justice
5 300 South Spring Street, Suite 1702
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7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

12 YONG BUM BAE, L.A.C.
338 S. Western Avenue, # 201
13 Los Angeles, California 90020

14 Acupuncturist License No. AC12253,
15 Respondent.

Case No. 1A-2015-7

OAH No. 2016120553

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
18 entitled proceedings that the following matters are true:

19 **PARTIES**

20 1. Benjamin Bodea (Complainant) is the Executive Officer of the Acupuncture Board,
21 Department of Consumer Affairs (Board). He brought this action solely in his official capacity
22 and is represented in this matter by Xavier Becerra, Attorney General of the State of California,
23 by Nicholas B.C. Schultz, Deputy Attorney General.

24 2. Yong Bum Bae, L.Ac. (Respondent) is represented in this proceeding by attorney
25 Yohan Lee, Esq., whose address is: 5681 Beach Boulevard, Second Floor, Buena Park, California
26 90621.

27 3. On or about March 13, 2008, the Board issued Acupuncturist License No. AC12253
28 to Respondent. The Acupuncturist License was in full force and effect at all times relevant to the

1 charges brought in Accusation No. 1A-2015-7, and will expire on August 31, 2017, unless
2 renewed.

3 **JURISDICTION**

4 4. Accusation No. 1A-2015-7 was filed before the Board and is currently pending
5 against Respondent. The Accusation and all other statutorily required documents were properly
6 served on Respondent on July 26, 2016. The Accusation and other statutorily required documents
7 were again served on Respondent, as part of a Default Decision and Order, on November 15,
8 2016. Respondent subsequently filed his Notice of Defense contesting the Accusation.
9 Additionally, Respondent's motion to vacate the Default Decision and Order was granted on
10 December 2, 2016.

11 5. A copy of Accusation No. 1A-2015-7 is attached as Exhibit A and incorporated
12 herein by reference.

13 **ADVISEMENT AND WAIVERS**

14 6. Respondent has carefully read, fully discussed with counsel, and understands the
15 charges and allegations in Accusation No. 1A-2015-7. Respondent has also carefully read, fully
16 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary
17 Order.

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

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

27 ///

28 ///

1 CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 1A-2015-7.

4 10. Respondent agrees that his Acupuncturist License is subject to discipline and he
5 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order
6 below.

7 RESERVATION

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

12 CONTINGENCY

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

22 13. The parties understand and agree that Portable Document Format (PDF) and facsimile
23 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
24 signatures thereto, shall have the same force and effect as the originals.

25 14. In consideration of the foregoing admissions and stipulations, the parties agree that
26 the Board may, without further notice or formal proceeding, issue and enter the following
27 Disciplinary Order:

28 ///

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Acupuncturist License No. AC12253 issued to
3 Respondent is revoked. However, the revocation is stayed and Respondent is placed on probation
4 for three (3) years on the following terms and conditions.

5 1. **ATTEND CHEMICAL DEPENDENCY SUPPORT AND RECOVERY GROUPS.**

6 Effective thirty (30) days from the date of this Decision, Respondent shall begin attendance at a
7 chemical dependency support group (e.g., Alcoholics Anonymous, Narcotics Anonymous).
8 Documentation of attendance shall be submitted by the Respondent with each quarterly written
9 report. Frequency and duration shall be determined by the Board or its designee.

10 2. **ABSTAIN FROM DRUGS AND ALCOHOL AND SUBMIT TO TESTS AND**

11 **SAMPLES.** Respondent shall abstain completely from the personal use or possession of alcohol,
12 controlled substances as defined in the California Uniform Controlled Substances Act (Division
13 10, commencing with section 11000, Health and Safety Code) and dangerous drugs as defined by
14 Section 4022 of the Business and Professions Code, or any drugs requiring a prescription and
15 their associated paraphernalia except when the drugs are lawfully prescribed by a licensed
16 practitioner as part of a documented medical treatment. Upon request of the Board or its
17 designee, Respondent shall provide documentation from the licensed practitioner that the
18 prescription for the drug was legitimately issued and is a necessary part of the treatment of the
19 Respondent. Failure to timely provide such documentation shall be considered a violation of
20 probation. Any possession or use of alcohol, controlled substances, or their associated
21 paraphernalia not supported by documentation timely provided shall be considered a violation of
22 probation. Respondent shall undergo random, biological fluid testing as determined by the Board
23 or its designee. Respondent shall bear all costs of such testing. The length of time and frequency
24 will be determined by the Board or its designee. Any confirmed positive finding will be
25 considered a violation of probation.

