

**THE DISCIPLINE COMMITTEE OF THE
ROYAL COLLEGE OF DENTAL SURGEONS OF ONTARIO**

IN THE MATTER OF a Hearing of a panel of the Discipline Committee of the Royal College of Dental Surgeons of Ontario held pursuant to the provisions of the Health Professions Procedural Code which is Schedule 2 to the *Regulated Health Professions Act, 1991*, Statutes of Ontario, 1991, Chapter 18 (“Code”) respecting one **DR. RICHARD PASS**, of the Town of Waterdown, in the Province of Ontario;

AND IN THE MATTER OF the *Dentistry Act* and Ontario Regulation 853, Regulations of Ontario, 1993, as amended (“Dentistry Act Regulation”).

AND IN THE MATTER OF the *Statutory Powers Procedure Act*, Revised Statutes of Ontario, 1990, Chapter S.22, as amended; 1993, Chapter 27; 1994, Chapter 27.

Members in Attendance: Dr. Richard Hunter, Chair
 Ms. Judy Welikovitch.
 Dr. Nancy Di Santo

BETWEEN:

ROYAL COLLEGE OF DENTAL SURGEONS OF ONTARIO)	Appearances:
)	
)	Luisa Ritacca
)	Independent Counsel for the
)	Discipline Committee of the Royal
)	College of Dental Surgeons of Ontario
- and -)	
)	Emily Lawrence
)	For the Royal College of Dental
)	Surgeons of Ontario
)	

DR. RICHARD PASS) Charles Wrock for the Member
Hearing held by way of videoconference

REASONS FOR DECISION

This matter came on for hearing before a panel of the Discipline Committee (the “Panel”) of the Royal College of Dental Surgeons of Ontario (the “College”) in Toronto on March 9, 2021. This matter was heard by way of videoconference.

At the outset of the hearing, the College sought an order banning the publication of the names of any patients or information that could be used to identify any patients. The Member consented to the request. The Panel granted the order, which extends to the Notices of Hearing, exhibits filed, as well as to these reasons for decision.

THE ALLEGATIONS

The allegations against the Member were contained in the Notices of Hearing, dated October 6, 2020 (H200012) (Exhibit 1) and January 21, 2021 (21-0186) (Exhibit 2).

H200012

1. You committed an act or acts of professional misconduct as provided by s.51(1)(c) of the Health Professions Procedural Code, being Schedule 2 of the *Regulated Health Professions Act, 1991*, Statutes of Ontario, 1991, Chapter 18 in that, during the years 2019 and 2020, you contravened a provision of the *Dentistry Act, 1991*, the *Regulated Health Professions Act, 1991* or the Regulations under either of those Acts, contrary to paragraph 48 of Section 2 of Ontario Regulation 853, Regulations of Ontario, 1993, as amended.

Particulars

- You practised dentistry after your certificate of registration was suspended by the College on February 1, 2019 for non-payment of fees.

- You provided dental treatment to S. W. until on or around June 12, 2019.
 - You provided dental treatment to patients at Waterdown Smiles Dentistry on or around March 15, 2019, April 5, 2019, and May 17, 2019.
 - You provided dental treatment to H. H. on or around February 27, 2019, March 29, 2019, April 5, 2019, and June 19, 2019.
 - You provided dental treatment to patient(s), including “T. P.” as indicated in your email to Dr. Andre Tam, on or around January 20, 2020.
 - You practised dentistry after your certificate of registration was suspended by an Interim Order of the ICR Committee of July 26, 2019.
 - You provided dental treatment to patient(s), including “T. P.” as indicated in your email to Dr. Andre Tam, on or around January 20, 2020.
2. You committed an act or acts of professional misconduct as provided by s.51(1)(c) of the Health Professions Procedural Code, being Schedule 2 of the *Regulated Health Professions Act, 1991*, Statutes of Ontario, 1991, Chapter 18 in that, during the years 2019 and 2020, you engaged in conduct or performed an act or acts that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable, unprofessional or unethical, contrary to paragraph 59 of Section 2 of Ontario Regulation 853, Regulations of Ontario, 1993, as amended.

