## **DISCIPLINE COMMITTEE** OF THE COLLEGE OF DENTAL TECHNOLOGISTS OF ONTARIO

Terence Price, Chairperson, Public Member Michael Karrandjas, Professional Member Sarah Cheah, Professional Member
<ul><li>Jordan Glick for College</li><li>of Dental Technologists of Ontario</li></ul>
)
) Kristopher Grunwald, self-represented )
) Andrea Gonsalves ) Independent Legal Counsel ) Heard: March 17, 2020

#### **DECISION AND REASONS**

- This matter came on for hearing before a panel of the Discipline Committee (the "Panel") [1] of the College of Dental Technologists of Ontario (the "College") on March 17, 2020, by teleconference.
- At the outset of the hearing, the parties confirmed to the Panel their consent to proceeding [2] with an electronic hearing and that they waived all procedural requirements in connection with the electronic hearing, including the requirement for a notice of electronic hearing.

## The Allegations

The allegations against Kristopher Grunwald (the "Member" or the "Former Member") as set out in the Statement of Allegations appended to the Notice of Hearing dated July 22, 2019, are as follows.

#### IT IS ALLEGED THAT:

Mr. Kristopher Grunwald (the "Member") committed an act or acts of professional misconduct as provided by subsection 51(1)(c) of the Health Professions Procedural Code of the Dental Technology Act, 1991, as amended,

and subsection 1(2) of *Ontario Regulation 798/93*, as amended, in that, while engaged in the practice of dental technology as the Registered Dental Technologist ("**RDT**") and/or the RDT responsible for supervision at Accurate Dental Laboratories, also known as Accurate Dental Lab, (the "**Lab**") in Sudbury, Ontario, he failed to maintain a standard of practice of the profession when he:

- a. was absent from the Lab for more than 30 days during the 2017 and/or 2018 calendar year without arranging for a replacement RDT;
- b. was absent from the Lab for more than two calendar weeks in a sixweek period during the 2017 and/or 2018 calendar year without arranging for a replacement RDT;
- was absent from the Lab for more than two calendar weeks for one or more four-month periods in 2017 and/or 2018 without arranging for a replacement RDT;
- d. failed to supervise, oversee and/or review the design, construction, repair and/or alteration of each dental prosthetic, restorative or orthodontic device that was processed in the Lab;
- e. failed to stamp the invoice or other document authorizing the release of each case for cases processed at the Lab during the 2017 and/or 2018 calendar years;
- f. permitted the Lab to use his stamp on one or more invoices in the 2017 calendar year for case(s) that he did not supervise; and/or
- g. failed to ensure that records were kept in accordance with College standards.
- 2. The Member committed an act or acts of professional misconduct as provided by subsection 51(1)(c) of the *Health Professions Procedural Code* of the *Dental Technology Act, 1991*, as amended, and subsections 1(6) of *Ontario Regulation 798/93*, as amended, in that, while engaged in the practice of dental technology as the RDT and/or the RDT responsible for supervision at the Lab in Sudbury, Ontario, he knowingly subcontracted dental technological services when he, during or about the 2017 and/or 2018 calendar years:
  - a. directed and/or permitted the design, construction, repair or alteration of a dental prosthetic or orthodontic device at the Lab where the technical aspects of the design, construction, repair or alteration were not supervised by an RDT; and/or,
  - b. directed and/or permitted individuals who were not RDT's to supervise the technical aspects of the design, construction, repair or alteration of a dental prosthetic, restorative or orthodontic device.

