



**ONTARIO COURT OF JUSTICE**  
**Provincial Offences Court**  
(Regional Municipality of York Region)

**College of Physicians and Surgeons of Ontario**

- and -

**Javad Rabbani-Rassouli**

Defendant

**AGREED STATEMENT OF FACTS - PENALTY**

1. On April 4, 2012, prior to [REDACTED] attendance at The Aesthetic Zone, an Investigator with the College of Physicians and Surgeons, Steven Wright, wrote to Mr. Rabbani-Rassouli to advise that the College had received a complaint that Mr. Rabbani-Rassouli was using the title "Dr." at The Aesthetics Zone Clinic located at 55 Doncaster Avenue in Thornhill. Mr. Wright enclosed a copy of an advertisement from the DealSharing.com website and referred to section 33 of the Regulated Health Professions Act governing the use of the title "Doctor" in Ontario.

2. Mr. Wright requested that Mr. Rabbani-Rassouli cease and desist from using the title doctor while providing or offering to provide health care, and asked Mr. Rabbani-Rassouli to confirm in writing that he would abide by the legislation and change his business cards, advertisements and web page to conform with the legislation.

- I would like to ask that Mr. Wright's letter of April 4, 2012 and attachments be marked as an Exhibit.

3. On April 20, 2012, the College received a response from Mr. Rabbani-Rassouli to Mr. Wright's letter of April 4, 2012. His letter reads as follows [read it in].

4. On the envelope containing the letter received by the College on April 20, 2012, Mr. Rabbani-Rassouli listed his return address as 68 Colonial Crescent, Richmond Hill, Ontario.

- I would like to ask that a copy of Mr. Rabbani's letter received at the College on April 20, 2012 and envelope with return address be marked as an Exhibit

5. Mr. Rabbani-Rassouli is the co-owner of the residence located at 68 Colonial Crescent, Richmond Hill.

6. In addition to the \$99.00 she paid to purchase the coupon on the website, [REDACTED] [REDACTED] paid \$105.00 to the Aesthetic Zone on September 29, 2013 for the injections around her forehead and eyes on this date.

7. On May 5, 2013, when [REDACTED] attended at the residence at 124 Boake Trail in Richmond Hill, [REDACTED] paid \$250.00 to Mr. Rabbani-Rassouli for the injections around her forehead and eyes and she paid \$350.00 to Mr. Rabbani-Rassouli for the injections in her lips on this date.

