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ACUPUNCTURE BOARD

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7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against: Case No. 1A-2019-209  
13 **WOOD WEI, L.AC. (aka FEI JI)** ACCUSATION  
14 **120 Terrapin**  
**Irvine, CA 92618**  
15  
16 **Licensed Acupuncturist No. AC 15683**  
17 Respondent.

18 **PARTIES**

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

21 2. On or about September 19, 2013, the Board issued Licensed Acupuncturist No. AC  
22 15683 to WOOD WEI, L.Ac. (aka FEI JI) (Respondent). The Licensed Acupuncturist was in full  
23 force and effect at all times relevant to the charges brought herein and will expire on December  
24 31, 2026, unless renewed.

25 **JURISDICTION**

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

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4. Section 498 of the Code states:

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

5. Section 582 of the Code states, in pertinent part:

No person, company, or association shall use or attempt to use any diploma, certificate, transcript, or any other writing which has been purchased, fraudulently issued, illegally obtained, counterfeited, or materially altered, either as a certificate or as to character or color of certificate, to practice as a physician and surgeon, podiatrist, osteopathic physician, or a chiropractor, or to practice any other system or mode of treating the sick or afflicted, as provided in the Medical Practice Act, ... or to practice as any other licentiate under this division.

6. Section 583 of the Code states, in pertinent part:

No person shall in any document or writing required of an applicant for examination, license, certificate, or registration under this division, ... willfully make a false statement in a material regard.

7. Section 4955 of the Code states, in pertinent part:

The board may deny, suspend, or revoke, or impose probationary conditions upon, the license of any acupuncturist who is guilty of unprofessional conduct.

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

...

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

...

(i) Any action or conduct that would have warranted the denial of the acupuncture license.

...

8. Section 4955.1 of the Code states, in pertinent part:

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

(a) Securing a license by fraud or deceit.

...

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

...

1 **COST RECOVERY**

2 9. Section 4959 of the Code states, in pertinent part:

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

6 ...

7 **FACTUAL ALLEGATIONS**

8 10. On April 12, 2013,<sup>1</sup> the Board received an application from Respondent for the  
9 California Acupuncture Licensing Examination (CALE), the necessary precursor to granting an  
10 acupuncture license to an applicant who has graduated from a foreign educational institution. The  
11 application, signed by Respondent on March 29, 2013, attested under penalty of perjury to the  
12 facts asserted in the application.

13 11. The application included Respondent's claim that he attended and graduated from  
14 Guangxi University of Traditional Chinese Medicine (Guangxi) from September 1988 to July  
15 1993.

16 12. The application also included an Evaluation Report from the Foundation of  
17 International Services, Inc. (FIS) confirming Respondent completed his coursework in China at a  
18 recognized university that is considered equivalent to a regionally accredited institution in the  
19 United States.

20 13. Respondent took the August 13, 2013, CALE and achieved a passing score.

21 14. On September 18, 2013, the Board received an application for licensure from  
22 Respondent. The application, signed by Respondent on September 12, 2013, attested under  
23 penalty of perjury to the facts asserted in the application.

24 15. On September 19, 2013, the Board issued Respondent's license.

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28 <sup>1</sup> All dates listed herein are approximations or "on or about" the date.



1 particularly alleged in paragraphs 10 through 19, above, which are hereby incorporated by  
2 reference and realleged as if fully set forth herein.

3 **FOURTH CAUSE FOR DISCIPLINE**

4 **(False Statements in Application)**

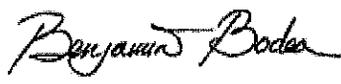
5 21. Respondent is further subject to disciplinary action under Code section 583, in that  
6 Respondent willfully made false representations in his application for licensure submitted to the  
7 Board, as more particularly alleged in paragraphs 10 through 20, above, which are hereby  
8 incorporated by reference and realleged as if fully set forth herein.

9 **PRAYER**

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

- 12 1. Revoking or suspending Licensed Acupuncturist No. AC 15683, issued to  
13 Respondent WOOD WEI, L.Ac. (aka FEI JI);
- 14 2. Ordering Respondent Wood Wei, L.Ac., to pay the Acupuncture Board the  
15 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
16 Professions Code section 4959 and if placed on probation, the costs of probation monitoring;
- 17 and,
- 18 3. Taking such other and further action as deemed necessary and proper.

19  
20 DATED: 3/9/2026

  
\_\_\_\_\_  
BENJAMIN BODEA  
Executive Officer  
Acupuncture Board  
Department of Consumer Affairs  
State of California  
*Complainant*

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