#### 3. [Withdrawn]

- 4. The Member committed an act or acts of professional misconduct as provided by subsection 51(1)(c) of the *Health Professions Procedural Code* of the *Dental Technology Act, 1991*, as amended, and subsections 1(21) of *Ontario Regulation 798/93*, as amended, in that, while engaged in the practice of dental technology as the RDT and/or the RDT responsible for supervision at the Lab in Sudbury, Ontario, he failed to keep records as required when he, during or about the 2017 and/or 2018 calendar years, failed to supervise, account for, and/or retain copies of records for the Lab.
- 5. The Member committed an act or acts of professional misconduct as provided by subsection 51(1)(c) of the *Health Professions Procedural Code* of the *Dental Technology Act, 1991*, as amended, and subsections 1(34) of *Ontario Regulation 798/93*, as amended, in that, while engaged in the practice of dental technology as the RDT and/or the RDT responsible for supervision at the Lab in Sudbury, Ontario, he engaged in conduct or performed an act or acts relevant to the practice of dental technology that, having regard to all the circumstances, would reasonably be regarded by members of the profession as disgraceful, dishonourable or unprofessional when he, during or about the 2017 and/or 2018 calendar years:
  - a. was absent from the Lab for more than 30 days during the 2017 and/or 2018 calendar year without arranging for a replacement RDT;
  - b. was absent from the Lab for more than two calendar weeks in a sixweek period during the 2017 and/or 2018 calendar year without arranging for a replacement RDT;
  - was absent from the Lab for more than two calendar weeks for one or more four-month periods in 2017 and/or 2018 without arranging for a replacement RDT;
  - d. failed to supervise, oversee and/or review the design, construction, repair and/or alteration of each dental prosthetic, restorative or orthodontic device that was processed in the Lab;
  - e. failed to stamp the invoice or other document authorizing the release of each case for cases processed at the Lab during the 2017 and/or 2018 calendar years;
  - f. permitted the Lab to use his stamp on one or more invoices in the 2017 calendar year for case(s) that he did not supervise; and/or
  - g. failed to ensure that records were kept in accordance with College standards.

#### Member's Plea

[4] The College sought leave to withdraw allegation 3 in the Statement of Allegations. The Panel granted leave to withdraw allegation 3. The Member then admitted the remaining in the Statement of Allegations (allegations 1, 2, 4 and 5) in their entirety. The Panel conducted an oral plea inquiry and was satisfied that the Member's admissions were voluntary, informed and unequivocal.

## **Agreed Statement of Facts**

[5] Counsel for the College advised the Panel that the parties had reached an agreement on the facts. An Agreed Statement of Facts was presented to the Panel which provided in relevant part as follows.

## EVIDENCE REGARDING THE MEMBER

- 1. At all times relevant, Mr. Kristopher Grunwald ("Mr. Grunwald" or the "Former Member") was a registered member of the College of Dental Technologists of Ontario (the "College").
- 2. In June of 2018, the College received information regarding a dental technology lab named Accurate Services ("Accurate" or the "Lab") that was purportedly operating without a Registered Dental Technologist ("RDT"). While the College's public register listed Mr. Grunwald as the RDT responsible for supervising the lab, his certificate was not noted on the wall and he was not observed to be present while the lab was operating.
- 3. Within the years 2017-2018 (the "Relevant Time"), in his annual renewal of registration with the College, Mr. Grunwald indicated that he was employed by Accurate as a practitioner and the "RDT-in-charge". He additionally noted that he worked an average of 30-31 hours per week.
- 4. Mr. Grunwald did not act as the RDT responsible for supervising the lab within the years 2017-2018. In those years, he attended the laboratory 5-10 times in total and was otherwise absent. He did not supervise, oversee or review the design, construction, repair or alteration of each dental prosthetic, restorative or orthodontic device that was processed in the lab.
- 5. Despite not acting as the RDT responsible for supervision the lab, with the Relevant Time, the Former Member permitted the Lab to use a photocopy of his stamp on several invoices regarding cases. The Former Member, himself, did not supervise any cases or stamp any invoices during the Relevant Time. The Former Member did not keep any records at all during the Relevant Time.

