

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

In the Matter of the Accusation Against:

**WOONG SOO JEON, L.A.C.  
9175 MISSION GORGE ROAD  
SANTEE CA 92071**

**Acupuncturist License No. 11565**

Respondent.

Case No. 1A-2018-171

OAH No. 2020010433

**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 31, 2020.

It is so ORDERED December 21, 2020.

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

1 XAVIER BECERRA  
Attorney General of California  
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8 *Attorneys for Complainant*

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

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13 In the Matter of the Accusation Against:

14 **WOONG SOO JEON, L.Ac.**  
15 **9175 MISSION GORGE ROAD**  
**SANTEE CA 92071**

16 **Acupuncturist License No. 11565,**

17 Respondent.

Case No. 1A-2018-171

OAH No. 2020010433

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

18  
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 Xavier Becerra, Attorney General of the State of California, by Robert W. Lincoln, Deputy  
25 Attorney General.

26 2. Woong Soo Jeon, L.Ac. (Respondent) is represented in this proceeding by attorney  
27 Matthew Sheena, Esq., Garmo & Garmo, LLP, whose address is: 124 W Main St Ste 200  
28 El Cajon, CA 92020.

1           3.     On or about February 22, 2007, the Board issued Acupuncturist License No. 11565  
2     to Woong Soo Jeon, L.Ac. (Respondent). The Acupuncturist License was in full force and effect  
3     at all times relevant to the charges brought in Accusation No. 1A-2018-171 and will expire on  
4     December 31, 2020, unless renewed.

5   **JURISDICTION**

6           4.     Accusation No. 1A-2018-171 was filed before the Board, and is currently pending  
7     against Respondent. The Accusation and all other statutorily required documents were properly  
8     served on Respondent on October 24, 2019. Respondent timely filed his Notice of Defense  
9     contesting the Accusation. A copy of Accusation No. 1A-2018-171 is attached as Exhibit A and  
10    incorporated by reference.

11   **ADVISEMENT AND WAIVERS**

12          5.     Respondent has carefully read, fully discussed with counsel, and understands the  
13    charges and allegations in Accusation No. 1A-2018-171. Respondent also has carefully read,  
14    fully discussed with counsel, and understands the effects of this Stipulated Surrender of License  
15    and Order.

16          6.     Respondent is fully aware of his legal rights in this matter, including the right to a  
17    hearing on the charges and allegations in the Accusation; the right to confront and cross-examine  
18    the witnesses against him; the right to present evidence and to testify on his own behalf; the right  
19    to the issuance of subpoenas to compel the attendance of witnesses and the production of  
20    documents; the right to reconsideration and court review of an adverse decision; and all other  
21    rights accorded 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 does not contest that, at an administrative hearing, complainant could  
26    establish a prima facie case with respect to the charges and allegations contained in Accusation  
27    No. 1A-2018-171, and that he has thereby subjected his Acupuncture License No. to disciplinary  
28    action.



1 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied  
2 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees  
3 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason  
4 by the Executive Officer on behalf of the Board, Respondent will assert no claim that the  
5 Executive Officer, the Board, or any member thereof, was prejudiced by its/his/her review,  
6 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or  
7 of any matter or matters related hereto.

8 **ADDITIONAL PROVISIONS**

9 12. The Stipulated Surrender of License and Disciplinary Order is intended by the parties  
10 herein to be an integrated writing representing the complete, final and exclusive embodiment of  
11 the agreements of the parties in the above-entitled matter.

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

15 14. In consideration of the foregoing admissions and stipulations, the parties agree that  
16 the Board may, without further notice or formal proceedings, issue and enter the following order

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**ORDER**

IT IS HEREBY ORDERED that Acupuncturist License No. 11565, issued to Respondent Woong Soo Jeon, L.Ac., is surrendered and accepted by the Board.

1. 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.

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

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, Respondent does not contest that, at an administrative hearing, complainant could establish a prima facie case with respect to the charges and allegations contained in Accusation No. 1A-2018-171 and that he has thereby subjected his Acupuncture License No. 11565 to disciplinary action, 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 \$16,023.75 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 Accusation, No. 1A-2018-171 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.

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1 **ACCEPTANCE**

2 I have carefully read the above Stipulated Surrender of License and Order and have fully  
3 discussed it with my attorney, Matthew Sheena, ESQ. I understand the stipulation and the effect  
4 it will have on my Acupuncturist License. I enter into this Stipulated Surrender of License and  
5 Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order  
6 of the Acupuncture Board.

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8 DATED: 9/2/20 Original Signature on File  
9 WOONG SOO JEON, L.Ac.  
*Respondent*

10 I have read and fully discussed with Respondent Woong Soo Jeon, L.A.c. the terms and  
11 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
12 approve its form and content.

13 DATED: 9/2/20 Original Signature on File  
14 MATTHEW SHEENA, ESQ.  
*Attorney for Respondent*

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16 **ENDORSEMENT**

17 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
18 for consideration by the Acupuncture Board of the Department of Consumer Affairs.

19 DATED: September 5, 2020 Respectfully submitted,  
20 XAVIER BECERRA  
21 Attorney General of California  
22 ALEXANDRA M. ALVAREZ  
Supervising Deputy Attorney General  
23   
//RWLIII Electronically Signed 9/5/2020//  
24   
ROBERT W. LINCOLN  
25 Deputy Attorney General  
Attorneys for Complainant

**Exhibit A**

**Accusation No. 1A-2018-171**