

APR 3 2012

1 KAMALA R. HARRIS,
Attorney General of California
2 JOSE R. GUERRERO
Supervising Deputy Attorney General
3 DAVID CARR
State Bar No. 131672
4 Deputy Attorney General
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-5538
6 Facsimile: (415) 703-5480
Attorneys for Complainant

ACUPUNCTURE BOARD

7
8 **BEFORE THE**
ACUPUNCTURE BOARD
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 1A-2010-145

11
12 **PAUL ALEXANDER SLIDDERS,**

ACCUSATION

13 2657 Kentia Street
14 Oxnard, CA 93036

15 Acupuncture License No. AC 12278,

16 Respondent.
17

18
19 Complainant alleges:

20 PARTIES

21
22 1. Janelle Wedge ("Complainant") brings this Accusation solely in her official capacity
23 as the Executive Officer of the Acupuncture Board, Department of Consumer Affairs.

24 2. On or about March 17, 2008, the Acupuncture Board issued Acupuncture License
25 Number AC 12278 to Paul Alexander Slidders ("Respondent"). The Acupuncture License will
26 expire on January 31, 2014, unless renewed.

27 ///

28 ///

JURISDICTION

1
2 3. This Accusation is brought before the Acupuncture Board (“Board”), Department of
3 Consumer Affairs, under the authority of the following laws. All section references are to the
4 Business and Professions Code unless otherwise indicated.

5 4. Section 4955 of the Code states:

6 “The board may deny, suspend, or revoke, or impose probationary conditions upon
7 the license of any acupuncturist if he or she is guilty of unprofessional conduct.

8 “Unprofessional conduct shall include, but not be limited to, the following:

9 “...

10 “(b) Conviction of a crime substantially related to the qualifications, functions,
11 or duties of an acupuncturist, the record of conviction being conclusive evidence
12 thereof.”

13 5. Section 4956 of the Code states:

14 “A plea or verdict of guilty or a conviction following a plea of nolo contendere made
15 to a charge which is substantially related to the qualifications, functions, or duties of an
16 acupuncturist is deemed to be a conviction within the meaning of this chapter.”

17 “The board may order a license suspended or revoked, or may deny a license, or may
18 impose probationary conditions upon a license, when the time for appeal has elapsed, or the
19 judgment of conviction has been affirmed on appeal, or when an order granting probation is
20 made suspending the imposition of sentence irrespective of a subsequent order under the
21 provisions of Section 1203.4 of the Penal Code allowing the person to withdraw his or her
22 pleas of guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or
23 dismissing the accusation, complaint, information, or indictment.”

24 6. Penal Code section 243(d) describes the crime of “Battery Causing Serious Bodily
25 Injury.” This crime may be alternatively charged as a misdemeanor or felony.

26 7. Penal Code section 422 defines the crime of “Criminal Threats” as an intentional
27 threat made to a specific individual in such circumstances as to convey an immediate,
28

1 unconditional, unequivocal threat of death or great bodily injury. This crime may be alternatively
2 charged as a misdemeanor or felony.

3 COST RECOVERY

4 8. Section 4959 of the Code states:

5 "(a) The board may request the administrative law judge, under his or her
6 proposed decision in resolution of a disciplinary proceeding before the board, to
7 direct any licensee found guilty of unprofessional conduct to pay to the board a sum
8 not to exceed actual and reasonable costs of the investigation and prosecution of the
9 case.

10 "(b) The costs to be assessed shall be fixed by the administrative law judge and
11 shall not in any event be increased by the board. When the board does not adopt a
12 proposed decision and remands the case to an administrative law judge, the
13 administrative law judge shall not increase the amount of any costs assessed in the
14 proposed decision.

15 "(c) When the payment directed in the board's order for payment of costs is not
16 made by the licensee, the board may enforce the order for payment in the superior
17 court in the county where the administrative hearing was held. This right of
18 enforcement shall be in addition to any other rights the board may have as to any
19 licensee directed to pay costs.

20 "(d) In any judicial action for the recovery of costs, proof of the board's
21 decision shall be conclusive proof of the validity of the order of payment and the
22 terms for payment."

23 "(e) All costs recovered under this section shall be considered a reimbursement
24 for costs incurred and shall be deposited in the Acupuncture Fund."

25 ///

1 FIRST CAUSE FOR DISCIPLINE

2 (Substantially Related Convictions)

3 9. Respondent is subject to disciplinary action under code sections 4955(b)
4 [Substantially Related Conviction] in that he was convicted of a crime substantially related to the
5 qualifications, functions, or duties of an acupuncturist. The circumstances are as follows:

6 10. At approximately 8:00 p.m. on July 28, 2010, National Park Service Rangers
7 responded to a complaint of an assault in Muir Woods National Monument. The officers
8 interviewed a man who claimed injuries inflicted that evening by his friend, Paul Alexander
9 Slidders. The man stated that he, Slidders, and a third friend had come to Muir Woods in order
10 to calm Slidders, who had seemed very anxious, but that after a short period of increasingly
11 strange behavior, including shouted imprecations against an unseen "evil force," Slidders had
12 attacked the third friend. Slidders punched and kicked the victim repeatedly, despite the
13 narrator's attempts to stop him. Slidders told the narrator that the third friend had to die. When
14 the narrator attempted to prevent Slidders from pursuing the fleeing third friend, Slidders
15 attacked him with punches and kicks. He managed to escape from Slidders and fled, eventually
16 finding the third friend who was hiding in the woods after summoning help with his cell phone.
17 The Rangers soon found Slidders walking along the hiking trail. Slidders was placed under arrest
18 and taken to Marin General Hospital, where he was treated for a broken hand; he was then
19 booked into Marin County Jail.

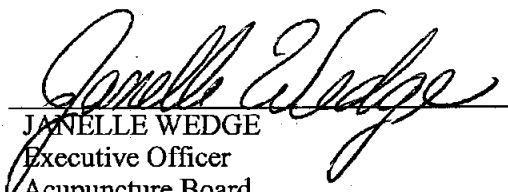
20 11. On or about April 20, 2011, a criminal information titled *People of the State of*
21 *California vs. Paul Alexander Slidders* was filed in Marin County Superior Court, case number
22 SC171342. The Complaint charged Respondent with felony violations of Penal Code sections
23 243(d) [Battery Causing Serious Bodily Injury] and 422 [Criminal Threats], among other
24 allegations.

25 12. On or about April 20, 2011, Respondent entered pleas of guilty to both felony
26 charges, Penal Code sections 243(d) [Battery Causing Serious Bodily Injury] and 422 [Criminal
27 Threats]. Sentencing was continued to procure a pre-sentencing probation department report.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. Taking such other and further action as deemed necessary and proper.

DATED: APR - 3 2012


JANELLE WEDGE
Executive Officer
Acupuncture Board
Department of Consumer Affairs
State of California
Complainant