1 2 3 4 5 6 7 8	EDMUND G. BROWN JR. Attorney General of California THOMAS S. LAZAR Supervising Deputy Attorney General BETH FABER JACOBS Deputy Attorney General State Bar No. 89145 110 West "A" Street, Suite 1100 San Diego, CA 92101 P.O. Box 85266 San Diego, CA 92186-5266 Telephone: (619) 645-2069 Fax: (619) 645-2061 Attorneys for Appearing Agency, Acupuncture Board of California		SUPERIOR COUNT OF CALLFORNIA SUPERIOR COUNTY OF ORANGE HARBOR JUSTICE CENTER HARBOR JUSTICE COUT NOV 16 2010 ALAN CARL PON, CLARK OF THE COUT
9		SUPERIOR COURT OF TH	E STATE OF CALIFORNIA
10		COUNTY OF ORANGE, H	ARBOR JUSTICE CENTER
11			
12	THE DEOL	PLE OF THE STATE OF	10 SM 01604 Case No. <del>OCSO 10-072164</del>
13	CALIFOR		Case 110. 0000 10-072104
14		Plaintiff,	STIPULATION FOR RESTRICTION OF ACUPUNCTURE LICENSE AS
15		V.	CONDITION OF RELEASE; ORDER
16	WILLIAM	JAMES GOIT,	[Penal Code, § 23]
17		Defendant.	
18			
19		CTURE BOARD OF	
20	CALIFORNIA, DEPARTMENT OF CONSUMER AFFAIRS, STATE OF		
21	CALIFOR	NIA,	
22		Appearing Agency.	
23	Defe	ndant, William James Goit, and Janel	le Wedge, the Executive Officer of the
24	Acupuncture Board of California ("Acupuncture Board"), by and through their respective		
25	counsel, hereby stipulate to the following:		
26	1.	Defendant William James Goit, L.A.	c., is a licensed acupuncturist in the State of
27	California.	He is represented in this proceeding by Ron Chrislip, Esq.	
28	///		
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	Stipulation for Restriction of Acupuncture License as Condition of Release; Order (OCSO 10-072164)		

2. The Acupuncture Board is the state agency charged with protecting the public
 through the licensing and discipline of acupuncturists in the State of California. The Acupuncture
 Board is represented by Edmund G. Brown Jr., Attorney General of the State of California, by
 Beth Faber Jacobs, Deputy Attorney General.

3. On April 27, 2010, a Complaint was filed in *People v. William James Goit*, Orange
County Superior Court, Harbor Justice Center, Case No. OCSO 10-072164, charging defendant
with one count of misdemeanor sexual battery [a violation of Penal Code section 243.4,
subdivision (e)(1)], on a patient identified as Jane Doe.

9 4. Penal Code section 23 authorizes a state agency to voluntarily appear in a criminal
10 proceeding and make a recommendation to the Court to promote the interests of justice and
11 protect the interests of the public if the crime charged is substantially related to the qualifications,
12 functions, or duties of the licensee.

13 5. Defendant Goit maintains a solo acupuncture practice entitled "La Paz Acupuncture
14 and Herbs," located at 25260 La Paz Road, No. F, Laguna Hills, California.

6. The purpose of this Stipulation is to restrict defendant Goit's acupuncture license as a
condition of his continued release until the conclusion of the above-entitled criminal proceedings
against defendant Goit, and to do so without a formal hearing under Penal Code section 23.

7. Therefore, the parties request the Court order the following conditions of continued
release, which are also memorialized in the attached Order for the Court's signature, be added for
Defendant Goit pending the conclusion of this criminal case, :

The Acupuncture License of Defendant William James Goit, Acupuncture
 License No. AC 2716, issued by the California Acupuncture Board, shall be restricted
 as follows:

A. Defendant Goit shall not consult with, examine, or provide treatment to any female patient, as authorized under his acupuncture license, unless all of the following occurs:

Defendant has a third party chaperone present during any consultation,
 examination, or treatment;

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Stipulation for Restriction of Acupuncture License as Condition of Release; Order (OCSO 10-072164)

1		2. The chaperone has been approved by the Board, has read the		
2		criminal complaint on file in this matter, and has been advised by the		
3		Board of the role of chaperone prior to serving as chaperone under this		
4		Order;		
5		3. The chaperone initials and dates each patient medical record		
6		at the time the chaperone's services are provided;		
7		4. Defendant Goit maintains a separate log of all patients seen		
8		for whom a third party chaperone is required. The log shall contain the		
9		patient name, address and telephone number and the date and nature of		
10		the treatment or service provided. Defendant Goit shall make this log		
11		available for immediate inspection and copying on the premises by the		
12		Acupuncture Board or its designee; and		
13		5. The consultation, examination, or treatment takes place at		
14	Defendant Goit's current place of business, the La Paz Acupuncture and Herbs Luce Massage, 25260 La Paz Road, No. F, Laguna Hills, California.			
15				
16	8.	Defendant Goit shall post this Stipulation and attached Order in a conspicuous		
17 27	location ac	cation accessible to the public at his current place of business, the La Paz Acupuncture and		
18	Massage, 2	5260 La Paz Road, No. F, Laguna Hills, California.		
19	9.	As public documents reflecting a restriction on Defendant Goit's acupuncture		
20	licensee, th	licensee, this Stipulation and the attached Order of the Court restricting Defendant Goit's		
21	acupuncture license shall be posted on the Acupuncture Board's website.			
22	10.	10. This Order shall remain in effect as a condition of continued release, or, if bail is		
23	ordered, as	a condition of bail, until the completion of the criminal proceedings.		
24	11.	This Stipulation will be void and unenforceable if the Superior Court does not adopt		
25		tion or sign the attached Order. $() 0000 0 0101 ()$		
26	Dated: _/	-16-10 William James Goit, L.Ac.		
27		Defendant		
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		Stipulation for Restriction of Acupuncture License as Condition of Release; Order (OCSO 10-072164		

