BEFORE THE ACUPUNCTURE BOARD DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

In the Matter of the Accusation Against

SU CHEN LEE, L.Ac. 1817 A Clark Lane, Unit A Redondo Beach, CA 90278

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Case No. 1A-2016-290

Acupuncturist License No. AC 16228

Respondent.

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 October 14, 2022.

It is so ORDERED October 04, 2022

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

1 * 2 3 4 5 6 7	ROB BONTA Attorney General of California ROBERT MCKIM BELL Supervising Deputy Attorney General WENDY WIDLUS Deputy Attorney General State Bar No. 82958 California Department of Justice 300 So. Spring Street, Suite 1702 Los Angeles, CA 90013 Telephone: (213) 269-6457 Facsimile: (916) 731-2117 E-mail: Wendy.Widlus@doj.ca.gov Attorneys for Complainant		
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9	BEFORE THE ACUPUNCTURE BOARD		
10	DEPARTMENT OF CONSUMER AFFAIRS		
11	STATE OF CA	ALIFORNIA	
12	In the Matter of the Accusation Against	Case No. 1A-2016-290	
13	SU CHEN LEE, L.Ac.		
14 15	1817 A Clark Lane, Unit A Redondo Beach, CA 90278	STIPULATED SURRENDER OF LICENSE AND ORDER	
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17	Acupuncturist License No. AC 16228,		
18	Respondent.		
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. Benjamin Bodea (Complainant) is the Executive Officer of the Acupuncture Board		
23	(Board). He brought this action solely in his official capacity and is represented in this matter by		
24	Rob Bonta, Attorney General of the State of California, by Wendy Widlus, Deputy Attorney		
25	General.		
-26	2. Su Chen Lee, L.Ac. (Respondent) is representing herself in this proceeding and has		
27	chosen not to exercise her right to be represented by counsel.		
28	3. On or about September 29, 2014, the Board issued Acupuncturist License No. AC		
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	Stipulated Surrender of License (Case No. 1A-2016-290)		

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16228 to Respondent. The Acupuncturist License was in full force and effect at all times relevant 1 to the charges brought in Accusation No. 1A-2016-290 and will expire on March 31, 2024, unless * 2 renewed. 3 JURISDICTION 4 Accusation No. 1A-2016-290 was filed before the Board, and is currently pending 4. 5 against Respondent. The Accusation and all other statutorily required documents were properly 6 served on Respondent on June 1, 2022. Respondent timely filed her Notice of Defense contesting 7 the Accusation. A copy of Accusation No. 1A-2016-290 is attached as Exhibit A and 8 incorporated by reference. 9 ADVISEMENT AND WAIVERS 10 Respondent has carefully read, and understands the charges and allegations in 5. 11 Accusation No. 1A-2016-290. Respondent also has carefully read, and understands the effects of 12 this Stipulated Surrender of License and Order. 13 Respondent is fully aware of her legal rights in this matter, including the right to a 6. 14 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at 15 her own expense; the right to confront and cross-examine the witnesses against her; the right to 16 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to 17 compel the attendance of witnesses and the production of documents; the right to reconsideration 18 and court review of an adverse decision; and all other rights accorded by the California 19 Administrative Procedure Act and other applicable laws. 20 Respondent voluntarily, knowingly, and intelligently waives and gives up each and 7. 21 every right set forth above. 22 **CULPABILITY** 23 8. Respondent admits the truth of each and every charge and allegation in Accusation 24 No. 1A-2016-290, agrees that cause exists for discipline and hereby surrenders her Acupuncturist 25 License No. AC 16228 for the Board's formal acceptance. 26 9. Respondent understands that by signing this stipulation she enables the Board to issue 27 an order accepting the surrender of her Acupuncturist License without further process. 28 2

Stipulated Surrender of License (Case No. 1A-2016-290)

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-2016-290 shall be deemed to be true, correct and admitted by
 Respondent when the Board determines whether to grant or deny the petition.

CONTINGENCY

This stipulation shall be subject to approval by the Board. Respondent understands 11. 8 and agrees that counsel for Complainant and the staff of the Board may communicate directly 9 with the Board regarding this stipulation and surrender, without notice to or participation by 10 Respondent. By signing the stipulation, Respondent understands and agrees that she may not 11 withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers 12 and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the 13 Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this 14 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not 15 be disqualified from further action by having considered this matter. 16

17 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
18 copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures
19 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:

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<u>ORDER</u>

IT IS HEREBY ORDERED that Acupuncturist License No. AC 16228, issued to Respondent Su Chen Lee, L.Ac., is surrendered and accepted by the Board.

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.

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1	2. Respondent shall lose all rights and privileges as an Acupuncturist in California as of	
'2	the effective date of the Board's Decision and Order.	
3	3. Respondent shall cause to be delivered to the Board her wall certificate and, if one	
4	was issued, her pocket license on or before the effective date of the Decision and Order.	
5	4. If Respondent ever files an application for licensure or a petition for reinstatement in	
6	the State of California, the Board shall treat it as a petition for reinstatement. Respondent must	
7	comply with all the laws, regulations and procedures for reinstatement of a revoked or	
8	surrendered license in effect at the time the petition is filed, and all of the charges and allegations	
9	contained in Accusation No. 1A-2016-290 shall be deemed to be true, correct and admitted by	
10	Respondent when the Board determines whether to grant or deny the petition.	
11	5. Respondent shall pay the agency its costs of investigation and enforcement in the	
12	amount of \$\$10,542.25 prior to issuance of a new or reinstated license.	
13	6. If Respondent should ever apply or reapply for a new license or certification, or	
14	petition for reinstatement of a license, by any other health care licensing agency in the State of	
15	California, all of the charges and allegations contained in Accusation, No. 1A-2016-290 shall be	
16	deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of	
17	Issues or any other proceeding seeking to deny or restrict licensure.	
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	Stipulated Surrender of License (Case No. 1A-2016-290)	

1	ACCEPTANCE	
`2	I have carefully read the Stipulated Surrender of License and Order. I understand the	
3	stipulation and the effect it will have on my Acupuncturist License. I enter into this Stipulated	
4	Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound	
5	by the Decision and Order of the Acupuncture Board.	
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7	DATED: <u>SIb 2022</u> <u>S. U. Lee</u> SU CHEN LEE, L.Ac.	
8	Respondent	
9	In Pro Per	
10	ENDORSEMENT	
11	The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted	
12	for consideration by the Acupuncture Board of the Department of Consumer Affairs.	
13	DATED: 8/22/2022 Respectfully submitted,	
14	Rob Bonta	
15	Attorney General of California ROBERT MCKIM BELL	
16	Supervising Deputy Attorney General	
17	Wendy Widlus	
18	WENDY WIDLUS Deputy Attorney General	
19	Attorneys for Complainant	
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11	Stipulated Surrender of License (Case No. 1A-2016-290)	

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Exhibit A

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Accusation No. 1A-2016-290