




REPLY ON COMPLAINT SUBMITTED BY DR. BAKKEN



kamal alhallak

ACP# 9538

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He is offering treatment for Acne & Snoring. Reading through the website information he is diagnosing medical conditions and offering treatments.....	28
He states his clinic specializes in advanced acne that GP's (like me) and dermatologists fail at. There is	

no referral of these patients to appropriate MD's or sleep diagnostic centers.....	28
The Buttock Lift shows a picture quoting 30 vials of fill and 4 threads! This is an extremely high number to inject into tissue that can create vascular compromise. a.	28
He is not trained or licensed to offer/perform the "P" Shot, patented by Dr. Runels. His description of the procedure is also inaccurate. It also is not a permanent fix for erectile dysfunction.	29
I have included the initial website that I saw and have printed just particular sections from it that was present in May into June which I will call number 1.....	31
Subsequently the third website from later June into early July shows these online certificates being replaced with different certificates. Copies of the hands-on training certificates are included.	31
I am trained, certified and licensed for some of the Vampire procedures. The list of registered injectors is available on Dr. Runel's website..	31
As I have mentioned on the website number 1 it states there was a clinical manager with twenty years' experience and at that time there).	33
His PRP section is a mixture of inaccuracies and I have made some written comments on some of these photocopied sections enclosed.	33
He is not a pioneer in the field and the relevancy of "medical certificate" requires explanation.	33
I have read the standards of practice for the Alberta College of Pharmacy. I believe it is incumbent of your pharmacist.....	33
Mr. Alhallak's website has been revamped 3 times in less than 3 months and significantly. Most of the boasting,.....	34
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I have included some testimonials which are updated on a regular basis. Physicians are not allowed to have these on a website as the College views these very differently from a Google or RateMD Review.	34
I covered this part; with technology advancement, we came up with a new way to keep updating the testimonies in real-time.....	34
Having the best client satisfaction rate in Alberta (Where is the proof?).	34
Having the absolute best reviewed medical spa/laser center and cosmetic clinic in the whole Albany area (His is the only cosmetic clinic in Albany).	35
Having the most advanced cosmetic clinic in Alberta!.....	35
Making statements that he is one of a few people who use Botox to reshape lips/eyebrows/face slimming and neck lift.....	35
Claiming to be the number 1 Botox injector in Edmonton (I personally know several MD's in Edmonton that would refute this).....	35
Claiming to have the best lasers (can't substantiate).....	36
Under Vampire Breast Lift-That he is the official provider and has the best training and client satisfaction rates in Alberta.....	37
Claims to be the only certified Vampire "O" Shot provider in Edmonton and that he is only one of a few in Canada to provide this Vampire PRP Procedure.	37
That he claims to have 25 years of experience within his medical spa and laser center. This misrepresents the truth.	37
States that anyone can have a Vampire Facelift. This statement is not true, and there are significant	

and specific contraindications. 37

Claims to be the best provider of PRP for skin tightening and hair loss in Edmonton (proof?). 37

States he has very long experience with PRP - training and evidence to support this not accompanying this statement and he applied for certification only in 2019. 37

States he uses RegenLab PRP kits and that these are the best and most expensive. This is a false claim as well 37

States Bellefill, permanent filler, is the most studied dermal filler on the market (not sure where this claim comes from). 37

The general spa industry is not regulated, and vigilance is required to protect the public from harm by those involved in the industry. 38

I have some questions that I feel need clarification and answers due to their serious nature as I persisted to follow the website changes. Some of these have been brought up in my list of concerns; 39

First of all, I want to thank Mr. Krempien for coordinating the investigation of Dr. Bakken's complaint. Many thanks to Jennifer Mosher, who is assigned by the Alberta College of Pharmacists (ACP), to carry out the investigation. Moreover, I wish to thank the complainer, Dr. Bakken, for the time she spent auditing www.albanylaser.ca.

Knowing that a physician in a different city is continuously checking our publications and services, is an indication that my successful practice in the cosmetic field expanded beyond. Moreover, it gave me more confidence in my choice of getting involved in the cosmetic field.

In this reply, you will find

In my reply I provided four sections as following

- Summary about Dr. Bakken's Complaint
- Summary of my Practice, Education and training
- Replies to all Dr. Bakken's questions in the order that she provided

In the last section, I retyped the questions submitted by Dr. Bakken's complaint, in the order she provided them, in blue and answered then one by one in black.

Summary about Dr. Bakken's Complaint

I went through the complaint carefully, trying to spot the basis of Dr. Bakken's complaint. However, after reading her letter to the ACP's complaint department, I realized that she is not concerned about public safety. However, Dr. Bakken is more concerned about her medical spa business and worried about competition. She conducted complete audit on me, my practice, my website, my business structure, scheduling, staffing.

Instead of her spending time to improve her skills, service quality, patient satisfaction, and marketing strategies, she thought it would be easier to eradicate the competition by complaining about me and my practice.

As I read through this complaint, I was saddened by Dr. Bakken's perception of Pharmacists, myself specifically. She insisted on referring to me as "this Pharmacist" and "Mr. Alhallak," yet she is fully aware that I hold a Ph.D. in Pharmacy and Pharmaceutical Sciences from U of A. Her information about the legal eligibilities of Pharmacists to prescribe and inject medication and medical devices is outdated. Moreover, she failed to realize that Pharmacist is a self-regulated profession and assigned herself an auditor and public protector. She mentioned in her letter that she submitted the same complaint to different entities such as CPSA, Dr. Runels from the Cellular Medicine Association, and Allergan. I believe she should have more faith and trust in the ACP.

Moreover, she put her knowledge and practice as the ultimate reference for all practices in the cosmetic field. She is under the impression that being an M.D. gave her the right to demote and degrade all other health professions. Moreover, Dr. Bakken wrongly thinks that acquiring knowledge and competencies are limited to her and selected physicians. She used her competencies and perception to set the bar for all other health professionals in this field.

Dr. Bakken has a bad reputation in her home town, between colleagues and co-workers and employees. She was forced out of Red Deer Hospital and had an alarmingly high turn-out rate among her employees.

I looked for Davenport clinic website and I notice she does not have one! It really dazzled me how a medical business at this time does not have a website.

In conclusion, her complaint is merely a reflection of a jealous competitor who feels superior to others and cannot keep up with an ever-developing field, such as the cosmetic field.



Michelle McCulloch

5 reviews



★★★★★ 5 months ago

I drive to Albany Cosmetics from Red Deer because Dr Kamal is wonderful!! His eye for beauty is 2nd to none and so updated in all he does . He's truly gift...



1



Albany Cosmetic and Laser centre (Own...

5 months ago

Thanks Michelle :)



Bethany Reese

2 reviews



★★★★★ 8 months ago

Dr. Alhallak is absolutely fantastic and very professional in everything he does! I have done several procedures with him and to be honest, I a...



2



Albany Cosmetic and Laser centre (Own...

8 months ago

Thanks for the nice words

That being said, I feel compelled to reply to this complaint as it came from the ACP. Moreover, I must mention that once the College concludes this investigation, I will submit a professional misconduct complaint against Dr. Bakken. This is based on the selling of compounds and medications in her clinic, in addition to trafficking and committing unjustified billing between her clinic and medical spa. Moreover, I will take legal actions against Dr. Bakken for stalking and defaming.

I do believe that the ACP should also touch base with the CPSA about the disrespect Dr. Bakken showed in this matter to our profession, the ACP authority and legibility.

Summary of my Practice, Education, and Training:

I want to give the investigators a brief review about myself. My name is, MHD Kamal Alhallak, the MHD is an abbreviation for Mohammad. I graduated as the 2002-class valedictorian from the Faculty of Pharmacy and Pharmaceutical Sciences at Damascus University. After finishing my M.Sc. in industrial pharmacy at U of D, I received admission to the Ph.D. program at the faculty of Pharmacy at U of A under Dr. Leobenbergs supervision. I commenced the program in September 2006 and graduated in September 2012 with a Doctorate in Pharmacy and Pharmaceutical Sciences. During my post-graduate studies, I taught all the sterile and non-sterile compounding labs. In 2010, the dean of the Faculty of Pharmacy awarded me the prestigious "The Graduate Student Teaching Award" alongside several awards and scholarships. Along with my post-graduate studies, I was able to pass my PEBC exams and complete my internship. Along with my doctorate, I managed to work as a part-time community pharmacist until my graduation.

My supervisory committee was interdisciplinary between Pharmacy, Medicine, and engineering. During my Ph.D. program, I published seven papers that included peer-reviewed original research and review papers.

Please find a list of my peer-reviewed published articles.

[Distribution of effervescent inhalable nanoparticles after pulmonary delivery: an in vivo study.](#)

Al-Hallak MH, Sarfraz MK, Azarmi S, Roa WH, Finlay WH, Rouleau C, Löbenberg R.
Ther Deliv. 2012 Jun;3(6):725-34.

[Secondary cytotoxicity mediated by alveolar macrophages: a contribution to the total efficacy of nanoparticles in lung cancer therapy?](#)

Al-Hallak KM, Azarmi S, Anwar-Mohamed A, Roa WH, Löbenberg R.

[Pulmonary delivery of inhalable nanoparticles: dry powder inhalers.](#)

Al-Hallak MH, Sarfraz MK, Azarmi S, Roa WH, Finlay WH, Löbenberg R.
Ther Deliv. 2011 Oct;2(10):1313-24. Review.

[Inhalable nanoparticles, a non-invasive approach to treat lung cancer in a mouse model.](#)

Roa WH, Azarmi S, **Al-Hallak MH**, Finlay WH, Magliocco AM, Löbenberg R.

J Control Release. 2011 Feb 28;150(1):49-55. doi: 10.1016/j.jconrel.2010.10.035. Epub 2010 Nov 6.

[Pulmonary toxicity of polysorbate-80-coated inhalable nanoparticles; in vitro and in vivo evaluation.](#)

Al-Hallak MH, Azarmi S, Sun C, Lai P, Prenner EJ, Roa WH, Löbenberg R.
AAPS J. 2010 Sep;12(3):294-9. doi: 10.1208/s12248-010-9190-4. Epub 2010 Apr 20. No abstract available.

[Microcalorimetric method to assess phagocytosis: macrophage-nanoparticle interactions.](#)

Al-Hallak MH, Sarfraz MK, Azarmi S, Kohan MH, Roa WH, Löbenberg R.

AAPS J. 2011 Mar;13(1):20-9. doi: 10.1208/s12248-010-9240-y. Epub 2010 Nov 6.

[Isothermal microcalorimetry as a quality by design tool to determine optimal blending sequences.](#)

Al-Hallak MH, Azarmi S, Xu Z, Maham Y, Löbenberg R.

AAPS J. 2010 Sep;12(3):417-23. doi: 10.1208/s12248-010-9202-4. Epub 2010 May 12.

