

FIRST STATEMENT OF SPECIFIED ALLEGATIONS
LYLE LEFFLER
Related to File # 04-12-2023

The Registrant

1. At the material times, Lyle Leffler (the "Registrant") was a duly registered member of the College of Homeopaths of Ontario (the "College").

Criminal Findings

2. It is alleged that in or around May 2019, the Registrant was charged with certain historical sexual offences contrary to the Criminal Code of Canada.
3. On or about September 7, 2022, the Registrant was found guilty of one count of indecent assault contrary to section 149 of the Criminal Code of Canada and one count of sexual assault contrary to section 271 of the Criminal Code of Canada.
4. On or about April 6, 2023, the Registrant received a conditional sentence of two years less one day along with three years of probation and numerous ancillary orders with respect to each conviction, to be served concurrently.

Failing to Report Charges and Convictions

5. It is alleged that from in or about 2019 to in or about September 2022 the Registrant failed to notify the College of the criminal charges and/or the bail conditions against him as required by section 85.6.4 of the Health Professions Procedural Code, being Schedule 2 to the *Regulated Health Professions Act, 1991* (the "Code").
6. It is alleged that in or about September 2022 the Registrant failed to report to the College the findings of guilt against him as required by section 86.6.1 of the Code.

False Statements on Annual Renewal Forms

7. It is further alleged that every year from in or about February 2019 to in or about April 2023, the Registrant falsely answered the questions on his College renewal forms regarding criminal charges and/or conditions or restrictions relating to his custody or release.

Revocation by College of Massage Therapists of Ontario

8. It is alleged that at the material times, the Registrant was also a registrant of the College of Massage Therapists of Ontario (CMTO).
9. It is alleged on or about November 16, 2023, the Registrant was found to have engaged in professional misconduct by the Discipline Committee of the CMTO for conduct analogous to paragraphs 2-7 above.

Professional Misconduct Alleged

10. It is alleged that the above conduct constitutes professional misconduct pursuant to Clause 51(1)(a) of the Code (the member has been found guilty of an offence that is relevant to the member's suitability to practise).
11. It is further alleged that the above conduct constitutes professional misconduct pursuant to Clause 51(1)(b) of the Code (the governing body of another health profession in Ontario, or the governing body of a health profession in a jurisdiction other than Ontario, has found that the member committed an act of professional misconduct that would, in the opinion of the panel, be an act of professional misconduct under this section or an act of professional misconduct as defined in the regulations).

12. It is further alleged that the above conduct constitutes professional misconduct pursuant to clause 51(1)(c) of the Code, and as defined in one or more of the following paragraphs of section 26 of Ontario Regulation 315/12 made under the *Homeopathy Act, 2007*
- a. **Paragraph 24** (Signing or issuing, in his or her professional capacity, a document that the member knows or ought to know contains a false or misleading statement) and/or
 - b. **Paragraph 38** (Contravening, by act or omission, a provision of the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts) and/or
 - c. **Paragraph 49** (Engaging in conduct that would reasonably be regarded by members as conduct unbecoming a member of the profession).

Hearing Date: TBD

SECOND STATEMENT OF SPECIFIED ALLEGATIONS

LYLE LEFFLER

Related to File # 2022-03

The Registrant

1. At the material times, Lyle Leffler (the "Registrant") was a duly registered member of the College of Homeopaths of Ontario (the "College").

Criminal Findings

2. It is alleged that since April 1, 2015, the Registrant has used and/or permitted patients to use the "doctor" title when providing or offering to provide homeopathic services in Ontario.
3. It is alleged that homeopaths are not authorized to use the doctor title when providing or offering to provide homeopathic services in Ontario.

Professional Misconduct Alleged

4. It is alleged that the above conduct constitutes professional misconduct pursuant to clause 51(1)(c) of the Health Professions Procedural Code, and as defined in one or more of the following paragraphs of section 26 of Ontario Regulation 315/12 made under the *Homeopathy Act, 2007*
 - a. **Paragraph 30** (Using a term, title or designation in respect of the member's practice that is not authorized by the College) and/or
 - b. **Paragraph 38** (Contravening, by act or omission, a provision of the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts, including s. 33 of the *Regulated Health Professions Act, 1991*) and/or
 - c. **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 members as disgraceful, dishonourable or unprofessional) and/or
 - d. **Paragraph 49** (Engaging in conduct that would reasonably be regarded by members as conduct unbecoming a member of the profession).

Hearing Date: TBD