- 6. In July of 2003, the College introduced its "Laboratory Supervision Standard" (the "Supervision Standard"). The Former Member acknowledges that the Supervision Standard reflects the standard of practice as it relates to laboratory supervision during the Relevant Time.
- 7. The Former Member had planned on retiring in 2017. He did not resign from the College or update his profile until after the Relevant Time. Subsequent to the Relevant Time, the Former Member formally resigned his membership with the College.

#### **ADMISSIONS**

- 8. By virtue of the above conduct, the Former Member admits to having committed professional misconduct as provided by subsection 51(1)(c) of the *Health Profession Procedural Code* by contravening the following sections of *Ontario Regulation 798/93* to the *Dental Technology Act*, 1991:
  - A. Subsection 1(2) of *Ontario Regulation* 798/93, as amended, in that, while engaged in the practice of dental technology as the RDT and/or the RDT responsible for supervision at Accurate, in Sudbury, Ontario, he failed to maintain a standard of practice of the profession when he:
    - a. was absent from the Lab for more than 30 days during the 2017 and/or 2018 calendar year without arranging for a replacement RDT;
    - b. was absent from the Lab for more than two calendar weeks in a six-week period during the 2017 and/or 2018 calendar year without arranging for a replacement RDT;
    - c. was absent from the Lab for more than two calendar weeks for one or more four-month periods in 2017 and/or 2018 without arranging for a replacement RDT;
    - d. failed to supervise, oversee and/or review the design, construction, repair and/or alteration of each dental prosthetic, restorative or orthodontic device that was processed in the Lab;
    - e. failed to stamp the invoice or other document authorizing the release of each case for cases processed at the Lab during the 2017 and/or 2018 calendar years;
    - f. permitted the Lab to use his stamp on one or more invoices in the 2017 calendar year for case(s) that he did not supervise; and

- g. failed to ensure that records were kept in accordance with College standards.
- B. Subsection 1(6) of *Ontario Regulation 798/93*, as amended, in that, while engaged in the practice of dental technology as the RDT and/or the RDT responsible for supervision at the Lab in Sudbury, Ontario, he knowingly subcontracted dental technological services when he, during or about the 2017 and/or 2018 calendar years:
  - a. directed and/or permitted the design, construction, repair or alteration of a dental prosthetic or orthodontic device at the Lab where the technical aspects of the design, construction, repair or alteration were not supervised by an RDT;
  - b. directed and/or permitted individuals who were not RDT's to supervise the technical aspects of the design, construction, repair or alteration of a dental prosthetic, restorative or orthodontic device.
- C. Subsection 1(21) of *Ontario Regulation 798/93*, as amended, in that, while engaged in the practice of dental technology as the RDT and/or the RDT responsible for supervision at the Lab in Sudbury, Ontario, he failed to keep records as required when he, during or about the 2017 and/or 2018 calendar years, failed to supervise, account for, and/or retain copies of records for the Lab.
- D. Subsection 1(34) of *Ontario Regulation 798/93*, as amended, in that, while engaged in the practice of dental technology as the RDT and/or the RDT responsible for supervision at the Lab in Sudbury, Ontario, he engaged in conduct or performed an act or acts relevant to the practice of dental technology that, having regard to all the circumstances, would reasonably be regarded by members of the profession as disgraceful, dishonourable or unprofessional when he, during or about the 2017 and/or 2018 calendar years:
  - a. was absent from the Lab for more than 30 days during the 2017 and/or 2018 calendar year without arranging for a replacement RDT;
  - b. was absent from the Lab for more than two calendar weeks in a six-week period during the 2017 and/or 2018 calendar year without arranging for a replacement RDT;
  - c. was absent from the Lab for more than two calendar weeks for one or more four-month periods in 2017 and/or 2018 without arranging for a replacement RDT;

- d. failed to supervise, oversee and/or review the design, construction, repair and/or alteration of each dental prosthetic, restorative or orthodontic device that was processed in the Lab;
- e. failed to stamp the invoice or other document authorizing the release of each case for cases processed at the Lab during the 2017 and/or 2018 calendar years;
- f. permitted the Lab to use his stamp on one or more invoices in the 2017 calendar year for case(s) that he did not supervise; and.
- g. failed to ensure that records were kept in accordance with College standards.

