

RECEIVED

FEB 12 2026

ACUPUNCTURE BOARD

1 ROB BONTA  
2 Attorney General of California  
3 MATTHEW M. DAVIS  
4 Supervising Deputy Attorney General  
5 ANDRES T. CARNAHAN  
6 Deputy Attorney General  
7 State Bar No. 232688  
8 600 West Broadway, Suite 1800  
9 San Diego, CA 92101  
10 Telephone: (619) 738-9349  
11 Facsimile: (916) 732-7920  
12 E-mail: [Andres.Carnahan@doj.ca.gov](mailto:Andres.Carnahan@doj.ca.gov)

13 *Attorneys for Complainant*

14 **BEFORE THE**  
15 **ACUPUNCTURE BOARD**  
16 **DEPARTMENT OF CONSUMER AFFAIRS**  
17 **STATE OF CALIFORNIA**

18 In the Matter of the Accusation Against:

Case No. 23-20610-AP

19 **JIN WOOK CHOI, L.AC.**  
20 40250 Murrieta Hot Springs Road #105  
21 Murrieta, CA 92563

**ACCUSATION**

22 **Acupuncturist License No. 13667,**

23 Respondent.

24 **PARTIES**

25 1. Benjamin Bodea (Complainant) brings this Accusation solely in his official capacity  
26 as the Executive Officer of the Acupuncture Board, Department of Consumer Affairs (Board).

27 2. On or about April 26, 2010, the Board issued Acupuncturist License Number 13667  
28 to Jin Wook Choi, L.Ac. (Respondent). The Acupuncturist License was in full force and effect at  
all times relevant to the charges brought herein and has now expired as of November 30, 2025.

**JURISDICTION**

3. This Accusation is brought before the Board, under the authority of the following  
laws. All section references are to the Business and Professions Code (Code) unless otherwise  
indicated.

////

1 4. Section 4955 of the Code states, in pertinent part:

2 The board may deny, suspend, or revoke, or impose probationary conditions  
3 upon, the license of any acupuncturist who is guilty of unprofessional conduct.

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

5 ...

6 (d) Aiding or abetting in, or violating or conspiring in, directly or indirectly, the  
7 violation of the terms of this chapter or any regulation adopted by the board pursuant  
8 to this chapter.

9 ...

10 (i) Any action or conduct that would have warranted the denial of the  
11 acupuncture license.

12 (j) The violation of any law or local ordinance on an acupuncturist's business  
13 premises by an acupuncturist's employee or a person who is working under the  
14 acupuncturist's professional license or business permit, that is substantially related to  
15 the qualifications, functions, or duties of an acupuncturist. These violations shall  
16 subject the acupuncturist who employed the individuals, or under whose  
17 acupuncturist license the employee is working, to disciplinary action.

18 ...

19 5. Section 4955.1 of the Code states, in pertinent part:

20 The board may deny, suspend, revoke, or impose probationary conditions upon  
21 the license of any acupuncturist if he or she is guilty of committing a fraudulent act  
22 including, but not be limited to, any of the following:

23 ...

24 (e) Failing to maintain adequate and accurate records relating to the provision  
25 of services to their patients.

26 6. Section 4955.2 of the Code states, in pertinent part:

27 The board may deny, suspend, revoke, or impose probationary conditions upon  
28 the license of any acupuncturist if he or she is guilty of committing any one of the  
following:

(a) Gross negligence.

(b) Repeated negligent acts.

...

7. California Code of Regulations, title 16, section 1399.453, states:

An acupuncturist shall keep complete and accurate records on each patient who  
is given acupuncture treatment, including but not limited to, treatments given and  
progress made as a result of the acupuncture treatments.

1 8. California Code of Regulations, title 16, section 1399.469.2 states:

2 In addition to the conduct described in Section 4955 of the Business and  
3 Professions Code, "unprofessional conduct" also includes but is not limited to the  
4 following:

5 ...

6 (c) Failure to cooperate and participate in any board investigation pending  
7 against the licensee. This subsection shall not be construed to deprive a licensee of  
8 any privilege guaranteed by the Fifth Amendment to the Constitution of the United  
9 States, or any other constitutional or statutory privileges. This subsection shall not be  
10 construed to require a licensee to cooperate with a request that would require the  
11 licensee to waive any constitutional or statutory privilege or to comply with a request  
12 for information or other matters within an unreasonable period of time in light of the  
13 time constraints of the licensee's practice. Any exercise by a licensee of any  
14 constitutional or statutory privilege shall not be used against the licensee in a  
15 regulatory or disciplinary proceeding against the licensee.

16 (d) Failure to report to the board within 30 days any of the following: (1) The  
17 bringing of an indictment or information charging a felony against the licensee.

18 (2) The arrest of the licensee.

19 ...

20 9. Section 726 of the Code states:

21 (a) The commission of any act of sexual abuse, misconduct, or relations with a  
22 patient, client, or customer constitutes unprofessional conduct and grounds for  
23 disciplinary action for any person licensed under this or under any initiative act  
24 referred to in this division.

25 (b) This section shall not apply to consensual sexual contact between a licensee  
26 and his or her spouse or person in an equivalent domestic relationship when that  
27 licensee provides medical treatment, to his or her spouse or person in an equivalent  
28 domestic relationship.

### COST RECOVERY

10. Section 4959 of the Code states:

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

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

(c) When the payment directed in the board's order for payment of costs is not

1 made by the licensee, the board may enforce the order for payment in the superior  
2 court in the county where the administrative hearing was held. This right of  
enforcement shall be in addition to any other rights the board may have as to any  
licensee directed to pay costs.