26 3. **OBEY ALL LAWS.** Respondent shall obey all federal, state and local laws and all

27 regulations governing the practice of acupuncture in California. A full and detailed account of
28 any and all violations of law shall be reported by the Respondent to the Board in writing within

1 seventy-two (72) hours of occurrence.

2 4. QUARTERLY REPORTS. Respondent shall submit quarterly declarations under
3 penalty of perjury on forms provided by the Board stating whether there has been compliance
4 with all the conditions of probation.

5 5. SURVEILLANCE PROGRAM. Respondent shall comply with the Board's
6 probation surveillance program and shall, upon reasonable notice, report to the assigned
7 investigative district office. Respondent shall contact the assigned probation surveillance monitor
8 regarding any questions specific to the probation order. Respondent shall not have any
9 unsolicited or unapproved contact with 1) victims or complainants associated with the case;
10 2) Board members or members of its staff; or 3) persons serving the Board as expert examiners.

11 6. INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Respondent shall appear in
12 person for interviews with the Board or its designee upon request at various intervals and with
13 reasonable notice.

14 7. CHANGES OF EMPLOYMENT. Respondent shall notify the Board in writing
15 through the assigned probation surveillance compliance officer of any and all changes of
16 employment, location and address within thirty (30) days of such change.

17 8. TOLLING FOR OUT-OF-STATE PRACTICE OR RESIDENCE. In the event
18 Respondent should leave California to reside or to practice outside the State, Respondent must
19 notify the Board in writing of the dates of departure and return. Periods of residency or practice
20 outside California will not apply to the reduction of this probationary period.

21 9. EMPLOYMENT AND SUPERVISION OF TRAINEES. Respondent shall not
22 employ or supervise or apply to employ or supervise acupuncture trainees during the course of
23 this probation. Respondent shall terminate any such supervisorial relationship in existence on the
24 effective date of this probation.

25 10. COST RECOVERY. Respondent shall pay to the Board its costs of investigation and
26 enforcement in the amount of \$5,595.00. Respondent shall be permitted to pay these costs in a
27 payment plan approved by the Board or its designee, with payments to be completed no later than
28 three (3) months prior to the end of the probation term. Cost recovery will not be tolled.

1 At Respondent's request, if Respondent has not complied with this condition during the
2 probationary term, and if Respondent has presented sufficient documentation of his good faith
3 efforts to comply with this condition, and if no other conditions of probation have been violated,
4 then the Board or its designee, in its discretion, may grant an extension of Respondent's probation
5 period up to two (2) years without further hearing in order to comply with this condition. During
6 the two (2) year extension, all original conditions of probation will apply. The filing of
7 bankruptcy by Respondent shall not relieve Respondent of his responsibility to reimburse the
8 Board for its investigative and prosecution costs.

9 11. VIOLATION OF PROBATION. If Respondent violates probation in any respect, the
10 Board may, after giving Respondent notice and the opportunity to be heard, revoke probation and
11 carry out the disciplinary order that was stated. If an accusation or petition to revoke probation is
12 filed against Respondent during probation, the Board shall have continuing jurisdiction until the
13 matter is final, and the period of probation shall be extended until the matter is final. No petition
14 for modification or termination of probation shall be considered while there is an accusation or
15 petition to revoke probation pending against Respondent.

16 12. COMPLETION OF PROBATION. Upon successful completion of probation,
17 Respondent's license will be fully restored.

18 ACCEPTANCE

19 I have carefully read the Stipulated Settlement and Disciplinary Order and have fully
20 discussed it with my attorney, Yohan Lee, Esq. I understand the stipulation and the effect it will
21 have on my Acupuncturist License. I enter into this Stipulated Settlement and Disciplinary Order
22 voluntarily, knowingly, and intelligently, and I agree to be bound by the Decision and Order of
23 the Acupuncture Board.

24
25 DATED: 5/12/2017

26 Yong Bum Bae
YONG BUM BAE, L.A.C.
Respondent

27 ///

28 ///

1 I have read and fully discussed with Respondent the terms and conditions and other matters
2 contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and
3 content.

4 DATED: 5/12/2017



5 YOHAN LEE, ESQ.
6 *Attorney for Respondent*

7 **ENDORSEMENT**

8 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
9 submitted for consideration by the Acupuncture Board.

