

1 KAMALA D. HARRIS
Attorney General of California
2 JUDITH T. ALVARADO
Supervising Deputy Attorney General
3 CHRISTINA L. SEIN
Deputy Attorney General
4 State Bar No. 229094
California Department of Justice
5 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
6 Telephone: (213) 897-9444
Facsimile: (213) 897-9395
7 E-mail: Christina.Sein@doj.ca.gov
8 *Attorneys for Complainant*

9 **BEFORE THE**
SPEECH-LANGUAGE PATHOLOGY AND AUDIOLOGY AND HEARING AID
10 **DISPENSERS BOARD**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 1C-2012-62

13 **KWANG HO (KEN) LEE**
14 **3130 W. Olympic Blvd., #290**
Los Angeles, CA 90006

A C C U S A T I O N

15 **Hearing Aid Dispenser License No. HA**
16 **7552,**

17 Respondent.

18
19 Complainant alleges:

20 **PARTIES**

21 1. Paul Sanchez (Complainant) brings this Accusation solely in his official capacity as
22 the Executive Officer of the Speech-Language Pathology and Audiology and Hearing Aid
23 Dispensers Board, Department of Consumer Affairs (Board).

24 2. On or about September 30, 2009, the Board issued Hearing Aid Dispenser License
25 Number HA 7552 to Kwang Ho (Ken) Lee (Respondent). Said license was in full force and
26 effect at all times relevant to the charges brought herein and will expire on September 30, 2015,
27 unless renewed.
28

JURISDICTION

1
2 3. This Accusation is brought before the Board under the authority of the following
3 laws. All section references are to the Business and Professions Code unless otherwise indicated.

4 4. Section 2531.02 of the Code states:

5 "Protection of the public shall be the highest priority for the Speech-Language Pathology
6 and Audiology and Hearing Aid Dispensers Board in exercising its licensing, regulatory, and
7 disciplinary functions. Whenever the protection of the public is inconsistent with other interests
8 sought to be promoted, the protection of the public shall be paramount."

9 5. Section 651 of the Code states in pertinent part:

10 “(a) It is unlawful for any person licensed under this division or under any initiative act
11 referred to in this division to disseminate or cause to be disseminated any form of public
12 communication containing a false, fraudulent, misleading, or deceptive statement, claim, or image
13 for the purpose of or likely to induce, directly or indirectly, the rendering of professional services
14 or furnishing of products in connection with the professional practice or business for which he or
15 she is licensed. A "public communication" as used in this section includes, but is not limited to,
16 communication by means of mail, television, radio, motion picture, newspaper, book, list or
17 directory of healing arts practitioners, Internet, or other electronic communication.

18 “(b) A false, fraudulent, misleading, or deceptive statement, claim, or image includes a
19 statement or claim that does any of the following:

20 “(1) Contains a misrepresentation of fact.

21 “(2) Is likely to mislead or deceive because of a failure to disclose material facts.

22 “(3) (A) Is intended or is likely to create false or unjustified expectations of favorable
23 results, including the use of any photograph or other image that does not accurately depict the
24 results of the procedure being advertised or that has been altered in any manner from the image of
25 the actual subject depicted in the photograph or image....

26 “(4) Relates to fees, other than a standard consultation fee or a range of fees for
27 specific types of services, without fully and specifically disclosing all variables and other material
28 factors.

1 “(5) Contains other representations or implications that in reasonable probability will
2 cause an ordinarily prudent person to misunderstand or be deceived.

3 “(6) Makes a claim either of professional superiority or of performing services in a
4 superior manner, unless that claim is relevant to the service being performed and can be
5 substantiated with objective scientific evidence.

6 “(7) Makes a scientific claim that cannot be substantiated by reliable, peer reviewed,
7 published scientific studies.

8 “(8) Includes any statement, endorsement, or testimonial that is likely to mislead or
9 deceive because of a failure to disclose material facts.

10 “....

11 “(e) Any person so licensed may not use any professional card, professional announcement
12 card, office sign, letterhead, telephone directory listing, medical list, medical directory listing, or
13 a similar professional notice or device if it includes a statement or claim that is false, fraudulent,
14 misleading, or deceptive within the meaning of subdivision (b).

15 “....

16 “(g) Any violation of this section by a person so licensed shall constitute good cause for
17 revocation or suspension of his or her license or other disciplinary action.