[Thermal treating of acrylic matrices as a tool for controlling drug release.](#)

Hasanzadeh D, Ghaffari S, Monajjemzadeh F, **Al-Hallak** MH, Soltani G, Azarmi S.

Chem Pharm Bull (Tokyo). 2009 Dec;57(12):1356-62.

My thesis was accepted and published under the title “Inhalable nanoparticles in lung cancer treatment; efficacy, safety, distribution and nanoparticle-macrophage interactions.”

<https://era.library.ualberta.ca/items/f8d893fc-acb9-4323-8103-6478d74f4b71>

Here is a bibliography about training and education

- *Candidate of Master of Business Administration from the University of Alberta*
- *A Master of Science degree in Industrial Pharmacy*
- *A Doctor of Philosophy in Pharmaceutical Sciences based on transdermal and inhaled delivery system of drugs*
- *Certified Diabetes Educator;*
- *Certified Respiratory Educator;*
- *Certified Geriatric Pharmacist*
- *Certificates from the British Columbia Academy of Medical Aesthetics and Skin Care in the following:*
 - *Platelet-Rich Plasma Therapy for skin rejuvenation and hair restoration (completed December 2016);*
 - *Lipodissolve Mesotherapy by microinjections & ultrasonic / radiofrequency / vacuum cavitation for localized fat reduction and body contouring (completed November 2016);*
 - *Cosmetic Administration of Botulinum Toxin (BOTOX) and Injectable Soft Tissue Dermal Fillers (completed December 2016);*
- *Training as a phlebotomist from NAIT;*
- *Training in how to perform an “O-shot” (clitoral and intravaginal PRP injection).*
- *Training in how to perform vampire PRP different treatments*
- *Training for the Brazilian butt-lift under Dr. Vance Elliot in Sherwood Park through Galderma.*

Additionally, I wish to add the following:

- *Negotiation and selling skills training Jan and Feb 2014*
- *Radiation safety course, U of A, 2007*

- Care and Use of Animal in Research, part one and part two, U of A, 2007
 - Hands-On Master Class on minimally invasive techniques with IFASS in Seoul, South Korea June 2017. The course was two days that covered most of the cosmetic injectables
 - PDO Training at Medical Estiteka, Istanbul, Turkey Sept 2018. The course focused on using PDO Threads.
 - Hands-On Master Class on minimally invasive techniques with IFASS in Vancouver 2019. The course was two days that covered most of the cosmetic injectables
 - Five days of training in Procedural Dermatology Essential Updates for Health Professionals by Oakstone
- All my certification is displayed on my website

Due to the civil war in Syria, I was left with no choice but to turn down a post-doc position and in-turn, decided to start my own business venture (I had family and sibling financially). Over my practice as a community pharmacy, I worked to achieve special training and certifications in Diabetes, Respiratory, and Geriatric pharmacy (CDE, CRA, CGP). I was first of many pharmacists to obtain their additional prescribing authority APA and to offer flu shots to the neighboring community. Physicians from the Callingwood community were referring patients to Westwood Pharmacy for further training in Carb counting, insulin initiation, and inhaler-technique optimization, CPAP and Bi-PAP machines and mask fitting.

I have worked hard to achieve a high level of education and maintain practice standards. This has helped me to become a trusted health provider within the community and amongst my peers and other health professionals, such as physicians and nurses.

Since 2012, I mentored nine interns, who are all working and serving their community as licensed Pharmacists. Moreover, five of these interns currently work for me as employees or subcontracts.

I noticed the cosmetic field in Edmonton is dictated by physicians, even though it is performed and carried out by nurses under a physician umbrella. I studied most of the well-known practitioners in the cosmetic fields, and I realized there is a very low client-satisfaction rate. Therefore, when I started the Albany Cosmetic and Laser Center, I decided to provide the best possible practice in the cosmetic field. Therefore, I did not spare any cost on training, tools, materials, pharmaceuticals, EMR, or booking system. My training included provincial, national, and international hands-on training. I made sure to receive every available training, including the non-restricted activities such as phlebotomy provided at NAIT.

With my business responsibility continuously evolving to include different areas of health care, management and advertising, I decided to start my MBA program. I was offered admission in 2016, and since then have been placing an effort in taking at least one course every semester in business school; to better build my knowledge and skills in management, marketing, accounting, and finance. Currently, I have completed all my core courses and still must go through the elective courses.

The acquired marketing skills, along with my confidence and competence in the cosmetic injection field, has been a key player for my practice. Therefore, my practice in cosmetic injectables started

to gain fame and attention, leaving one particular competitor insecure. From this, grew the journey of endless complaints as stated by Dr. Bakken. These complaints included CPSA, Health Canada, ACP, AH, and all the online and social media platforms. I am sure you are aware of the two anonymous complaints submitted to ACP and CPSA regarding the use of the protected abbreviation “Dr.” Both complaints were resolved to the satisfaction of both colleges. Most of my certificates, training, and registrations as available on this link <https://albanylaser.ca/about-us/>

Board of Pharmacy Specialties

Here by Certifies that

Mhd Kamal Al-Hallak

having satisfied all the requirements for certification
in the specialty practice area of

Geriatric Pharmacy

and upon the recommendation of the Specialty Council
on Geriatric Pharmacy and is a designated

Board Certified Geriatric Pharmacist

For the period of 2019 - 2025

Credential Number : 99107738

Given this 1st day of July 2018



Jimmy A. Linde
General Chairman

Andrea D'Annunzio
BPS Chairman

William M. Ellis
BPS Executive Director



Founded by the American Pharmacists Association 1976



RADIATION SAFETY COMMITTEE

University of Alberta



MHD Kamal Al-Hallak

has successfully completed
RADIATION SAFETY COURSE

May 17, 2007 to May 22, 2007

Carl Johnson
Radiation Protection Officer

John H. Mercer
Chair, Radiation Safety Committee



UNIVERSITY OF
ALBERTA

Graduate Student Teaching Award

PRESENTED TO

KAMAL AL-HALLAK

IN RECOGNITION OF EXCELLENCE IN THE PERFORMANCE OF
TEACHING ASSISTANT DUTIES IN
THE FACULTY OF PHARMACY AND PHARMACEUTICAL SCIENCES

MARCH 2010

Indira Samarasekera

Indira V. Samarasekera
President and Vice-Chancellor

M. Shirvani

Mazi Shirvani, Vice-Provost and Dean
Faculty of Graduate Studies and Research

Réseau
canadien
pour
les soins
respiratoires



Canadian
Network
for
Respiratory
Care

Kamal Alhallak

Certified Respiratory Educator

CRE Date: June 2016
Expiry: June 30, 2021

Cheryl Connors

Cheryl Connors, Executive Director

The Canadian Diabetes Educator Certification Board



*Hereby grants the designation of
Certified Diabetes Educator (CDE)
to*



M.H.D Kamal Al-Hallak

*who has successfully met the requirements
for Certification in Diabetes Education*

Certified from May 2013 to June 2018
CTFNO - 0513005679

Judith Hill
Chairperson, CDECB

Pharmacist's role as health professional in Cosmetic Field

Health professions, including pharmacy, are ever-evolving ones. Moreover, self-regulated health professionals face and overcome new challenges every day by acquiring new skills and competencies. This is achieved through training, education and with the support of the colleges by adapting and modifying new standards and bylaws. This task requires a dynamic mentality and critical thinking skills to maintain a balance between the protection of the public and the continuous evolution of diverse health professions.

For example, the tremendous effort of the ACP allowed Pharmacists to have a more significant role in the community. We, as ACP regulated members, witnessed the shift towards patient-focused health care; which grew the last decade, more than it did since establishing the ACP.

Since the approval of Cosmetic Botox by the FDA in April 2002 for the treatment of moderate to severe glabellar lines, Cosmetic and aesthetic non-surgical non-invasive practice proved to be a promising field with high patient and community demands. Some colleges such as CARNA and CPSA realized the potential of this field and took steps to incorporate it within their regulated member's standard of practice. Moreover, they realized that neither under-graduate nor post-graduate programs in nursing and medical school offer any training or education tailored explicitly to the cosmetic fields. Therefore, the CPSA and CARNA decided that it is up to the regulated member to acquire the skill and competencies through training and self-education prior to practicing cosmetic injections.

As I mentioned before, some outdated physicians, including Dr. Bakken, felt threatened by the new scope of practice of other health professionals. And instead of improving their level of

practice, services, and skills, they started to take an easier way by following the trail of successful practitioners.

Replies to all Dr. Bakken's questions in the order that she provided

Can it be confirmed that license 9538 is allocated to Mr. Kamal Alhallak and that he is actually registered with the Alberta College of Pharmacy?

This point proves that Dr. Bakken was able to locate the following information on my website:

- I am a pharmacist
- My license numbers
- That ACP handles any complaints or malpractice issue raised from my practice at Albany

To answer Dr. Bakken's question. Yes, I am registered with ACP license # 9538 with additional prescribing authority and license to administer medication by injection

Can it be substantiated that the Alberta College of Pharmacy gave approval and is aware of EVERY procedure that he lists on his website that he offers. For example, he is advertising and performing PRP (Vampire procedures), a physician or physician directed (RN). He is also offering PDQ (Polydioxanone)

which is not available to buy in Canada and does not have Health Canada approval. He will be buying off shore, likely Korea.

- I consulted the CPSA and Alberta health services, and both confirmed the Platelet-rich plasma is not considered a blood product.
- AHS referred me to this website <https://www.albertahealthservices.ca/lab/page3319.aspx>
- They added that all blood products as administered I.V. or I.M. and must come from a donor, which is not similar to the case of the PRP.
- I am following the most updated guideline from the CPSA <http://www.cpsa.ca/wp-content/uploads/2018/09/PRP-Guidelines-June-2018.pdf>
- It is essential to point out that the previous document is for deep PRP injection, joints, and articulations.
- All the PRP application performed at Albany Cosmetic and Laser Centre, including the O-shot, are injected superficially (S.C).
- I completed multiple training to develop competencies in extraction and meso-injection of the PRP with micro-needling
- I did an accredited course at NAIT for venipuncture, even though it is not a restricted activity
- I keep the highest standards for a clean procedure during the preparation and application of PRP
- I use the closed system approved by Health Canada for collection and extraction of the PRP.

