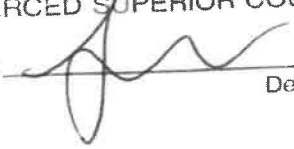




FILED 4/15/25  
MERCED SUPERIOR COURT  
By:  Deputy

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*Attorneys for Physician Assistant Board of California  
Acupuncture Board of California  
Penal Code § 23*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF MERCED**

THE PEOPLE OF THE STATE OF  
CALIFORNIA,

Plaintiff,

vs.

**Roman Robles, P.A., L.A.c.**

Defendant.

Physician Assistant License No. 12500  
Acupuncture License No. AC 10537

Court Case No. 23CR-06037

PA Board Case No. 950-2024-004986

~~[PROPOSED]~~

**ORDER – PARTIAL RESTRICTION OF  
PRACTICE AS A PHYSICIAN  
ASSISTANT AND ACUPUNCTURIST**

**[PENAL CODE § 23]**

Date: April 15, 2025  
Time: 8:30 a.m.  
Dept: 6  
Judge: Judge Slocum

The Court having read and considered the “Recommendation by State Licensing Agency re: Restrictions on Practice as a Physician’s Assistant and Acupuncturist,” filed with the Court on behalf of Rozana Khan in her capacity as the Executive Director of the Physician Assistant Board (“P.A. Board”) and Benjamin Bodea in his capacity as the Executive Director of the Acupuncture Board (“Acupuncture Board”), Department of Consumer Affairs, through counsel, Attorney

1 General of the State of California, Rob Bonta, By Deputy Attorney General Nina Y. Benjamin,  
2 with notice to the Defendant, and having heard and considered the arguments of Mr. Jeffrey  
3 Tenenbaum, attorney for Mr. Roman Robles, P.A., L.A.c., orders the following bail  
4 restriction/restriction pending own recognizance release:

5 **IT IS HEREBY ORDERED THAT,** Defendant, Roman Robles, L.Ac. and P.A.,  
6 Certificate Nos. AC 10537 and 12500, shall have the following restrictions imposed on his ability  
7 to practice western and eastern medicine during the pendency of the criminal proceedings:

- 8 1. The Defendant shall post a notice to all patients as follows:

9 **IT IS THE POLICY OF THIS CLINIC THAT ALL PATIENTS WILL BE**  
10 **OFFERED THE SERVICES OF A THIRD-PARTY CHAPERONE AND**  
11 **UNLESS THEY WAIVE THE PRESENCE OF A CHAPERONE IN WRITING,**  
12 **A CHAPERONE WILL BE PROVIDED. IF YOU ARE NOT OFFERED A**  
13 **CHAPERONE YOU MAY CONTACT THE PHYSICIAN ASSISTANT BOARD**  
14 **(www.pab.ca.gov) OR THE CALIFORNIA ACUPUNCTURE BOARD**  
15 **(www.acupuncture.ca.gov).**

16 The Notice shall comply with the font, font size, and placement requirements as set  
17 forth in Title 16 Code of California Regulations § 1355.4, subdivision (b)(1). The  
18 notice shall be posted in all physical locations that Defendant engages in the practice of  
19 western and/or eastern medicine where he sees patients in person.

- 20 2. The Defendant shall have an adult chaperone physically present with line of site of the  
21 treatment in the examination room at all times when he sees patients. There shall be a  
22 female chaperone for all female patients.
- 23 3. The Defendant shall have all patients, at each treatment session, sign and acknowledge that  
24 a chaperone will be present, at all times during the treatment. If a patient waives the  
25 presence of a chaperone, the patient must physically sign and date additional  
26 documentation that states the patient specifically waived the presence of a chaperone  
27 during the procedure.
- 28