10 Dated: May 15, 2017

11 Respectfully submitted,

12 XAVIER BECERRA
13 Attorney General of California
14 JUDITH T. ALVARADO
15 Supervising Deputy Attorney General

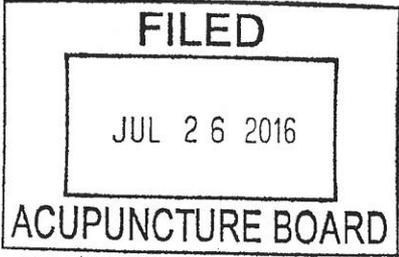

16 NICHOLAS B.C. SCHULTZ
17 Deputy Attorney General
18 *Attorneys for Complainant*

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Exhibit A

Accusation No. 1A-2015-7

1 KAMALA D. HARRIS
Attorney General of California
2 JUDITH T. ALVARADO
Supervising Deputy Attorney General
3 NICHOLAS B.C. SCHULTZ
Deputy Attorney General
4 State Bar No. 302151
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5 300 South Spring Street, Suite 1702
Los Angeles, California 90013
6 Telephone: (213) 897-6564
Facsimile: (213) 897-9395
7 *Attorneys for Complainant*



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

11 In the Matter of the Accusation Against:
12 YONG BUM BAE, L.AC.
239 South La Cienega Boulevard, #101
13 Beverly Hills, California 90211
14 Acupuncturist License No. AC12253,
15 Respondent.

Case No. 1A-2015-7

ACCUSATION

17 Complainant alleges:

18 **PARTIES**

19 1. Benjamin Bodea (Complainant) brings this Accusation solely in his official capacity
20 as the Acting Executive Officer of the Acupuncture Board, Department of Consumer Affairs
21 (Board).

22 2. On or about March 13, 2008, the Acupuncture Board issued Acupuncturist License
23 Number AC12253 to Yong Bum Bae, L.Ac. (Respondent). The Acupuncturist License was in
24 full force and effect at all times relevant to the charges brought herein and will expire on August
25 31, 2017, unless renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board under the authority of the following
28 laws. All section references are to the Business and Professions Code unless otherwise indicated.

1 4. Section 4955 of the Code states:

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

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

5 “(a) Using or possessing any controlled substance as defined in Division 10 (commencing
6 with Section 11000) of the Health and Safety Code, or dangerous drug or alcoholic beverage to an
7 extent or in a manner dangerous to himself or herself, or to any other person, or to the public, and
8 to an extent that the use impairs his or her ability to engage in the practice of acupuncture with
9 safety to the public.

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

12 “... ”

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

15 “... ”

16 5. Section 4955.1 of the Code states:

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

20 “... ”

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

23 “... ”

24 6. Section 4956 of the Code states:

25 “A plea or verdict of guilty or a conviction following a plea of nolo contendere made to a
26 charge which is substantially related to the qualifications, functions, or duties of an acupuncturist
27 is deemed to be a conviction within the meaning of this chapter.

28 ///

1 “The board may order a license suspended or revoked, or may deny a license, or may
2 impose probationary conditions upon a license, when the time for appeal has elapsed, or the
3 judgment of conviction has been affirmed on appeal, or when an order granting probation is made
4 suspending the imposition of sentence irrespective of a subsequent order under the provisions of
5 Section 1203.4 of the Penal Code allowing the person to withdraw his or her pleas of guilty and to
6 enter a plea of not guilty, or setting aside the verdict of guilty, or dismissing the accusation,
7 complaint, information, or indictment.”

8 7. Section 490 of the Code states:

9 “(a) In addition to any other action that a board is permitted to take against a licensee, a
10 board may suspend or revoke a license on the ground that the licensee has been convicted of a
11 crime, if the crime is substantially related to the qualifications, functions, or duties of the business
12 or profession for which the license was issued.

13 “(b) Notwithstanding any other provision of law, a board may exercise any authority to
14 discipline a licensee for conviction of a crime that is independent of the authority granted under
15 subdivision (a) only if the crime is substantially related to the qualifications, functions, or duties
16 of the business or profession for which the licensee’s license was issued.

17 “(c) A conviction within the meaning of this section means a plea or verdict of guilty or a
18 conviction following a plea of nolo contendere. Any action that a board is permitted to take
19 following the establishment of a conviction may be taken when the time for appeal has elapsed, or
20 the judgment of conviction has been affirmed on appeal, or when an order granting probation is
21 made suspending the imposition of sentence, irrespective of a subsequent order under the
22 provisions of Section 1203.4 of the Penal Code.

