



College of
**TRADITIONAL
CHINESE MEDICINE
PRACTITIONERS +
ACUPUNCTURISTS**
of British Columbia

900-200 Granville Street
Vancouver, BC, V6C 1S4
ctcma.bc.ca

T (604) 742-6563
Toll Free 1-855-742-6563
F (604) 357-1963
E info@ctcma.bc.ca

CITATION TO APPEAR

Section 37 of the *Health Professions Act*

To: Su Lan (Mary) Lee
4854 Eagleview Road
Sechelt, BC V0N 3A2

(the “Respondent”)

TAKE NOTICE that the Inquiry Committee of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of British Columbia (the “College”) has directed me, as the Registrar, to issue this Citation under section 37 of the *Health Professions Act*, R.S.B.C. 1996, c. 183 (the “Act”) and section 66(1) of the College’s bylaws.

A hearing panel of the College Discipline Committee (the “Discipline Committee”) will conduct a hearing to inquire into your conduct, the circumstances of which are set out in the attached schedule, to determine whether you have engaged in professional misconduct as defined in s. 26 of the Act.

AND FURTHER TAKE NOTICE that the hearing will be held as follows:

PLACE: The hearing will proceed by videoconference using a secure Zoom link through Charest Reporting with details to be provided at a later date.

DATE: Tuesday, August 30, 2022 and Wednesday, August 31, 2022

TIME: 9:30 a.m.

AND FURTHER TAKE NOTICE that section 38(4.1) of the Act entitles you to an outline of the anticipated evidence from each of the witnesses that will be called by the College and an opportunity to inspect any documentary evidence at least fourteen (14) days prior to the hearing. Your rights relating to the hearing can be found in the Act and the College Bylaws.

AND FURTHER TAKE NOTICE that, at the hearing, legal counsel for the College will make submissions with respect to the appropriate action to be taken regarding your registration. The action that can be taken includes but is not

limited to a reprimand, the imposition of limits or conditions on your practice, suspension and/or cancellation of your registration and/or the imposition of a fine under section 39(2) of the Act.

Non-Appearance by Respondent: If you fail to appear at the date, time and place set for the hearing, the Discipline Committee is entitled to proceed with the hearing in your absence upon proof of receipt of the Citation by you and may take any action, without further notice to you, that it is authorized to take under the Act, Regulations and College Bylaws pursuant to section 38(5) of the Act.

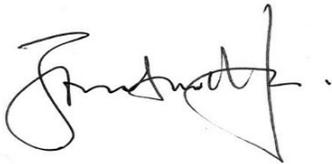
Contact Information for the Discipline Committee

The mailing address of the Discipline Committee for delivery is:

College of Traditional Chinese Medicine Practitioners and Acupuncturists of British Columbia
900 – 200 Granville Street
Vancouver, B.C. V6C 1S4
Tel: (604) 742-6563
Fax: (604) 357-1963

Attention: Discipline Committee

Dated at Vancouver, British Columbia, this 28th day of July 2022.



Jonathan Ho
Registrar

SCHEDULE A

Nature of the alleged conduct to be inquired into:

A. Breaches of 2012 Consent Order

Blood-letting treatments

1. On or about February 27, 2012, you provided a consent order under s. 33(6) of the Act to the College to resolve a complaint filed with the College on May 27, 2011 (the “2012 Consent Order”).
2. In paragraph 3 of the 2012 Consent Order, you undertook not to repeat the conduct of blood-letting in your practice.
3. By letter dated August 25, 2021, two of your clients, E.K. and S.G., filed a complaint with the College regarding your practice which attached a copy of “Mary’s Fee Schedule”. That fee schedule included the following notation: “Cupping (including cup (\$) and disposal fees) take blood \$180”. E.K. and S.G. also provided a chart listing the treatments they had received. There are multiple notations in the treatment chart which indicate you provided blood-letting to E.K. or S.G. on April 28, 2021, May 7, 2021, May 17, 2021, and May 21, 2021.
4. On September 1, 2021, the College received a second complaint about your practice from your client, M.L. (collectively, E.K., S.G., and M.L. are referred to as the “Clients”). M.L. alleged that you provided her with two acupuncture treatments and three cupping treatments which included piercing her skin and using a suction cup to draw blood.
5. On September 8, 2021, a College inspector, M.S., attended at your clinic at the direction of the Inquiry Committee to inspect your clinic and to interview you. You advised the inspector that you did not do blood-letting very often and that last patient you performed it on was E.K.
6. You contravened paragraph 3 of the 2012 Consent Order and engaged in professional misconduct under section 26 of the Act by continuing to provide blood-letting to the Clients.

Failure to maintain clinical records

7. In paragraph 1 of the 2012 Consent Order, you undertook not to repeat the conduct of failing to maintain properly documented clinical records for your patients.
8. During the Inquiry Committee investigation into the Clients’ allegations, you were requested to produce your clinical records for the assessments and/or treatments of the Clients for the relevant period. You were unable and/or failed to produce your clinical records for the Clients.
9. On September 8, 2021, at the direction of the Inquiry Committee, the inspector requested that you produce the Clients’ clinical and billing records. You advised the inspector that you did not have the following documents for the Clients:
 - a. intake forms, medical history or treatment records, including daily treatment plans;
 - b. consent for treatment forms;
 - c. receipts for treatment; or
 - d. entries in any appointment book.

10. You contravened paragraph 1 of the 2012 Consent Order and engaged in professional misconduct under section 26 of the Act and/or contravened Standard 2.8 of the College's Standards of Practice for Registrants and the Clinical Record Keeping Practice Standard by failing to maintain and secure proper clinical records for the Client.

B. Breaches of the Inquiry Committee's section 35 orders

11. As a result of the information compiled by the Inquiry Committee, the Committee considered whether extraordinary action was required under s. 35 of the Act to protect the public.

12. On November 2, 2021, a panel of the Inquiry Committee (the "Panel") suspended your registration under s. 35(1)(b) of the Act pending completion of its own motion investigation or pending any hearing of the Discipline Committee. You were advised of the Panel's order on November 4, 2021.

13. On June 16, 2022 at 12:00 pm a College inspector, J.L., attended an appointment with you at your clinic. During the appointment, the inspector advised you of her ailments. You described various traditional Chinese medicine treatments to the inspector, performed an assessment on the inspector, and provided the inspector with a brochure addressing Sacroiliac (SI) Joint dysfunction and treatment. You recommended that the inspector start with "Treatment A" as listed on your SI Joint Treatment Fee Document and explained the process for completing Treatment A. You then pressed at various points of the inspector's abdomen and rib area to assess her clinical concerns. You also then noted redness on the inspector's ear and pressed an "ear bean" on the inspector's body.

14. On June 22, 2022 at approximately 12:00 pm the inspector, J.L., attended at your clinic for a second appointment. You assessed the inspector by pressing several points of her front hip flexor and abdominal area, inserted acupuncture needles into the inspector's body, and provided clinical advice to her. The inspector paid \$250.00 in cash for the assessment and clinical treatment you provided.

15. You contravened the Panel's s. 35(1)(b) order and engaged in professional misconduct under section 26 of the Act by engaging in the unauthorized practice of traditional Chinese medicine and/or acupuncture while your registration was suspended by the Panel.