

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

In the Matter of the Accusation Against:

**HIROYUKI TERAOKA, L.Ac.  
275 South Beverly Drive, Suite 210  
Beverly Hills, CA 90212**

**Acupuncturist License No. AC 12859,**

Respondent.

Case No. 1A-2019-192

OAH No. 2023060330

**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 July 19, 2024 .

It is so ORDERED June 19, 2024.

Original Signature on File  
\_\_\_\_\_  
FOR THE ACUPUNCTURE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

1 ROB BONTA  
Attorney General of California  
2 JUDITH T. ALVARADO  
Supervising Deputy Attorney General  
3 REBECCA L. SMITH  
Deputy Attorney General  
4 State Bar No. 179733  
300 South Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6475  
6 Facsimile: (916) 731-2117  
*Attorneys for Complainant*  
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8 **BEFORE THE**  
9 **ACUPUNCTURE BOARD**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:  
12 **HIROYUKI TERAOKAWA, L.Ac.**  
13 **275 South Beverly Drive, Suite 210**  
14 **Beverly Hills, CA 90212**  
15 **Acupuncturist License No. AC 12859,**  
16 Respondent.

Case No. 1A-2019-192

OAH No. 2023060330

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

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

20 **PARTIES**

21 1. Benjamin Bodea (Complainant) is the Executive Officer of the Acupuncture Board  
22 (Board). He brought this action solely in his official capacity and is represented in this matter by  
23 Rob Bonta, Attorney General of the State of California, by Rebecca L. Smith, Deputy Attorney  
24 General.

25 2. Hiroyuki Terakawa, L.Ac. (Respondent) is represented in this proceeding by attorney  
26 Carolyn Park, whose address is 137 South Prospect Avenue, Tustin, California 92780.

27 3. On or about February 18, 2009, the Board issued Acupuncturist License No. AC  
28 12859 to Respondent. The Acupuncturist License was in full force and effect at all times relevant

1 to the charges brought in Accusation No. 1A-2019-192 and will expire on July 31, 2024, unless  
2 renewed.

### 3 **JURISDICTION**

4 4. Accusation No. 1A-2019-192 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 April 24, 2023. Respondent timely filed his Notice of Defense  
7 contesting the Accusation. A copy of Accusation No. 1A-2019-192 is attached as Exhibit A and  
8 incorporated by reference.

### 9 **ADVISEMENT AND WAIVERS**

10 5. Respondent has carefully read, fully discussed with counsel, and understands the  
11 charges and allegations in Accusation No. 1A-2019-192. Respondent also has carefully read,  
12 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License  
13 and Order.

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

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

### 22 **CULPABILITY**

23 8. Respondent understands that the charges and allegations in Accusation No. 1A-2019-  
24 192, if proven at a hearing, constitute cause for imposing discipline upon his Acupuncturist  
25 License.

26 9. For the purpose of resolving the Accusation without the expense and uncertainty of  
27 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual  
28 basis for the charges in the Accusation and that those charges constitute cause for discipline.

1 Respondent hereby gives up his right to contest that cause for discipline exists based on those  
2 charges.

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

5 **CONTINGENCY**

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

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

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

20 **ORDER**

21 IT IS HEREBY ORDERED that Acupuncturist License No. AC 12859, issued to  
22 Respondent Hiroyuki Terakawa, L.Ac., is surrendered and accepted by the Board.

23 1. The surrender of Respondent's Acupuncturist License and the acceptance of the  
24 surrendered license by the Board shall constitute the imposition of discipline against Respondent.  
25 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
26 license history with the Board.

27 2. Respondent shall lose all rights and privileges as an acupuncturist in California as of  
28 the effective date of the Board's Decision and Order.

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

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 1A-2019-192 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the Board its costs of investigation and enforcement in the amount of Twenty-Eight Thousand Ninety-Nine Dollars and No Cents (\$28,099.00) prior to submission of an application for a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation, No. 1A-2019-192 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

**ACCEPTANCE**

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney Carolyn Park. 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: 05 / 30 / 2024

HiroYuki Terakawa

HIROYUKI TERAOKA, L.AC.  
*Respondent*

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1 I have read and fully discussed with Respondent HIROYUKI TERAOKAWA, L.Ac. the  
2 terms and conditions and other matters contained in this Stipulated Surrender of License and  
3 Order. I approve its form and content.

4 DATED: 05/30/2024

*Carolyn Park*  
CAROLYN PARK  
Attorney for Respondent


6  
7 **ENDORSEMENT**

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

10 DATED: May 31, 2024

Respectfully submitted,

11 ROB BONTA  
12 Attorney General of California  
13 JUDITH T. ALVARADO  
14 Supervising Deputy Attorney General

  
15 REBECCA L. SMITH  
16 Deputy Attorney General  
17 Attorneys for Complainant

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