Particulars:

- You wilfully and blatantly disregarded the College’s suspension of your licence effective February 1, 2019, for non-payment of fees by continuing to practise dentistry.
- You wilfully and blatantly disregarded the Interim Order of July 26, 2019, which suspended your certificate of registration. This Order was made after the College received information that you

were continuing to practise dentistry despite the suspension of your licence on February 1, 2019.

- By continuing to provide dental treatment despite the College's suspension of your licence, you have put the health and safety of patients at risk.
- Your repeated disregard for the College's suspension of your licence suggests that you are unwilling to be governed by the College, that you are practising dentistry without regulation, and flouting the authority of the College.

21-0186

1. You committed an act or acts of professional misconduct as provided by s.51(1)(c) of the *Health Professions Procedural Code*, being Schedule 2 of the *Regulated Health Professions Act, 1991*, Statutes of Ontario, 1991, Chapter 18 in that, during the year 2019, you contravened a provision of the *Dentistry Act, 1991*, the *Regulated Health Professions Act, 1991* or the Regulations under either of those *Acts*, contrary to paragraph 48 of Section 2 of Ontario Regulation 853, Regulations of Ontario, 1993, as amended.

Particulars:

- You practised dentistry after your certificate of registration with the College was suspended for non-payment of fees on February 1, 2019:
 - You provided treatment to S.W. until on or around June 12, 2019.
2. You committed an act or acts of professional misconduct as provided by s.51(1)(c) of the *Health Professions Procedural Code*, being Schedule 2 of the *Regulated Health Professions Act, 1991*, Statutes of Ontario, 1991, Chapter 18 in that, during the year 2019, you contravened a standard of practice or failed to meet the standards of practice of the profession, contrary to paragraph 1 of Section 2 of Ontario Regulation 853, Regulations of Ontario, 1993, as amended.

Particulars:

- You breached the College's Standard of Practice on Infection Prevention and Control in the Dental Office in that you treated S. W. outside of a sterile dental office environment, including in her home and in her father's parked vehicle.

3. You committed an act or acts of professional misconduct as provided by s.51(1)(c) of the *Health Professions Procedural Code*, being Schedule 2 of the *Regulated Health Professions Act, 1991*, Statutes of Ontario, 1991, Chapter 18 in that, during the year 2019, you engaged in conduct or performed an act that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable, unprofessional or unethical, contrary to paragraph 59 of Section 2 of Ontario Regulation 853, Regulations of Ontario, 1993, as amended.

Particulars:

- You wilfully and blatantly disregarded the College's suspension of your certificate of registration with the College effective February 1, 2019 by continuing to practice dentistry.
- In continuing to provide dental treatment despite the College's suspension of your certificate of registration, you put the health and safety of patient(s) at risk.
- You breached the College's Standard of Practice on Infection Prevention and Control in the Dental Office in that you treated S.W. outside of a sterile dental office environment, and more specifically, you provided treatment to her in her home and in her father's parked vehicle.
- Your disregard of the College's Standard of Practice on Infection Prevention and Control in the Dental Office placed the health and safety of patient(s) at risk.
- Your disregard for the College's suspension of your certificate of registration as well as your disregard of the College's Standard of Practice on Infection Prevention and Control suggests that you are unwilling to be governed by the College, that you have practised dentistry without regulation and flouted the authority of the College.
- You failed to notify your patient, S.W. or her guardian(s) of the closure of your dental practice.
- You failed to arrange for appropriate transfer of care for your patient, S.W., upon the closure of your dental practice.
- Your correspondence with T.W., the father of your patient, S.W, included aggressive and accusatory language. (*withdrawn*)

THE MEMBER'S PLEA

The Member admitted the allegations of professional misconduct as set out in the Notices of Hearing.

The Panel confirmed with the Member that he understood the plea as entered, and as such as satisfied that Member's admissions were voluntary, informed and unequivocal.

