

ALBERTA COLLEGE OF SPEECH-LANGUAGE
PATHOLOGISTS AND AUDIOLOGISTS

IN THE MATTER OF
THE *HEALTH PROFESSIONS ACT*

AND IN THE MATTER OF A HEARING
REGARDING THE CONDUCT OF

KRISTEN HEDLEY

**DECISION OF THE HEARING
TRIBUNAL**

INTRODUCTION

1. On March 20, 2024, the Hearing Tribunal held a hearing into the conduct of Kristen Hedley via videoconference. The hearing was held under Part 4 of the *Health Professions Act* (the "HPA").
2. In attendance as members of the Hearing Tribunal were Darwin Durnie, Chair and public member; Patricia Hull, public member; and Brie Schindel and Christine Beliveau, Registered Speech-Language Pathologists. Annabritt Chisholm and Amin Ben Khaled, Student-at-Law, acted as independent counsel to the Hearing Tribunal.
3. Colleen Wetter, the Complaints Director, was in attendance at the hearing and self-represented. Ms. Hedley was also present and self-represented.
4. There were no objections to the composition or jurisdiction of the Hearing Tribunal to proceed with a hearing. The hearing was a public hearing. There were no applications from either party to hold the hearing, or any part of the hearing, in private.
5. Ms. Wetter made a preliminary application to adjourn the matter for later in the day to allow her to speak with Ms. Hedley, as the parties had not spoken prior to meeting on the day of the hearing. The Hearing Tribunal accepted the preliminary application. After the adjournment, Ms. Wetter advised the Hearing Tribunal that the parties had come to an agreement in respect to the merits of the hearing.
6. Ms. Wetter confirmed that the hearing would proceed by way of an Agreed Statement of Facts and Admission of Unprofessional Conduct. Ms. Hedley and the Hearing Tribunal agreed with this proposal and the hearing proceeded by consent.
7. The Hearing Tribunal confirmed that Ms. Hedley had no issues by proceeding without legal counsel in a self-represented capacity. Ms. Hedley was advised and aware of her right to legal counsel and waived that right.

ALLEGATIONS

8. A Notice of Hearing, dated February 2, 2024, was entered into the record and marked as Exhibit 1. The allegations set out in the Notice of Hearing were as follows:

IT IS ALLEGED THAT:

- 1) From December 7, 2022 to November 21, 2023, Kristen Hedley failed or refused to respond to requests of or cooperate with the Complaints Director.
- 2) From May 21, 2023 to June 19, 2023, Kristen Hedley failed or refused to comply with a request of or cooperate with an investigator.

and that the conduct described above constitutes unprofessional conduct as defined in s. 1(1)(p) of the HPA, and/or constitutes a contravention of Alberta College of Speech-Language Pathologists and Audiologists ("ACSLPA") by-laws, Standards of Practice, and/or Code of Ethics.

EVIDENCE AND DOCUMENTS BEFORE THE HEARING TRIBUNAL

9. No witnesses were called at this hearing. The documents and evidence that were before the Hearing Tribunal were submitted by agreement of both parties and were as follows:
 - Exhibit 1: Notice to Attend a Hearing
 - Exhibit 2: Agreed Statement of Facts and Admissions of Unprofessional Conduct
 - Exhibit 3: Notice to Attend a Hearing
 - Exhibit 4: Email From Vita Wensel¹ to Kristen Hedley, dated April 12, 2023
 - Exhibit 5: Email From Vita Wensel to Kristen Hedley, dated May 9, 2023
 - Exhibit 6: Email From Vita Wensel to Kristen Hedley, dated May 9, 2023
 - Exhibit 7: Email From Colleen Wetter to Kristen Hedley, dated July 14, 2023
 - Exhibit 8: Memorandum From Colleen Wetter to Brenda Benard, Investigator, dated August 6, 2023
 - Exhibit 9: Email From Colleen Wetter to Kristen Hedley, dated September 12, 2023
 - Exhibit 10: Letter From Colleen Wetter to Kristen Hedley, dated November 28, 2023
 - Exhibit 11: Email From McKenzie Henze to Kristen Hedley, dated February 2, 2024
 - Exhibit 12: Declaration of Attempted Service
 - Exhibit 13: Screenshot of Notice to Attend a Hearing on ACLSPA website
 - Exhibit 14: Email from Colleen Wetter to Kristen Hedley, dated December 18, 2023
 - Exhibit 15: Excerpt from the *Health Professions Act*, section 1(1)(pp)
 - Exhibit 16: ACSLPA's Code of Ethics, June 2022

FACTS

10. The facts in this case are undisputed and set out in detail in the Agreed Statement of Facts (Exhibit 2). The key facts are summarized in the paragraphs that follow.

