

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

In the Matter of the Accusation Against:

**CHUN LING WANG, LAC
2862 Cherry Way
Pomona, CA 91767**

Acupuncturist No. AC 15246

Respondent.

Case No. 1A-2019-200

OAH No. 2026030928

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 9/26/2026.

It is so ORDERED 8/27/2026.

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

1 ROB BONTA
Attorney General of California
2 TESSA L. HEUNIS
Supervising Deputy Attorney General
3 MONICA L. DOBSON
Deputy Attorney General
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5 Los Angeles, CA 90013
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7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **CHUN LING WANG, LAC**
14 **2862 Cherry Way**
Pomona, CA 91767

15 **Acupuncturist License No. AC 15246,**

16 Respondent.

Case No. 1A-2019-200

OAH No. 2026030928

**STIPULATED SURRENDER OF
LICENSE AND DISCIPLINARY ORDER**

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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 Monica L. Dobson, Deputy Attorney
24 General.

25 2. Chun Ling Wang, LAc (Respondent) is represented in this proceeding by Adam B.
26 Brown, Esq., whose address is: 3848 W. Carson Street, Suite 206, Torrance, CA 90503.

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4. February 3, 2026, Accusation No. 1A-2019-200 was filed before the Board and is currently pending against Respondent. A true and correct copy of the Accusation and all other statutorily required documents were properly served on Respondent on February 3, 2026. Respondent timely filed her Notice of Defense contesting the Accusation. A true and correct copy of Accusation No. 1A-2019-200 is attached as Exhibit A and incorporated by reference.

5. Respondent has carefully read, fully discussed with counsel, and fully understands the charges and allegations in Accusation No. 1A-2019-200. Respondent also has carefully read, fully discussed with counsel, and fully understands the effects of this Stipulated Surrender of License and Order.

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

7. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 1A-2019-200, agrees that cause exists for discipline and hereby surrenders her Acupuncturist License No. AC 15246 for the Board's formal acceptance.

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9. Respondent fully understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Acupuncturist License without further process.

10. 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-2019-200 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

CONTINGENCY

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

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

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

ORDER

IT IS HEREBY ORDERED that Acupuncturist License No. AC 15246, issued to Respondent Chun Ling Wang, LAc, is surrendered and accepted by the Board.

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

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

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

3. Respondent shall cause to be delivered to the Board her wall certificate and, if one was issued, her pocket license 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-2019-200 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 agency its costs of investigation and enforcement in the amount of \$13,316.50 prior to the submission of the petition and/or 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-2019-200 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, Adam B. Brown, Esq. I fully understand the stipulation and the effect it will have on my Acupuncturist License No. AC 15246. Having the benefit of counsel, 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: July 30, 2026

Signed by:
Chun L. Wang
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CHUN LING WANG, LAC
Respondent

I have read and fully discussed with Respondent Chun Ling Wang, LAc the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: July 31, 2026

DocuSigned by:
Adam Brown
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ADAM B. BROWN
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: 07.31.2026

Respectfully submitted,
ROB BONTA
Attorney General of California
TESSA L. HEUNIS
Supervising Deputy Attorney General

M. Dobson
MONICA L. DOBSON
Deputy Attorney General
Attorneys for Complainant

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