- I have special training and skills in working under a clean or sterile environment
- All my staff finished online training for blood and body fluid handling, and we have done a risk assessment and emergency policy
- <http://bbfeab.ca/bbfeprotectingyourselfandpreparingyourworkplacev5/>
- PDO threads are widely used all over Canada. I received my first training in South Korea and had another course in Vancouver this summer. Over 100 physicians and nurses attended the hands-on course in Vancouver. Some of them have been practicing the PDO threads for over five years.
- PDO is health Canada approved to be used as soft tissue absorbable sutures, most of the practitioners are using the thread in the cosmetic field in approximation to this approval
- There are different sources for the PDO threads including NovaThreads, Silhouette soft and Ultra V.
- I can provide a long list of medical spas and clinics that uses PDO threads. However, I will give four examples:
 - Dr. Anil Sharma, as he practices in Edmonton
<https://www.thesharmaclinic.com/non-surgical-facelifts-edmonton/silhouette-soft/>
 - “Aesthetic solutions” in Red Deer offer and advertise for PDO threads <http://www.aestheticsolutions.ca/pdo-threads.php>
 - Dr. Rajani and Dr. Torgerson as they are considered the top practitioners in the cosmetic fields

<https://thethreadlift.com/dr-rajani/>

<https://drtorgerson.com/surgical-procedure/facelift-toronto/the-thread-lift-a-non-invasive-alternative-or-too-good-to-be-true/>

A question to Dr. Bakkens; When was the training you had about working under a clean and sterile environment? Did your staff get any training for handling PRP and spill accidents? Do you perform the PRP microneedling procedures yourself, or do you delegate it to someone else? Who do you honestly believe is more competent to prepare PRP?

His claims on the website in respect to training in several countries and approval by the Alberta College of Pharmacy to perform the same procedures as a physician with no supporting evidence.

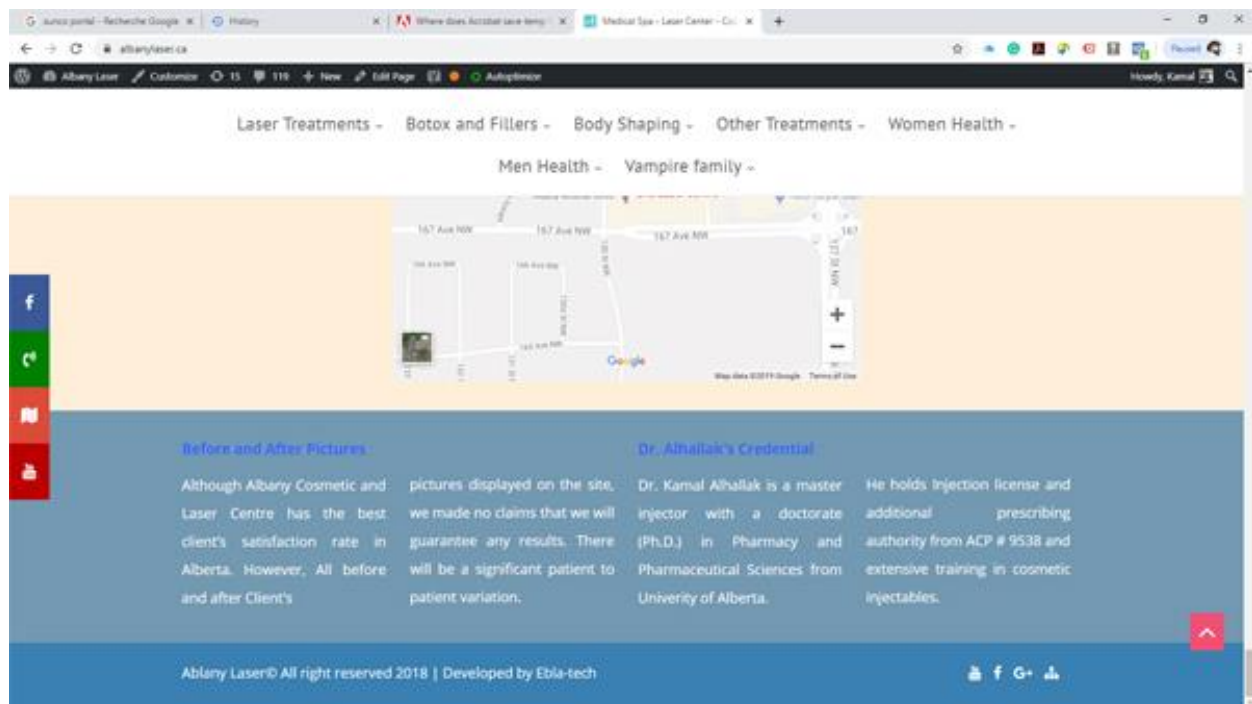
I have the additional prescribing authority and the injection license from the ACP, and my license is still valid. The only restrictions I have from the

prescribing authority is related to Narcotics and controlled medication (As for all other Pharmacies with APA). I explicitly stated in my website about my credentials and training.

Dr. Alhallak's Credential

Dr. Kamal Alhallak is a master injector with a doctorate (Ph.D.) in Pharmacy and Pharmaceutical Sciences from University of Alberta.

He holds Injection license and additional prescribing authority from ACP # 9538 and extensive training in cosmetic injectables.



The above picture is a screenshot from my website. This footer is shown in every post and page.

The injection license that I have as a Pharmacist does not limit me to a specific medication or indication if I show enough training and competency, which I did. All my training certificates are listed here

Would the College of Physicians and Surgeons be required to be aware that he is performing physician restricted procedures?

It is important to highlight here that Pharmacists are a self-regulated profession. Moreover, I am not the only pharmacist practicing in the cosmetic field. However, since I have been practicing in cosmetic field extensively, I was in contact with the CPSA multiple times and they did not raise any issue regarding my practice. Moreover, they investigated me for using the protected abbreviation "Dr." and sent

me a confirmation about my rights to use this title in my practice as shown in the letters below



PERSONAL AND CONFIDENTIAL

June 7, 2019

Albany Cosmetic and Laser Centre
12914 – 167 Ave NW
Edmonton, AB T6V 1J6

Delivered via Mail

Attention: Dr. Kamal Alhallak

Dear Dr. Alhallak:

RE: **Protected Words and Abbreviations, *Health Professions Act*, RSA 2000, c H-7 (HPA)**

I have reviewed your credentials and webpage at www.albanylaser.ca, as well as other pages on the site, on the date indicated above, and find that your use of the protected abbreviation, "Dr." does not contravene the *Health Professions Act*.

I thank you for your cooperation, as we worked together to resolve the complaint.

Sincerely,

 Recoverable Signature

X 

James West, BA, LLB
Associate Complaints Director
Signed by: James West

JW/lg

Proof of radiation inspections and certification to operate grade 3b & 4 lasers as required by physicians registered with the College of Physicians and Surgeons.

It is important to highlight that registering and operating grade 3b and 4 laser machines are not exclusive to physicians. Professional practices other than physicians have the option of registering the laser machines with the Occupational Health and Safety office in Alberta (OHS) <https://www.alberta.ca/register-radiation-equipment.aspx>

Moreover, operating laser machines and laser therapy is not a restricted activity under the *Health Professions Act* as stated by the CPSA. <http://www.cpsa.ca/accreditation/laser-equipment/faqs/> and any trained personal can operate them if they pass safety inspections and the machines are properly registered.

Since we have two physicians in our staff (Dr. Salem Tomi, and Dr. Adel Abdulhafed), all of our machines (Fotona Dynamis, Fraxel Dual, Lutronic Spectra and Cynosure elite plus) are registered with the CPSA (I attached one example below). I am the one in charge of communications and paperwork.

During my Ph.D. I had a full 5-day Radiation Safety Course (please see attached), I dealt with Radioactive Iodine and C¹⁴. Dr. Bakken could rest assured about the safety of the public with me on board.

I would like to ask Dr. Bakken if she had any radio-activity safety course outside the one offered by the companies that sell laser machines? Is it comparable to what I have?



RADIATION SAFETY COMMITTEE
University of Alberta

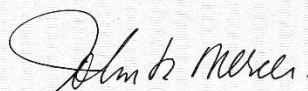


MHD Kamal Al-Hallak

has successfully completed
RADIATION SAFETY COURSE

May 17, 2007 to May 22, 2007


Radiation Protection Officer


Chair, Radiation Safety Committee



College of Physicians & Surgeons
of Alberta
Profile for Registered Radiation Equipment

Owner Information

Name and Address

Tomi, Dr. Salem
10538 124 ST NW
WEST OLIVER MEDICAL CLINIC
Edmonton AB
T5N 1R9

Telephone:

780-756-3090

Fax:

780-756-3089

Contact:

Alhallak, Kamal

Contact Telephone:

780-244-2696

Contact Email:

alhallak@ualberta.ca

Facility Information

Facility Number: RL220000

Name and Address

Albany Laser and Medical Clinic
12916 - 167 Avenue NW
Edmonton AB
T6V 1J6

Telephone:

780-244-2696

Fax:

780-244-0692

Facility Contact:

Alhallak, Kamal

Contact Telephone:

780-244-2696

Contact Email:

alhallak@ualberta.ca

Equipment Information

Equipment Number: RL220000.L001

Equipment Type: Class 4 Laser

Equipment Sub - Type: On-Site

Manufacturer: Cynosure

Model #: Apogee Elite Plus

Serial #: ELM+ 1101

Manufacture Date: 01-Sep-2016

Location: Laser and Cosmetic Room

Last Verification Date: 28-Feb-2017

Registration Date: 02-Mar-2017

Expiry Date: 30-Sep-2020

Equipment Status: Active

Inactive Date:

Clarification of his prescribing authority and what this generic term means in specifically what drugs he can order.

Dr. Bakken could have done a little search or visit the ACP website to better educate herself about Pharmacist activities instead of wasting my time explaining it. As stated by the ACP <https://abpharmacy.ca/what-drugs-can-pharmacists-prescribe>

Pharmacists may prescribe all Schedule 1 drugs and blood products. There are no lists of drugs; instead, all pharmacists are expected to limit their prescribing to situations where they have an adequate understanding of the patient, the condition being treated, and the drug being prescribed.

Pharmacists may not prescribe narcotics, benzodiazepines, barbiturates, anabolic steroids and other drugs regulated by the Controlled Drugs and Substances Act. (Section 16, Pharmacists Profession Regulation; Standard 11, Standards of Practice for Pharmacists and Pharmacy Technicians)

Category:

Pharmacist prescribing

After the extensive training in the cosmetic field and the positive feedback from the public, I am sure that we can agree that I have an adequate understanding of the patient, the condition being treated, and the drug being prescribed.

How he is obtaining his Botox/Dysport as there are 2 categories - THERAPEUTIC and he is not offering any form of therapeutic medical Botox (migraines, sweating, eye tics, trigger points); and COSMETIC which is restricted to Physicians or RN's with medical director. (See email from Allergan, July 11th, 2019)

I have an account with Allergan under my name for Albany Cosmetic and Laser center as one of the medical directors for the Centre! Since I have the right to prescribe and inject it, I am fully eligible to have an account under my name.

I want to question How Dr. Bakken dispenses the Botox, Dysport and other medical devices to the patients? Does she give a prescription and give them the choice to get the Botox dispensed by a licensed pharmacy as mandated by the CPSA? Is she making any effort to avoid dispensing a schedule #1 medication directly to the patients? How about the conflict of interest! Moreover, her practice of providing compounding services in her medical spa and clinic.

