



Court File No.

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

COLLEGE OF PHYSICIANS AND SURGEONS OF ONTARIO

Applicant

and

REZA GHALAMGHASH

Respondent

**APPLICATION UNDER Section 87 of the Health Professions Procedural Code, being  
Schedule 2 to the *Regulated Health Professions Act, 1991*, S.O. 1991, c. 18**

**NOTICE OF APPLICATION**

**TO THE RESPONDENT**

A LEGAL PROCEEDING HAS BEEN COMMENCED by the applicant. The claim made by the applicant appears on the following page.

THIS APPLICATION will come on for a hearing

- ☐ In person
- ☐ By telephone conference
- ☒ By video conference

at the following location: Superior Court of Justice, 330 University Avenue., Toronto, ON M5G 1R7 on a day to be set by the registrar.

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or an Ontario lawyer acting for you must forthwith prepare a notice of appearance in Form 38A prescribed by the Rules of Civil Procedure, serve it on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in this Court Office, and you or your lawyer must appear at the hearing.

IF YOU WISH TO PRESENT AFFIDAVIT OR OTHER DOCUMENTARY EVIDENCE TO THE COURT OR TO EXAMINE OR CROSS-EXAMINE WITNESSES ON THE APPLICATION, you or your lawyer must, in addition to serving your notice of appearance, serve a copy of the evidence on the applicant's lawyer or, where the applicant does not have a lawyer,

serve it on the applicant, and file it, with proof of service, in the court office where the application is to be heard as soon as possible, but at least two days before the hearing.

IF YOU FAIL TO APPEAR AT THE HEARING, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO OPPOSE THIS APPLICATION BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

Date

Issued by \_\_\_\_\_  
Local registrar

Address of  
Court office 330 University Avenue  
Toronto, Ontario M5G 1R7

TO: Reza Ghalamghash  
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## APPLICATION

### THE APPLICANT MAKES APPLICATION FOR:

1. An order, if necessary, abridging the time for service and filing of all court materials filed by the Applicant, the College of Physicians and Surgeons of Ontario (“CPSO”);
2. An interim, interlocutory and permanent order directing the Respondent, Reza Ghalamghash, to comply with sections 27, 30 and 33 of the *Regulated Health Professions Act, 1991*, S.O. 1991, c.18 (“RHPA”), and sections 4 and 9 of the *Medicine Act, 1991*, S.O. 1991, c. 30 (“*Medicine Act*”), and in particular:
  - (a) to permanently refrain from:
    - (i) using the title “doctor” and any variation or abbreviation thereof, including “Dr.”, in the course of providing or offering to provide, in Ontario, health care to individuals;
    - (ii) holding himself out as a person qualified to practice in Ontario as a physician, surgeon or in a specialty of medicine such as dermatology, including through the use of the titles “surgeon” and “dermatologist”, and through the use of any designations associated with the practice of medicine;
    - (iii) performing or offering to perform any controlled act, including but not limited to administering a substance by injection and performing a procedure below the dermis; or
    - (iv) treating or advising a person with respect to his or her health in circumstances in which it is reasonably foreseeable that serious bodily harm

may result from the treatment or advice or from an omission from the treatment or advice; and

- (b) to immediately remove, and to permanently refrain from displaying or permitting to be displayed on any website, social media account, certificate, diploma, email address, advertisement, brochure, business card, receipt, letterhead, or other document connected to or associated with the provision of any health care:
  - (i) all references to the titles “doctor”, “Dr.”, “surgeon” and “dermatologist”, as applied to the Respondent;
  - (ii) all references to the Respondent indicating that he is a doctor, physician, surgeon, or dermatologist;
  - (iii) all references that the Respondent performs, or is permitted to perform, any controlled act, including but not limited to administering a substance by injection and performing a procedure below the dermis; and
  - (iv) any other references, claims or assertions which fail to comply with the RHPA and the *Medicine Act*.

3. Its costs of this application; and

4. Such further and other relief as counsel may advise and this Court may permit.

**THE GROUNDS FOR THE APPLICATION ARE:**

5. The CPSO is the self-regulating body for the medical profession in Ontario;

6. The CPSO regulates the practice of medicine and is entrusted with serving and protecting the public interest;

7. Only members of the CPSO, the College of Chiropractors of Ontario, the College of Optometrists of Ontario, the College of Psychologists of Ontario, and the Royal College of Dental

Surgeons of Ontario may use the title “doctor” and abbreviations and variations thereof, such as “Dr.”, in the course of providing or offering to provide, in Ontario, health care services;

8. Only members of the CPSO may use the titles “physician”, “surgeon” and “dermatologist”;

9. Only members of the CPSO may hold themselves out as persons qualified to practice in Ontario as physicians or in a specialty of medicine, including dermatology;

10. There are certain acts (“controlled acts”) that can only be performed by members of a regulated health profession, or, in certain circumstances that do not apply here, by persons to whom members have properly delegated those acts. Controlled acts include administering a substance by injection and performing a procedure on tissue below the dermis;

11. The Respondent is not a member any regulated health profession in Ontario, including the Applicant CPSO;

12. Nonetheless, the Respondent:

- (a) provides or offers to provide, in Ontario, health care services to individuals, including prescribing and administering facial cosmetic injections, which are controlled acts;
- (b) uses the title “doctor” and a variation or abbreviation thereof, namely “Dr.”, in the course of providing or offering to provide, in Ontario, health care to individuals;
- (c) uses the titles “surgeon” and “dermatologist” and holds himself out as a person who is qualified to practice in Ontario as a surgeon and dermatologist;
- (d) treats or advises individuals with respect to their health in circumstances in which it is reasonably foreseeable that serious bodily harm may result from the treatment or advice or from an omission from the treatment or advice, including prescribing and administering facial cosmetic injections;

13. Sections 27, 30 and 33 of the *Regulated Health Professions Act*, 1991, S.O. 1991, c.18;
14. Sections 4 and 9 of the *Medicine Act*, 1991, S.O. 1991, c. 30;
15. Section 87 of the Health Professions Procedural Code, being Schedule 2 to the *Regulated Health Professions Act*, 1991, S.O. 1991, c. 18;
16. Rules 3, 14.05, and 40 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194;
17. Section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C. 43; and
18. Such further and other grounds as counsel may advise and this Court may permit.

**THE FOLLOWING DOCUMENTARY EVIDENCE WILL BE USED AT THE HEARING OF THE APPLICATION:**

19. The affidavit of Joseph Ashkan, sworn March 7, 2025;
20. The affidavit of Shanna Yee, sworn March 6, 2025;
21. The affidavit of Lisa Tucker, sworn March 7, 2025;
22. The affidavit of Robert Todd, sworn March 5, 2025;
23. The affidavit of Greg Hutchinson, sworn March 4, 2025;
24. The affidavit of Thomas Musters, sworn March 11, 2025;
25. The affidavit of Dr. Jimmy Poon, sworn March 17, 2025; and
26. The affidavit of Dr. Anil Chopra, sworn March 24, 2025.
27. Such further and other evidence as counsel may advise and this Court may permit.

April 3, 2025

**STEINECKE MACIURA LEBLANC**

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College of Physicians and Surgeons of Ontario

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PROCEEDING COMMENCED AT TORONTO

**NOTICE OF APPLICATION**

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