THE EVIDENCE

On consent of the parties, the College introduced into evidence an Agreed Statement of Facts (Exhibit 4) which substantiated the allegations. The Agreed Statement of Facts provides as follows:

Allegations of Professional Misconduct

Background

1. Dr. Richard Lawrence Pass received his dental degree from the University of Toronto in 1966. He has been registered with the College as a general dentist from 1966 and as an orthodontist from 1971.
2. Dr. Pass maintained an orthodontic clinic at 40 Mill Street North in Waterdown, Ontario. Dr. Pass closed this practice in July 2018. From July 2018, Dr. Pass continued to see patients after he closed his clinic. Dr. Pass saw patients at other dental clinics, in patients' homes, or at a private residence Dr. Pass referred to as his "lab", located at 2352 Cavendish Drive in Burlington, Ontario.
3. Dr. Pass' certificate of registration was administratively suspended for non-payment of fees on February 1, 2019. The College notified Dr. Pass by letter that his certificate of registration had been suspended and that, as a result, he was not entitled to practise dentistry or provide treatment to patients.
4. On July 26, 2019, the Inquiries, Complaints and Reports Committee ("ICRC") of the College issued an interim order suspending Dr. Pass' certificate of registration during the investigation into his practice

("Interim Order"). Dr. Pass received a copy of the Interim Order by e-mail and courier on July 30, 2019.

5. The Discipline Committee has been referred to Notices of Hearing of allegations of professional misconduct of Dr. Pass: 21-0186 and H20012. Dr. Pass and the College agree that a panel of the Discipline Committee may combine the hearings and that these Agreed Statement of Facts may be used as evidence in both, pursuant to s. 9.1 of the *Statutory Powers Procedure Act*.

Dr. Pass Practised While Suspended

6. In January 2019, Dr. Pass arranged to use the offices of Waterdown Smiles Dental ("Waterdown Smiles") located in Waterdown, Ontario to provide treatment to patients. The owners of Waterdown Smiles and Dr. Pass agreed that Waterdown Smiles would provide reception services as well as a dental assistant for Dr. Pass, and that Dr. Pass would reimburse for these services. Dr. Pass did not inform the owners of Waterdown Smiles at any point that his certificate of registration was suspended as of February 1, 2019.
7. Dr. Pass had used Waterdown Smiles to see patients on three dates: March 15, 2019, April 5, 2019, and May 17, 2019 (which was a long weekend). He brought patient charts and his own pre-sterilized equipment in pouches.
8. On March 15, 2019, Dr. Pass provided orthodontic care (including changing wires, taking impressions, and adjusting brackets) to approximately ten patients at the Waterdown Smiles office. A dental assistant employed by Waterdown Smiles Dental assisted him.
9. On April 5, 2019, Dr. Pass provided orthodontic care (including changing wires, taking impressions, and adjusting brackets) to approximately six patients at the Waterdown Smiles office. A dental assistant employed by Waterdown Smiles Dental assisted him.
10. On May 17, 2019, Dr. Pass provided orthodontic care (including changing wires, taking impressions, and adjusting brackets) to a number of patients at the Waterdown Smiles office.

11. Dr. Pass did not inform his any of his patients that his certificate of registration had been suspended by the College.
12. S.W. and H.H. were two of the patients that Dr. Pass treated after his certificate of registration was suspended on February 1, 2019.

S.W.

13. S.W. is a minor. Dr. Pass began treatment of S.W. prior to the closure of his clinic. Neither S.W. nor her parents were informed of the closure of the clinic. Rather than transfer her care to another orthodontist, Dr. Pass continued to treat S.W. at various other locations. Her appointments were arranged through text messages exchanged by Dr. Pass and S.W.'s parents.
14. Dr. Pass did not keep a patient record of his care of S.W. after January 21, 2019.
15. Dr. Pass provided treatment to S.W. at her home on April 5, 2019. Dr. Pass also conducted an examination of S.W. on April 26, 2019 in the backseat of a parked car belonging to her father.
16. Dr. Pass set an appointment with Mr. W. scheduled for May 15, 2019, to take impressions of S.W.'S teeth at his "lab" at 2352 Cavendish Drive in Burlington. Dr. Pass failed to attend. Dr. Pass delivered a final retainer for S.W. on May 23, 2019, which he left in the mailbox of the W. residence. On June 12, 2019, Dr. Pass offered to see S.W. that afternoon in his lab, but this offer was declined.

H.H.

17. Dr. Pass began treatment of H.H. prior to the closure of his clinic. Dr. Pass continued to treat H.H. after the closure of his clinic at various other locations. Her appointments were arranged primarily through e-mails with Dr. Pass.
18. While Dr. Pass' certificate of registration was suspended for non-payment of fees between February 1, 2019 and July 26, 2019, Dr. Pass treated H.H. at least four times: February 27, 2019; March 29, 2019; April 5, 2019 (at Waterdown Smiles), and June 19, 2019.