18 “....”

19 6. Section 2533 of the Code states:

20 “The board may refuse to issue, or issue subject to terms and conditions, a license on the
21 grounds specified in Section 480, or may suspend, revoke, or impose terms and conditions upon
22 the license of any licensee for any of the following:

23 “....

24 “(e) Committing a dishonest or fraudulent act that is substantially related to the
25 qualifications, functions, or duties of a licensee.

26 “(f) Incompetence, gross negligence, or repeated negligent acts.

27 “....

28 “(k) Violation of Section 1689.6 or 1793.02 of the Civil Code.”

1 7. Section 2538.11 of the Code states:

2 "(a) 'Practice of fitting or selling hearing aids,' as used in this article, means those practices
3 used for the purpose of selection and adaptation of hearing aids, including direct observation of
4 the ear, testing of hearing in connection with the fitting and selling of hearing aids, taking of ear
5 mold impressions, fitting or sale of hearing aids, and any necessary postfitting counseling.

6 "The practice of fitting or selling hearing aids does not include the act of concluding the
7 transaction by a retail clerk.

8 "When any audiometer or other equipment is used in the practice of fitting or selling
9 hearing aids, it shall be kept properly calibrated and in good working condition, and the
10 calibration of the audiometer or other equipment shall be checked at least annually.

11 "(b) A hearing aid dispenser shall not conduct diagnostic hearing tests when conducting
12 tests in connection with the practice of fitting or selling hearing aids.

13 "(c) Hearing tests conducted pursuant to this article shall include those that are in
14 compliance with the Food and Drug Administration Guidelines for Hearing Aid Devices and
15 those that are specifically covered in the licensing examination prepared and administered by the
16 board."

17 8. Section 2538.35 of the Code states:

18 "A licensee shall, upon the consummation of a sale of a hearing aid, deliver to the purchaser
19 a written receipt, signed by or on behalf of the licensee, containing all of the following:

20 "(a) The date of consummation of the sale.

21 "(b) Specifications as to the make, serial number, and model number of the hearing aid or
22 aids sold.

23 "(c) The address of the principal place of business of the licensee, and the address and
24 office hours at which the licensee shall be available for fitting or postfitting adjustments and
25 servicing of the hearing aid or aids sold.

26 "(d) A statement to the effect that the aid or aids delivered to the purchaser are used or
27 reconditioned, as the case may be, if that is the fact.

28 "(e) The number of the licensee's license and the name and license number of any other

1 hearing aid dispenser or temporary licensee who provided any recommendation or consultation
2 regarding the purchase of the hearing aid.

3 "(f) The terms of any guarantee or written warranty, required by Section 1793.02 of the
4 Civil Code, made to the purchaser with respect to the hearing aid or hearing aids."

5 9. Section 2538.36 of the Code states:

6 "(a) Whenever any of the following conditions are found to exist either from observations
7 by the licensee or on the basis of information furnished by the prospective hearing aid user, a
8 licensee shall, prior to fitting or selling a hearing aid to any individual, suggest to that individual
9 in writing that his or her best interests would be served if he or she would consult a licensed
10 physician specializing in diseases of the ear or if no such licensed physician is available in the
11 community then to a duly licensed physician:

12 "(1) Visible congenital or traumatic deformity of the ear.

13 "(2) History of, or active drainage from the ear within the previous 90 days.

14 "(3) History of sudden or rapidly progressive hearing loss within the previous 90 days.

15 "(4) Acute or chronic dizziness.

16 "(5) Unilateral hearing loss of sudden or recent onset within the previous 90 days.

17 "(6) Significant air-bone gap (when generally acceptable standards have been established).

18 "(7) Visible evidence of significant cerumen accumulation or a foreign body in the ear
19 canal.

20 "(8) Pain or discomfort in the ear.

21 "(b) No referral for medical opinion need be made by any licensee in the instance of
22 replacement only of a hearing aid that has been lost or damaged beyond repair within one year of
23 the date of purchase. A copy of the written recommendation shall be retained by the licensee for
24 the period provided for in Section 2538.38. A person receiving the written recommendation who
25 elects to purchase a hearing aid shall sign a receipt for the same, and the receipt shall be kept with
26 the other papers retained by the licensee for the period provided for in Section 2538.38. Nothing
27 in this section required to be performed by a licensee shall mean that the licensee is engaged in
28 the diagnosis of illness or the practice of medicine or any other activity prohibited by the

1 provisions of this code."

