



College of
TRADITIONAL
CHINESE MEDICINE
PRACTITIONERS +
ACUPUNCTURISTS
of British Columbia

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AMENDED CITATION TO APPEAR
Section 37 of the *Health Professions Act*

TO: Dawood Taghizadeh
[REDACTED]

(the "Respondent")

TAKE NOTICE that the Inquiry Committee of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of British Columbia (the "College") has directed me, as the Registrar, to issue this Citation under section 37 of the *Health Professions Act*, RSBC 1996, c. 183 (the "Act"). A hearing panel of the College's Discipline Committee will conduct a hearing to inquire into your conduct, the circumstances of which are set out in the attached schedule, to determine whether you have engaged in professional misconduct as defined in s. 26 of the Act.

AND FURTHER TAKE NOTICE that the hearing will be held as follows:

PLACE: ~~To Be Determined~~ via videoconference (link to be provided)

DATE: ~~To Be Determined~~ August 30, 2023

TIME: 9:00 a.m.

AND FURTHER TAKE NOTICE that section 38(4.1) of the Act entitles you to an outline of the anticipated evidence from each of the witnesses that will be called by the College and an opportunity to inspect any documentary evidence at least fourteen (14) days prior to the hearing. Your rights relating to the hearing can be found in the Act and the College Bylaws.

AND FURTHER TAKE NOTICE that, at the hearing, legal counsel for the College will make submissions with respect to the appropriate action to be taken regarding your registration. The action that can be taken includes but is not limited to a reprimand, the imposition of limits or conditions on your practice, suspension and/or cancellation of your registration and/or the imposition of a fine under section 39(2) of the Act.

Non-Appearance by Respondent: If you fail to appear at the date, time and place set for the hearing, the Discipline Committee is entitled to proceed with the hearing in your absence upon proof of receipt of the Citation by you and may take any action, without further notice to you, that it is authorized to take under the Act, Regulations and College Bylaws pursuant to section 38(5) of the Act.

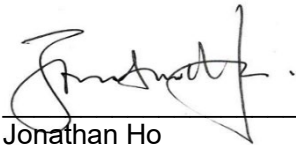
Contact Information for the Discipline Committee

The mailing address and contact information for the Discipline Committee for delivery is:

College of Traditional Chinese Medicine Practitioners
and Acupuncturists of British Columbia
900-200 Granville Street
Vancouver, B.C. V6C 1S4
Tel: (604) 742-6563
Fax: (604) 357-1963

Attention: Discipline Committee

Dated at Victoria, British Columbia, this ~~28~~ 23rd day of ~~April~~ May 2023.



Jonathan Ho
Registrar

SCHEDULE

Nature of the alleged conduct to be inquired into:

1. On various dates between January and December 2022, including January 18, 2022, the Respondent engaged in the unauthorized use of the title “Doctor” and/or “Dr.” on two publicly accessible websites, Twitter (www.twitter.com/dawoodpamclinic) and Facebook (www.facebook.com/PacificAlternativeMedicalClinic), contrary to section 12(2)(b) of the *Health Professions Act*, RSBC 1996, c. 183, section 3 of the *Traditional Chinese Medicine Acupuncturist Regulation*, BC Reg. 283/2000, and section 92 of the College’s Bylaws.
2. In April 2022, the Respondent engaged in the unauthorized use of the title “Doctor” and/or “Dr.” in marketing materials that were made available at the Respondent’s clinic at [REDACTED] (the “Clinic”), including a business card and a Pacific Alternative Medical Clinic pamphlet, contrary to section 12(2)(b) of the *Health Professions Act*, RSBC 1996, c. 183, section 3 of the *Traditional Chinese Medicine Acupuncturist Regulation*, BC Reg. 283/2000, and section 92 of the College’s Bylaws.
3. On various dates between January and December 2022, including January 18, 2022, the Respondent engaged in misleading marketing practices by using the term “medical” on the Facebook page for Pacific Alternative Medical Clinic (www.facebook.com/PacificAlternativeMedicalClinic), contrary to section 92 of the College’s Bylaws.
4. In April 2022, the Respondent engaged in misleading marketing practices by using the term “medical” in marketing materials for Pacific Alternative Medical Clinic, including a business card and a Pacific Alternative Medical Clinic pamphlet, that were made available at the Clinic, contrary to section 92 of the College’s Bylaws.