## **Decision**

[6] The Panel found that the Member committed acts of professional misconduct as set out in allegations 1, 2, 4 and 5 of the Statement of Allegations in the Notice of Hearing. With respect to allegation 5, the Panel found that the Member engaged in conduct that would reasonably be regarded by members as disgraceful, dishonourable and unprofessional.

## **Reasons for Decision**

- [7] The Panel considered the Agreed Statement of Facts and the Member's admissions and found that the evidence supports findings of professional misconduct as alleged in the Statement of Allegations.
- [8] Allegation #1 in the Notice of Hearing is supported by paragraphs 3, 4, 5, 6, and 8 (A) in the Agreed Statement of Facts. According to the standards of practice of the profession at the relevant time as demonstrated by the College's Supervision Standard, the RDT responsible for supervising a laboratory is responsible for all aspects of the dental technology practice in that laboratory. This standard of practice ensures that the RDT is present in the laboratory in order to oversee and keep detailed records of all work undertaken. This oversight is also accomplished by requiring that the RDT who supervises cases is the only person permitted to use his/her College-issued stamp on invoices.
- [9] The Member notified the College in his annual renewal of registration that he had worked an average of 30-31 hours per week while he was employed by the Lab. The evidence before the Panel, however, was that the Member was in the Lab only 5-10 times during the 2017 and/or 2018 calendar year and he did not supervise or oversee any of the work processed by the Lab. In addition, during this time, the Member permitted the lab to use a photocopy of his stamp on several invoices yet he did not supervise any cases or stamp any invoices. The Member acknowledged that he did not keep any records during this time period. By these acts and

omissions, the Member failed to maintain the standards of practice of the profession as described in paragraph 8, above.

- [10] Allegation #2 in the Notice of Hearing is supported by paragraphs 2, 3, 4, 6 and 8 (B) in the Agreed Statement of Facts. Subsection 1(6) of *Ontario Regulation 798/93*, as amended, prohibits the subcontracting of dental technology by an RDT responsible for the supervision of a laboratory. With regard to this allegation, the Panel finds that while the College's public register listed the Member as the RDT responsible for supervising the Lab, his certificate of registration was not noted on the wall and that he was not observed to be present while the lab was operating. In addition, the Member agreed that he was present in the lab only 5-10 times, was otherwise absent, and did not supervise or oversee any of the work processed by that lab. By effectively abdicating his responsibilities as supervising RDT and allowing the technical aspects of the design, construction, repair and/or alteration of dental prosthetic, restorative or orthodontic device to be performed by others, or not at all, the Member subcontracted dental technological services at the Lab.
- [11] Allegation #4 in the Notice of Hearing is supported by paragraphs 2, 3, 4, 6 and 8 (C) in the Agreed Statement of Facts. Subsection 1(21) of *Ontario Regulation 798/93*, as amended, makes it an act of professional misconduct for an RDT responsible for the supervision of laboratory to fail to keep records as required. The College's Supervision Standard requires a supervising RDT to ensure that all records of the laboratory kept and stored in accordance with the College standards. With regard to this allegation, the Panel finds that while the College's public register listed the Member as the RDT responsible for supervising the Lab he was not observed to be present while the lab was operating and he did not keep any records of cases released during the 2017 and/or 2018 calendar year.
- With regard to Allegation #5, the Panel finds that the Member engaged in conduct that would reasonably be regarded by members of the College as disgraceful, dishonourable and unprofessional. His actions demonstrate serious disregard for his professional responsibilities as an RDT, including as reflected in 1(2), 1(6), and 1(21) of Ontario Regulation 798/93. The requirement that members of the profession ensure that the design, construction, repair, and alteration of dental prosthetics, restorative and orthodontic devices be supervised by an RDT in accordance with the Supervision Standard is a fundamental principle of the profession and is necessary to protect the public. By allowing others to use his stamp and by not ensuring that accurate records were kept for all cases released by the Lab, the Member showed total disregard for his responsibilities as an RDT. In addition, despite advising the College in his annual renewal that he worked an average of 30-31 hours per week while employed by the Lab, the Member in fact was in the Lab only 5-10 times total in 2017 and 2018. He did not supervise or oversee any of the work processed by the Lab. The Member ought to have known that his actions and behaviour fall well below the standards of a Registered Dental Technologist. The Member's total disregard for his professional obligations over a long period of time casts serious doubts on the Member's moral fitness as a member of this College.

