**DISCIPLINE COMMITTEE OF THE**
**COLLEGE OF TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS OF ONTARIO**

B E T W E E N :

COLLEGE OF TRADITIONAL CHINESE MEDICINE
PRACTITIONERS AND ACUPUNCTURISTS OF ONTARIO

- and -

JUN WANG

**NOTICE OF HEARING**
**(4-0113)**

The Inquiries, Complaints and Reports Committee of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (the "College") has referred specified allegations against you to the Discipline Committee of the College. The allegations were referred in accordance with section 26 of the *Health Professions Procedural Code* which is Schedule II to the *Regulated Health Professions Act*, 1991 (referred to as the "*Code*"). The statement of specified allegations is attached to this notice of hearing. A discipline panel will hold a hearing under the authority of sections 38 to 56 of the Code, as amended, for the purposes of deciding whether the allegations are true. A pre-hearing conference will be held at a date, place and location to be set by the Chair of the Discipline Committee. A discipline panel will convene at the place, time and date to be set by the Pre-Hearing Conference Chair, or as soon thereafter as the panel can be convened, for the purposes of conducting the discipline hearing. In accordance with the *Hearings in Tribunal Proceedings (Temporary Measures) Act, 2020*, S.O. 2020, c.5, Sched. 3, and the *Rules of Procedure of the Discipline Committee of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario*, the hearing and pre-hearing may be conducted electronically.

**IF YOU DO NOT ATTEND ON THE DATE FOR THE HEARING IN ACCORDANCE WITH THE PRECEDING PARAGRAPH, THE DISCIPLINE PANEL MAY PROCEED IN YOUR ABSENCE AND YOU WILL NOT BE ENTITLED TO ANY FURTHER NOTICE IN THE PROCEEDINGS.**

If the discipline panel finds that you have engaged in professional misconduct, it may make one or more of the following orders:

1. Direct the Registrar to revoke the member's certificate of registration.

2. Direct the Registrar to suspend the member's certificate of registration for a specified period of time.

3. Direct the Registrar to impose specified terms, conditions and limitations on the member's certificate of registration for a specified or indefinite period of time.

4. Require the member to appear before the panel to be reprimanded.

5. Require the member to pay a fine of not more than $35,000 to the Minister of Finance.

6. If the act of professional misconduct was the sexual abuse of a patient, require the member to reimburse the College for funding provided for that patient under the program required under section 85.7.

7. If the panel makes an order under paragraph 6, require the member to post security acceptable to the College to guarantee the payment of any amounts the member may be required to reimburse under the order under paragraph 6.

The discipline panel may, in an appropriate case, make an order requiring you to pay all or part of the College's costs and expenses pursuant to section 53.1 of the *Code*.

You are entitled to disclosure of the evidence against you in accordance with section 42(1) of the *Code*, as amended.

You must also make disclosure in accordance with section 42.1 of the *Code*, which states as follows:

> Evidence of an expert led by a person other than the College is not admissible unless the person gives the College, at least ten days before the hearing, the identity of the expert and a copy of the expert's written report or, if there is no written report, a written summary of the evidence.

Further, you must also make disclosure in accordance with rules 11, 12 and 13 of the *Rules of Procedure of the Discipline Committee of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario*, which state as follows:

> 11.1 Each party to a proceeding shall deliver to every other party (a) a list of, and (b) if not previously produced, copies of, all documents that the party intends to produce or enter as evidence at the hearing, as soon as is reasonably practicable after the Notice of Hearing is served, and in any case, at least 10 days before the commencement of the hearing on the merits.

11.2 A party who does not disclose a document or thing in compliance with sub-rule 11.1 may not refer to the document or thing or introduce it in evidence at the hearing without leave of the Panel, which may be on any conditions that the Panel considers just.

12.1 A party to a proceeding shall serve every other party a list of the witnesses the party intends to call to testify on the party's behalf at the hearing, at least 10 days before the commencement of the hearing.

12.2 If no affidavit has been served in accordance with rule 27, and material matters to which a witness is to testify have not otherwise been disclosed, a party to a proceeding shall provide to every other party a summary of the evidence that the witness is expected to give at the hearing, at least 10 days before the commencement of the hearing.

12.3 A witness summary shall contain:

(a) the substance of the evidence of the witness;

(b) reference to any documents to which that the witness will refer; and

(c) the witness's name and address or, if the witness's address is not provided, the name and address of a person through whom the witness can be contacted.