- 1 4. Within 10 days of the issuance of this Order, the Defendant shall provide a list of  
2 chaperones to the Acupuncture Board and the Physician Assistant Board who will be  
3 providing chaperone services. The list can be provided to the Attorney General's Office as  
4 the regulatory agencies' legal representative. The list shall include name, current contact  
5 information including personal cell phone and/or e-mail address. Defendant shall agree to  
6 waive any confidentiality that he may have as the chaperones' employer and the regulatory  
7 agencies shall be able to contact the chaperones to discuss Defendant's compliance with  
8 the chaperone policy. Defendant agrees that he shall not restrict or retaliate against a  
9 chaperone in any way, for communicating with a regulatory agency discussing the  
10 chaperone requirement or any observations made by the chaperone.
- 11 5. Each chaperone is required to agree, under penalty of perjury, that they do not have prior  
12 criminal history or other disciplinary action related to sexual misconduct.
- 13 6. If a chaperone leaves Defendant's service, Defendant shall provide the name of a  
14 replacement chaperone within five days. If Defendant cannot find a chaperone to observe  
15 his clinical procedures, Defendant shall immediately cease and refrain from providing  
16 western and eastern medical services until and unless a chaperone is identified and the  
17 contact information is provided to the regulatory agencies.
- 18 7. The Defendant shall have the chaperone document the chaperone's presence during the  
19 entirety of the medical treatment and encounter in a logbook designated solely for tracking  
20 chaperone attendance.
- 21 8. The Defendant, or his employee, or his representative, shall keep a logbook in the office of  
22 all patient visits. The logbook should include the patient's name, phone number, the date  
23 and time of the visit, and the name of the chaperone who observed the procedure. The  
24 logbook shall be made available to the regulatory agencies on a reasonable basis to ensure  
25 compliance with this bail condition. The logbook will also include the name of any patient  
26 who waives the physical presence of a chaperone with their contact information and  
27 document that they signed waiving the presence of a chaperone.

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- 1 9. The Defendant will provide the regulatory agencies with weekly updates of the logbook  
2 including all documents that patients signed waiving the presence of a chaperone.  
3 10. The Defendant shall retain any and all security camera footage within the office during the  
4 duration of criminal proceedings. At least one security camera is to provide a view of the  
5 front desk showing that the required notice is posted prominently and is visible to all  
6 patients. The Defendant is required to ensure that all security cameras are in working order  
7 during the pendency of his criminal proceedings.

8 The above Proposed Order complies with the Order that I orally made from the bench  
9 when this matter came before me during a regular hearing. I find that these restrictions are  
10 required to protect the public. I find that these restrictions are the least restrictive means that I  
11 may impose on the Defendant's ability to practice his profession pending the outcome of these  
12 criminal proceedings in order to adequately protect the public. I reserve the right to vacate these  
13 orders or impose a complete restriction on Defendant's ability to practice should the Court  
14 become aware of new and/or different facts.

15  
16 DATED: 4-15-25

  
17 JUDGE OF THE SUPERIOR COURT  
18 COUNTY OF MERCED  
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**DECLARATION OF SERVICE BY E-MAIL and U.S. MAIL**

Case Name: **In the Matter of the Penal Code Section 23 Against: Roman Robles, P.A.**  
No.: **23CR-06037**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On April 9, 2025, I served the attached **[PROPOSED] ORDER – PARTIAL RESTRICTION OF PRACTICE AS A PHYSICIAN ASSISTANT AND ACUPUNCTURIST [PENAL CODE § 23]** by transmitting a true copy via electronic mail and by placing a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

Alexandria Albertoni  
Merced County District Attorney's Office  
650 W. 20th Street  
Merced, CA 95340  
*E-mail address:*  
*alexandria.albertoni@countyofmerced.com*

Roman Robles, AC  
328 Northbank Ct., Apt. #55  
Stockton, CA 95207  
***Defendant***  
*E-mail address:*  
*gen-e-zek@drromanroblesacupuncture.com*

Roman Robles, P.A.  
2908 G St., Ste A  
Merced, CA 95340  
***Defendant***  
*E-mail address:*  
*romanmodernhealth@yahoo.com*

Lauri L. Partin  
Merced County Public Defender's Office  
1944 M Street  
Merced, CA 95340  
*E-mail address:*  
*lauri.partin@countyofmerced.com*

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on April 9, 2025, at Fresno, California.

\_\_\_\_\_  
Lisa Gaad  
Declarant

\_\_\_\_\_  
*/s/ Lisa Gaad*  
Signature