

**SINGAPORE MEDICAL COUNCIL DISCIPLINARY TRIBUNAL INQUIRY FOR  
DR GOH SENG HENG AND DR GOH MING LI MICHELLE ON 22 JANUARY 2018**

**Disciplinary Tribunal:**

Ms Molly Lim, SC (Chairman)

Prof Lee Eng Hin

Prof Ho Tew Hong

Dr Swah Teck Shin

**Counsel for the Singapore Medical Council:**

Mr Kevin Ho

Ms Jeslyn Tan

(M/s Braddell Brothers LLP)

**Counsel for Dr Goh Seng Heng:**

Ms Mak Wei Munn

Ms Rachel Ong

(M/s Allen & Gledhill LLP)

**Counsel for Dr Goh Ming Li Michelle:**

Mr Lok Vi Ming, SC

Mr Joseph Lee

Ms Natalie Huang

(M/s LVM Law Chambers LLC)

## GROUNDS OF DECISION OF THE DISCIPLINARY TRIBUNAL

*(Note: Certain information may be redacted or anonymised to protect the identity of the parties.)*

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## A. Introduction

1. This inquiry relates to the seven (7) charges preferred by the Singapore Medical Council (“**SMC**”) against each of the following:
  - a. Dr Goh Seng Heng (“**the 1<sup>st</sup> Respondent**”); and
  - b. Dr Goh Ming Li Michelle (“**the 2<sup>nd</sup> Respondent**”).
2. At all material times between 2013 and 2014:
  - a. the 1<sup>st</sup> and 2<sup>nd</sup> Respondents were registered medical practitioners under the Medical Registration Act (Cap. 174) (“**MRA**”) at Aesthetic Medical Holdings Pte Ltd (“**AMHPL**”, which owns and operates the chain of medical clinics known as “*PPP Laser Clinics*”); and
  - b. both the 1<sup>st</sup> and 2<sup>nd</sup> Respondents were directors of AMHPL and had control over PPP Laser Clinics’ marketing and publicity materials.
3. Both the 1<sup>st</sup> and 2<sup>nd</sup> Respondents had agreed to a joint hearing of the charges against them.<sup>1</sup>

## B. The charges against the 1<sup>st</sup> Respondent

4. The seven (7) charges against the 1<sup>st</sup> Respondent are set out in a Notice of Inquiry (“**NOI**”) dated 2 October 2017 and as amended at the hearing on 22 January 2018.<sup>2</sup>
5. Briefly, the seven (7) charges against the 1<sup>st</sup> Respondent are that he had on seven (7) occasions (between 24 October 2013 and 24 April 2014), whilst practising as a medical practitioner registered under the MRA, breached the 2002 edition of the SMC Ethical Code and Ethical Guidelines (“**2002 ECEG**”) read with the Private Hospitals and Medical Clinics (Publicity) Regulations (Cap. 248, S 281/2004) (“**PHMCPR**”) when he listed his service information and advertised his services in the TODAY newspaper (a newspaper in circulation in Singapore), which advertisements solicited or encouraged the use of the services provided by PPP Laser Clinics, and where the 1<sup>st</sup> Respondent was described as, amongst other things, the “*Emeritus Consultant*” associated with PPP Laser Clinics.

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<sup>1</sup> See letters both dated 21 December 2017 from Counsel for the SMC and Counsel for the 2<sup>nd</sup> Respondent.

<sup>2</sup> See Annex A(1).

6. The relevant guidelines and regulation state that:
  - a. the listing of doctors' service information to the public shall not amount to blatant advertising – Guideline 4.4.1 of the 2002 ECEG;
  - b. it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies – Guideline 4.4.3.2 of the 2002 ECEG; and
  - c. any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution – Regulation 4(1)(f) of the PHMCPR.
7. The allegation made against the 1<sup>st</sup> Respondent is that the TODAY newspaper, being a form of general media, is not an allowable form of information outlet for listing of the 1<sup>st</sup> Respondent's services. The statements made in the advertisements in the TODAY newspaper, which offered treatment packages at PPP Laser Clinics, had solicited and/or encouraged the use of the services there.
8. Consequently, for each of the seven (7) occasions when the service information was listed and the advertisement was published in the TODAY newspaper, the 1<sup>st</sup> Respondent was charged with having been guilty of such improper act or conduct, which brings disrepute to the medical profession under Section 53(1)(c) of the MRA.

**C. The charges against the 2<sup>nd</sup> Respondent**

9. The seven (7) charges against the 2<sup>nd</sup> Respondent are set out in a NOI dated 2 October 2017 and as amended at the hearing on 22 January 2018.<sup>3</sup>
10. Briefly, the seven (7) charges against the 2<sup>nd</sup> Respondent are that she had on seven (7) occasions (between 24 October 2013 and 24 April 2014), whilst practising as a medical practitioner registered under the MRA, breached the 2002 ECEG read with the PHMCPR when she had listed service information and

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<sup>3</sup> See Annex A(2).

advertised her services in the TODAY newspaper which, being a form of general media, is not an allowable form of information outlet for listing of the 2<sup>nd</sup> Respondent's services, and which advertisements solicited and/or encouraged the use of the services provided by PPP Laser Clinics, of which the 2<sup>nd</sup> Respondent is named as the "*Founder & Chief Executive Officer*".