#### **Penalty Submissions**

- [13] Counsel for the College presented the Panel with a Joint Submission as to Order that the parties had entered into. The Joint Submission requested that this Panel make an order as follows.
  - 1. Directing the Member to appear before the panel to be reprimanded and the fact of the reprimand to be recorded on the Public Register of the College.
  - 2. Directing the Registrar to suspend the Former Member's certificate of registration for a period of six (6) months. The period of suspension will begin on the date that the Former Member is re-registered in the General Class.
  - 3. Directing the Registrar to impose a term, condition and limitation on the Former Member's certificate of registration after the suspension at paragraph 2 is completed:
    - a) requiring the Former Member to receive supervision of his practice for a period of two (2) years on the following terms:
      - i. the supervisor shall be appointed by the Registrar and shall be a professional member of the College;
      - ii. the supervisor shall visit with the Former Member on four
         (4) occasions at the Former Member's site(s) of practice.
         The first two site visits shall be announced while the latter two visits shall be unannounced;
      - iii. the supervisor shall determine the length of each visit;
      - iv. in conducting site visits, the supervisor shall review the Former Member's documentation relating to supervision including, but not limited to, supervisory logs and invoices to ensure compliance with the College's supervision standard;
      - v. the supervisor shall prepare a report to the Registrar for every site visit that will be provided directly to the Registrar<sup>1</sup>; and,

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<sup>&</sup>lt;sup>1</sup> For clarity, in the event that the supervisor's reports suggest that the Former Member is continuing to engage in professional misconduct, the reports may be relied upon by the Registrar in considering whether to appoint an investigator pursuant to section 75(1)(a) of the *RHPA Procedural Code*.

- vi. the Former Member shall pay the costs of the supervision and report (to a maximum of \$500 per site visit and report) and shall fully reimburse the College for these costs within twenty (20) days of receiving an invoice from the College for the supervision.
- b) Directing the Former Member to draft an essay of no less than 500 words explaining the requirements, expectations and obligations of a member under the Supervision Standard to be provided to the Registrar within 1 month of being re-registered in the General Class.<sup>2</sup>
- 4. Directing the Former Member to pay the College's costs fixed in the amount of \$5,000 to be paid by certified cheque according to the following schedule and provided that this Joint Submission as to Penalty is accepted in its entirety:
  - (i) \$2,500 to be paid by certified cheque or equivalent on the day of the oral hearing; and,
  - (ii) \$2,500 to be paid within 90 days thereafter.

In the event that the Former Member does not pay \$2,500 on the date of hearing, the payment of the entire \$5,000 becomes immediately due and enforceable.

- [14] College counsel made submissions in support of the Joint Submission as to Order and how it meets the goals of penalty. The Former Member supported the terms of the penalty by signing the Joint Submission as to Order on February 10, 2020 and his agreement was confirmed at the hearing on March 17, 2020. College Counsel acknowledged that the Former Member has resigned his College Certificate of Registration.
- [15] College counsel submitted that a reprimand delivered by the Panel would serve the goal of specific deterrence of the Former Member. In addition, College Counsel submitted that if the Former Member re-registers with the College in the General Class, the suspension of the Member's certificate of registration and the terms, conditions and limitations imposed on the Member's certificate of registration requiring supervision of his practice would provide additional specific deterrence.
- [16] College counsel further argued that the goal of general deterrence would be met by the suspension of the Formers Member's certificate of registration for a period of six (6) months

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<sup>&</sup>lt;sup>2</sup> The essay obligation must be fulfilled in a professional manner. If the essay is not completed in a professional manner to the satisfaction of the Registrar, the Registrar may, at her discretion, provide a further opportunity for the Former Member to complete the essay before a suspension is imposed.