Facts Relating to Ms. Hedley

11. Ms. Hedley was first registered with ACSLPA on September 1, 2012. Ms. Hedley was a regulated member of ACSLPA as a speech-language pathologist ("SLP") and held an active practice permit until December 31, 2023.
12. In January of 2024, Ms. Hedley let her registration and practice permit lapse. Ms. Hedley's registration was cancelled by ACSLPA on February 6, 2024.

¹ Ms. Wensel was the former Complaints Director of ACSLPA.

13. Ms. Hedley operated her own speech-language pathology practice in Edmonton called Sunshine Speech Services.
14. From 2022 to the date of the hearing, Ms. Hedley's contact information, was represented on ACSLPA's registration database as the same residential address in Edmonton.

The Complaint and Investigation

15. On April 12, 2023, ACSLPA's Complaints Director initiated a complaint against Ms. Hedley for failure to respond to ACSLPA (the "Complaint"). The Complaint was made under section 56 of the HPA.
16. As outlined in the April 12, 2023 letter of Complaint, the Complaints Director had attempted to contact Ms. Hedley for five months. The Complaints Director asked for a response from Ms. Hedley by April 24, 2023. The letter of Complaint included the dates and manner of contact with Ms. Hedley prior to April 12, 2023, as follows:
 - a. By phone on December 7, 2022 and left a voicemail;
 - b. By phone on December 8, 2022 and left a voicemail;
 - c. By email and providing a formal notice of the complaint on December 8, 2022 in writing via email and offering Ms. Hedley an opportunity to respond to the complaint;
 - d. By email on December 14, 2022;
 - e. By email and registered mail correspondence seeking a response on January 5, 2023;
 - f. By phone on January 17, 2023 and left a voicemail;
 - g. By email and registered mail correspondence seeking a response on January 17, 2023;
 - h. By email and registered correspondence about the next steps on January 26, 2023;
 - i. By phone on February 14, 2023 and left Ms. Hedley a voicemail; and
 - j. By email and registered mail correspondence about the complaint on March 29, 2023.
17. Ms. Hedley did not respond to the request of the Complaints Director by April 24, 2023, or at all, and did not pick up her registered mail.
18. On May 9, 2023, the Complaints Director notified Ms. Hedley by email and registered mail that she was commencing an investigation of the Complaint by the authority of section 55(2)(d) of the HPA.
19. Also on May 9, 2023, the Complaints Director notified Ms. Hedley by email and registered mail that she had appointed an investigator to conduct an investigation into the Complaint.
20. On July 14, 2023, Ms. Wetter became the Complaints Director. The Complaints Director emailed Ms. Hedley to notify her of the change.
21. Ms. Hedley did not respond or communicate with the investigator. On August 6, 2023, the investigator provided a Memorandum and concluded the investigation indicating they were unable to reach Ms. Hedley (Exhibit 8).

22. The Complaints Director attempted to contact Ms. Hedley:
 - a. By email on September 12, 2023;
 - b. By email on September 13, 2023;
 - c. By email on November 7, 2023;
 - d. By phone on November 21, 2023.
23. The Complaints Director determined there was sufficient evidence of unprofessional conduct by Ms. Hedley and that the matters should be referred to the Hearings Director in accordance with section 66(3)(a) of the HPA.

Facts Leading Up to the Hearing

24. On November 28, 2023, the Complaints Director sent a copy of the referral to a hearing, a summary of the allegations, prospective dates for the hearing as well as disclosure to Ms. Hedley by registered mail.
25. On February 2, 2024, ACSLPA's Hearings Director sent the Notice of Hearing and details of the videoconference meeting to Ms. Hedley by email at info@sunshinespeech.ca.
26. On February 2, 2024, the Hearings Director also arranged for a process server to personally serve the February 2, 2024 documents along with the Complaints Director's November 28, 2023 package on Ms. Hedley. The process server was not successful in attempting to personally serve Ms. Hedley. A copy of the Declaration of Attempted Service was provided (Exhibit 12).
27. On February 2, 2024, a copy of the Notice to Attend was published on acslpa.ca.
28. The Complaints Director unsuccessfully attempted to contact Ms. Hedley in the following manner and dates:
 - a. By email on December 18, 2023;
 - b. By phone on January 25, 2024;
 - c. By phone on February 9, 2024.

