

Dr. Al-Hallak provided a detailed response in which he argued that Mr. Stanowich was biased, his inspection lacked objectivity, and he was disrespectful when conducting the inspection. Dr. Al-Hallak has questioned Mr. Stanowich's authority, process, and judgement throughout the entirety of the report, and does not appear to have been able to objectively self-reflect on some of his behaviors that Mr. Stanowich was inquiring about.

Under section 53.4(2)(e) of the *Health Professions Act* (HPA), I must make a referral to the Complaints Director if, on the basis of information contained in the inspection report, I am of the opinion that a regulated member's conduct constitutes unprofessional conduct. Based on the information contained in the inspection report, I am of the opinion that Dr. Al-Hallak's conduct constitutes unprofessional conduct. Without limiting the scope of concerns raised in Mr. Stanowich's report, I am of the opinion that the report shows evidence of unprofessional conduct under the following four elements of unprofessional conduct set out in section 1(1)(pp) of the *Health Professions Act*:

- (i) displaying a lack of knowledge of or lack of skill or judgment in the provision of professional services;
- (ii) contravening the Code of Ethics and the Standards of Practice for Pharmacists and Pharmacy Technicians;
- (iii) contravening of schedule 19 of the HPA in respect of Dr. Al-Hallak practicing outside of the scope of pharmacy; and
- (iv) engaging in conduct that harms the integrity of regulated profession of pharmacy.

I am also concerned that Dr. Al-Hallak may have breached section 3 of the *Pharmacy and Drug Act* which limits the provision of a "pharmacy service" to a "licensed pharmacy with an appropriate category of license."

From the evidence set out in the report, I am concerned that Dr. Al-Hallak's practice demonstrates conduct that is a risk to the public and jeopardizes the integrity of our profession. More specifically, I am concerned that Dr. Al-Hallak:

- may be misleading and harming the public by inappropriately using his Doctor of Philosophy designation in his pharmacist practice, leaving the impression that he is a medical doctor;
- may be issuing advertising that is inaccurate and misleading;
- may be prescribing drugs and administering drugs by injection for patients, and failing to collaborate with other health care professionals when doing so;
- may not be complying with ACP's Standards of Practice for Pharmacists and Pharmacy Technicians with respect to the assessment of patients, prescribing of drugs, dispensing of drugs and maintenance of records, and;
- may be prescribing and conducting interventions that are not evidenced based, and that may be outside the scope of pharmacist practice.

I am requesting that you investigate Dr. Al-Hallak's conduct in the course of his practice to determine whether, under section 66(3) of the *Health Professions Act*, this matter should be referred to a Hearing Tribunal or dismissed.