

The Executive Committee of the College of Physicians and Surgeons directs that, pursuant to section 47.6 of **The Medical Profession Act, 1981**, the Discipline Committee hear the following charges against Dr. Ryan Kyliuk, namely:

- 1) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated October 16, 2006 for 80 tablets of Percocet;
- b) you inserted in the prescription form the name "Ryan Kyliuk" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. J. Spelay;
- d) you attended at Shoppers Drug Mart, where you obtained the 80 tablets of Percocet;
- e) there was no medical or therapeutic purpose for you to prescribe the 80 tablets of Percocet.

- 2) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated October 12, 2006 for 50 tablets of Demerol;
- b) you inserted in the prescription form the name "Ryan Kyliuk" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. J. Spelay;
- d) you attended at Shoppers Drug Mart, where you obtained the 50 tablets of Demerol;
- e) there was no medical or therapeutic purpose for you to prescribe the 50 tablets of Demerol.

- 3) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated August 21, 2006 for 30 tablets of oxycodone IR;
- b) you inserted in the prescription form the name "Ryan Kyliuk" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. Werbicki;

- d) you attended at London Drugs, where you obtained the 30 tablets of oxycodone IR;
- e) there was no medical or therapeutic purpose for you to prescribe the 30 tablets of oxycodone IR.

- 4) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated September 29, 2006 for 60 tablets of Percocet;
- b) you inserted in the prescription form the name "Ryan Kyliuk" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. Werbicki;
- d) you attended at Central Avenue Pharmasave, where you obtained the 60 tablets of Percocet;
- e) there was no medical or therapeutic purpose for you to prescribe the 60 tablets of Percocet.

- 5) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated January 17, 2007 for 100 tablets of Demerol;
- b) you inserted in the prescription form the name "██████████" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. Ganguli;
- d) you attended at Safeway Pharmacy, where you obtained the 100 tablets of Demerol;
- e) there was no medical or therapeutic purpose for you to prescribe the 100 tablets of Demerol.

- 6) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated February 5, 2007 for 100 tablets of Demerol;
- b) you inserted in the prescription form the name "██████████" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. Ganguli;
- d) you attended at Safeway Pharmacy, where you obtained the 100 tablets of Demerol;

e) there was no medical or therapeutic purpose for you to prescribe the 100 tablets of Demerol.

- 7) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated February 12, 2007 for 80 tablets of Demerol;
- b) you inserted in the prescription form the name "██████████" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. Ganguli;
- d) you attended at Drugstore Pharmacy #9060, where you obtained the 80 tablets of Demerol;
- e) there was no medical or therapeutic purpose for you to prescribe the 80 tablets of Demerol.

- 8) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated February 16, 2007 for 90 tablets of Demerol;
- b) you inserted in the prescription form the name "██████████" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. Ganguli;
- d) you attended at Drugstore Pharmacy #9060, where you obtained the 90 tablets of Demerol;
- e) there was no medical or therapeutic purpose for you to prescribe the 90 tablets of Demerol.

- 9) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981** S.S. 1980-81 c. M-10.1 and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated February 19, 2007 for 80 tablets of Demerol;
- b) you inserted in the prescription form the name "██████████" as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. Ganguli;
- d) you attended at Safeway Pharmacy, where you obtained the 80 tablets of Demerol;

e) there was no medical or therapeutic purpose for you to prescribe the 80 tablets of Demerol.

10) You Dr. Ryan Kyliuk are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(n) and/or section 46(o) and/or section 46(p) of **The Medical Profession Act, 1981 S.S. 1980-81 c. M-10.1** and/or Bylaw 44(2) and Paragraph 20 of the Code of Ethics.

The evidence which will be led in support of this particular will include that:

- a) you completed a prescription form dated February 19, 2007 for 30 tablets of Oxycontin;
- b) you inserted in the prescription form the name “[REDACTED]” as the patient who was to receive the prescription;
- c) you signed that prescription in a manner that indicated that the prescription was signed by a resident for Dr. Ganguli;
- d) you attended at Safeway Pharmacy, where you obtained the 30 tablets of Oxycontin;
- e) there was no medical or therapeutic purpose for you to prescribe the 30 tablets of Oxycontin.