SUBMISSIONS

Submissions of Ms. Wetter

29. Ms. Wetter advised that the parties had entered into an Agreed Statement of Facts and Admission of Unprofessional Conduct, which was provided to the Hearing Tribunal (Exhibit 2).
30. Ms. Wetter reviewed the Agreed Statement of Facts and the Exhibits and emphasized the various attempts made by ACSLPA to contact Ms. Hedley. Ms. Wetter noted that Ms. Hedley did not respond to emails, phone calls, voicemails, letters and registered mail from the Complaints Director or investigator from December of 2022 until the day of the hearing.
31. Ms. Wetter argued that the admitted conduct was so serious that it rose to the level of unprofessional conduct under the HPA. Ms. Wetter drew the Hearing Tribunal's

attention to Ms. Hedley's Admission of Unprofessional Conduct that her conduct was unprofessional and submitted that the Hearing Tribunal could and should rely on Ms. Hedley's admission, particularly in the context of the Agreed Statement of Facts and supporting evidence.

32. In particular, Ms. Wetter noted Ms. Hedley admitted that the facts outlined in the Agreed Statement of Facts prove the alleged conduct and that the conduct is unprofessional conduct, as defined in sections 1(1)(pp)(vii)(b) and 1(1)(pp)(xii) of the HPA.
33. Ms. Wetter submitted that she explained to Ms. Hedley her right to obtain legal counsel or get legal advice before Ms. Hedley signed the Agreed Statement of Facts and Admission of Unprofessional Conduct.
34. Ms. Wetter submitted that in the Agreed Statement of Facts and Admission of Unprofessional Conduct, Ms. Hedley acknowledged her right to consult legal counsel and waived her right to do so. Ms. Hedley chose to proceed without legal counsel and understood that the Hearing Tribunal could choose to impose one or more of the orders outlined in section 82 of the HPA, and that the findings of unprofessional conduct and orders of the Hearing Tribunal will be publicly available on ACSLPA's webpage in accordance with ACSLPA Bylaw sections 64 and 65.
35. Ms. Wetter urged the Hearing Tribunal to accept the Agreed Statement of Facts and Admission of Unprofessional Conduct and to make a finding that Ms. Hedley engaged in the unprofessional conduct set out therein. Ms. Wetter submitted that the law is clear that an agreement between the parties should be accepted unless something is substantially wrong with the agreement and it cannot be remedied by allowing the parties to make submissions on that point.

Submissions of Ms. Hedley

36. Ms. Hedley indicated she had no submissions to add.

FINDINGS

37. After hearing from the Complaints Director and Ms. Hedley and reviewing the evidence and admissions, the Hearing Tribunal finds, on a balance of probabilities, that the conduct alleged in the Notice of Hearing occurred as alleged.
38. The Hearing Tribunal accepts Ms. Hedley's Admission of Unprofessional Conduct and agrees that the proven conduct constitutes unprofessional conduct under sections 1(1)(pp)(vii)(b) and 1(1)(pp)(xii) of the HPA.

REASONS

39. In this case, the facts are not in dispute. There is clear and cogent evidence in the Agreed Statement of Facts and supporting documents, and there is an admission from Ms. Hedley that the conduct occurred.
40. In considering whether the conduct rises to the level of unprofessional conduct, the Hearing Tribunal reviewed the material provided in the Agreed Statement of Facts and

Admission of Unprofessional Conduct and supporting exhibits, and ACSLPA's Code of Ethics, June 2022.

41. With respect to Allegation 1, the Hearing Tribunal considered the facts set out above establish the conduct alleged. The Hearing Tribunal finds that Ms. Hedley failed or refused to respond to requests of or cooperate with the Complaints Director.
42. With respect to Allegation 2, the Hearing Tribunal finds that the facts as set out above establish the conduct alleged. More specifically, Ms. Hedley failed or refused to comply with a request of or cooperate with an investigator.
43. In the Hearing Tribunal's view, this conduct defies an essential and fundamental expectation of regulated members. Ms. Hedley's conduct displayed a serious disregard for her professional obligations. As a result, the Hearing Tribunal finds this conduct to be unprofessional.
44. The Hearing Tribunal finds that this failure to respond to and cooperate with the Complaints Director constitutes a breach of ACSLPA's Code of Ethics, June 2022, which was in force at the relevant times, which reads:

2 Professionalism

Regulated members:

2.1 Promote and protect the public's trust, and the reputation of the professions, by acting with honesty, integrity, objectivity, diligence, and courtesy.