19. Dr. Pass also offered orthodontic treatment to H.H. in August 2019, despite having received the Interim Order suspending his certificate of registration, although he did not provide the treatment.
20. Dr. Pass did not provide a complete and accurate copy of the treatment records of H.H. to her despite her requests, nor to the College.

T.P.

21. Dr. Pass provided orthodontic treatment to patient T.P. in January 2020, despite his certificate of registration being suspended by the Interim Order. On January 20, 2020, Dr. Pass sought to transfer treatment to another dentist.

Allegations in the Notices of Hearing

22. Dr. Pass admits and acknowledges that he was not permitted to practise any form of dentistry, including providing orthodontic treatment, while his certificate of registration was suspended for non-payment of fees on February 1, 2019. Dr. Pass also admits and acknowledges that he was not permitted to practise any form of dentistry, including providing orthodontic treatment, after his certificate of registration was suspended by an Interim Order of the ICRC on July 26, 2019. He further admits that he had notice that his certificate was suspended for non-payment of fees as of February 1, 2019, and of the Interim Order dated July 26, 2019, within days of the issuance of these orders.
23. If Dr. Pass were to testify, he would state that he continued to practise after February 1, 2019 because he was attempting to complete treatment for patients who had paid him for full orthodontic services. He admits and acknowledges that he should have transferred these patients to another practitioner and that whatever financial arrangements or pressures he felt did not relieve him of his professional obligation to cease practising while suspended.
24. Dr. Pass admits and acknowledges that he committed acts of professional misconduct when he contravened a provision of the *Dentistry Act, 1991*, the *Regulated Health Professions Act, 1991* or the Regulations under either of those Acts, contrary to paragraph 48 of Section 2 of Ontario Regulation 853, Regulations of Ontario, 1993, as alleged in Allegation 1

of the Notice of Hearing in H200012 and Allegation 1 of the Notice of Hearing in C190436 (now 21-0186) (as it relates to S.W.), when he practised dentistry after his certificate of registration was suspended by the College on February 1, 2019 for non-payment of fees, in that he:

- a. provided dental treatment to at least sixteen patients at Waterdown Smiles on March 15, 2019, April 5, 2019, and May 17, 2019;
 - b. provided or offered to provide dental treatment to S.W. on at least three occasions including April 5, 2019, April 26, 2019 and June 12, 2019; and
 - c. provided dental treatment to H.H. on at least four occasions including February 27, 2019, March 29, 2019, April 5, 2019, and June 19, 2019.
25. Dr. Pass admits and acknowledges that he committed acts of professional misconduct when he contravened a provision of the *Dentistry Act, 1991*, the *Regulated Health Professions Act, 1991* or the Regulations under either of those Acts, contrary to paragraph 48 of Section 2 of Ontario Regulation 853, Regulations of Ontario, 1993, as alleged in Allegation 1 of the Notice of Hearing in H200012, when he practised dentistry after his certificate of registration was suspended by the Interim Order on July 26, 2019 in that he provided dental treatment to T.P. in January 2020.
26. Dr. Pass admits and acknowledges that the standards of practice require all dentists to maintain a safe and healthy office environment for patients, including treating patients only in a clean and well-organized office environment, as required by the College's Standard of Practice on Infection Prevention and Control in the Dental Office. He admits and acknowledges that it is a breach of the standards of practice to treat patients outside of a sterile dental office environment, including in a patient's home or car. Dr. Pass also admits that this is the case even if he only inspected a patient's mouth and did not make adjustments.
27. Dr. Pass admits and acknowledges that he committed acts of professional misconduct when he contravened a standard of practice or failed to meet the standards of practice of the profession, contrary to paragraph 1 of Section 2 of Ontario Regulation 853, Regulations of Ontario, 1993, as

alleged in Allegation 2 of the Notice of Hearing in C190436, when he treated S.W. of a sterile dental office environment, including in her home and in her father's parked vehicle on June 12, 2019.

