

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

In the Matter of the Accusation Against:

**DONG QING LU, L.Ac.**  
**6530 Rhone Court**  
**Highland, CA 92346-2669**

**Acupuncturist License No. AC 16367**

Respondent.

Case No. 1A-2019-84

OAH No. 2022050321

**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     **OCT 09 2022**    .

It is so ORDERED     **SEP 29 2022**    .

Original Signature on File

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FOR THE ACUPUNCTURE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

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15 **Acupuncturist License No. AC 16367,**  
16 **Respondent.**

Case No. 1A-2019-84

OAH No. 2022050321

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

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

19 **PARTIES**

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

24 2. Dong Qing Lu, L.Ac. (Respondent) is representing herself in this proceeding and has  
25 chosen not to exercise her right to be represented by counsel.

26 3. On or about November 3, 2014, the Board issued Acupuncturist License No. AC  
27 16367 to Dong Qing Lu, L.Ac. (Respondent). The Acupuncturist License was in full force and  
28 effect at all times relevant to the charges brought in Accusation No. 1A-2019-84 and will expire

1 on December 31, 2023, unless renewed.

2 **JURISDICTION**

3 4. Accusation No. 1A-2019-84 was filed before the Board, and is currently pending  
4 against Respondent. The Accusation and all other statutorily required documents were properly  
5 served on Respondent on April 14, 2022. Respondent timely filed her Notice of Defense  
6 contesting the Accusation. A copy of Accusation No. 1A-2019-84 is attached as Exhibit A and  
7 incorporated by reference.

8 **ADVISEMENT AND WAIVERS**

9 5. Respondent has carefully read, and understands the charges and allegations in  
10 Accusation No. 1A-2019-84. Respondent also has carefully read, and understands the effects of  
11 this Stipulated Surrender of License and Order.

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

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

21 **CULPABILITY**

22 8. Respondent admits the truth of each and every charge and allegation *except paragraph 17,*  
23 No. 1A-2019-84, agrees that cause exists for discipline and hereby surrenders her Acupuncturist  
24 License No. AC 16367 for the Board's formal acceptance.

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

27 **CONTINGENCY**

28 10. This stipulation shall be subject to approval by the Board. Respondent understands

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

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

12 12. This Stipulated Surrender of License and Order is intended by the parties herein to be  
13 an integrated writing representing the complete, final and exclusive embodiment of the agreement  
14 of the parties in this above entitled matter.

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

17 **ORDER**

18 **IT IS HEREBY ORDERED** that Acupuncturist License No. AC 16367, issued to  
19 Respondent Dong Qing Lu, L.Ac., is surrendered and accepted by the Board.

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

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

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

28 4. If Respondent ever files an application for licensure or a petition for reinstatement in

1 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
2 comply with all the laws, regulations and procedures for reinstatement of a revoked or  
3 surrendered license in effect at the time the petition is filed, and all of the charges and allegations  
4 contained in Accusation No. 1A-2019-84 shall be deemed to be true, correct and admitted by  
5 Respondent when the Board determines whether to grant or deny the petition.

6 5. Respondent shall pay the agency its costs of investigation and enforcement in the  
7 amount of \$8,329.50 prior to issuance of a new or reinstated license.

8 6. If Respondent should ever apply or reapply for a new license or certification, or  
9 petition for reinstatement of a license, by any other health care licensing agency in the State of  
10 California, all of the charges and allegations contained in Accusation, No. 1A-2019-84 shall be  
11 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
12 Issues or any other proceeding seeking to deny or restrict licensure.

13 **ACCEPTANCE**

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

18  
19 DATED: 07-10-22

  
20 DONG QING LU, L.Ac.  
21 Respondent

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**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: July 11, 2022

Respectfully submitted,  
ROB BONTA  
Attorney General of California  
ROBERT MCKIM BELL  
Supervising Deputy Attorney General

*Colleen M. McGurrin* for  
WENDY WIDLUS  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 1A-2019-84**