11. Such advertisements are in breach of Guidelines 4.4.1 and 4.4.3.2 of the 2002 ECEG read with Regulation 4(1)(f) of the PHMCPR, as reproduced in paragraph 6 above.
12. Consequently, for each of the seven (7) occasions when the service information was listed and the advertisement was published in the TODAY newspaper, the 2<sup>nd</sup> Respondent was charged with having been guilty of such improper act or conduct, which brings disrepute to the medical profession under s. 53(1)(c) of the MRA.

**D. The parties' agreement on 21 December 2017**

13. On 21 December 2017, Counsel for the SMC informed the Disciplinary Tribunal ("**DT**") that the SMC had reached an agreement with the 1<sup>st</sup> and 2<sup>nd</sup> Respondents on the charges against each of them in that:
  - a. both the 1<sup>st</sup> and 2<sup>nd</sup> Respondents would take a certain course of action with respect to the 4<sup>th</sup>, 6<sup>th</sup> and 7<sup>th</sup> charges in their respective NOIs; and
  - b. the SMC would agree to have the remaining charges taken consideration for the purpose of sentencing.<sup>4</sup>

**E. Hearing on 22 January 2018**

14. Prior to the hearing on 22 January 2018, all parties had submitted their respective submissions and bundles of documents, and which were marked at the hearing as follows:
  - a. Agreed Statement of Facts ("**ASOF**");
  - b. Agreed Bundle of Documents ("**ABOD**");
  - c. SMC's Submissions on Sentencing ("**PS**");
  - d. SMC's Table of Precedents ("**TOP**");

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<sup>4</sup> See letter dated 21 December 2017 from Counsel for the SMC.

- e. SMC's Bundles of Authorities ("**SBA**");
  - f. 1<sup>st</sup> Respondent's Plea in Mitigation ("**1RM**");
  - g. 1<sup>st</sup> Respondent's Bundle of Authorities ("**1RBA**");
  - h. 2<sup>nd</sup> Respondent's Plea in Mitigation ("**2RM**"); and
  - i. 2<sup>nd</sup> Respondent's Bundle of Authorities ("**2RBA**").
15. At the hearing, the DT also granted leave to Counsel for the SMC to amend:
- a. the charges against the 1<sup>st</sup> Respondent by adding, at sub-paragraph (c) of each charge, the phrase "*read in conjunction with Reg 4(1)(f) of the PHMCPR*" after the phrase "*In breach of Guidelines 4.4.1*"; and
  - b. the charges against the 2<sup>nd</sup> Respondent by adding, at sub-paragraph (c) of each charge, the phrase "*read in conjunction with Reg 4(1)(f) of the PHMCPR*" after the phrase "*In breach of Guidelines 4.4.1*", and to correct the typographical error in the 7<sup>th</sup> charge against her, at paragraph 7(c)(i) where the word "*Found*" should read as "*Founder*".

#### The 1<sup>st</sup> Respondent's plea

16. The 4<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> charges against the 1<sup>st</sup> Respondent were read out to him, and he pleaded guilty to all the three charges and offered his apology.
17. The ASOF was also read out to the 1<sup>st</sup> Respondent, who agreed to the same unconditionally.

#### The 2<sup>nd</sup> Respondent's plea

18. The 4<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> charges against the 2<sup>nd</sup> Respondent were read out to her, and she pleaded guilty to all the three charges and offered her apology.
19. The 2<sup>nd</sup> Respondent also confirmed her unconditional agreement to the ASOF.

#### Submissions and mitigation pleas

20. The DT then heard submissions from:

- a. Counsel for the 1<sup>st</sup> Respondent on the mitigation plea for the 1<sup>st</sup> Respondent and on the appropriate sanctions to be imposed;<sup>5</sup>
  - b. Counsel for the 2<sup>nd</sup> Respondent on the mitigation plea for the 2<sup>nd</sup> Respondent and on the appropriate sanctions to be imposed;<sup>6</sup> and
  - c. Counsel for the SMC on their response to the submissions made by Counsel for the 1<sup>st</sup> and 2<sup>nd</sup> Respondents, and on the appropriate sanctions to be imposed on the 1<sup>st</sup> and 2<sup>nd</sup> Respondents.<sup>7</sup>
21. The hearing was then adjourned for an hour for the DT to consider its decision and to pronounce its decision at the resumed hearing.