Please refer to the document published by the CPSA about dispensing a schedule #1 and compounding at a clinic with fees

<http://cpsa.ca/wp-content/uploads/2015/04/Dispensing-of-Schedule-1-2-Drugs-by-a-Physician-for-a-Fee.pdf>



PLEASE REVIEW THE FORM TO ENSURE NAMED CONTACTS ARE AUTHORIZED WEB USERS. UPON VERIFICATION, PLEASE HAVE THE FINANCIALLY RESPONSIBLE PARTY SIGN THE FORM.
 FAX BACK YOUR SIGNED FORM TO 1-866-256-2094 OR EMAIL TO: MR-ALLERGANDIRECTCA@ALLERGAN.COM
 PLEASE NOTE: IF YOU DO NOT RECEIVE AN EMAIL WITHIN 2 BUSINESS DAYS OF SUBMITTING YOUR SIGNED FORM, PLEASE CONTACT A WEB SUPPORT SPECIALIST AT 1-855-DRCT-CAN

ALLERGAN CANADA, INC.

WEB Request: 200226709

Allergan Direct on-line Web Access Form

The information displayed below indicates the names, phone numbers and e-mail addresses of those parties authorized to place orders on behalf of each Ship to appearing below.

Ship to Number : 704182
 Ship to Name & Address : ALBANY LASER & COSMETIC CENTRE
 KAMAL ALHALLAK
 12914 167 AVENUE
 EDMONTON
 AB T6V 1J6

Name	Phone#	E-mail address
Dr. kamal alhallak	5805202835	ALHALLAK@UALBERTA.CA

Payer Account: 704182
 Payer Name & Address: ALBANY LASER & COSMETIC CENTRE
 KAMAL ALHALLAK
 12914 167 AVENUE
 EDMONTON
 AB T6V 1J6

The information displayed below indicates the names, phone numbers and e-mail addresses of those parties who are authorized to **View and Pay** open items in your account.

Name	Phone#	E-mail address
Dr. kamal alhallak	5805202835	ALHALLAK@UALBERTA.CA

As the financially responsible party (payer) I authorize Allergan to create passwords to the above authorized parties.
 I hereby warrant and agree under penalty of perjury to accept financial responsibility for all Allergan product purchased through Allergan Direct.
 These passwords are not to be shared with any other individuals inside, or outside, of our organization.

ALBANY LASER & COSMETIC CENTRE (704182)

Payer Name

DocuSigned by:

ALBANY LASER & COSMETIC CENTRE
 Authorized Signatory
 9208970333421

4/4/2017

Date: _____

By: Kamal Alhallak Pharmacist Ph.D. APA ACP#9538

Owner/Director _____

Print Name/Credentials/License#

Print Title

Proof of liability to protect patients from complications from this pharmacist providing restricted procedures.

Proof of liability to protect staff from patient complications, should they occur.

This point has been investigated by CPSA and ACP. We carry a comprehensive liability insurance at Albany Cosmetic and Laser Centre that covers me and all the other staff. The insurance company is fully aware of the list of restricted and non-restricted activities and the one who is providing them. Actually, our premium increased lately since we added some new laser machines and cosmetic service. The insurance policy is 60 pages and will be provided as a separate document

The use of testimonials on his website which are updated regularly (examples enclosed).

I am not sure if that is a question or complaint? One can link his/her website to have a real-time reflection of the reviews on social media platforms such as Facebook and Google. This is a way to increase the transparency instead of getting one fixed review! I am not willing to teach Dr. Bakken how to perform this technical procedure if that is OK with the college.

The numerous exaggerated, false and embellished claims which include inaccurate and misleading comments and descriptions about treatments offered and equipment used (I will give examples).

I will be looking for the example and will reply to them!

His recent addition of Dr. Adel Abdulhafid, "part time", an obstetrician/gynecologist to oversee his women's health section. This Doctor works at two other locations as an ob./gyn. I question if this association is acceptable in a business owned by a pharmacist? The 110" Shot that is mentioned on his website is a patented and licensed procedure of Dr. Charles Runnels, an American physician. Mr. Alhallak is not licensed or registered by Dr. Runnels to offer that procedure or perform it. It states under the women's section that Dr. Adel Abdulhafid will be providing the consults for a Vampire "O" Procedure and a nurse will be performing the actual procedure. Dr. Adel Abdulhafid is also not registered or licensed to perform the Vampire "O" Procedure.

I am not sure if that is a question for me or Dr. Abdulhafid? We usually book consultation and procedure to Dr. Abdulhafid according to his schedule. He does the consultation and some treatment once a month. All the consultations and procedures are fully paid by the patients and we do not charge AHS for any of the services provided in our center.

Yes, a pharmacist can be an owner to any clinic, there is no restriction there! The conflict of interests occurs if a physician is an owner of a pharmacy. Moreover, Albany Cosmetic and Laser Center is not a clinic, and our portfolio is very clear (that is why I do not use Therapeutic Botox)

I feel humiliated by Dr. Bakken calling me "this Pharmacist" and "Mr. Alhallak" and I know she is doing this on purpose. I would like to ask Dr. Bakken to address me as Dr. Alhallak from now on.

Listing discounts and incentives (discount if fill in a survey).

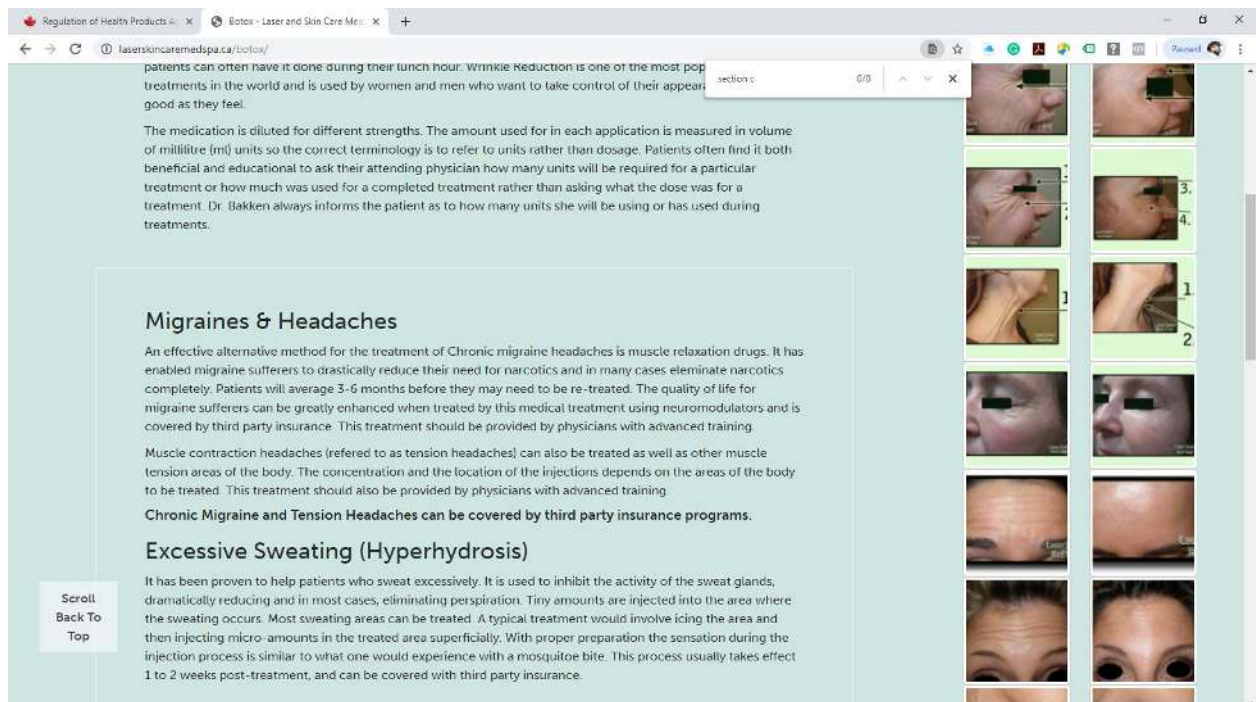
I am not sure if that is a complaint! As a researcher with Ph.D. I always adjust my marketing strategies and add new services from the client's feedback. Giving coupons and incentives is an approved way to get the client to participate in such activities.

Mr. Alhallak is in violation of the Food & Drug Act (Section C.01.044) with his extensive discussion of Botox/Dysport/Kybella. These products can only be named and priced - not discussed. Belkyra is the Canadian product sold to physicians from Allergan. Kybella is the American equivalent. His information implies he is buying his product from the States (see included email from Allergan).

All my posts and pages are educational in nature and free from any advertising material. Moreover, it complies with Food & Drug Act (Section C.01.044). Anyway, I believe that this is an issue outside the ACP scope.

Regarding Belkyra, I did my training with Allergan and I have a direct account to order from them. We use the name Kybella in some of our pages and post to improve the SEO of our website and to explain to our reader than Kybella and Belkyra are interchangeable! I do not buy anything from the USA!

I attached a screenshot from Dr. Bakken Website, I would love to hear how she is complying with the Food & Drug Act (Section C.01.044) using before and after picture as well as discussing different therapeutic uses of schedule #1 medication such as therapeutic botox.



He alludes to an RN on staff but there is no RN listed in the staff section, working with Dr. Adel Abdulhafid performing/assisting with cosmetic vaginal procedures.

Is that a question for me or Dr. Abdulhafid? Please feel free to contact him if you have any questions about staff and procedures related to the women health. In a communication between the ACP and CSPA, Dr. Karen Mazurek, Deputy Registrar for CPSA, she indicated: Under the authority of schedule 21 of the HPA, CPSA does accredit some private facilities that perform "non-hospital surgical procedures". The criteria for this are not well-defined but nothing at Albany Center appeared to meet the threshold with the exception of Dr. Al-Hallak' s proposed IVF procedures.

The Physicians, Surgeons and Osteopaths Professional Regulations allow physicians to supervise restricted activities being performed by other individuals. The level of supervision depends on whether the individual is a regulated health professional or not. She indicated she would email me the standards respecting supervision of restricted activities but summarized by saying that the supervising physician must be competent to perform the activity, the activity must be safe and appropriate, the consent of the patient must be obtained, and the physician must be readily available. In the case of an unregulated healthcare professional, the physician must directly supervise the activity.

I attached a letter from Dr. Abdulhafid indicating he is responsible for all the procedures done under women health section.



To the Alberta College of Pharmacy Registrar

Dear Mr. Erberhart

Please be advised that my professional corporation is in partnership with Albany Cosmetic and laser center. Dr. Kamal Alhallak offered me the director position in the Women's Health Department at Albany Cosmetic and Laser Centre. I accepted my position responsibility on Feb 1st 2019.