28. Dr. Pass admits and acknowledges that he committed acts of professional misconduct as provided by s.51(1)(c) of the *Health Professions Procedural Code*, being Schedule 2 of the *Regulated Health Professions Act, 1991*, Statutes of Ontario, 1991, Chapter 18 in that he engaged in conduct or performed an act or acts that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable, unprofessional or unethical, as alleged in Allegation 2 of the Notice of Hearing in H200012 and Allegation 3 of the Notice of Hearing in C190436. In particular, Dr. Pass admits and acknowledges that:
- a. he had knowledge and disregarded the suspension of his certificate of registration for non-payment of fees and of the Interim Order and made a conscious and deliberate choice to continue to practise dentistry when he was not entitled to do so;
 - b. his conduct demonstrates that he did not have due respect for or a willingness to be governed by the College;
 - c. by doing so, he put his patients' health and safety at risk, including when he breached the standards of practice as detailed in the College's Standard of Practice on Infection Prevention and Control when he treated patients, including S.W., outside of a sterile dental office environment;
 - d. he was obliged and failed to advise patients of the closure of his clinic and to arrange transfer of their care.

General

29. Dr. Pass admits that the acts described above constitute professional misconduct and he now accepts responsibility for his actions and the resulting consequences.
30. Dr. Pass has had the opportunity to take independent legal advice with respect to his admissions.

DECISION AND REASONS FOR DECISION

The Panel finds that the Member engaged in professional misconduct as set out in the Notices of Hearing and Agreed Statement of Facts.

The Member pled guilty to five (5) allegations of professional misconduct as set out in the Notices of Hearing and did not dispute the facts as presented in the Agreed Statement of Facts.

The Panel is of the view that the evidence contained in the Agreed Statement of Facts clearly substantiates the allegations that Dr. Pass breached the College's Standards of Practice and in particular, that he:

- practised while suspended.
- failed to advise his patients and colleagues that he was suspended.
- Provided orthodontic services in an unsterile environment.
- failed to keep proper and complete patient records.

PENALTY SUBMISSIONS

The parties presented the Panel with a Joint Submission on Penalty and Costs (Exhibit 5), which provides as follows.

1. The Royal College of Dental Surgeons of Ontario ("College") and Dr. Richard Lawrence Pass ("the Member") jointly submit that, as a result of the panel's finding that the Member is guilty of professional misconduct, this panel of the Discipline Committee impose the following penalty on the Member, namely, that it make an order:
 - (a) requiring the Member to appear before the panel of the Discipline Committee to be reprimanded within ninety (90) days of this Order becoming final or on a date fixed by the Registrar;
 - (b) directing the Registrar to revoke the Member's certificate of registration immediately upon the Order becoming final; and
 - (c) that the Member pay costs to the College in the amount of \$7,500.00 in respect of this discipline hearing, such costs to be paid in full

within ninety (90) days of this Order becoming final or on a date to be fixed by the Registrar.

2. The College and the Member further submit that pursuant to the Code, as amended, the results of these proceedings must be recorded on the Register of the College indefinitely and any publication of the Decision of the panel would therefore occur with the name and address of the Member included.
3. The Member has not previously appeared before the Discipline Committee of the College.

PENALTY DECISION

The Panel agrees with and accepts the Joint Submission on Penalty and orders that:

- (a) The Member appear before the panel of the Discipline Committee to be reprimanded within ninety (90) days of this Order becoming final or on a date fixed by the Registrar;
- (b) The Registrar revoke the Member's certificate of registration immediately upon the Order becoming final; and
- (c) The Member pay costs to the College in the amount of \$7,500.00 in respect of this discipline hearing, such costs to be paid in full within ninety (90) days of this Order becoming final or on a date to be fixed by the Registrar.

REASONS FOR PENALTY DECISION

The Panel is aware that joint submissions should be respected unless they fall so far outside the range of an appropriate sanction that they would bring the administration of justice at the College into disrepute, or are otherwise contrary to the public interest.

The Panel found that the Joint Submission on Penalty and Costs was appropriate as demonstrated by the cases relied on by the College. The penalty will adequately serve

to protect the public. The decision on Penalty sends a strong message to the profession that conduct of this nature will not be tolerated by the College. In reaching this decision, the Panel is mindful of the seriousness of the misconduct and is deeply concerned by the Member breaching an Interim Order made by the ICRC. Numerous patients were treated by Dr. Pass while his certificate of registration was suspended. Record keeping was incomplete. The Panel also was disturbed by Member's blatant disregard of his patients' well being by performing dental services in a non sterile environment. The Panel deemed Dr. Pass to be ungovernable and as a result was of the opinion that revocation was the appropriate penalty.