### **Orders of the DT**

22. At the resumed hearing, the DT read out the following orders made.

#### *As against the 1<sup>st</sup> Respondent*

23. Since the 1<sup>st</sup> Respondent had pleaded guilty to the 4<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> charges preferred against him by the SMC, the DT found that the three said charges had been made out against him and that he had, on each of the dates mentioned in the three charges, been guilty of such improper act or conduct, which in the opinion of the DT brought disrepute to the medical profession.
24. As for the sanctions to be imposed, having heard the submissions made by Counsel for the 1<sup>st</sup> Respondent and Counsel for the SMC, and taking into account all relevant circumstances, the mitigation tendered, and the precedent cases, the DT made the following orders under s. 53(2) of the MRA against the 1<sup>st</sup> Respondent, that the 1<sup>st</sup> Respondent:
- a. pays a penalty of \$20,000 for the 4<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> charges after having taken the other charges into consideration, namely the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 5<sup>th</sup> charges;
  - b. be censured;

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<sup>5</sup> See 1RM at [7] to [20] for the 1<sup>st</sup> Respondent's full submissions.

<sup>6</sup> See 2RM at [24] to [62] for the 2<sup>nd</sup> Respondent's full submissions.

<sup>7</sup> See PS at [42] to [60] for the SMC's full submissions. In addition, Counsel for the SMC tendered their skeletal submissions in reply ("SS"). See SS at [2] to [4] for the SMC's response and submissions on the sanctions to be imposed; see SS at [5] for the SMC's specific submissions addressing the 2<sup>nd</sup> Respondent's plea.

- c. gives an undertaking to the SMC that he will not engage in the improper act or conduct complained of or any similar kind; and
- d. pays to the SMC the costs and expenses of and incidental to these proceedings, which costs and expenses are to be agreed, and if not, to be taxed.

*As against the 2<sup>nd</sup> Respondent*

25. Since the 2<sup>nd</sup> Respondent had pleaded guilty to the 4<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> charges preferred against her by the SMC, the DT found that the three said charges had been made out against her and that she had, on each of the dates mentioned in the three charges, been guilty of such improper act or conduct, which in the opinion of the DT brought disrepute to the medical profession.
26. As for the sanctions to be imposed, having heard the submissions made by Counsel for the 2<sup>nd</sup> Respondent and Counsel for the SMC, and taking into account all relevant circumstances, the mitigation tendered, and the precedent cases, the DT made the following orders under s. 53(2) of the MRA against the 2<sup>nd</sup> Respondent, that the 2<sup>nd</sup> Respondent:
- a. pays a penalty of \$20,000 for the 4<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> charges after having taken the other charges into consideration, namely the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 5<sup>th</sup> charges;
  - b. be censured;
  - c. gives an undertaking to the SMC that she will not engage in the improper act or conduct complained of or any similar kind; and
  - d. pays to the SMC the costs and expenses of and incidental to these proceedings, which costs and expenses are to be agreed, and if not, to be taxed.
27. The DT thanked all Counsel for all assistance rendered, in particular for their submissions made on the precedent cases, which served as a useful guide for the DT when it considered the appropriate sanctions to be imposed.
28. The hearing was then concluded, and the parties were informed that the DT would deliver its grounds of decision shortly.

**F. The DT's grounds of decision**

*Fine more appropriate*

29. It was common ground between the respective Counsel for the SMC and for the 1<sup>st</sup> and 2<sup>nd</sup> Respondents (jointly “**the Respondents**”) that, having regard to the facts of this case and the precedent cases, this was not an appropriate case for a suspension order to be made against the Respondents. Instead, a fine would be more appropriate.
30. The DT agreed with all Counsel that, in this case, a fine rather than suspension would be appropriate.
31. In the precedent cases where a suspension order was made against a medical practitioner under s. 53(2)(b) of the MRA, it was because the medical practitioner had been found guilty of having published advertisements which were either “misleading”, “false”, or designed to mislead the public. See for example, the cases cited by the Disciplinary Tribunal in the case by the SMC against Dr Tan Yew Weng David (“**Dr Tan's case**”):<sup>8</sup>

*“[15(c)(ii)] in the case of **Dr B** (1998), the Respondent was penalised with a 6-month suspension for distributing a pamphlet advertising the medical services provided by his company and name cards bearing the names of 4 other doctors at 4 branch clinics for the purpose of obtaining patients or promoting a professional advantage. The advertisement was wrongful as it was designed to mislead the public into thinking that there were 4 doctors with the company and that there were 4 branch clinics forming part of the group, when in fact that was not the case;*

*[15(c)(iii)] in the case of **Dr C** (1998), the Respondent was penalised with a 3-month suspension for advertising in a widely circulated magazine and offering skin treatment at a discounted price at the Therapy Centre or for free to lucky participants, together with a*

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<sup>8</sup> See 1RBA at Tab 4 and 2RBA at Tab 11.

*photograph showing for the purpose of obtaining patients and/or promoting the doctor's professional advantage and the intent here was to mislead the public into thinking that the Therapy Centre was a licensed medical clinic..."*

32. The Respondents' case was clearly different from the suspension cases cited above. The charges against the Respondents were that they had advertised their services in the TODAY newspaper, which was then not an allowable form of information outlet, and had in their advertisements solicited and/or encouraged the use of their clinic's services. There was no suggestion or evidence that the information contained in the Respondents' advertisements were misleading or false or designed to mislead the public.
33. In the circumstances, the appropriate order in this case would be to impose on the Respondents a penalty not exceeding \$100,000 pursuant to s. 53(2)(e) of the MRA, and the usual consequential orders of censure, undertaking, and costs as provided under s. 53(2)(f), (g) and (h) of the MRA respectively.