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

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

### 7 **FIRST CAUSE FOR DISCIPLINE**

#### 8 **(Sexual Misconduct Against A Patient)**

9 11. Respondent has subjected his Acupuncture License No. AC 13667 to disciplinary  
10 action under section 726 of the Code, in that he committed an act of sexual abuse or misconduct  
11 against Patient A<sup>1</sup>, as more particularly alleged hereinafter:

12 12. On or about October 27, 2023, the Board received a complaint regarding Respondent  
13 by American Specialty Health Plans Inc. (ASH) which indicated that Respondent may have  
14 "exhibited a lack of appropriate professional boundaries" with Patient A.

15 13. The ASH complaint alleged that Respondent inappropriately touched Patient A  
16 during a massage session that occurred immediately following an acupuncture treatment. Patient  
17 A reported that she visited Respondent's Acupuncture business on October 7, 2023, in order to  
18 receive acupuncture services. During the appointment, Respondent offered a massage and Patient  
19 A accepted. Prior to the massage, Patient A unsnapped her bra and laid face down. Patient A  
20 then resnapped her bra after she was asked to turn over for a massage on her front side. During  
21 this portion of the massage, Respondent touched Patient's right breast. After touching her breast,  
22 Respondent asked to touch it again, to which Patient A replied "no" and grabbed her belongings.  
23 Then as Patient A was leaving the location, Respondent handed Patient A \$30 and stated "I  
24 know... I know you're the patient and I'm the provider."

25 14. Patient A also reported that during a previous acupuncture appointment following her  
26 treatment, Respondent hugged her and made a "kissing" noise.

27  
28 <sup>1</sup> To protect the privacy of the patient involved, the patient's name has not been included  
in this pleading. Respondent is aware of the identity of the patient referred to herein.



1 negligent in his care, treatment, and management of Patient A., as set forth in paragraphs 11  
2 through 21, above, which are incorporated herein by reference as if fully set forth herein.

3 **THIRD CAUSE FOR DISCIPLINE**

4 **(Failing to Maintain Adequate and Accurate Records)**

5 23. Respondent has further subjected his Acupuncture License No. AC 13667 to  
6 disciplinary action under section 4955.1, subdivision (e), of the Code, and Title 16, section  
7 1399.453, of the California Code of Regulations, in that during his care, treatment, and  
8 management of Patient A, he failed to maintain adequate and accurate records relating to the  
9 provision of services to Patient A, as set forth in paragraphs 11 through 22, above, which are  
10 incorporated herein by reference as if fully set forth herein.

11 **FOURTH CAUSE FOR DISCIPLINE**

12 **(Unprofessional Conduct)**

13 24. Respondent has further subjected his Acupuncture License No. AC 13667 to  
14 disciplinary action under section 4955 of the Code, in that he engaged in unprofessional conduct  
15 in his care, treatment, and management of Patient A., as set forth in paragraphs 11 through 23,  
16 above, which are incorporated herein by reference as if fully set forth herein.

17 **FIFTH CAUSE FOR DISCIPLINE**

18 **(Failure to Cooperate)**

19 25. Respondent has further subjected his Acupuncture License No. AC 13667 to  
20 disciplinary action under section 4955 of the Code, and Title 16, section 1399.469.2(c), of the  
21 California Code of Regulations, in that in that he engaged in unprofessional conduct when he  
22 failed to cooperate and participate in a pending Board investigation, as set forth in paragraphs 11  
23 through 24, above, which are incorporated herein by reference as if fully set forth herein.

24 **SIXTH CAUSE FOR DISCIPLINE**

25 **(Failure to Report)**

26 26. Respondent has further subjected his Acupuncture License No. AC 13667 to  
27 disciplinary action under section 4955 of the Code, and Title 16, section 1399.469.2(d), of the  
28 California Code of Regulations, in that in that he engaged in unprofessional conduct when he

1 failed to report to the Board the bringing of an indictment or information charging him with  
2 multiple felonies charges and his failure to report to the Board any and all arrests within 30 days  
3 of each occurrence, as set forth in paragraphs 11 through 25, above, which are incorporated  
4 herein by reference as if fully set forth herein.

5 **SEVENTH CAUSE FOR DISCIPLINE**

6 **(Violation of the Acupuncture Licensure Act)**

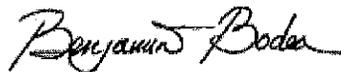
7 27. Respondent has further subjected his Acupuncture License No. AC 13667 to  
8 disciplinary action under section 4955, subdivision (d), of the Code, in that he violated the terms  
9 of the Acupuncture Licensure Act, as set forth in paragraphs 11 through 26, above, which are  
10 incorporated herein by reference as if fully set forth herein.

11 **PRAYER**

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
13 and that following the hearing, the Acupuncture Board issue a decision:

- 14 1. Revoking or suspending Acupuncturist License Number 13667, issued to Respondent  
15 Jin Wook Choi, L.Ac.;
- 16 2. Ordering Respondent Jin Wook Choi, L.Ac. to pay the Acupuncture Board the  
17 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
18 Professions Code section 4959 and if placed on probation, the costs of probation monitoring;  
19 and,
- 20 3. Taking such other and further action as deemed necessary and proper.

21  
22 DATED: 2/18/2026



23 \_\_\_\_\_  
24 BENJAMIN BODEA  
25 Executive Officer  
26 Acupuncture Board  
27 Department of Consumer Affairs  
28 State of California  
*Complainant*

SD2025802811