23 “(d) The Legislature hereby finds and declares that the application of this section has been
24 made unclear by the holding in *Petropoulos v. Department of Real Estate* (2006) 142 Cal.App.4th
25 554, and that the holding in that case has placed a significant number of statutes and regulations
26 in question, resulting in potential harm to the consumers of California from licensees who have
27 been convicted of crimes. Therefore, the Legislature finds and declares that this section
28 establishes an independent basis for a board to impose discipline upon a licensee, and that the

1 amendments to this section made by Senate Bill 797 of the 2007 -08 Regular Session do not
2 constitute a change to, but rather are declaratory of, existing law.”

3 8. Section 493 of the Code states:

4 “Notwithstanding any other provision of law, in a proceeding conducted by a board within
5 the department pursuant to law to deny an application for a license or to suspend or revoke a
6 license or otherwise take disciplinary action against a person who holds a license, upon the
7 ground that the applicant or the licensee has been convicted of a crime substantially related to the
8 qualifications, functions, and duties of the licensee in question, the record of conviction of the
9 crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact,
10 and the board may inquire into the circumstances surrounding the commission of the crime in
11 order to fix the degree of discipline or to determine if the conviction is substantially related to the
12 qualifications, functions, and duties of the licensee in question.

13 “...”

14 9. Section 498 of the Code states:

15 “A board may revoke, suspend, or otherwise restrict a license on the ground that the
16 licensee secured the license by fraud, deceit, or knowing misrepresentation of a material fact or
17 by knowingly omitting to state a material fact.”

18 COST RECOVERY

19 10. Section 4959 of the Code states:

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

24 “(b) The costs to be assessed shall be fixed by the administrative law judge and shall not
25 in any event be increased by the board. When the board does not adopt a proposed decision and
26 remands the case to an administrative law judge, the administrative law judge shall not increase
27 the amount of any costs assessed in the proposed decision.

28 ///

1 H. Not drive a motor vehicle with a measurable amount of alcohol or drugs in his
2 blood;

3 I. Not refuse to take and complete any blood alcohol or drug chemical test, any
4 field sobriety test, and any preliminary alcohol screening when requested by any peace officer;

5 J. Comply with the supplemental terms of probation regarding the installation of
6 an ignition interlock device;

7 K. Obey all laws and orders of the Superior Court; and

8 L. Pay any other fines, fees or costs at the direction of the Superior Court.

9 12. The circumstances leading to Respondent's conviction are as follows:

10 A. At approximately 3:10 a.m. on January 9, 2015, law enforcement officers with
11 the Los Angeles Police Department (LAPD) were dispatched to a traffic collision near the
12 intersection of Wilshire Boulevard and South Westmoreland Avenue in Los Angeles. The LAPD
13 officers arrived at the crash scene and quickly observed the victim-motorist standing outside of
14 his Jeep vehicle, which had significant damage to the right side. The victim-motorist told the
15 LAPD officers that he was driving his Jeep eastbound on Wilshire Boulevard when he stopped at
16 a red light near the intersection of South Westmoreland Avenue. The victim-motorist reported
17 that a black Mercedes vehicle "sideswiped" his Jeep and then drove away eastbound on Wilshire
18 Boulevard without stopping. A witness to the hit-and-run followed the black Mercedes to a
19 parking lot near Wilshire Boulevard and South Rampart Boulevard. The witness contacted and
20 briefly interacted with the driver of the black Mercedes, later identified as Respondent. The
21 witness later reported to the LAPD officers that Respondent appeared to be "drunk."

22 B. The LAPD officers located and contacted Respondent near his black Mercedes
23 at the intersection of Wilshire Boulevard and South Rampart Boulevard. The LAPD officers
24 inspected Respondent's black Mercedes and observed fresh damage to the left side of the vehicle.
25 The LAPD officers concluded that the damage to Respondent's vehicle was consistent with the
26 damage to the victim-motorist's vehicle.

27 C. Respondent told the LAPD officers that he did not recall the traffic crash, but
28 admitted to driving the black Mercedes to the parking lot where he parked his vehicle.

1 Respondent admitted to drinking "one beer" earlier that evening. During the LAPD officers'
2 contact with Respondent, he displayed symptoms of intoxication, including: the strong odor of
3 alcohol emitting from his breath; bloodshot and watery eyes; slurred speech; a flush, red face; and
4 poor coordination. Respondent agreed to take Standardized Field Sobriety Tests, but he was
5 ultimately unable to perform the tests as explained and demonstrated by the LAPD officers.
6 Consequently, the LAPD officers formed the opinion that Respondent was under the influence of
7 an intoxicant and was unable to operate a motor vehicle safely upon a highway.