#### *Parties' disagreement*

34. The main disagreement between the parties was the quantum of the penalty to be imposed, in particular, whether:
- a. some weight (and consequently a lower quantum is to be imposed) should be given to the several mitigating factors in favour of the 1<sup>st</sup> and 2<sup>nd</sup> Respondents;
  - b. the quantum to be imposed on the 1<sup>st</sup> and 2<sup>nd</sup> Respondents should be for a global sum;
  - c. if not, whether the quantum to be imposed on the 2<sup>nd</sup> Respondent should be lower than that imposed on the 1<sup>st</sup> Respondent; and
  - d. whether the quantum should be \$15,000 as proposed by the 1<sup>st</sup> Respondent, or in the higher range of between \$20,000 and \$25,000 as proposed by the SMC.

#### *The mitigating factors*

35. In support of their case for a lower quantum, Counsel for the 1<sup>st</sup> and 2<sup>nd</sup> Respondents cited numerous mitigating factors in their favour.<sup>9</sup> These factors include the Respondents' contributions to society, favourable testimonials, and their unblemished records.
36. In *Ang Peng Tiam v Singapore Medical Council and another matter* [2017] 5 SLR 356 ("**Ang's Case**"),<sup>10</sup> various mitigating factors were cited in Ang's favour such as his general good character and his contributions in community work.
37. However, as explained by the Court of Three Judges in Ang's case, "*in the context of medical disciplinary proceedings, where any mitigating value that an offender's good track record might attract must also be balanced against the wider interests of protecting public confidence in and the reputation of the medical profession*",<sup>11</sup> and in respect of the mitigating factors, "*the weight to be given to this consideration will be limited because the key sentencing objective at play is general deterrence. Further, we are also bound to have regard to the need to protect public confidence and the reputation of the medical profession*".<sup>12</sup>
38. Since the general objective of sentencing in medical disciplinary proceedings is of "*general deterrence*" and "*the need to protect public confidence and the reputation of the medical profession*", whilst the various mitigating factors cited by the Respondents were commendable, little or limited weight would be given to these factors when deciding on the appropriate quantum of penalty to be imposed.

#### *Global fine for both Respondents*

39. The 2<sup>nd</sup> Respondent's case was that the fine to be imposed should be for a global sum of \$15,000 for both Respondents, as there was only 1 advertisement (which contained both Respondents' photographs and the listing of their respective designations thereunder) to the public per charge. The 2<sup>nd</sup> Respondent argued that:<sup>13</sup>

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<sup>9</sup> See 1RM at [15] to [20] at 2RM at [57] to [61] for the 1<sup>st</sup> and 2<sup>nd</sup> Respondents' respective mitigating factors.

<sup>10</sup> See SS at [2] to [3].

<sup>11</sup> See Ang's case at [104].

<sup>12</sup> See Ang's case at [106].

<sup>13</sup> See 2RM at [46].

*“The prohibition in Guidelines 4.4.1 and 4.4.3.2 of the 2002 ECEG is directed at preventing a harm, namely the solicitation of public custom. There was a singular act done in this regard, in the form of a single advertisement (in each Charge). If for instance, both doctors had caused 2 separate types of advertisements to be placed each time, such that the mischief was twice inflicted, we would readily agree that both doctors should be separately punished as if both committed separate offences.”*

40. The DT could not agree to a global fine to be imposed for both Respondents. Each of the Respondents, as registered medical practitioners, is bound to observe the guidelines and regulations which governed the medical profession, and is culpable for his or her breach of the same.
41. The placement of the advertisements (whether it is by the Respondents in one joint advertisement or in two separate advertisements), which were in breach of the guidelines of the 2002 ECEG, would render each of the Respondents equally culpable for the breach.
42. Moreover, as each of the 1<sup>st</sup> and 2<sup>nd</sup> Respondents had been charged separately and found guilty on their separate charges, each would be sentenced on his/her own charges.

*Whether the quantum of the penalty should be lower for the 2<sup>nd</sup> Respondent*

43. Counsel for the 2<sup>nd</sup> Respondent also submitted orally that the quantum of penalty to be imposed on the 2<sup>nd</sup> Respondent should be lower than that for the 1<sup>st</sup> Respondent, in view of the fact that the 2<sup>nd</sup> Respondent's experience as a registered medical practitioner was only seven years compared to the 1<sup>st</sup> Respondent's 34 years.
44. The DT was of the view that in a case such as this where the improper conduct related to the advertisement of services which was an administrative act, the 2<sup>nd</sup> Respondent's relatively shorter years of experience was immaterial.