2 10. California Code of Regulations, title 16, section 1399.126, states:

3 "(a) For purposes of Section 3365.5 of the code, a significant air-bone gap is defined as a
4 difference of 15 decibels or more between the higher air conduction and the lower bone
5 conduction pure tone thresholds at 2 or more succeeding octave frequencies of 500 Hertz through
6 and including 4000 Hertz.

7 "(b) Tests for significant air-bone gap shall be performed in a suitable environment using
8 appropriate equipment to establish threshold values and with appropriate masking procedures
9 employed."

10 11. California Code of Regulations, title 16, section 1399.127, subdivision (9) states:

11 "(9) Refers to a dispenser's certification by a professional organization but either does not
12 include the name of the certifying organization or, includes the name written in a manner not
13 easily understood by consumers.

14 Correct: John Doe, Hearing Aid Dispenser Lic. No. HA-xxxx

15 NB-HIS, Certified by the National Board of Certification in Hearing Instrument Sciences

16 Incorrect: John Doe, NB-HIS."

17 12. California Code of Regulations, title 16, section 1399.130, subdivision (d) states:

18 "Notwithstanding the causes for action listed under Section 2533 of the Code, the Board
19 may deny, issue subject to terms and conditions, suspend, or revoke a license, or impose
20 conditions of probation upon a licensee, for any of the following causes:

21 "...

22 "(d) Failure to cooperate and participate in any board investigation pending against the
23 licensee. This subsection shall not be construed to deprive a licensee of any privilege guaranteed
24 by the Fifth Amendment to the Constitution of the United States, or any other constitutional or
25 statutory privileges. This subsection shall not be construed to require a licensee to cooperate with
26 a request that would require the licensee to waive any constitutional or statutory privilege or to
27 comply with a request for information or other matters within an unreasonable period of time in
28 light of the time constraints of the licensee's practice. Any exercise by a licensee of any

1 constitutional or statutory privilege shall not be used against the licensee in a regulatory or
2 disciplinary proceeding against the licensee.”

3 **SONG-BEVERLY CONSUMER WARRANTY ACT**

4 13. Civil Code Section 1793.02 states in pertinent part:¹

5 “(a) All new and used assistive devices sold at retail in this state shall be accompanied by
6 the retail seller’s written warranty which shall contain the following language: “This assistive
7 device is warranted to be specifically fit for the particular needs of you, the buyer. If the device is
8 not specifically fit for your particular needs, it may be returned to the seller within 30 days of the
9 date of actual receipt by you or completion of fitting by the seller, whichever occurs later. If you
10 return the device, the seller will either adjust or replace the device or promptly refund the total
11 amount paid. This warranty does not affect the protections and remedies you have under other
12 laws.” In lieu of the words “30 days” the retail seller may specify any longer period.

13 “(b) The language prescribed in subdivision (a) shall appear on the first page of the
14 warranty in at least 10-point bold type. The warranty shall be delivered to the buyer at the time of
15 the sale of the device.

16 “(c) If the buyer returns the device within the period specified in the written warranty, the
17 seller shall, without charge and within a reasonable time, adjust the device or, if appropriate,
18 replace it with a device that is specifically fit for the particular needs of the buyer. If the seller
19 does not adjust or replace the device so that it is specifically fit for the particular needs of the
20 buyer, the seller shall promptly refund to the buyer the total amount paid, the transaction shall be
21 deemed rescinded, and the seller shall promptly return to the buyer all payments and any assistive
22 device or other consideration exchanged as part of the transaction and shall promptly cancel or
23 cause to be canceled all contracts, instruments, and security agreements executed by the buyer in
24 connection with the sale. When a sale is rescinded under this section, no charge, penalty, or other
25 fee may be imposed in connection with the purchase, fitting, financing, or return of the device.

26 “....”

27 ¹ The text of section 1793.02 of the Civil Code quoted herein is the text of the section as it
28 existed on the dates of the violations alleged.

1 COST RECOVERY

2 14. Section 125.3 of the Code states, in pertinent part, that the Board may request the
3 administrative law judge to direct a licentiate found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 COMPLAINT FILED BY M. Y.