45. The Hearing Tribunal notes that this did not involve a minor mistake committed by Ms. Hedley, but an accumulation of her failure to respond to and cooperate with the Complaints Director of ACSLPA over a significant period up until the day of the hearing. Failure to respond to ACSLPA and cooperate with an investigation undermines ACSLPA's ability to regulate the profession and to protect the public. The Hearing Tribunal finds Ms. Hedley's conduct breached ACSLPA's Code of Ethics, June 2022 and constitutes unprofessional conduct.
46. The Hearing Tribunal will receive submissions on sanction from the parties. The Hearing Tribunal asks that the parties consult each other to determine whether submissions will be made in writing or in person. The proposed format and timing of the parties' submissions is to be submitted to the Hearings Director two weeks after receipt of this decision. The Hearings Director will then relay the parties' proposal to the Hearing Tribunal. If the parties need further direction from the Hearing Tribunal regarding the submissions on sanction, they can request such direction from the Hearing Tribunal.

Signed on behalf of the Hearing Tribunal by:



Darwin Durnie, Chair

Dated May 9, 2024

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**DECISION OF THE HEARING
TRIBUNAL REGARDING
SANCTIONS**

INTRODUCTION

1. On May 9, 2024, the Hearing Tribunal issued its Merits Decision that found the following allegations against Ms. Kristen Hedley had been proven on a balance of probabilities:
 - 1) From December 7, 2022 to November 21, 2023, Kristen Hedley failed or refused to respond to requests of or cooperate with the Complaints Director.
 - 2) From May 21, 2023 to June 19, 2023, Kristen Hedley failed or refused to comply with a request of or cooperate with an investigator.and that the conduct described above constitutes unprofessional conduct as defined in s. 1(1)(p) of the HPA, and/or constitutes a contravention of Alberta College of Speech-Language Pathologists and Audiologists ("ACSLPA") by-laws, Standards of Practice, and/or Code of Ethics.
2. In its decision, the Hearing Tribunal indicated that it would receive submissions on sanction from the parties and asked that the parties consult one another to determine whether the submissions should be made in writing or in person.

SERVICE

3. The Hearing Tribunal received the following information which satisfied it that Ms. Hedley was provided with a copy of the Merits Decision as well as instructions on how to provide sanction submissions.
4. On May 15, 2024, the Hearings Director emailed Ms. Hedley at the email address she provided to ACSLPA and confirmed during the hearing held March 20, 2024. The email contained a copy of the Hearing Tribunal's Merits Decision as well as a letter to Ms. Hedley from the Hearings Director containing instructions to Ms. Hedley to provide her preference on the format of submissions on sanctions by June 12, 2024.
5. On May 16, 2024, a copy of the Merits Decision and the letter from the Hearings Director were also delivered to Ms. Hedley by registered mail at the mailing address she provided to ACSLPA and confirmed during the hearing held March 20, 2024.
6. An Affidavit of Colleen Wetter dated June 5, 2024 confirmed that in her role as Complaints Director, Ms. Wetter made multiple attempts to reach Ms. Hedley via email to discuss sanctions but that Ms. Hedley did not respond to those emails.
7. The Hearing Tribunal was also advised by the Hearings Director that Ms. Wetter sent her June 5, 2024 submissions on sanction to Ms. Hedley via email but that Ms. Hedley did not respond.