45. The 2<sup>nd</sup> Respondent, as the CEO of PPP Laser Clinics, was just as responsible as the 1<sup>st</sup> Respondent (as the Executive Group Chairman) for all advertisements placed by their administrative staff, including the placement of the advertisements complained of. As such, the 2<sup>nd</sup> Respondent would have to take equal responsibility with the 1<sup>st</sup> Respondent for the advertisements and be subject to the same penalty.

*Quantum of the fine*

46. The DT accepted the parties' submissions that Dr Tan's case<sup>14</sup> could be used as a starting guide on the amount of the penalty ("**the fines**") to be imposed.
47. In Dr Tan's case, he was charged in connection with an advertisement published in one issue of the TODAY newspaper, in which Dr Tan had associated himself, in an official capacity, with a non-medical product named Reduze ("**the Product**"), and with a non-medical company named Avenza Pte Ltd ("**Avenza**"), which marketed the Product by representing that he was the Medical Director of Avenza.
48. Originally, there were two charges preferred against Dr Tan, and pursuant to representations made by him, the SMC withdrew one charge and proceeded with the other charge against Dr Tan for having, by the said advertisement, acted in breach of Guideline 4.5.1.2 of the 2002 ECEG which brings disrepute to the medical profession under s. 53(1)(c) of the MRA. Dr Tan pleaded guilty to the charge and was ordered to pay a penalty of \$5,000.
49. Since Dr Tan's case involved only one charge, whereas the Respondents' case involved three charges to which each Respondent had pleaded guilty, and with four other charges being taken into consideration, the penalty to be imposed should be much more than \$5,000.
50. However, even using the fine of \$5,000 in Dr Tan's case (which was for one convicted charge) as a guide, in view of the numerous charges involved in the Respondents' case (three convicted charges and four charges taken into consideration), a fine of \$15,000 for each Respondent would still be inadequate.

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<sup>14</sup> See 1RBA at Tab 4, 2RBA at Tab 11, and TOP at S/N 1.

51. On the other hand, the DT was of the view that in deciding on the fines to be imposed on the Respondents, to be fair to the Respondents, some discount ought to be factored in to take into consideration the delay in the prosecution.
52. In Ang's case, the Court held that they would have ordered that Dr Ang be suspended for an aggregate period of 16 months but did not, as they had taken into account the "*inordinate delay in the institution and prosecution of the proceedings which has caused him prejudice in the form of having to endure the anxiety and distress of proceedings hanging over him*".<sup>15</sup> Consequently, the Court ordered that Dr Ang be suspended for an aggregate period of eight months. In short, the Court discounted the suspension period in view of the delay.
53. As made clear by the Court in Ang's case, the delay must be an "*inordinate delay*" due to no fault of Dr Ang (or the offender). The underlying rationale in the Court's willingness to apply a discount is so as to be fair to Dr Ang, who would have suffered a prejudice in the delay in the proceedings in having to endure the anxiety and distress of the proceedings. However, as was also made clear by the Court, there is a need to balance the prejudice caused to Dr Ang against the interests in protecting public confidence and the reputation of the profession.<sup>16</sup>
54. Applying the above principles, the DT was of the view that, in this case, it would be appropriate to apply a discount to the penalty to be imposed.
55. The complaint on the advertisements was made as early as in October 2013,<sup>17</sup> but the Respondents were notified of the complaint only in August 2014 (almost ten months later),<sup>18</sup> and asked to provide information on the treatment and equipment used and to confirm the number of times the advertisements were published.
56. The Respondents provided the information requested and copies of the advertisements in their responses both dated 2 October 2014.<sup>19</sup> Thereafter, and

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<sup>15</sup> See Ang's case at [128].

<sup>16</sup> See Ang's case at [128].

<sup>17</sup> See ABOD at Tab 1.

<sup>18</sup> See ABOD at Tabs 2 and 3.

<sup>19</sup> See ABOD at Tabs 6 and 7.

up to 17 March 2016<sup>20</sup> for almost two years, the SMC engaged the Respondents in correspondence, seeking more information on the treatments offered and to which the Respondents had provided.

57. It was only in October 2016,<sup>21</sup> two years later, that the Respondents were informed that disciplinary proceedings would be commenced against them in relation to the complaint. However, it was only one year later in October 2017<sup>22</sup> that the Respondents were formally charged.
58. There was no reason why these charges, which concerned the advertisements of the Respondents' services and solicitation of business, could not be brought earlier. The delays, which were not entirely due to the Respondents' fault, would have prejudiced them in terms of having to endure the distress and anxiety of the disciplinary proceedings.
59. In view of the delays (almost three years) in prosecuting the Respondents in relation to the complaint, the situation had also changed. The Respondents are no longer operating under AMHPL or PPP Laser Clinics, which the advertisements were promoting. The need for the penalty to be imposed on the Respondents to act as a deterrent and as a protection of public confidence has also assumed less significance with the passage of three years.
60. As such, it would not be appropriate (and would be excessive) to penalise the Respondents with a fine of \$25,000 each.
61. Instead, having considered all factors, the DT was of the view that a fine of \$20,000, as ordered against each Respondent would, in the circumstances of this case, be appropriate.

