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

11
12 In the Matter of the Accusation Against:

Case No. 1A-2019-200

13 **CHUN LING WANG, L.AC**
14 **2862 Cherry Way**
Pomona, CA 91767

ACCUSATION

15 **Acupuncturist No. AC 15246,**

16 Respondent.

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18
19 **PARTIES**

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

22 2. On or about April 2, 2013, the Board issued Acupuncture License No. AC 15246 to
23 Chun Ling Wang, L.Ac. (Respondent). That license was in full force and effect at all times
24 relevant to the charges brought herein and will expire on May 31, 2026, unless renewed.

25 **JURISDICTION**

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

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4. Section 498 of the Code states:

A board may revoke, suspend, or otherwise restrict a license on the ground that the licensee secured the license by fraud, deceit, or knowing misrepresentation of a material fact or by knowingly omitting to state a material fact.

5. Section 582 of the Code states, in pertinent part:

No person, company, or association shall use or attempt to use any diploma, certificate, transcript, or any other writing which has been purchased, fraudulently issued, illegally obtained, counterfeited, or materially altered, either as a certificate or as to character or color of certificate, to practice as a physician and surgeon, podiatrist, osteopathic physician, or a chiropractor, or to practice any other system or mode of treating the sick or afflicted, as provided in the Medical Practice Act, ... or to practice as any other licentiate under this division.

6. Section 583 of the Code states, in pertinent part:

No person shall in any document or writing required of an applicant for examination, license, certificate, or registration under this division, ... willfully make a false statement in a material regard.

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

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

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

...

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

...

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

...

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

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

(a) Securing a license by fraud or deceit.

...

(c) Committing any act involving dishonesty or corruption with respect to the qualifications, functions, or duties of an acupuncturist.

...

1 **COST RECOVERY**

2 9. Section 4959 of the Code states, in pertinent part:

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

8 ...

9 **FACTUAL ALLEGATIONS**

10 10. On October 17, 2012, the Board received an application from Respondent for the
11 California Acupuncture Licensing Examination (CALE), the necessary precursor to granting an
12 acupuncture license to an applicant who has graduated from a foreign educational institution. The
13 application, signed by Respondent on October 3, 2012, attested under penalty of perjury to the
14 facts asserted in the application.

15 11. The application included Respondent's claim that she attended and graduated from
16 Fujian University of Traditional Chinese Medicine (Fujian) from September of 2001 to July of
17 2006.

18 12. The application also included an Evaluation Report from the Foundation of
19 International Services, Inc. (FIS) confirming Respondent completed her coursework in China at a
20 recognized university that is considered equivalent to a regionally accredited institution in the
21 United States.

22 13. Respondent took the February 21, 2013, CALE and achieved a passing score.

23 14. On March 28, 2013, the Board received an application for licensure from Respondent.
24 The application, signed by Respondent on March 25, 2013, attested under penalty of perjury to
25 the facts asserted in the application.

26 15. On April 2, 2013, the Board issued Respondent's license.

27 16. Information that suggested Respondent secured her license by fraud arose in an
28 unrelated investigation. Thereafter the Board requested an investigation of this information by
the Division of Investigation of the Department of Consumer Affairs. The Board also undertook

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1 a comprehensive review of the validity of the documents Respondent provided in support of her
2 application.

3 17. During the investigation, on October 29, 2019, the FIS Director of Evaluation
4 provided a letter stating he reviewed the alleged FIS evaluation that Respondent submitted to the
5 Board as part of her application. The FIS Director determined the evaluation was a forgery.

6 18. During the investigation, on January 6, 2020, an Attaché for the U.S. Department of
7 Homeland Security, Immigration and Customs Enforcement in Beijing, China contacted the
8 Fujian Registrar's office. The Fujian Registrar's office evaluated Respondent's alleged Fujian
9 Certificate of Graduation and determined the certificate was a forgery.

10 **FIRST CAUSE FOR DISCIPLINE**

11 **(Secured License by Fraud)**

12 19. Respondent is subject to disciplinary action under Code sections 498, 4955, and
13 4955.1, subdivision (a), in that Respondent procured her acupuncture license by fraud or deceit,
14 as more particularly alleged in paragraphs 10 through 18, above, which are hereby incorporated
15 by reference and realleged as if fully set forth herein.

16 **SECOND CAUSE FOR DISCIPLINE**

17 **(Dishonest or Corrupt Acts)**

18 20. Respondent is further subject to disciplinary action under Code sections 4955 and
19 4955.1, subdivision (c), in that Respondent committed an act involving dishonesty or corruption
20 with respect to the qualifications, functions, or duties of an acupuncturist, as more particularly
21 alleged in paragraphs 10 through 19, above, which are hereby incorporated by reference and
22 realleged as if fully set forth herein.

23 **THIRD CAUSE FOR DISCIPLINE**

24 **(Use of Counterfeit Certificate)**

25 21. Respondent is further subject to disciplinary action under Code section 582, in that
26 Respondent used a counterfeit certificate to practice as a licensed acupuncturist, as more
27 particularly alleged in paragraphs 10 through 20, above, which are hereby incorporated by
28 reference and realleged as if fully set forth herein.

1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(False Statements in Application)**

3 22. Respondent is further subject to disciplinary action under Code section 583, in that
4 Respondent willfully made false representations in her application for licensure submitted to the
5 Board, as more particularly alleged in paragraphs 10 through 21, above, which are hereby
6 incorporated by reference and realleged as if fully set forth herein.

7 **PRAYER**

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

10 1. Revoking or suspending Acupuncture License No. AC 15246, issued to Respondent
11 Chun Ling Wang, L.Ac.;

12 2. Ordering Respondent Chun Ling Wang, L.Ac. to pay the Acupuncture Board the
13 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
14 Professions Code section 4959 and, if placed on probation, the costs of probation monitoring; and

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

16
17 DATED: 1/20/2026



18 _____
19 BENJAMIN BODEA
20 Executive Officer
21 Acupuncture Board
22 Department of Consumer Affairs
23 State of California
24 Complainant

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