My responsibilities include (but not exclusive to)

- The assessment of female sexual dysfunction.
- Designing treatment protocols for sexual dysfunction and vaginal rejuvenation.
- Performing the treatment or delegating a trained staff at Albany Cosmetic and Laser, as I see fit

Some of the treatment we currently offer is the Vaginal Radio-frequency procedure (Votiva) by Inmode, and PRP vaginal injection, commonly known as O-shot. Please do not hesitate to contact me or CPSA if you have any further question

Sincerely

Dr. Adel Abdulhafid

Obstetrician/Gynecologist

(780) 244-2696

aabdulhafid@albanylaser.ca

<https://albanylaser.ca/services/women-health/>

The location and potential conflict of interest of this business sharing the same location and waiting room as the Health Aide IDA Pharmacy (especially if he is working as a pharmacist or has a vested interest in ownership) and the Albany Medical Clinic. This medical clinic is comprised of a group of family physician and specialists. The signage reads Albany Medical & Laser Centre which certainly can be misinterpreted and misleading. His business is called Albany Laser & Cosmetic Centre. Salam Shartoo, a pharmacist, is the manager, not the owner, of the Health Aide IDA.

I am a health professional and a businessman! I own shares in multiple medical and non-medical projects! I own and manage four pharmacies in Edmonton (it is well-known by the ACP) and about to open the fifth one. I own shares in Health Aid Pharmacy, but not in the clinic. Moreover, I am not listed as a staff in Health Aid Pharmacy. The ACP investigated the matter and the report showed that Albany Cosmetic and Laser Centre is well separated from other businesses.

The signs have changed long ago but Google did not update the record. It would be helpful if Dr. Bakken reported this concern to Google so they can update the record. Here is a current picture of the signs



I am in the process of reporting the possible conflict of interest between “Davenport Medical Clinic” and “Laser and Skin Care Medspa” Both owned by Dr. Bakken. A couple of her previous clients informed me that she pushed them to get laser treatments at her medical spa, along with other billing issues.

He refers to FDA clearance on procedures throughout the website without mentioning the status with Health Canada.

During my Ph.D. I did some work for Health Canada and I am fully aware of the relationship between them. Any approval procedure starts with the FDA then with Health Canada after. Anyway, I am not sure what Dr. Bakken's concern is here.

He is offering treatment for Acne & Snoring. Reading through the website information he is diagnosing medical conditions and offering treatments. He shows before & after treatments for acne with his laser, but he also includes information on LEVULAN, however his medical description of the procedure is inaccurate. Sleep apnea is a serious diagnosis and every year children and adults die from this condition when not diagnosed and appropriate treatment provided by, as a rule, specialized dentists and specialized physicians in sleep disorder.

Albany Cosmetic and Laser center is the only laser center that combine three of the most effective lasers together under one roof

- Lutronic Spectra equipped with all handpieces and wavelengths
- Fotona ER and ND YAG equipped with all hand pieces
- Fraxel Dual fractional laser

The availability off all these tools make it possible for us to provide such as good results and gain this wonderful reputation that made a well-establish physician at Red Deer get worried.

Regarding Levulan procedure, I would love Dr. Bakken to send me the right protocol so I can update and correct my website.

As a Certified Respiratory Educator, I believe I have enough knowledge to know what sleep Apnea is, I trained hundreds of people about using their CPAP and BiPAP machines, fitting their masks and improving their sleep quality. Fotona Laser has a very clear indication in helping Sleep Apnea and Snoring by shrinking the targeted tissues.

He states his clinic specializes in advanced acne that GP's (like me) and dermatologists fail at. There is no referral of these patients to appropriate MD's or sleep diagnostic centers. This does not appear to be a part of his protocol prior to treating acne & snoring with his lasers. He does not state he has medical certificates to diagnose and treat acne or snoring.

I am not sure what is wrong in specializing in advanced acne? If Dr. Bakken fails in something, it does not mean that other health professionals would not succeed. We do not accept any referral as we do not bill for consultations or treatments. Moreover, being an M.D. is not a license to success, it depends on how much the health professional is willing to invest in their education!

The Buttock Lift shows a picture quoting 30 vials of fill and 4 threads! This is an extremely high number to inject into tissue that can create vascular compromise. The expense would be much higher than a plastic surgery butt lift. Does he have proof of training for this procedure and the medical experience to handle complications? PDO threading is not approved in Canada.

The picture caption stated 300 mls of fillers, not 30 vials of fillers! I used Sculptra PLLA fillers for Buttock Lift. According to the peer-to-peer training with Dr. Vance Elliot, he recommended reconstituting the Sculptra vial in 50 mls of distilled water for injection. This means that the client in the picture received 5 vials of Sculptra, which is very normal! I am wondering if Dr. Bakken has experience or training using Sculptra.

He is not trained or licensed to offer/perform the "P" Shot, patented by Dr. Runels. His description of the procedure is also inaccurate. It also is not a permanent fix for erectile dysfunction.

I had a peer-to-peer training with Dr. Abdulhafid regarding the P and O shot. It is important to mention that the P and O shot is only the brand name of a procedure. Even Dr. Runels is out dated in his technique of collecting and activating the PRP.

I welcome Dr. Bakken's feedback to improve the description of the procedure.

Regarding the patent infringement, I do believe that this is outside the ACP scope.

In respect to PRP, the literatures common theme is that this is a medical procedure performed by a physician or a RN under the direction of a physician. It requires training and competency in the collection and injection of blood product as well as the disposal of such to ensure there is no infection or contamination. I have highlighted his statement in the PRP section where he acknowledges that the drawing of the blood required a physician or a licensed phlebotomist. There is no indication who performs this particular step for him. He confirms only that he does all PRP procedures.

To my knowledge, phlebotomy is not a restricted activity and any individual can perform it. I took an accredited course of training at NAIT that is designed for Health professionals who would like to improve their competency in this field (please see below)

The regen lab kit is Health Canada, and FDA approved. It is a closed system that provides the best safety feature in the PRP field. I informed him that we follow the CPSA guidelines for unaccredited settings published in June 2018

<http://www.cpsa.ca/wp-content/uploads/2018/09/PRP-Guidelines-June-2018.pdf>



Northern Alberta Institute of Technology

has granted this

Certificate of Achievement

in the

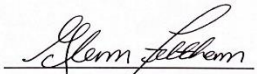
Phlebotomy (Venipuncture) Workshop

course to

Kamal Alhallak



Dated the
27th day of May 2017
Edmonton, Alberta, Canada


Glenn Feltham, PhD, BA, BS, MBA, LL.B, FCPA, FCMA
President and CEO

I have a master's degree in Industrial Pharmacy, a Ph.D. in Pharmacy and Pharmaceutical Science. I taught the sterile compounding at the faculty of pharmacy for three years. I am wondering what Dr. Bakken has in terms of training and tools to prevent infection or contamination?

I have included the initial website that I saw and have printed just particular sections from it that was present in May into June which I will call number 1. There have been dramatic changes to the website now, which I will call number 3. In the number 1 website it was very difficult to know that "Dr." Kamal was a pharmacist and not a medical doctor as he was referred to consistently as Dr. Kamal. It took some digging through the website to find a brief description that he was a pharmacist with special privileges through the Alberta College of Pharmacy. By mid-June it morphed into something else that I did not get an opportunity to photocopy (number 2). He had added 2 online training certificates for the Vampire Breast Lift and Vampire Facelift. This occurred when Dr. Charles Runels became aware, he was advertising the patented procedures on the Albany website and his script indicated he had been performing these for a number of years. Contrary to what was described in the website Kim Kardashian did not name this procedure. When he was advised to stop offering the procedures, he took an online program that was offered via Dr. Runels company in the States but that was subsequently retracted. He is aware. That website was posted briefly and then barely a week later it morphed into the one that I have labelled website 3.


- In August 2018 both ACP and CSPA were satisfied with the way I am presenting myself in the cosmetic field. Regarding the website change, I always change my website which is a private property. I find it alarming that Dr. Bakken is tracking all the changes of my website to notice every single change in it! As a successful M.D. I am sure she has more important things to do!


Subsequently the third website from later June into early July shows these online certificates being replaced with different certificates. Copies of the hands-on training certificates are included.

I am trained, certified and licensed for some of the Vampire procedures. The list of registered injectors is available on Dr. Runel's website. I pay a monthly fee for the authorization to advertise that I am a Vampire provider. In comparing the certificates that I possess as well as many of those of a colleague of mine in Calgary there is certainly doubt that these 2 certificates of Mr. Alhallak's are authentic. None of our certificates list every degree that we have ever achieved in our careers. There is also discrepancy in the signatures. Mr. Alhallak does not have certificates for the "O" or the "P" procedure yet acknowledges Dr. Runel in the "O" section of the website. These 2 procedures can cause injury and infection particularly to the urethra (male/female), supporting tissues and corpus cavernosum without precise placement and "hands on training". The Vampire procedures are not "learn by YouTube".

- I attached the payment for the training and the monthly fees for using the Vampire procedure, I also attached the training certificates.

- Feb 12, 2019	PAYPAL *CELLMEDASSC	109.84	\$3,915.80
Posted Date	4029357733		
Feb 14, 2019	AL		
	US		
	452071*****4007		
	Print		

- Feb 11, 2019	AMERICAN COSMETIC CELLUL	1,361.48	(\$4,082.90)
Posted Date	8889205311	USD 997.00	
Feb 12, 2019	AL	converted at	
	US	1.36558	
	 The foreign exchange transaction amount was determined on the date when the transaction was posted to the account.		
	452071*****4007		
	Print		

Webmail - Main			
Orgasm Shot* (Q-Shot*) Office			
Q-Shot* (Orgasm Shot*) Office			
Not secure cshot.info/members/directory/			
Member Since: February 2019			
David Owers, MD	ddpowers@telus.net https://www.agelessradiancemd.com/	https://www.agelessradiancemd.com/	604-945-7546
Member Since: February 2019			
Kamal Alhallak, PhD	info@albanylaser.ca https://albanylaser.ca	https://albanylaser.ca	587-520-2835
Member Since: February 2019			
	bespokeskinmd@gmail.com https://www.bespokeskinmd.com	https://www.bespokeskinmd.com	613-549-7546
Help			

I was listed in the director of the O-shot provider, however due to Dr. Bakken continuous complain, recently, they decided to take off my name due to continuous complains from Dr. Bakken.

As I have mentioned on the website number 1 it states there was a clinical manager with twenty years' experience and at that time there was one "young" aesthetician mentioned that did the Belkyra procedure along with her other job duties. This is not legally acceptable and may be happening but there is no mention in website 3. I do not have a copy of the staff section from number 1 website. Number 1 website called him Dr. Kamal throughout, and this is how he provided services from opening in 2017 (with no qualifiers of title).