**G. Publication of Decision**

62. The DT orders that the grounds of decision be published with the necessary redaction of identities and personal particulars of the persons involved.

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<sup>20</sup> See ABOD at Tabs 18 and 19.

<sup>21</sup> See ABOD at Tabs 21 and 22.

<sup>22</sup> See ABOD at Tabs 23 and 24.

63. The Inquiry is hereby concluded.

Dated this 5<sup>th</sup> day of February 2018.

**Annex A(1)****1ST CHARGE**

1. That you, **DR GOH SENG HENG**, are charged that you, on or about 24 October 2013, whilst practising as a medical practitioner registered under the Medical Registration Act (Cap. 174) (“**MRA**”), had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The Singapore Medical Council’s Ethical Code and Ethical Guidelines 2002 edition (“**2002 ECEG**”) states that:-
  - (i) the listing of doctors’ service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the Private Hospitals and Medical Clinics (Publicity) Regulations (“**PHMCPR**”) provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
  - (i) were listed as a medical practitioner and the “*Executive Group Chairman*” associated with PPP Laser Clinics, with “*29 years of Clinical Experience in Aesthetic Medicine*”;

- (ii) advertised that you were able to perform “*Laser Medical Facials*” at PPP Laser Clinics, including “*MicroLaser Treatments*”, “*Cool-Touch Treatments*” and “*Laser & Light Combination Treatments*”; and
  
- (iii) advertised that you and/or PPP Laser Clinics were offering a “*\$100 Treatment Package*” at “*\$4,200 GST included for a Total of 124 Laser Treatments*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**2ND CHARGE**

2. That you, **DR GOH SENG HENG**, are charged that you, on or about 28 October 2013, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Executive Group Chairman*" associated with PPP Laser Clinics, with "*29 years of Clinical Experience in Aesthetic Medicine*";
  - (ii) advertised that you were able to perform "*Laser Medical Facials*" at PPP Laser Clinics, including "*MicroLaser Treatments*", "*Cool-Touch Treatments*" and "*Laser & Light Combination Treatments*"; and

- (iii) advertised that you and/or PPP Laser Clinics were offering a “*S100 Treatment Package*” at “*\$4,200 GST included for a Total of 124 Laser Treatments*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**3RD CHARGE**

3. That you, **DR GOH SENG HENG**, are charged that you, on or about 23 December 2013, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Founder & Emeritus Consultant*" associated with PPP Laser Clinics, with "*30 years of Clinical Experience in Aesthetic Medicine*";
  - (ii) advertised that you were able to perform "*Laser Medical Facials*" at PPP Laser Clinics, including "*Micro-Laser Treatments*", "*Cool-Touch Treatments*" and "*Laser & Light Combination Treatments*";

(iii) advertised that you and/or PPP Laser Clinics were offering “2 *Skin Rejuvenation Treatments in less than 5 minutes*”, with “*Immediate visible improvements [with] No Surgery, No Downtime*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics; and

(iv) advertised that you and/or PPP Laser Clinics were offering treatment packages at “*\$4,200 GST included for a Total of 224 Laser Treatments*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**4TH CHARGE**

4. That you, **DR GOH SENG HENG**, are charged that you, on or about 22 January 2014, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Emeritus Consultant & Chief Preceptor for PPP Doctors Globally*" associated with PPP Laser Clinics, with "*30 years of Clinical Experience in Aesthetic Medicine (since 1984)*";
  - (ii) advertised that you were able to perform "*Skin Rejuvenation Treatments*" at PPP Laser Clinics, including "*Micro-Laser Treatments*", "*Cool-Touch Treatments*" and "*Laser & Light Combination System*" treatments;

(iii) advertised that you and/or PPP Laser Clinics were offering “2 *Skin Rejuvenation Treatments in less than 5 minutes*”, with “*Immediate visible improvements [with] No Surgery, No Downtime*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics; and

(iv) advertised that you and/or PPP Laser Clinics were offering treatment packages as follows:

(1) “*CNY PACKAGE 01*” for “*8 days of Laser & Light Combination System*” at “*\$1,088 GST included*”, including “*8 Micro-Laser Treatments*”, “*8 Cool-Touch Treatments*” and “*8 Laser & Light Combination System*” treatments; and

(2) “*CNY PACKAGE 02*” FOR “*8 Months of Laser & Light Combination System*” at “*\$8,888 GST included*”, including “*32 Micro-Laser Treatments*”, “*32 Cool-Touch Treatments*” and “*32 Laser & Light Combination System*” treatments;

which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**5TH CHARGE**

5. That you, **DR GOH SENG HENG**, are charged that you, on or about 18 March 2014, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Emeritus Consultant & Chief Preceptor for PPP Doctors Globally*" associated with PPP Laser Clinics, with "*30 years of Clinical Experience in Aesthetic Medicine (since 1984)*";
  - (ii) advertised that you were able to perform treatments to "*Shrink Pores, Treat Pimples, Reduce Scars & Lighten Pigmentation*" at PPP Laser Clinics, including "*Micro-Laser (ML) Treatments*", "*Cool-Touch (CT) Treatments*" and "*Laser Light Cleaning System (LLCS) Treatments*"; and