SUBMISSIONS

Submissions of the Complaints Director

8. Ms. Wetter proposed the following orders as fair and appropriate in the circumstances of this case:

- a. If Ms. Hedley applies for registration and a practice permit and satisfies the requirements of the registrar, she must:
 - i. Immediately serve a two-week suspension and there will be a condition on her practice permit until the suspension is served;
 - ii. Immediately attend counselling and require her counsellor to submit confirmation to the Complaints Director that she has attended on a regular basis for two years. She will be responsible for the cost of counselling. The Complaints Director will be required to approve the counsellor who must be a registered social worker, registered psychologist or psychiatrist in Alberta and receive written confirmation from the counsellor that she agrees to the terms of the Hearing Tribunal's orders. There will be a condition on Kristen Hedley's practice permit until she has completed the counselling.
 - iii. Receive a reprimand and the May 9, 2024 Decision will serve as the reprimand.
 - b. Ms. Hedley should pay all the costs of the investigation and hearing. Costs of the investigation and hearing were \$4085.86 as of May 15, 2024 and that it is possible that the remaining costs, including service on Ms. Hedley, meetings of the Hearing Tribunal and its preparation of a written decision could be another \$3000.
9. Ms. Wetter submitted that the proposed sanctions address the seriousness of the proven conduct and protect the public while also providing a path forward if Ms. Hedley wishes to resume practicing as a speech-language pathologist.
10. Ms. Wetter reviewed the factors outlined in the case of *Jaswal v Newfoundland Medical Board* ("Jaswal") and applied them to this complaint matter:
- a. *Nature and gravity of the proven allegations*: Ms. Hedley's conduct was serious and impacted ACLSPA's ability to carry out its regulatory functions.
 - b. *Age and experience of the member*: Ms. Hedley was an experienced member, having been registered with ACSLPA since September 1, 2012.
 - c. *Previous character of the member*: there are no prior findings of unprofessional conduct against Ms. Hedley, which is a mitigating factor.
 - d. *Age and mental condition of the offended patient*: this factor does not apply as no patients were involved in this complaint matter.
 - e. *Number of times the offence was proven to have occurred*: Ms. Hedley did not respond to multiple requests from the investigator and the Complaints Director until the date of the hearing (March 20, 2024).
 - f. *The role of the member in acknowledging what occurred*: Ms. Hedley admitted her conduct was unprofessional conduct, which did not save time at the hearing but was nonetheless a mitigating factor.
 - g. *Whether the member suffered other serious financial or other penalties*: Ms. Hedley did not provide evidence as to her financial circumstances.

- h. *Impact on the offended patient:* As noted above, this factor does not apply as no patients were involved in this complaint matter.
 - i. *The presence or absence of mitigating circumstances:* Ms. Hedley accepted responsibility for her conduct and does not have a history of unprofessional conduct.
 - j. *The need to promote specific and general deterrence:* The proposed orders will educate regulated members about the consequences of similar behaviour.
 - k. *The need to maintain the public's confidence in the integrity of the profession:* The public must be assured that ACSLPA will address complaints and ensure a regulated member or individual under their jurisdiction responds in the complaint process.
 - l. *The degree to which the proven conduct fell outside of the range of permitted conduct:* Ms. Hedley's conduct impeded ACSLPA's ability to address complaints and fulfill its regulatory obligations and was outside of the range of permitted conduct.
 - m. *The range in similar cases:* there are no specific cases from ACSLPA that address this conduct.
11. Ms. Wetter referred to the Court of Appeal's decision in *Jinnah v Alberta Dental Association and College ("Jinnah")* and explained that it provided a legal framework to assist the Hearing Tribunal in deciding whether it should order costs in this case.
12. She stated that *Jinnah* set out four compelling reasons for a regulator to impose costs in a discipline proceeding:
- a. When a member engages in serious unprofessional conduct;
 - b. When a member is a serial offender who engages in unprofessional conduct on two or more occasions;
 - c. When a member fails to cooperate with investigators and forces a college to expense more resources than is necessary to ascertain the facts related to a complaint; and
 - d. When a member engages in hearing misconduct.
13. At paragraph 20 of the Complaints Director's submissions on sanction, Ms. Wetter submitted that in this case, the Hearing Tribunal remarked on the seriousness of Ms. Hedley's conduct. It found Ms. Hedley's conduct was not a minor mistake but an accumulation of her failure to respond over a significant period until the day of the hearing. Ms. Hedley's conduct in its Merits Decision and that the other compelling reasons to order costs included:
- a. Ms. Hedley did not respond to the investigator or the Complaints Director on multiple occasions as she was required to do;
 - b. The costs represent all necessary costs to investigate this matter and hold a hearing and were reasonable;

- c. There were no unnecessary costs;
- d. The investigation and hearing were necessary to address Ms. Hedley's conduct and ensure ACSLPA took steps to fulfill its statutory obligation;
- e. The investigation and hearing would have been unnecessary if Ms. Hedley had responded during the complaint process.

