

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

In the Matter of the Petition to Revoke  
Probation Against:

Case No. 1A-2011-97

**SUBHASH RAMCHANDRA  
GHARMALKAR, L.Ac.  
1530 Baker Street, #G  
Costa Mesa, CA 92626-3572**

**Acupuncturist License No. AC 4473**

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 December 11, 2021.

It is so ORDERED December 1, 2021.

Original Signature On File  
\_\_\_\_\_  
FOR THE ACUPUNCTURE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

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10 **ACUPUNCTURE BOARD**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
12 **STATE OF CALIFORNIA**

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14 **SUBHASH RAMCHANDRA**  
15 **GHARMALKAR, L.Ac.**  
16 **1530 Baker Street, #G**  
17 **Costa Mesa, CA 92626-3572**

18 **Acupuncturist License No. AC 4473,**

19 Respondent.

Case No. 1A-2011-97

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

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

22 **PARTIES**

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

27 2. Subhash Ramchandra Gharmalkar, L.Ac. (Respondent) is representing himself in this  
28 proceeding and has chosen not to exercise his right to be represented by counsel.

1           3.    On or about August 6, 1993, the Board issued Acupuncturist License No. AC 4473 to  
2 Respondent. The Acupuncturist License was in full force and effect at all times relevant to the  
3 charges brought in Petition to Revoke Probation No. 1A-2011-97 and will expire on January 31,  
4 2022, unless renewed.

5   **JURISDICTION**

6           4.    Petition to Revoke Probation No. 1A-2011-97 was filed before the Board, and is  
7 currently pending against Respondent. The Petition to Revoke Probation and all other statutorily  
8 required documents were properly served on Respondent on May 13, 2021. Respondent timely  
9 filed his Notice of Defense contesting the Petition to Revoke Probation. A copy of Petition to  
10 Revoke Probation No. 1A-2011-97 is attached as Exhibit A and incorporated by reference.

11   **ADVISEMENT AND WAIVERS**

12           5.    Respondent has carefully read, and understands the charges and allegations in Petition  
13 to Revoke Probation No. 1A-2011-97. Respondent also has carefully read, and understands the  
14 effects of this Stipulated Surrender of License and Order.

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

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

24   **CULPABILITY**

25           8.    Respondent admits the truth of each and every charge and allegation in Petition to  
26 Revoke Probation No. 1A-2011-97, agrees that cause exists for discipline and hereby surrenders  
27 his Acupuncturist License No. AC 4473 for the Board's formal acceptance.

28           9.    Respondent understands that by signing this stipulation he enables the Board to issue

1 an order accepting the surrender of his Acupuncturist License without further process.

2 **CONTINGENCY**

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

12 11. This Stipulated Settlement and Disciplinary Order is intended by the parties herein to  
13 be an integrated writing representing the complete, final, and exclusive embodiment of the  
14 agreements of the parties in the above-entitled matter.

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

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

20 **ORDER**

21 **IT IS HEREBY ORDERED** that Acupuncturist License No. AC 4473, issued to  
22 Respondent Subhash Ramchandra Gharmalkar, L.Ac., is surrendered and accepted by the Board.

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

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

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3. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate 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 Petition to Revoke Probation No. 1A-2011-97 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 \$7,344.00 prior to issuance of 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 Petition to Revoke Probation, No. 1A-2011-97 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 Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Acupuncturist License. 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: 07/9/2021

  
SUBHASH RAMCHANDRA  
GHARMALKAR, L.Ac.  
*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 9, 2021

Respectfully submitted,

ROB BONTA  
Attorney General of California  
E. A. JONES III  
Supervising Deputy Attorney General

*Wendy Widlus*

WENDY WIDLUS  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Petition to Revoke Probation No. 1A-2011-97**