7 15. M. Y., a 77-year-old male (at the time of purchase), saw an advertisement for hearing
8 aids promising clear sound without noise or distortion. The advertisement was by "Ken Lee:
9 HIS", "Board Certified UCLA" of Modus Hearing Aids (Modus). On or about December 2,
10 2010, M. Y. went to Modus and, at first, he did not want to purchase the hearing aids because it
11 was still difficult to understand what others were saying. Respondent, however, assured M. Y.
12 that it would only take a few adjustments of the hearing aids. Accordingly, M. Y. purchased a
13 pair of Starkey S, High End hearing aids, serial no. 11001422 (right) and no. 11001421 (left) for
14 \$2,600.

15 16. From the date of purchase until July 16, 2012, M. Y. states he had approximately 20
16 adjustments with no improvement and contends that the hearing aids were getting worse. M. Y.
17 alleges that he asked for a refund, but was refused.

18 17. M. Y. provided the Board a copy of the invoice dated December 2, 2010 and signed
19 by Respondent on December 3, 2010. The invoice does not have a hearing aid license number
20 printed on it, the hearing aid serial numbers, or the date and signature indicating the
21 consummation of the hearing aid sale (delivery or fitting date). The Song-Beverly Consumer
22 Warranty Act is not printed in bold, does not appear to be 10-point or larger font, the terms of the
23 warranty are not explained, and the language has been modified with statements added regarding
24 the retention of fees in the event of a refund. The warranty also does not include the office hours
25 that Respondent would be available for fitting or post-fitting adjustments and servicing of the
26 hearing aids.

27 18. In response to the Board's request for all documents relating to M. Y., including the
28 purchase agreement, delivery receipt, and chart notes, Respondent provided a registration form

1 lacking the required FDA questions, an unidentified copy of a test with air conduction testing
2 only and no patient name, and a copy of an invoice dated December 2, 2010, which lacked
3 hearing aid serial numbers and contained modified language from the Song-Beverly Consumer
4 Warranty Act.

5 19. In response to the Board's repeated requests for chart notes regarding adjustments to
6 M. Y.'s hearing aids, Respondent provided audio testing from Noah dated December 3, 2010 with
7 air conduction testing only, and Starkey software fitting summaries dated December 3, 2010,
8 January 12, 2011, and October 25, 2011, with no notes or comments. The hearing aid serial
9 numbers identified on the Noah testing and fitting summaries do not match M. Y.'s hearing aid
10 serial numbers.

11 **FIRST CAUSE FOR DISCIPLINE**

12 **(Incompetence, Gross Negligence, and/or Repeated Negligent Acts)**

13 20. Respondent's license is subject to disciplinary action under sections 2533,
14 subdivision (f), 2538.11, subdivision (c), 2538.35, subdivisions (b), (e), and (f), and 2538.36 of
15 the Code, section 1793.02, subdivisions (a), (b), and (c) of the Civil Code, and Title 16, sections
16 1399.126, subdivision (b), 1399.127, subdivision (9), and 1399.130, subdivision (d), of the
17 California Code of Regulations, in that Respondent exhibited incompetence, gross negligence,
18 and/or committed repeated negligent acts in his care and treatment of M. Y., as more particularly
19 alleged hereinafter:

20 21. Respondent's practice as set forth above in Paragraphs 15 through 19 are incorporated
21 by reference as if fully set forth herein.

22 22. Respondent's practice includes the following acts and/or omissions which constitute
23 extreme departures from the standard of care, incompetence and repeated negligent acts:

24 A. Respondent's registration form lacked the required FDA questions necessary to
25 determine the need for medical referral and clearance prior to the selling or fitting of hearing aids.

26 B. Respondent failed to perform bone conduction testing of M. Y. as required to
27 determine the need for medical referral and clearance prior to the selling or fitting of hearing aids.

28 C. Respondent failed to perform post-fitting verification testing.

1 D. Respondent's invoice failed to comply with the requirements for written
2 receipts and violated the Song-Beverly Consumer Warranty Act.

3 E. Respondent's advertisement does not properly identify himself as a hearing aid
4 dispenser, which should show his California hearing aid dispensing license number, and holds
5 himself out as being "Board Certified UCLA" when there are no schools in California which offer
6 Board Certification in hearing aid dispensing.

7 F. Respondent demonstrated poor recordkeeping and failed to comply with the
8 Board's repeated requests to provide complete documentation related to M.Y.'s records.