- Susan Buski our main certified laser aesthetician has over 25 years of laser experience in different dermatology offices. We recently recruited Dariane Hotlby, a laser aesthetician who used to work at Dr. Bakken office

His PRP section is a mixture of inaccuracies and I have made some written comments on some of these photocopied sections enclosed.

He is not a pioneer in the field and the relevancy of "medical certificate" requires explanation.

I have read the standards of practice for the Alberta College of Pharmacy. I believe it is incumbent of your pharmacist as it is with a physician that information be stated precisely, is not misleading, is not false, that professional conduct is expected at all times and that any claims will not be made that cannot be substantiated or breach standards of practice.

- I feel that Dr. Bakken took it on herself to audit me and my practice. Until now I could not make a single complaint about an injection that went wrong or serious issues that occurred. I could read her website and come up with multiple mistakes, but I do not have time for this.
- Secondly, I am wondering how does Dr. Bakken assume that she knows better than me? What was the last training she got? What is her active subscription to medical journals and databases?

Mr. Alhallak's website has been revamped 3 times in less than 3 months and significantly. Most of the boasting, exaggerated and false claims can still be found throughout the latest website along with aggressive marketing of the Vampire procedures for which he does not have licensing approval to offer or perform. You will note I am sending a copy of this letter to Allergan (provider of Medical/Cosmetic Botox, Dysport, Belkyra and other medical devices and products). I am also forwarding a copy to the Complaints Director of the College of Physicians and Surgeons who may or may not be aware of this situation and the unique practice of Mr. Alhallak.

Dysport belongs to Galderma portfolio, not Allergan. As you noticed, CSPA is fully aware of my practice in Albany Cosmetic and Laser Center. We are a self-regulated professional, and only ACP has a mandate over me. Until now, I am a pharmacist with good standing with ACP. I believe that this is not a simple complaint but in fact defaming, which might have legal consequences. Moreover, I feel that Dr. Bakken is even undermining the authority of ACP by submitting the complain to different authorities at the same time.

Claims & Testimonials

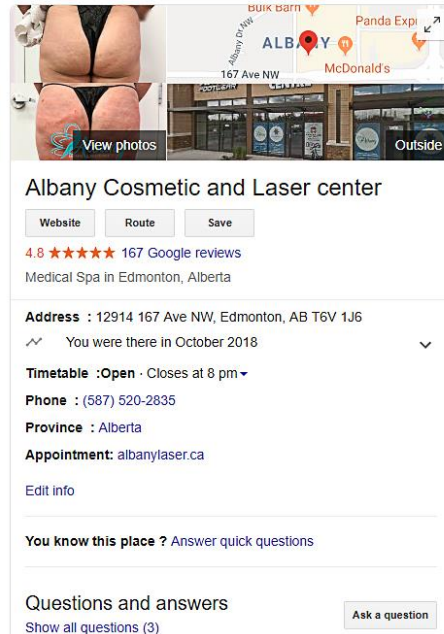
I have included some testimonials which are updated on a regular basis. Physicians are not allowed to have these on a website as the College views these very differently from a Google or RateMD Review.

I covered this part; with technology advancement, we came up with a new way to keep updating the testimonies in real-time. We display the most recent three reviews; once we get a new review, the section will be updated automatically (the newest review will replace the oldest one) and a total of three reviews will be displayed all the time. I will now give examples of the claims that are questionable or false:

Having the best client satisfaction rate in Alberta (Where is the proof?).

I have 168 reviews with an average of 4.8 scores after three years of business. Dr. Bakken has been practicing for the last 20 years with 38 reviews and 4.2 score.

Dr. Bakken noticed us only because we are doing well, with clients of hers taking the trouble to drive for 2.5 hours to receive laser treatments and cosmetic injections at Albany Cosmetic and Laser Centre.



Having the absolute best reviewed medical spa/laser center and cosmetic clinic in the whole Albany area (This is the only cosmetic clinic in Albany).

People are not naïve, and they do their due diligence before trusting their beauty with a medical provider. The area has many other medical spas and clinics such as Dr. Sharma and external affairs.

Having the most advanced cosmetic clinic in Alberta!

We have a collection of the most advanced machines in the industry. I would love to know the portfolio of the laser machines that Dr. Bakken has, and we could compare.

Making statements that he is one of a few people who use Botox to reshape lips/eyebrows/face slimming and neck lift. I, as well as most MDs in cosmetic aesthetic spas, perform this frequently.

I am very glad to realize other providers perform this procedure on a regular basis. This means that patients have lots of other options.

Claiming to be the number 1 Botox injector in Edmonton (I personally know several MDs in Edmonton that would refute this). Allergan designates this rating annually by cities and areas in Alberta and recognizes the appropriate clinic. He should be able to provide proof if true.

The picture below is our rating at Albany Cosmetic and laser center

Web Reviews

Facebook

4.9 / 5

37 votes

RateMDs

5/5

1 vote

canadainf.com

4.8 / 5

17 reviews

The one below is Dr. Bakken rating....

Find A Doctor Find A Facility Health News Health Forum

40 AVE ROSS ST 20 AVE 30 AVE RANGE RD 276

Dr. Maureen Bakken ✓
Family Doctor / G.P.
★ ★ ★ ★ ☆ 65 reviews
#90 of 152 Family Doctors / G.P.s in Red Deer, Alberta

Female
Laser Skin Care Medspa
View Phone Number
View Map & Address
Unavailable

Share this Doctor:
twitter facebook

Ratings Credentials Insurance

Claiming to have the best lasers (can't substantiate).

I would like to ask Dr. Bakken to report a medical spa that has an equivalent combination of the following

- 1- Cynosure Elite Plus or equivalent
- 2- Lutronic Spectra Nano-second Q-switch equipped with all the handpieces
- 3- Fraxel dual with 1550 and 1927 NM wavelength
- 4- Fotona Dynamis
- 5- Fotona SP Dynamis Laser equipped with Intimalase handpiece
- 6- Fractura RF fractional microneedling
- 7- Ulthera HIFU
- 8- CoolSculpting
- 9- Silk Peel Microdermabrasion

I would like to ask Dr. Bakken about the energy-based machines (such as Laser and RF) portfolio at her clinic and medical spa?

Under Vampire Breast Lift-That he is the official provider and has the best training and client satisfaction rates in Alberta. He is not an official provider, nor can he substantiate the rest of the statement.

We discussed this issue earlier

Claims to be the only certified Vampire "O" Shot provider in Edmonton and that he is only one of a few in Canada to provide this Vampire PRP Procedure. When actually he is not a certified Vampire "O" Shot provider. There are many in Canada that do the procedure, the legitimate certified registered

I was not aware of this before, and I will take off that sentence from the website

That he claims to have 25 years of experience within his medical spa and laser center. This misrepresents the truth. Twenty years plus of this could be his clinic manager and his website states he has been open since March of 2017.

We Stated that we have 20+ years of combined experience. This means that when you add the experience of all the staff together, it will add up to 20 years.

States that anyone can have a Vampire Facelift. This statement is not true, and there are significant and specific contraindications.

In general, we avoid doing Vampire in client with auto-immune diseases and other serious condition such as cancer and uncontrolled hypertension and diabetes. We have special forms to collect medical history and to assess every client eligibility to any treatment.

Claims to be the best provider of PRP for skin tightening and hair loss in Edmonton (proof?).

The proof is my results and patient's feedback and review along with my extensive training in the sterile compounding and lab techniques. I went to Turkey to better learn about PRP in the field of hair loss and the best way of activating the plasma.

States he has very long experience with PRP - training and evidence to support this not accompanying this statement and he applied for certification only in 2019.

Not sure what certifications she meant

States he uses RegenLab PRP kits and that these are the best and most expensive. This is a false claim as well

I thought so! I would love to know more about this point

States Bellefill, permanent filler, is the most studied dermal filler on the market (not sure where this claim comes from). This product is a rebranding of a product called Artecoll that was on the market in the last 20 years. It was fraught with significant complications that led to many lawsuits. There is little to no place for permanent fillers in the cosmetic industry. Even I, with 15 plus years' experience see no purpose for using it with the significant risk factors and the difficulty of removing the product if there are complications

Dr. Bakken is contradicting herself, she stated that Bellafill has been around for over 20 years, which is made it the most studied filler in the market. Most of the information is taken from the official website of Bellafill. Every health professional

feels comfortable performing some injection and procedure according to the competency and training.

I want to note that the name of the filler is Bellafill, not Bellefill as Dr. Bakken has mentioned

The screenshot shows the Bellafill website with the following content:

- Header: "sunevamedical.com/products/bellafill/"
- Top banner: "procedures with the practice that provided them with a 5-year filler"
- Image: "Real Patients" showing a close-up of a person's face.
- Main content area:
 - BELLAFILL IS THE ONLY FDA APPROVED 5-YEAR DERMAL FILLER**
 - Months Duration** chart:

Product	Duration (Months)
Bellafill	60
Leading HA filler 1	24
Bio Stimulator filler 1	24
Bio Stimulator filler 2	12
Leading HA filler 2	6
 - Text: "Establishes a new category of long term filler" and "A great opportunity to differentiate your practice"
 - PROVEN SAFE AND EFFECTIVE**
 - Text: "Bellafill is the **most** studied dermal filler on the market. With over 1,542 patients across multiple clinical studies, Bellafill has proven itself time and time again to be safe and effective. In fact, Bellafill's 12-year Post Market Surveillance data shows a consistently low adverse event (0.12%) rate that is comparable to other HA fillers."
- Bottom banner: **Stimulates collagen** for natural looking

The general spa industry is not regulated, and vigilance is required to protect the public from harm by those involved in the industry. The only regulated professionals are those that require compliance with the College of Physicians and Surgeons and the other specific Colleges such as Dentistry and Nursing. In this unusual situation, it is the Alberta College of Pharmacy. I believe, as a physician with a special interest in Dermatology for forty years and owner/operator of a Medical Spa for fifteen years, that we are obligated to maintain a high standard of care even outside the traditional medical model. The public is vulnerable to trusting that all is well and that they are in good hands as the word "Medical Span" to the general public would imply a medical doctor is involved at treatment levels.

Dr. Bakken is more protective of her business and clientele than what she is for the public. I have maintained the highest of the standards in Albany Cosmetic and Laser Centre. Moreover, I do believe that Dr. Bakken is in dire need for some educational course about the Pharmacist new authority and eligibility to perform restricted activities. With her 40 years of practice as an M.D. and fifteen years as the operator of a medical spa, she still not able to satisfy the community of Red Deer. As it is obvious, my practice in the cosmetic field took the medical spa industry to a different level and raised the bar for other health professionals. Dr. Bakken has one

of two choices, she either improve her practice and services, or she should be content with what she has. The field is expanding, and more health professionals including pharmacists will enter the field, casting more competition on Dr. Bakken practice. I do not believe that she would try to shut them all down!