Submissions of Ms. Hedley

14. Ms. Hedley did not provide submissions on sanction.

DECISION ON SANCTIONS

15. Section 82 of the *Health Professions Act* authorizes the Hearing Tribunal to order sanctions after making findings of unprofessional conduct.
16. After considering the Complaints Director's submissions, the Hearing Tribunal agrees that if Ms. Hedley wishes to be reinstated on ACSLPA's register as a regulated speech-language pathologist, it is appropriate for her to serve a period of suspension and receive a reprimand as proposed by the Complaints Director.
17. Failing or refusing to respond to requests of or cooperate with the Complaints Director or an investigator appointed by the Complaints Director during an investigation under Part 4 of the *Health Professions Act* is unacceptable conduct for a regulated member to engage in. Ms. Hedley demonstrated a serious disregard for her professional obligations which undermined ACSLPA's ability to regulate the profession and protect the public.
18. The Hearing Tribunal was not satisfied that Ms. Hedley should undertake counselling as proposed by the Complaints Director. The Hearing Tribunal carefully reviewed the information before it and found an insufficient evidentiary basis to connect why the proposed order for counselling would be responsive or proportional to the conduct at issue given there was no patient involved.
19. Instead, the Hearing Tribunal finds that a fine of \$750 for each of Allegation 1 and 2, for a total fine of \$1500 is appropriate to order within the Hearing Tribunal's authority under section 82 of the *Health Professions Act*. Fines are punitive and will send a message of specific and general deterrence, to Ms. Hedley, should she return to practice, as well as to other members of the profession that the proven conduct in this case will not be tolerated by the College. Together, with a two-week suspension should Ms. Hedley choose to return to practice, the Hearing Tribunal believes the fine will serve as a deterrent.

Costs

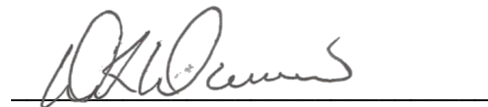
20. The Hearing Tribunal considered the Complaints Director's request that Ms. Hedley pay all of the costs of the investigation and hearing which were estimated to be approximately \$7000 once the sanctions portion of the hearing concluded. The Hearing Tribunal also considered the Court of Appeal's decision in *Jinnah* as referenced in the Complaints Director's submissions.
21. The Hearing Tribunal finds this is not a case where a costs order is warranted.

22. The Hearing Tribunal considered its decision to issue a fine for each of the Allegations under section 82 of the *Health Professions Act* as the punitive measure and differentiates these from a costs award. In the Hearing Tribunal's view, the costs of this matter were administrative and amount to costs ACLSPA was required to incur to operate.
23. The Hearing Tribunal considered the four factors set out in *Jinnah* which suggest when costs are warranted. It does not find that this was a case that involved a member that engaged in serious unprofessional conduct such as fraud as outlined in *Jinnah*, nor was there evidence that Ms. Hedley was a serial offender. While Ms. Hedley did not respond to repeated requests to participate in the investigation process, she did appear at the merits portion of the hearing and entered into an Agreed Statement of Facts and Admission of Unprofessional Conduct. This meant the hearing proceeded on an uncontested basis. Thus, the Hearing Tribunal is not satisfied that this amounts to Ms. Hedley failing to cooperate with investigators or engaging in hearing misconduct such that the College was forced to expend resources beyond what was necessary to ascertain the facts related to this complaint matter.

CONCLUSION

24. For the reasons set out above, the Hearing Tribunal makes the following orders on sanction under section 82 of the *Health Professions Act*:
 - a. If Ms. Hedley is reinstated onto the College's register as a speech-language pathologist, she must immediately serve a two-week suspension and there will be a condition on her practice permit until the suspension is served.
 - b. If Ms. Hedley is reinstated on the College's register as a speech-language pathologist, she will receive a reprimand and the Hearing Tribunal's Merits Decision dated May 9, 2024 shall serve as that reprimand.
 - c. Ms. Hedley shall pay a fine of \$750 for each of Allegation 1 and 2, for a total fine of \$1500, to be paid within 90 days of the date the Hearing Tribunal's Sanctions Decision is served on her.

Signed on behalf of the Hearing Tribunal by:



Darwin Durnie, Chair

Dated October 5, 2024