9 23. Respondent's acts and/or omissions as set forth in paragraphs 20 through 22, above,
10 whether proven individually, jointly, or in any combination thereof, constitute incompetence,
11 gross negligence, and/or repeated negligent acts pursuant to section 2533, subdivision (f), of the
12 Code. Therefore, cause for discipline exists.

13 **SECOND CAUSE FOR DISCIPLINE**
14 **(Dishonest or Fraudulent Act That is Substantially Related to the Qualifications, Functions,
or Duties of a Licensee)**

15 24. Respondent's license is subject to disciplinary action under sections 2533,
16 subdivision (e), and 651, subdivisions (a), (b), and (e), of the Code, section 1793.02, subdivisions
17 (a), (b), and (c) of the Civil Code, and Title 16, sections 1399.127, subdivision (9), and 1399.130,
18 subdivision (d), of the California Code of Regulations, in that Respondent committed a dishonest
19 or fraudulent act, as more particularly alleged hereinafter:

20 25. Respondent's practice as set forth above in Paragraphs 15 through 19 are incorporated
21 by reference as if fully set forth herein.

22 26. Respondent's practice includes the following dishonest or fraudulent acts:

23 A. Respondent's invoice failed to comply with the requirements for written
24 receipts and violated the Song-Beverly Consumer Warranty Act.

25 B. Respondent's advertisement does not properly identify himself as a hearing aid
26 dispenser, which should show his California hearing aid dispensing license number, and holds
27 himself out as being "Board Certified UCLA" when there are no schools in California which offer
28

1 Board Certification in hearing aid dispensing.

2 **THIRD CAUSE FOR DISCIPLINE**

3 **(Violation of the Song-Beverly Consumer Warranty Act)**

4 27. Respondent's license is subject to disciplinary action under sections 2533,
5 subdivision (k), of the Code and section 1793.02, subdivisions (a), (b), and (c), of the Civil Code,
6 in that Respondent's written warranty violates the Song-Beverly Consumer Warranty Act, as
7 more particularly alleged hereinafter:

8 28. Respondent's practice as set forth above in Paragraphs 15 through 19 are incorporated
9 by reference as if fully set forth herein.

10 29. The Song-Beverly Consumer Warranty Act is not printed in bold on Respondent's
11 written warranty, does not appear to be 10-point or larger font, the terms of the warranty are not
12 explained, and the language has been modified with statements added regarding the retention of
13 fees in the event of a refund. The warranty also does not include the office hours that Respondent
14 would be available for fitting or post-fitting adjustments and servicing of the hearing aids.

15 **COMPLAINT FILED BY J. H.**

16 30. J. H., a 63-year-old male (at the time of purchase), alleges that he visited Modus in
17 June 2012 to have his hearing tested by Respondent, who recommended a left hearing aid. J. H.
18 purchased the hearing aid for \$1,400 and alleges that, after five adjustments occurring in the July
19 through November 2012 timeframe, the hearing aid was useless and provided no benefit.

20 31. In July 2013, Respondent told J. H. that no further adjustments were possible and
21 recommended that J. H. continue using the hearing aid. J. H. continued to wear the hearing aid,
22 which he claimed had zero effectiveness, and requested a refund in August 2013. Respondent
23 refused to provide a refund.

24 32. J. H. provided the Board a copy of an invoice dated July 9, 2012 for a Starkey S, high
25 end, RIC hearing aid. In response to the Board's request, Respondent provided a copy of an
26 invoice for J. H. dated October 9, 2012. The invoices do not have a hearing aid license number
27 printed on it, the hearing aid serial numbers, or the date and signature indicating the
28 consummation of the hearing aid sale (delivery or fitting date). The Song-Beverly Consumer

1 Warranty Act is not printed in bold, does not appear to be 10-point or larger font, the terms of the
2 warranty are not explained, and the language has been modified with statements added regarding
3 the retention of fees in the event of a refund. The warranty also does not include the office hours
4 that Respondent would be available for fitting or post-fitting adjustments and servicing of the
5 hearing aids.

6 33. In response to the Board's request for all documents relating to J. H., including the
7 purchase agreement, delivery receipt, and chart notes, Respondent provided the October 9, 2012
8 invoice mentioned above and a computer printout of an audiogram with the printed date of
9 evaluation as September 5, 2012, however, handwritten next to that date is "June 10, 2012." The
10 provided audiogram lacks bone conduction testing.

