

## **DR. TSHIMANGA WILLY KALALA– CHARGE OF UNPROFESSIONAL CONDUCT**

You Dr. Tshimanga Willy Kalala are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(o) of **The Medical Profession Act, 1981** s.s. 1980-81 c. M-10.1.

The evidence that will be led in support of this charge will include one or more of the following:

- a) *In approximately September, 2009 you completed a document entitled “Curriculum Vitae for Family Physician Applicants” which you provided to the College of Physicians and Surgeons of Saskatchewan. In that document you answered “NO” to the question “Have you ever been the subject of an enquiry or investigation by a medical licensing authority or hospital”.*
- b) *That answer was inaccurate or misleading.*
- c) *In the document which you completed in approximately September, 2009 you answered “NO” to the question “Have you ever been suspended, disqualified, censured, or had any disciplinary action taken against you as a member of any profession?”*
- d) *That answer was inaccurate or misleading.*
- e) *On or about November 29, 2010 you completed a declaration which was provided to the College of Physicians and Surgeons of Saskatchewan and responded with the answer “NO” to the question “Have you ever been the subject of an enquiry or investigation by a medical licensing authority or hospital”.*
- f) *That answer was inaccurate or misleading.*
- g) *In the declaration which you completed on or about November 29, 2010 you answered “NO” to the question “Have you ever been suspended, disqualified, censured, or had any disciplinary action taken against you as a member of any profession?”*
- h) *That answer was inaccurate or misleading.*
- i) *On or about December 3, 2010 you completed an application form for licensure with the College of Physicians and Surgeons of Saskatchewan and responded with the answer “NO” to the question “Have you ever been the subject of an enquiry or investigation by a medical licensing authority or hospital”.*
- j) *That answer was inaccurate or misleading.*
- k) *In the application form which you completed on or about December 3, 2010 you answered “NO” to the question “Have you ever been suspended, disqualified, censured, or had any disciplinary action taken against you as a member of any profession?”*
- l) *That answer was inaccurate or misleading.*
- m) *On or about October 20, 2011 you completed an application form for licensure with the College of Physicians and Surgeons of Saskatchewan and responded with the answer “NO” to the question “Have you ever been the subject of an enquiry or investigation by a medical licensing authority or hospital”.*
- n) *That answer was inaccurate or misleading.*
- o) *In the application form which you completed on or about October 20, 2011 you answered “NO” to the question “Have you ever been suspended, disqualified, censured, or had any disciplinary action taken against you as a member of any profession?”*
- p) *That answer was inaccurate or misleading.*