The Member's cooperation with the College led to an Agreed Statement of Facts and a Joint Submission with respect to Penalty and Costs. He pled guilty and in doing so, prevented a more lengthy and costly hearing.

The Member waived his right of appeal and received the reprimand at the conclusion of the hearing, after the Panel had rendered its decision.

I, Dr. Richard Hunter, sign these Reasons for Decision as Chairperson of this Discipline Panel.



April 7, 2021

Date

RCDSO v. DR. RICHARD PASS

Dr. Pass, as you know, this Discipline panel has ordered you be given an oral reprimand as part of the sanction imposed upon you. The reprimand should impress upon you the seriousness of your misconduct.

The fact that you have received this reprimand will be part of the public portion of the Register and, as such, part of your record with the College.

You will be given an opportunity to make a statement at the end of the reprimand if you wish.

The panel has found that you have engaged in multiple acts of professional misconduct. The misconduct related to breaching the standards of practice, including, practising while suspended; failing to advise your patients and your colleagues that you were suspended; practising in an unsterile environment, and improper and deficient record keeping. The cumulative effect of your conduct would reasonably be regarded by members as disgraceful, dishonourable, unprofessional and unethical.

Your professional misconduct is a matter of profound concern. It is completely unacceptable to your fellow dentists and to the public. You have brought discredit to the entire profession and to yourself. Public confidence in this profession has been put in jeopardy.

Of special concern to us is the fact that the professional misconduct in which you engaged has involved

- A prolonged period of practising while suspended
- Exposed patients to unnecessary risk by providing dental services in uncontrolled environments, including the backseat of a car

We have ordered the penalty of revocation, being the most significant penalty this Committee can impose. It is appropriate in this case because you have shown a disregard for the basic foundational principle that only members of this College can engage in the practice of dentistry. You willfully continued to practice despite not paying fees over a period of many months and you failed to abide by the ICRC's interim suspension. Your misconduct as found in this instance, coupled with your history before the ICRC demonstrates your complete disregard for the regulatory

authority of the College. The panel has concluded that at this point in your career you are ungovernable.

As I advised earlier, you will now be given an opportunity to make a comment if you wish to do so. This is not an opportunity for you to debate the merits or the correctness of the decisions we have made.

Do you have any questions or do you wish to make any comments?

IN THE MATTER OF a Hearing of a panel of the Discipline Committee of the Royal College of Dental Surgeons of Ontario held pursuant to the provisions of the Health Professions Procedural Code which is Schedule 2 to the *Regulated Health Professions Act, 1991*, Statutes of Ontario, 1991, Chapter 18 (“*Code*”) respecting one **DR. RICHARD PASS**, of the City of Thornhill, in the Province of Ontario;

AND IN THE MATTER OF the *Dentistry Act* and Ontario Regulation 853, Regulations of Ontario, 1993, as amended (“*Dentistry Act Regulation*”);

AND IN THE MATTER OF the *Statutory Powers Procedure Act*, Revised Statutes of Ontario, 1990, Chapter S.22, as amended; 1993, Chapter 27; 1994, Chapter 27.

NOTICE OF PUBLICATION BAN

This is formal notice that on March 9, 2021, the panel of the Discipline Committee of the Royal College of Dental Surgeons of Ontario made an Order directing that no person shall publish or broadcast the identity of any patients of the Member, or any information that could disclose the identity of any patients who are named in the Notice of Hearing and/or the Agreed Statement of Facts in this matter.

This Order is made pursuant to subsection 45(3) of the *Code*.

Subsection 93(1) of the *Code* reads:

93(1) Every person who contravenes an order made under subsection 7(3) or Section 45 or 47, or who contravenes subsection 76(3), 82(2) or (3), 85.2(1), 85.5(1) or (2) or 85.14(2) or Section 92.1 is guilty of an offence and on conviction is liable,

- (a) in the case of an individual to a fine of not more than \$25,000 for a first offence and not more than \$50,000 for a second or subsequent offence; or

(b) in the case of a corporation to a fine of not more than \$50,000 for a first offence and not more than \$200,000 for a second or subsequent offence.



Dr. Richard Hunter, Chair
Discipline Panel

March 9, 2021

Date

SD: 1070863