11 34. The Board renewed its request for all documents related to J. H. having not received
12 all previously requested documents. Respondent never responded to the Board's last request.

13 **FOURTH CAUSE FOR DISCIPLINE**

14 **(Incompetence, Gross Negligence, and/or Repeated Negligent Acts)**

15 35. Respondent's license is subject to disciplinary action under sections 2533,
16 subdivision (f), 2538.11, subdivision (c), 2538.35, subdivisions (b), (e), and (f), and 2538.36 of
17 the Code, section 1793.02, subdivisions (a), (b), and (c) of the Civil Code, and Title 16, sections
18 1399.126, subdivision (b), 1399.127, subdivision (9), and 1399.130, subdivision (d), of the
19 California Code of Regulations, in that Respondent exhibited incompetence, gross negligence,
20 and/or committed repeated negligent acts in his care and treatment of J. H., as more particularly
21 alleged hereinafter:

22 36. Respondent's practice as set forth above in Paragraphs 30 through 34 are incorporated
23 by reference as if fully set forth herein.

24 37. Respondent's practice includes the following acts and/or omissions which constitute
25 extreme departures from the standard of care, incompetence and repeated negligent acts:

26 A. There was no patient case history or information forms, chart notes, or any
27 documentation with the required FDA questions necessary to determine the need for medical
28 referral and clearance prior to the selling or fitting of hearing aids.

1 B. Respondent failed to perform bone conduction testing of J. H. as required to
2 determine the need for medical referral and clearance prior to the selling or fitting of hearing aids.

3 C. The audiogram has conflicting dates of evaluation and the test should have been
4 performed prior to the sale and fitting of the hearing aid.

5 D. Respondent failed to perform post-fitting verification testing.

6 E. Respondent's invoice failed to comply with the requirements for written
7 receipts and violated the Song-Beverly Consumer Warranty Act.

8 F. Respondent demonstrated poor recordkeeping and failed to comply with the
9 Board's repeated requests to provide complete documentation related to J. H.'s records.

10 38. Respondent's acts and/or omissions as set forth in paragraphs 35 through 37, above,
11 whether proven individually, jointly, or in any combination thereof, constitute incompetence,
12 gross negligence, and/or repeated negligent acts pursuant to section 2533, subdivision (f), of the
13 Code. Therefore, cause for discipline exists.

14 **FIFTH CAUSE FOR DISCIPLINE**

15 **(Violation of the Song-Beverly Consumer Warranty Act)**

16 39. Respondent's license is subject to disciplinary action under sections 2533,
17 subdivision (k), of the Code and section 1793.02, subdivisions (a), (b), and (c), of the Civil Code,
18 in that Respondent's written warranty violates the Song-Beverly Consumer Warranty Act, as
19 more particularly alleged hereinafter:

20 40. Respondent's practice as set forth above in Paragraphs 30 through 34 are incorporated
21 by reference as if fully set forth herein.

22 41. The Song-Beverly Consumer Warranty Act is not printed in bold on Respondent's
23 written warranty, does not appear to be 10-point or larger font, the terms of the warranty are not
24 explained, and the language has been modified with statements added regarding the retention of
25 fees in the event of a refund. The warranty also does not include the office hours that Respondent
26 would be available for fitting or post-fitting adjustments and servicing of the hearing aids.

27 ///

28 ///

1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Speech-Language Pathology and Audiology and Hearing Aid
4 Dispensers Board issue a decision:

5 1. Revoking or suspending Hearing Aid Dispenser License Number HA 7552, issued to
6 Kwang Ho (Ken) Lee;

7 2. Ordering Kwang Ho (Ken) Lee to pay the Speech-Language Pathology and
8 Audiology and Hearing Aid Dispensers Board the reasonable costs of the investigation and
9 enforcement of this case, pursuant to Business and Professions Code section 125.3; and

10 3. Taking such other and further action as deemed necessary and proper.
11
12

13
14 DATED: April 23, 2015



15 PAUL SANCHEZ
16 Executive Officer
17 Speech-Language Pathology and Audiology and Hearing
18 Aid Dispensers Board
19 Department of Consumer Affairs
20 State of California
21 *Complainant*

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