I am not sure if the ACP complaint department agree with me, but I find Dr. Bakken's language is very descending when it comes to the pharmacist role in general, and myself specifically. Who gave her the right to go and complain about me to every single association, college, and pharmaceutical company? That is defaming! If she is concerned about the public, a single serious complaint to the ACP would be sufficient!

Being an M.D. does not mean that she is better than all of us. I truly believe that my nine years of post-graduate education should be respected at least similarly to her M.D. credential if not more.

I heartily advise Dr. Bakken to spend more time improving her practice and service rather than following others.

I have some questions that I feel need clarification and answers due to their serious nature as I persisted to follow the website changes. Some of these have been brought up in my list of concerns;

Does the Alberta College of Pharmacy provide liability coverage for a pharmacist providing services usually recognized restricted to a physician?

I hold two liability insurances, one to cover me through my work in Westwood Pharmacy, and the other to cover me through my work in Albany Cosmetic and Laser Centre. They are separate and not related to each other.

Does the Alberta College of Pharmacy oversee the certification and radiation certificates required for these class 3 & 4 lasers?

We covered this point before. All of our machines are registered with CPSA. It is also important for Dr. Bakken to realize that owning a laser machine is not restricted to Physicians

Does the Alberta College of Pharmacy work in liaison with an association such as the CMPA, that would be providing liability insurance to pharmacists, including the umbrella liability protection for the staff in a clinic not operated by a medical doctor but a pharmacist? Does this extend to association with other health personal including sub-contracting medical practitioners in his clinic?

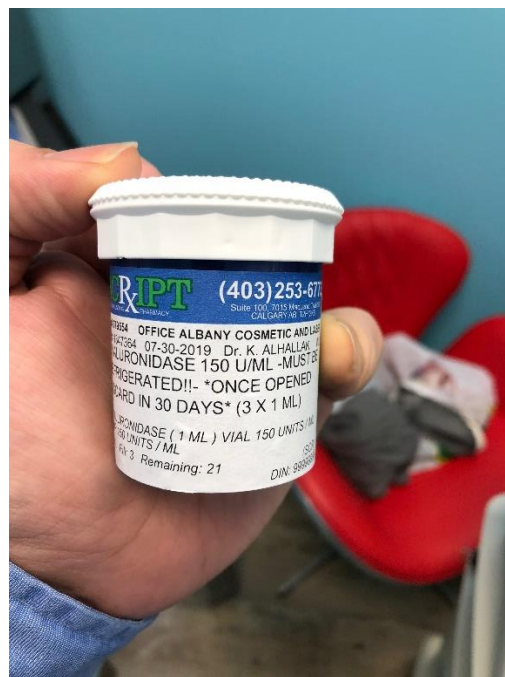
I will state again, that all of the staff of Albany Cosmetic and Laser Centre are covered under a professional liability insurance policy.

Mr. Alhallak is in violation of the Food & Drug Act as I have discussed earlier with his extensive discussion of Botox & Kybella (Belkyra) on his website. It is worth noting he is NOT offering therapeutic Botox for application to medical conditions such as migraines, sweating, tics, and trigger points etc. I have concern how he is obtaining his Botox. There are all kinds of possibilities outside of the controlled access particularly when one is a pharmacist (refer to email from Allergan July n, 2019). The only RN that I am aware of that has ordering authority in Alberta is a PHD RN named Lloyd Tapper who is also a registered Vampire provider.

I do believe that Dr. Bakken example, about Dr. Lloyd Tapper R.N. with Ph.D., is great support for me and my practice. There are other health professionals who could pursue higher education and training to perform extra restricted activities.

Does he keep hyaluronadase on site to reverse complications from filler injections and the background/medical training to recognize, diagnose and provide emergency care in case of complications such as a retinol occlusion? This product is expected to be available in every injector's clinic.

I always keep hyaluronidase (not hyaluronadase) on site. I order from Script Pharmacy in Calgary every three months. The last order was July-30th-2019



Dr. Bakken must realize that knowledge and training are not restricted to M.D. but available to any health professional who would like to improve. Unfortunately, she seems to miss this fact.

Mr. Alhallak is offering "nose jobs" involving PDO (Polydioxanone) threading along with filler. He had script and pictures/YouTube showing this in website number 2 that I did not get to photocopy before it changed again. The nose is considered a high-risk area for complications on the face. Does he have the approval by The Alberta College of Pharmacy to diagnose, and treat complications, and have access for rapid referral in place to a knowledgeable physician? He removed the YouTube of the PDO nose job (website number 2). I suspect he continues to do so with a Health Canada non-approved product.

I consider all the face as a high-risk area, not only the nose. I work through the highest standards possible. I am very competent with the face anatomy and in the process of writing a book on minimally invasive cosmetic procedures. Moreover, I have a special tool called Accuvein that helps me identifying any vascularity and avoid it <http://dd2.2b0.myftpupload.com/accuvein-for/aesthetic/>

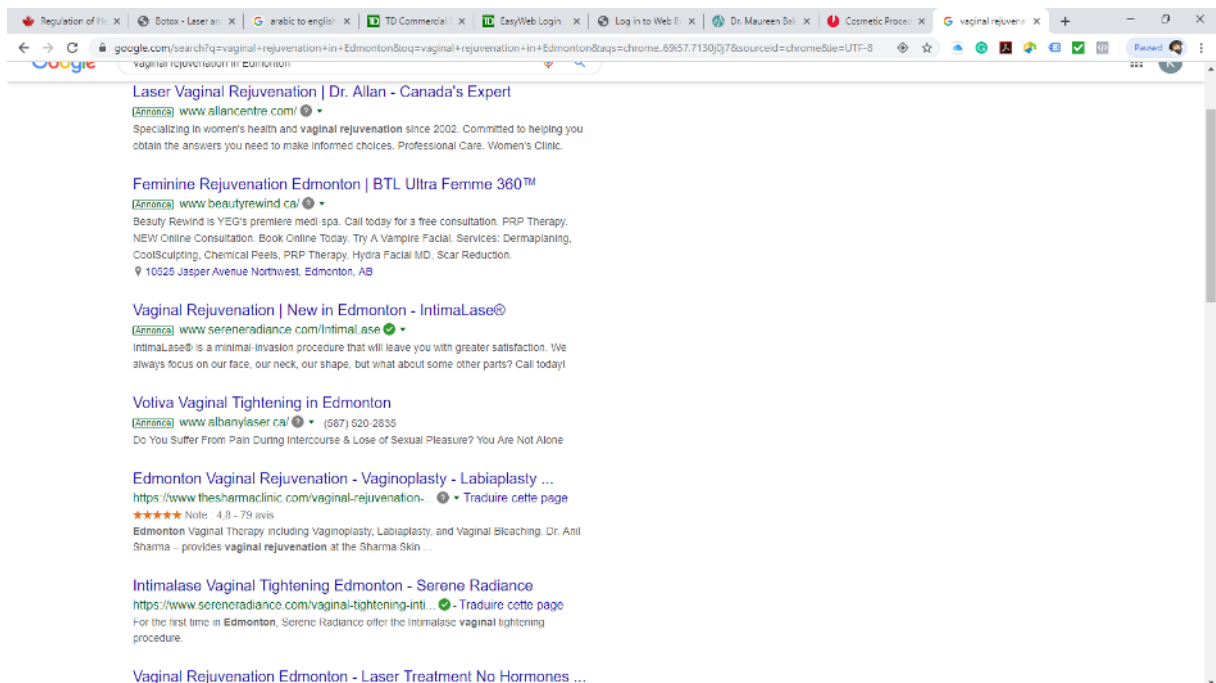
We are located next to the Albany medical clinic in case of an emergency, and I do know that all the physician working at this clinic are licensed to work in Alberta! However, I do not know if they are knowledgeable, according to Dr. Bakken's standards.

I want to ask Dr. Bakken why she assumes that she knows more than me, or her competency in cosmetic injections is better than mine?

I have enclosed an ongoing clinical trial on the Votiva laser that Mr. Alhallak is using for "vaginal rejuvenation." This study ends in January 2020. I have also enclosed another article discussing the particular FDA warnings to the manufacturers of these particular lasers sold for "vaginal rejuvenation." These manufacturers supply Canada, Health Canada has been relatively quiet over the controversy.

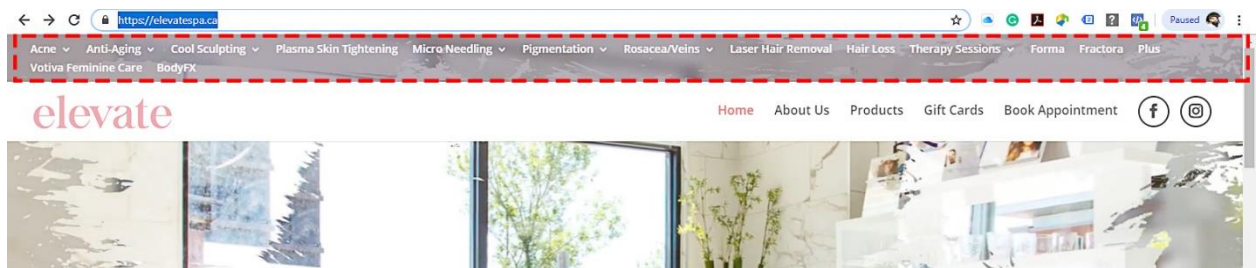
Votiva is not a laser, but radio-frequency. This shows that Dr. Bakken is a bit behind in her knowledge about the new treatment. We have a OBG specialist with us with his staff (including a nurse) who does all the consultations and the treatment for the Votiva. I can assure Dr. Bakken that the team operating the Votiva is more than capable of providing the patient with enough information and give them access to proper source on information

Moreover, by performing a simple search on google "Vaginal Rejuvenation in Edmonton," you will realize that this is a very common name for any vaginal treatment, and it is widely offered and advertised for! Similar to the PRP application in the cosmetic and medical field, there is not clear indication by the FDA and Health Canada, but it is widely used and advertised for.



Furthermore, I have to say that I find it surreal that Dr. Bakken is specifically interested in and concerned about my competencies and skills.

Please find below the website for Elevate medical Spa <https://elevatespa.ca/>



This company (Elevate) has four medical spa locations in Edmonton and offer all types of cosmetic injections, Botox, Fillers, Plasma injection, O-shot, P-shot, Vaginal rejuvenation, and more. However, there is no mention to any medical staff or health professionals to prescribe and perform the restricted activities. This is only one example of hundreds of other medical spas and beauty salons in Edmonton. Albany Cosmetic and Laser Centre has a highly organized practice with an excellent reputation. Our staff includes three regulated health professionals (one Pharmacist with Ph.D. and two Physicians), proper protocols, trained personnel, and malpractice insurance.

Moreover, Dr. Bakken complained about us to Health Canada, and we I believe we cleared the wording issue for “vaginal rejuvenation” indication.