12.4 A party who does not include a witness in the witness list or provide a summary of the evidence a witness is expected to give in accordance with these rules may not call that person as a witness without leave of the Panel, which may be on any conditions as the Panel considers just.

12.5 A witness may not testify to material matters that were not previously disclosed without leave of the Panel, which may be on any conditions that the Panel considers just.

13.1 A party who intends to call an expert to give expert opinion evidence at a hearing shall:

(a) inform the other parties of the intent to call the expert;

(b) identify the expert and the issue(s) on which the expert's opinion will be tendered;

(c) serve the other parties with a copy of the expert's written report or, if there is no written report, an affidavit in accordance with rule 27, or a witness summary in accordance with sub-rule 12.3; and

(d) file an "Acknowledgement Form – Expert's Duty" signed by the expert, in the form appended to these rules;

at least 10 days before the commencement of the hearing.

13.2 A party who fails to comply with sub-rule 13.1 may not call the expert as a witness or file the expert's report or affidavit without leave of the Panel, which may be on any conditions that the Panel considers just.

You, or your representative, may contact the lawyers for the College, Anastasia-Maria Hountalas in this matter:

**Steinecke Maciura LeBlanc**
Barristers & Solicitors
401 Bay Street
Suite 2308, P.O. Box 23
Toronto, ON M5H 2Y4

Telephone: (416) 644-4781
Facsimile: (416) 593-7867
Email: ahountalas@sml-law.com

Date: October 29, 2026



Sean Cassman
Registrar & CEO
College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario

TO: Jun Wang
5587 McFarren Blvd
Mississauga ON L5M 5X8

**STATEMENT OF SPECIFIED ALLEGATIONS**

**JUN WANG**

## The Member

1. Jun Wang (the "Member") has been a member of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (the "College"), R. TCMP, R. Ac, since on or about April 5, 2013.

## The Patient

2. It is alleged that the Member treated a female patient (the "Patient") on or about October 30, 2021, for a cupping and/or acupuncture treatment.

3. It is alleged that, during the appointment with the Patient, the Member did one or more of the following:

    a. Moved the draping down to expose the Patient's breasts and/or nipples;

    b. Touched and/or massaged the Patient's exposed breasts without informed consent and/or without obtaining written consent as required;

    c. Touched and/or pulled the Patient's exposed nipples; and/or

    d. Told the Patient that he was "assisting her Qi" and/or "opening her Qi" or words to that effect when she asked why he was touching her in this manner.

4. It is alleged that the touching, behaviour and/or remarks described in paragraph 3 is conduct of a sexual nature and not of a clinical nature appropriate to the service provided.

## Acts of Professional Misconduct

5. It is alleged that the above conduct constitutes professional misconduct pursuant to one or more of the following grounds of professional misconduct:

    a. Clause 51(1)(b.1) of the Health Professions Procedural Code, being Schedule 2 of the *Regulated Health Professions Act, 1991* (the "Code") (the member has sexually abused a patient, more specifically touching, behaviour and/or remarks of a sexual nature by the member towards the patient); and/or

    b. Clause 51(1)(c) of the Code and as set out in one or more of the following paragraphs of section 1 of Ontario Regulation 318/12 made under the *Traditional Chinese Medicine Act, 2006:*

        i. **Paragraph 1**: Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession, more specifically the Standard for Preventing Sexual Abuse (effective April 1, 2020) and/or the Standard for Consent (effective April 1, 2020);

ii. **Paragraph 2:** Abusing a patient or a patient's representative verbally, physically, psychologically or emotionally;

iii. **Paragraph 3:** Doing anything to a patient for a therapeutic, preventative, palliative, diagnostic, cosmetic or other health-related purpose except, (i) with the informed consent of the patient or the patient's authorized representative, or (ii) as required or authorized by law; and/or

iv. **Paragraph 48:** Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by the profession as disgraceful, dishonourable or unprofessional.

**APPENDIX**

1. The documents to be tendered in evidence at the hearing have been sent with this Notice of Hearing.

2. The *Rules of Procedure of the Discipline Committee of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario* have been sent with this Notice of Hearing.

3. Take notice that the documents that have been and may later be disclosed to you will be tendered as business documents pursuant to the *Evidence Act* of Ontario.

4. All documents that are disclosed to you in this matter are disclosed on the basis that they are to be used solely for the purpose of this proceeding and for no other purpose.

COLLEGE OF TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS OF ONTARIO

and

JUN WANG

DISCIPLINE COMMITTEE OF THE COLLEGE OF TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS OF ONTARIO

**NOTICE OF HEARING**
**(4-0113)**

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