- (iii) advertised that you and/or PPP Laser Clinics were offering treatment packages at “\$4,800” for “100 x Laser Light Cleaning System (LLCS) Treatments” and “8 x 3-in-1 Combination Treatments”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**6TH CHARGE**

6. That you, **DR GOH SENG HENG**, are charged that you, on or about 15 April 2014, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising as (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Chief Preceptor and Trainer of Regional PPP Doctors*";
  - (ii) advertised that you were able to perform "*PPP Laser Medical Facials*" at PPP Laser Clinics, including "*Laser Light Cleaning System (LLCS)*", "*Micro-Laser (ML)*" and "*Cool-Touch (CT)*" treatments;

(iii) advertised that you and/or PPP Laser Clinics were offering treatments which would bring about "*Cleaner, Healthier Skin In Less Than 5 Minutes*", which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics; and

(iv) advertised that you and/or PPP Laser Clinics were offering a "*\$100 Easter Buffet Package*" at "\$5,800" for "*200 x Laser Light Cleaning System (LLCS) Treatments*", "*8 x 3-in-1 Combination Treatments*" and "*120 pcs PPP Post-Laser Facial Masks*", which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**7TH CHARGE**

7. That you, **DR GOH SENG HENG**, are charged that you, on or about 24 April 2014, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Emeritus Consultant*" associated with PPP Laser Clinics, "*with 30 years of Clinical Experience in Aesthetic Medicine (Since 1984)*";
  - (ii) advertised that you were able to perform "*PPP Laser Medical Facials*" at PPP Laser Clinics, including "*Laser Light Cleaning System (LLCS)*", "*Micro-Laser (ML)*" and "*Cool-Touch (CT)*" treatments;

(iii) advertised that you and/or PPP Laser Clinics were offering treatments which would bring about "*Cleaner, Healthier Skin In Less Than 5 Minutes*", which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics; and

(iv) advertised that you and/or PPP Laser Clinics were offering a "*\$100 Easter Buffet Package*" at "\$5,800" for "*200 x Laser Light Cleaning System (LLCS) Treatments*", "*8 x 3-in-1 Combination Treatments*" and "*120 pcs PPP Post-Laser Facial Masks*", which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**Annex A(2)****1ST CHARGE**

1. That you, **DR GOH MING LI MICHELLE**, are charged that you, on or about 24 October 2013, whilst practising as a medical practitioner registered under the Medical Registration Act (Cap. 174) (“**MRA**”), had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The Singapore Medical Council’s Ethical Code and Ethical Guidelines 2002 edition (“**2002 ECEG**”) states that:-
  - (i) the listing of doctors’ service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the Private Hospitals and Medical Clinics (Publicity) Regulations (“**PHMCPR**”) provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
  - (i) were listed as a medical practitioner and the “*Founder & CEO of PPP Laser Clinic*”;

- (ii) advertised that you were able to perform “*Laser Medical Facials*” at PPP Laser Clinics, including “*MicroLaser Treatments*”, “*Cool-Touch Treatments*” and “*Laser & Light Combination Treatments*”; and
  
- (iii) advertised that you and/or PPP Laser Clinics were offering a “*\$100 Treatment Package*” at “*\$4,200 GST included for a Total of 124 Laser Treatments*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**2ND CHARGE**

2. That you, **DR GOH MING LI MICHELLE**, are charged that you, on or about 28 October 2013, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Founder & CEO of PPP Laser Clinic*";
  - (ii) advertised that you were able to perform "*Laser Medical Facials*" at PPP Laser Clinics, including "*MicroLaser Treatments*", "*Cool-Touch Treatments*" and "*Laser & Light Combination Treatments*"; and

- (iii) advertised that you and/or PPP Laser Clinics were offering a “*S100 Treatment Package*” at “*\$4,200 GST included for a Total of 124 Laser Treatments*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such act or improper conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**3RD CHARGE**

3. That you, **DR GOH MING LI MICHELLE**, are charged that you, on or about 23 December 2013, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Founder & CEO of PPP Laser Clinic*";
  - (ii) advertised that you were able to perform "*Laser Medical Facials*" at PPP Laser Clinics, including "*Micro-Laser Treatments*", "*Cool-Touch Treatments*" and "*Laser & Light Combination Treatments*";

(iii) advertised that you and/or PPP Laser Clinics were offering “2 *Skin Rejuvenation Treatments in less than 5 minutes*”, with “*Immediate visible improvements [with] No Surgery, No Downtime*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics; and

(iv) advertised that you and/or PPP Laser Clinics were offering treatment packages at “*\$4,200 GST included for a Total of 224 Laser Treatments*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such act or improper conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**4TH CHARGE**

4. That you, **DR GOH MING LI MICHELLE**, are charged that you, on or about 22 January 2014, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Founder & Chief Executive Officer of PPP Laser Clinics*";
  - (ii) advertised that you were able to perform "*Skin Rejuvenation Treatments*" at PPP Laser Clinics, including "*Micro-Laser Treatments*", "*Cool-Touch Treatments*" and "*Laser & Light Combination System*" treatments;