The responsibility is on Mr. Alhallak along with the Alberta College of Pharmacy to assure the Medical Spa community, physicians and the public at large that he is in compliance with;

- 1) *the special licensing*
- 2) *standards of practice and regulations*
- 3) *approved for diagnosing medical conditions*
- 4) *carte blanc drug prescribing authority.*

I take full responsibility for all the procedure performed at Albany Cosmetic and Laser Center. Moreover, I assure the ACP that all licenses are in place, the highest standards of practice and regulations are followed, and I am content to perform all the restricted activities at Albany Cosmetic and Laser Center.

I attached a copy of the “medical history” and “informed consent” forms that I collect with every patient and client before any Botox injection. Clients have access to this information and forms online, through a private portal access.

The screenshot shows a web-based form titled "Injectables Services Treatment Record" for Albany. The form is for a patient named Jacqueline Finn, with technician Dr. Kamal Alhallak. It includes a "Pre-Treatment Consultation" section with a list of 17 patient concerns, each with "Yes/No" radio buttons and a "Grade" field. A 3D facial diagram is shown with treatment points. Below is an "Assessment" section for candidate status and treatment preferences. The form is displayed in a PDF viewer with a sidebar of tools and a search bar.

Injectables Services Treatment Record

Name: Jacqueline Finn Technician: Dr. Kamal Alhallak

Pre-Treatment Consultation

Patient's Area(s) of Concern

Concern	Yes	No	Grade
1. Rhytids on forehead	<input checked="" type="radio"/>	<input type="radio"/>	3
2. Rhytids on glabella	<input checked="" type="radio"/>	<input type="radio"/>	3
3. Rhytids on eyes	<input checked="" type="radio"/>	<input type="radio"/>	2
4. Loose, sagging skin	<input type="radio"/>	<input checked="" type="radio"/>	No Grade
5. Enlarged pores	<input type="radio"/>	<input checked="" type="radio"/>	No Grade
6. Unwanted features, hyperpigmentation	<input type="radio"/>	<input checked="" type="radio"/>	No Grade
7. Scarring	<input type="radio"/>	<input checked="" type="radio"/>	No Grade
8. Active acne, comedones	<input type="radio"/>	<input checked="" type="radio"/>	No Grade
9. Spots, UV damage, hyperpigmentation	<input type="radio"/>	<input checked="" type="radio"/>	No Grade
10. Tattoos, permanent makeup	<input type="radio"/>	<input checked="" type="radio"/>	No Grade
11. Redness, unwanted veins	<input type="radio"/>	<input checked="" type="radio"/>	No Grade
12. Unwanted hair, Fitzpatrick type:	<input type="radio"/>	<input checked="" type="radio"/>	No Grade

Assessment

Client is a good candidate for:

Service	Yes	No	# of Treatments
1. Neurotoxins (Botox ® / Reloxin ®)	<input type="radio"/>	<input checked="" type="radio"/>	
2. Dermal fillers	<input type="radio"/>	<input checked="" type="radio"/>	
3. Laser rejuvenation	<input type="radio"/>	<input checked="" type="radio"/>	
4. Mesotherapy-carboxitherapy	<input type="radio"/>	<input checked="" type="radio"/>	
5. Chemical peels / facial treatments	<input type="radio"/>	<input checked="" type="radio"/>	
6. Other services	<input type="radio"/>	<input checked="" type="radio"/>	

List areas to treat: ☐ Tightening ☐ IPL / photofacial ☐ Wrinkle reduction

Search tools

- Create PDF
- Combine Files
- Edit PDF
- Export PDF
- Organize Pages
- Send for Review
- Comment
- Fill & Sign
- Enhance Scans
- Protect
- More Tools

Your current plan is Creative Cloud



Client Details

Client Purchase History

Client Records

Monty Stanowich Records

Create New Record

Photo Gallery

03/15/2019

- Intake Forms
 - Client Info Med History
 - Medical History
- Consent Forms
 - Botox Informed Consent 2
- Treatment Instructions
 - Botox Safety Information
 - Botox Treatment Instructions



Electronic Records

Select a record or add a new record.



[Email/Download]

Botox Informed Consent 2

Botox is the trade name for Botulinum purified protein complex made by Allergan and FDA approved. Botox therapy for wrinkles is an injection treatment designed to reduce facial expression lines by enabling the muscles to relax. On the face/neck, Botox therapy works best for "dynamic" lines and wrinkles, and is less effective for fine textural changes on the skin surface and for those lines present at rest. Botox therapy for underarm sweating ("hyperhidrosis") is an injection treatment in the axilla causing the sweat glands to cease working in the injected area.

Botox therapy is temporary, meaning it will have to be repeated on a regular basis to remain effective. An average response is 2 - 6 months of diminished muscle contraction (or underarm sweating if treated there). After a Botox injection, the effect gradually begins over several days and full effect may not be seen until 14 days post injection.

Contraindications For This Treatment Include:

- Pregnant or lactating women
- Clients with allergies to human albumin (small risk of viral transmission from human albumin used in Type A to provide a larger particle)
- Infection, inflammation, (including acne), or dermatitis of areas to be injected
- Fever, flu, or cold symptoms
- Facial asymmetry such as Bell's Palsy
- Clients with neurologic disorders including:
 - Amyotrophic Lateral Sclerosis (Lou Gehrig's Disease)
 - Myasthenia Gravis
 - Lambert Eaton Disorder
 - Multiple Sclerosis
 - Parkinson's disease

I am aware of the following information affecting my treatment and risks including but not limited to:

- For at least 6 hours after injection, remain in an upright position; actively contract the muscles treated (e.g. frown or grimace); do not vigorously rub or massage the treated area
- Antibiotics may potentiate the effects of Botox
- Clients taking aminoglycosides or medications that interfere with neuromuscular transmission may have a potentiated effect
- Thick sebaceous skin may have very deep wrinkles making them a poor candidate
- A natural eyelid ptosis may be more susceptible to drooping of the eyelid.
- Botox does not diffuse over scar tissue (the appearance of scar tissue may diminish following injection of Botox into neighboring wrinkles).
- Due to bruising potential, you should schedule Botox injections at least 2 to 3 weeks prior to an important event.
- Alcoholic beverages 24 hours prior to Botox injections may increase bruising
- Blood thinning medications and herbal supplements 2 weeks prior and after Botox injections typically increase bruising.

I am aware of the following risks:

- Mild to moderate discomfort or pain. Many patients describe the sensation as a pin-prick.

6/17/2019

https://www.myaestheticapro.com/987356j7658/admin/clients/records/forms/dsp_fulltemplate.cfm?locationid=1&form=100&clientid=99...

- Redness or swelling of the skin at the injection site, usually lasting only a few hours.
- Bruising in the treated area that may last for several days to several weeks after injections. In rare cases a bruise may last for longer periods of time.

Though rare, I am aware the following may also be considered a risk:

- Temporary eyebrow or eyelid drooping and/or double vision may occur if the Botox affects the muscles which move the eye and eyelid.
- Temporary lip ptosis (drooping) if Botox is used around the mouth area.
- Transient muscle twitching in the treated area.
- Transient headache.
- Infection. Whenever the skin barrier is penetrated infection is possible. Should any type of skin infection occur antibiotics may be necessary.

I understand that full effects of the treatment may take up to 12 days following the treatment and that if my level of correction is not as I had hoped, I may need to purchase additional Botox for injection to reach a higher level of correction. I agree to communicate with my practitioner within two weeks (14 days) for evaluation and/or additional correction.

I acknowledge that due to my unique skin composition, there are no guarantees, warranties, or assurances that I will be satisfied with my results.

I understand that this treatment may involve risks of complication from both known and unknown causes, and I freely assume those risks. Prior to receiving treatment, I have been candid in revealing any condition that may have a bearing on this procedure.

BY SIGNING BELOW, I ACKNOWLEDGE AND CERTIFY THAT I, Monty Stanovich, HAVE READ AND UNDERSTAND THE "CONSENT, RELEASE AND INDEMNITY AGREEMENT" FOR THIS PROCEDURE, AND THAT I AM SIGNING IT VOLUNTARILY.

PLEASE SIGN YOUR FULL NAME BELOW IF YOU AGREE



Client Signature

Date

https://www.myaestheticapro.com/987356j7658/admin/clients/records/forms/dsp_fulltemplate.cfm?locationid=1&form=100&clientid=99258&RecordId=222

6/17/2019

https://www.myaestheticapro.com/987356j7658/admin/clients/records/forms/dsp_fulltemplate.cfm?locationid=1&form=100&clientid=99...

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PLEASE SIGN YOUR FULL NAME BELOW IF YOU AGREE



Client Signature

Date

https://www.myaestheticapro.com/987356j7658/admin/clients/records/forms/dsp_fulltemplate.cfm?locationid=1&form=100&clientid=99258&RecordId=... 2/2

Here is a copy of my prescription pad

ALBANY COSMETIC AND LASER CENTRE

Dr. Kamal Alhallak
 Doctorate In Pharmacy And Pharmaceutical Sciences.
 Ph.D.M.Sc.B.Sc.Pharm. APA ACP# 9538

PATIENT NAME: D.O.B

ADDRESS HPN

Botox	units	LOT
Filler	mls	LOT
PRP	mls	LOT

1- Pigmentation formula

HQ	%	Kojic Acid	%	Retin-A	
HC	%	Vitmain C	%		%

2-

Cyproteron Acetate	%	Retin-A	%
Azelaic acid	%	Clindamycin	%

3- BTL Freezing Cream

Signature

ALBANY COSMETIC AND LASER CENTRE



- ☐ F1
- ☐ F2
- ☐ E1
- ☐ E2
- ☐ E3
- ☐ ck1
- ☐ ck2
- ☐ ck3
- ☐ ck4
- ☐ ck5
- ☐ Jw1
- ☐ Jw2
- ☐ Jw3
- ☐ Jw4
- ☐ Jw5

 12914 167 Ave NW Edmonton, Alberta

As well the expectation is that he can provide the authentic training documents for aesthetics, the "medical certificates" for Diabetes, Asthma and Geriatrics, proof of his skillset and medical knowledge, that he can diagnose and handle the medical complications that arise from the procedures that he offers, and that he has the certification and licensing to operate radioactive lasers. In summary to be recognized equivocally as a physician.

I believe that my training, skills and the post-graduate study would surpass any average physician including Dr. Bakken herself.

He can be challenged on his many claims and statements in regard to his business operation and explanations on equipment, procedures offered and the inaccurate medical information on the website.

I honestly believe that Dr. Bakken is behind with her knowledge and training, and she is not the best fit to judge me or my website.

The highlighted areas in the website sections provide the evidence and examples to support my position that Mr. Alhallak is working beyond the approved agreement and boundaries with the Alberta College of Pharmacy.

I went through the website print-out. It is disorganized, and the labels are really confusing