8 C. Respondent was arrested for driving under the influence of an alcoholic
9 beverage and transported to the Olympic Station where he consented to and provided two breath
10 samples. The first sample revealed that Respondent's breath alcohol concentration was
11 approximately 0.17 percent. The second sample revealed that Respondent's breath alcohol
12 concentration was approximately 0.18 percent.

13 D. Respondent was booked into the Metropolitan Detention Center.

14 13. Respondent's acupuncturist license was previously due to expire on August 31, 2015.
15 On August 15, 2015, Respondent completed a license renewal application and further certified
16 under penalty of perjury to the truthfulness of all statements, answers, and representations in the
17 license renewal application. In response to the question asking whether Respondent had been
18 convicted of any crime in any state since he last renewed his acupuncturist license, Respondent
19 indicated "no" by checking the appropriate box on the form. Respondent's acupuncturist license
20 was subsequently renewed and is now due to expire on August 31, 2017.

21 **FIRST CAUSE FOR DISCIPLINE**

22 **(Unprofessional Conduct –Use of an Alcoholic Beverage in a Dangerous Manner)**

23 14. By reason of the facts set forth in paragraphs 12 and 13 above, Respondent's license
24 is subject to disciplinary action under Section 4955, subdivision (a) of the Code, in that
25 Respondent used alcoholic beverages to the extent, or in such a manner, as to be dangerous and
26 injurious to himself, or to any other person or to the public.

27 15. Respondent's acts and/or omissions as set forth in paragraphs 12 and 13 above,
28 whether proven individually, jointly, or in any combination thereof, constitute Respondent's use

1 of alcoholic beverages to the extent, or in such a manner, as to be dangerous and injurious to
2 himself, or to any other person or to the public pursuant to Section 4955, subdivision (a) of the
3 Code. Therefore, cause for discipline exists.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Unprofessional Conduct - Conviction of a Substantially Related Crime)**

6 16. By reason of the facts set forth in paragraphs 12 and 13 above, Respondent's license
7 is subject to disciplinary action under Section 4955, subdivision (b), Section 4956, and Section
8 490 of the Code, in that Respondent has been convicted of a crime substantially related to the
9 qualifications, functions or duties of an acupuncturist.

10 17. Respondent's acts and/or omissions as set forth in paragraphs 12 and 13 above,
11 whether proven individually, jointly, or in any combination thereof, constitute the conviction of a
12 crime substantially related to the qualifications, functions or duties of an acupuncturist pursuant
13 to Section 4955, subdivision (b), Section 4956, and Section 490 of the Code. Therefore, cause for
14 discipline exists.

15 **THIRD CAUSE FOR DISCIPLINE**

16 **(Unprofessional Conduct - Committing an Act of Dishonesty or Corruption)**

17 18. By reason of the facts set forth in paragraph 14 above, Respondent's license is subject
18 to disciplinary action under Section 4955, subdivision (d), Section 4955.1, subdivision (c), and
19 Section 498 of the Code, in that Respondent committed an act involving dishonesty or corruption
20 with respect to the qualifications, functions or duties of an acupuncturist, and knowingly omitted
21 to state a material fact in securing his renewed acupuncturist license.

22 19. Respondent's acts and/or omissions as set forth in paragraph 14 above, whether
23 proven individually, jointly, or in any combination thereof, constitute the commission of an act
24 involving dishonesty or corruption with respect to the qualifications, functions or duties of an
25 acupuncturist, and knowingly omitting to state a material fact in securing his renewed
26 acupuncturist license pursuant to Section 4955, subdivision (d), Section 4955.1, subdivision (c),
27 and Section 498 of the Code. Therefore, cause for discipline exists.

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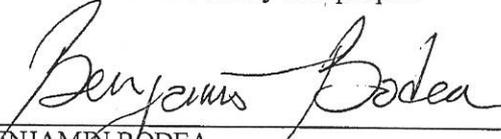
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PRAYER

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

- 1. Revoking or suspending Acupuncturist License Number AC12253, issued to Yong Bum Bae, L.Ac.
- 2. Ordering Yong Bum Bae, L.Ac. to pay the Acupuncture Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 4959;
- 3. Ordering Yong Bum Bae, L.Ac., if placed on probation, to pay the Acupuncture Board the costs of probation monitoring; and
- 4. Taking such other and further action as deemed necessary and proper.

DATED: **JUL 26 2016**



 BENJAMIN BODEA
 Acting Executive Officer
 Acupuncture Board
 Department of Consumer Affairs
 State of California
Complainant

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