(iii) advertised that you and/or PPP Laser Clinics were offering “2 *Skin Rejuvenation Treatments in less than 5 minutes*”, with “*Immediate visible improvements [with] No Surgery, No Downtime*”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics; and

(iv) advertised that you and/or PPP Laser Clinics were offering treatment packages as follows:

(1) “*CNY PACKAGE 01*” for “*8 days of Laser & Light Combination System*” at “*\$1,088 GST included*”, including “*8 Micro-Laser Treatments*”, “*8 Cool-Touch Treatments*” and “*8 Laser & Light Combination System*” treatments; and

(2) “*CNY PACKAGE 02*” FOR “*8 Months of Laser & Light Combination System*” at “*\$8,888 GST included*”, including “*32 Micro-Laser Treatments*”, “*32 Cool-Touch Treatments*” and “*32 Laser & Light Combination System*” treatments;

which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**5TH CHARGE**

5. That you, **DR GOH MING LI MICHELLE**, are charged that you, on or about 18 March 2014, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Founder & CEO of PPP Laser Clinics*";
  - (ii) advertised that you were able to perform treatments to "*Shrink Pores, Treat Pimples, Reduce Scars & Lighten Pigmentation*" at PPP Laser Clinics, including "*Micro-Laser (ML) Treatments*", "*Cool-Touch (CT) Treatments*" and "*Laser Light Cleaning System (LLCS) Treatments*"; and

- (iii) advertised that you and/or PPP Laser Clinics were offering treatment packages at “\$4,800” for “100 x Laser Light Cleaning System (LLCS) Treatments” and “8 x 3-in-1 Combination Treatments”, which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**6TH CHARGE**

6. That you, **DR GOH MING LI MICHELLE**, are charged that you, on or about 15 April 2014, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Founder & Chief Executive Officer of PPP Laser Clinics*";
  - (ii) advertised that you were able to perform "*PPP Laser Medical Facials*" at PPP Laser Clinics, including "*Laser Light Cleaning System (LLCS)*", "*Micro-Laser (ML)*" and "*Cool-Touch (CT)*" treatments; and

- (iii) advertised that you and/or PPP Laser Clinics were offering treatments which would bring about "*Cleaner, Healthier Skin In Less Than 5 Minutes*", which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics; and
  
- (iv) advertised that you and/or PPP Laser Clinics were offering a "*\$100 Easter Buffet Package*" at "\$5,800" for "*200 x Laser Light Cleaning System (LLCS) Treatments*", "*8 x 3-in-1 Combination Treatments*" and "*120 pcs PPP Post-Laser Facial Masks*", which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.

**7TH CHARGE**

7. That you, **DR GOH MING LI MICHELLE**, are charged that you, on or about 24 April 2014, whilst practising as a medical practitioner registered under the MRA, had listed service information and carried out advertising of your services in the TODAY newspaper (a newspaper in circulation in Singapore), to wit :-

**Particulars**

- (a) The 2002 ECEG states that:-
- (i) the listing of doctors' service information to the public shall not amount to blatant advertising (Guideline 4.4.1); and
  - (ii) it is not allowable for doctors to list service information in newspapers, which is a form of general commercial media. It is also not allowable to carry out advertising, either by the doctor himself or by proxies (Guideline 4.4.3.2);
- (b) Reg 4(1)(f) of the PHMCPR provides that any publicity of the services of a healthcare institution shall not be done in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution;
- (c) In breach of Guidelines 4.4.1 read in conjunction with Reg 4(1)(f) of the PHMCPR and 4.4.3.2 of the 2002 ECEG, you published and/or caused to be published in the TODAY newspaper, being a form of general commercial media which is not an allowable information outlet for listing your services, an advertisement wherein you :-
- (i) were listed as a medical practitioner and the "*Founder & Chief Executive Officer of PPP Laser Clinics*";
  - (ii) advertised that you were able to perform "*PPP Laser Medical Facials*" at PPP Laser Clinics, including "*Laser Light Cleaning System (LLCS)*", "*Micro-Laser (ML)*" and "*Cool-Touch (CT)*" treatments; and

- (iii) advertised that you and/or PPP Laser Clinics were offering treatments which would bring about "*Cleaner, Healthier Skin In Less Than 5 Minutes*", which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics; and
  
- (iv) advertised that you and/or PPP Laser Clinics were offering a "*\$100 Easter Buffet Package*" at "\$5,800" for "*200 x Laser Light Cleaning System (LLCS) Treatments*", "*8 x 3-in-1 Combination Treatments*" and "*120 pcs PPP Post-Laser Facial Masks*", which solicited and/or encouraged the use of the services provided by you and/or PPP Laser Clinics;

and that in relation to the alleged facts you have been guilty of such improper act or conduct which, in the opinion of the Disciplinary Tribunal, brings disrepute to your profession, under Section 53(1)(c) of the MRA.