

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

In the Matter of the Accusation Against:

**PILL HAN, L.AC. 5425  
5425 Stanton Avenue #C  
Buena Park, CA 90621  
Acupuncturist License No. AC 14493**

Respondent.

Case No. 1A-2012-45

OAH No. 2015031089

**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 December 18, 2015.

It is so ORDERED November 18, 2015.

  
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FOR THE ACUPUNCTURE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

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

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13 **PILL HAN, L.Ac.**  
14 **5425 Stanton Avenue #C**  
**Buena Park, CA 90621**  
15 **Acupuncturist License No. AC 14493**

16 Respondent.

Case No. 1A-2012-45

OAH No. 2015031089

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

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

21 **PARTIES**

22 1. Terri Thorfinnson (Complainant) is the Executive Officer of the Acupuncture Board  
23 (Board.) She brought this action solely in her official capacity and is represented in this matter by  
24 Kamala D. Harris, Attorney General of the State of California, by Wendy Widlus, Deputy  
25 Attorney General.

26 2. Pill Han, L.Ac. (Respondent) is representing himself in this proceeding and has  
27 chosen not to exercise her right to be represented by counsel.

28 3. On or about September 29, 2011, the Acupuncture Board issued Acupuncturist

1 License No. AC 14493 to Pill Han, L.Ac. (Respondent). The Acupuncturist License was in full  
2 force and effect at all times relevant to the charges brought in Accusation No. 1A-2012-45 and  
3 will expire on April 30, 2017, unless renewed.

#### 4 **JURISDICTION**

5 4. Accusation No. 1A-2012-45 was filed before the Board and is currently pending  
6 against Respondent. The Accusation and all other statutorily required documents were properly  
7 served on Respondent on February 24, 2015. Respondent timely filed her Notice of Defense  
8 contesting the Accusation. A copy of Accusation No. 1A-2012-45 is attached as Exhibit A and  
9 incorporated by reference.

#### 10 **ADVISEMENT AND WAIVERS**

11 5. Respondent has carefully read, and understands the charges and allegations in  
12 Accusation No. 1A-2012-45. Respondent also has carefully read, and understands the effects of  
13 this Stipulated Surrender of License and Order.

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

21 7. Respondent hereby voluntarily, knowingly, and intelligently waives and gives up her  
22 right to contest that cause for discipline exists based on those charges.

#### 23 **CULPABILITY**

24 8. Respondent understands that the charges and allegations in Accusation No. 1A-2012-  
25 45, if proven at a hearing, constitute cause for imposing discipline on her Acupuncturist License  
26 No. AC 14493.

27 9. For the purposes of resolving the Accusation without the expense and uncertainty of  
28 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual

1 basis for the charges in the Accusation and that those charges constitute cause for discipline.

2 10. Respondent agrees that cause exists for discipline for each and every charge and  
3 allegation in Accusation No. 1A-2012-45, that her Acupuncturist License is subject to discipline,  
4 and she hereby surrenders her Acupuncturist License No. AC 14493 for the Board's formal  
5 acceptance.

6 11. Respondent understands that by signing this stipulation she enables the Board to issue  
7 an Order accepting the surrender of her Acupuncturist License without further process.

### 8 **CONTINGENCY**

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

### 18 **OTHER AGREEMENTS**

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

22 14. The parties hereby agree that each party will bear their own costs incurred in this  
23 proceeding.

24 15. Respondent may apply for reinstatement of her Acupuncturist License No. AC 14493  
25 after two years have elapsed from the date of adoption of this stipulation by the Board.

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

28 // -

1 **ORDER**

2 **IT IS HEREBY ORDERED** that Acupuncturist License No. AC 14493, issued to  
3 Respondent Pill Han, L.Ac., is surrendered and accepted by the Acupuncture Board.

4 1. The surrender of Respondent's Acupuncturist License and the acceptance of the  
5 surrendered license by the Board shall constitute the imposition of discipline against Respondent.  
6 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
7 license history with the Acupuncture Board.

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

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

12 4. If Respondent ever files an application for licensure or a petition for reinstatement in  
13 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
14 comply with all the laws, regulations and procedures for reinstatement of a revoked license in  
15 effect at the time the petition is filed, and all of the charges and allegations contained in  
16 Accusation No. 1A-2012-45 shall be deemed to be true, correct and admitted by Respondent  
17 when the Board determines whether to grant or deny the petition.

18 5. If Respondent should ever apply or reapply for a new license or certification, or  
19 petition for reinstatement of a license, by any other health care licensing agency in the State of  
20 California, all of the charges and allegations contained in Accusation, No. 1A-2012-45 shall be  
21 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
22 Issues or any other proceeding seeking to deny or restrict licensure.

23 **ACCEPTANCE**

24 I have carefully read the Stipulated Surrender of License and Order. I understand the  
25 stipulation and the effect it will have on my Acupuncturist License. I enter into this Stipulated  
26 Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound  
27 by the Decision and Order of the Acupuncture Board.

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DATED:

PILL HAN, L.AC.  
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:

Respectfully submitted,  
KAMALA D. HARRIS  
Attorney General of California  
E. A. JONES III  
Supervising Deputy Attorney General

WENDY WIDLUS  
Deputy Attorney General  
*Attorneys for Complainant*

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DATED:

09/30/2015

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PILL HAN, L.A.C.  
Respondent

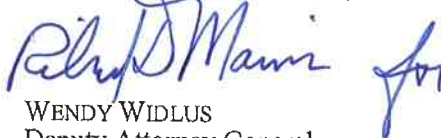
ENDORSEMENT

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:

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
E. A. JONES III  
Supervising Deputy Attorney General



WENDY WIDLUS  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 1A-2012-45**