1	Dated: 11/16/10	Ked Chij
2	2	RON CHRISLIP, ESQ. Attorney for Defendant
3		,
4		
5	Dated: November 10, 2010	EDMUND G. BROWN JR.
6		Attorney General of California THOMAS S. LAZAR Supervising Deputy Attorney General
7		Mitthe falen Jacobs
8		BETH/FABER JACOBS
9		Attorneys for Appearing Agency Acupuncture Board
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13	C	DRDER
14		
15	GOOD CAUSE APPEARING, the Stip	ulation is adopted as the Court's Order.
16	DATED: NOV 1 6 2010	CRAIG E. ROBISON
17	JUE	GE OF THE SUPERIOR COURT
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-	Stipulation for Restriction of Acupunctur	e License as Condition of Release; Order (OCSO 10-072164)

1		SUPERIOR COUNTY OF CALIFORNIA				
2	DROC JOST DOIL					
3		ALAN CAPLSON, Clork of the Court				
4		ALAN CARLSON				
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8	SUPERIOR COURT OF THE STATE OF CALIFORNIA					
9	COUNTY OF ORANGE, HARBOR JUSTICE CENTER					
10		TOSH BILDE				
11	THE PEOPLE OF THE STATE OF	Case No. OCSO 10-072164				
12	CALIFORNIA,	. ORDER RESTRICTING DEFENDANT				
13	Plaintif	GOIT'S ACUPUNCTURE LICENSE AS A				
14	V.	CONDITION OF CONTINUED RELEASE				
15	WILLIAM JAMES GOIT,	[Penal Code, § 23]				
16	Defendan	t.				
17		_				
18	ACUPUNCTURE BOARD OF					
19	CALIFORNIA, DEPARTMENT OF CONSUMER AFFAIRS, STATE OF					
20	CALIFORNIA,					
21	Appearing Agency.					
22	GOOD CAUSE APPEARING, and pursuant to Penal Code section 23, and					
23	Stipulation of the parties, the Court hereby ORDERS the following additional conditions of					
24	continued release for Defendant Goit pending the conclusion of the above-entitled criminal case:					
25	The Acupuncture License of Defendant William James Goit, Acupuncture					
26	License No. AC 2716, issued by the Cali	fornia Acupuncture Board, shall be restricted				
27	as follows:					
28						
		1				
		Order (OCSO 10-072164)				

1	A. Defendant Goit shall not consult with, examine, or provide treatment to			
2	any female patient, as authorized under his acupuncture license, unless all of the			
3	following occurs:			
4	1. Defendant has a third party chaperone present during any			
5	consultation, examination, or treatment;			
6	2. The chaperone has been approved by the Board, has read the			
7	criminal complaint on file in this matter, and has been advised by the			
8	Board of the role of chaperone prior to serving as chaperone under this			
9	Order;			
10	3. The chaperone initials and dates each patient medical record			
11	at the time the chaperone's services are provided;			
12	4. Defendant Goit maintains a separate log of all patients seen			
13	for whom a third party chaperone is required. The log shall contain the			
14	patient name, address and telephone number and the date and nature of			
15	the treatment or service provided. Defendant Goit shall make this log			
16	available for immediate inspection and copying on the premises by the			
17	Acupuncture Board or its designee; and			
18	5. The consultation, examination, or treatment takes place at			
19	Defendant Goit's current place of business, the La Paz Acupuncture and Herbs,			
20	25260 La Paz Road, No. F, Laguna Hills, California.			
21	CRAIG E. ROBISÓN			
22	DATED: NOV 1 6 2010 JUDGE OF THE SUPERIOR COURT			
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## DECLARATION OF PERSONAL SERVICE

Case Name: People v. William James Goit

No.: Orange County Superior Court, Case No. 10SM01604

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; my business address is: 110 West A Street, Suite 1100, P.O. Box 85266, San Diego, CA 92186-5266.

On <u>November 16, 2010</u>, I served the attached **Stipulation For Restriction of Acupuncture** License as Condition of Release; Order, and Order Restricting Defendant Goit's Acupuncture License as a Condition of Continued Release by personally delivering a true copy of each to the following person at the address as follows:

William James Goit, L.Ac. La Paz Acupuncture and Herbs 25260 La Paz Road, No. F Laguna Hills, California

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on November 17, 2010, at San Diego, California.

Beth Faber Jacobs Declarant

Porth Jalun Jalabs Signature

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