(should he be re-registered in the General Class), the reprimand and the supervision requirement, together with the requirement in s. 56 of the *Health Professions Procedural Code* that the Panel's decision and reasons, or a summary thereof, be published by the College along with the Former Member's name.

- [17] College counsel submitted that if the Former Member re-registers in the General Class, the goal of remediation and rehabilitation of the Former Member would be served by the supervision requirement and the requirement that the Former Member write an essay explaining the requirements, expectations and obligations of the Member to adhere to the Supervision Standard.
- [18] Regarding the term of the Joint Submission relating to costs, College counsel explained that although an order that the Former Member pay costs is not part of the penalty and is not meant to be punitive, the proposed requirement that the Former Member pay a portion of the College's costs related to the investigation and the hearing helps defray the cost of these proceedings to the broader membership.
- [19] College counsel relied on the decision of this Discipline Committee in *College of Dental Technologists of Ontario v Charlebois* (2016) to demonstrate that the proposed penalty falls within the range of appropriate penalties ordered in a similar case. In the *Charlebois* case, a Discipline Committee panel found that the member had committed professional misconduct for failing to meet the Supervision Standard and the improper use of the Member's stamp. The panel ordered a suspension of the member's certificate of registration; terms, conditions and limitations on the member's certificate of registration requiring supervision of the member's practice for a period of time and that he complete an essay; and an oral reprimand. The member was also ordered to pay a fine and to pay portion of the College's costs.

#### **Penalty Decision**

- [20] The Panel accepted the Joint Submission and made the following order:
- 1. The Member shall appear before the Panel to be reprimanded and the fact of the reprimand will be recorded on the Public Register of the College.
- 2. The Registrar is directed to suspend the Member's certificate of registration for a period of six (6) months. The period of suspension will begin on the date that the Member is reregistered in the General Class.
- 3. The Registrar is directed to impose a term, condition and limitation on the Member's certificate of registration after the suspension at paragraph 2 is completed:
  - a) requiring the Member to receive supervision of his practice for a period of two (2) years on the following terms:
    - i. the supervisor shall be appointed by the Registrar and shall be a professional member of the College;

- ii. the supervisor shall visit with the Member on four (4) occasions at the Member's site(s) of practice. The first two site visits shall be announced while the latter two visits shall be unannounced;
- iii. the supervisor shall determine the length of each visit;
- iv. in conducting site visits, the supervisor shall review the Former Member's documentation relating to supervision including, but not limited to, supervisory logs and invoices to ensure compliance with the College's supervision standard;
- v. the supervisor shall prepare a report to the Registrar for every site visit that will be provided directly to the Registrar; and,
- vi. the Member shall pay the costs of the supervision and report (to a maximum of \$500 per site visit and report) and shall fully reimburse the College for these costs within twenty (20) days of receiving an invoice from the College for the supervision.
- b) Directing the Member to draft an essay of no less than 500 words explaining the requirements, expectations and obligations of a member under the Supervision Standard to be provided to the Registrar within 1 month of being re-registered in the General Class.<sup>3</sup>
- 4. The Member is directed to pay the College's costs fixed in the amount of \$5,000 to be paid by certified cheque according to the following schedule:
  - (i) \$2,500 to be paid by certified cheque or equivalent on the day of the oral hearing; and,
  - (ii) \$2,500 to be paid within 90 days thereafter.

In the event that the Member does not pay \$2,500 on the date of hearing, the payment of the entire \$5,000 becomes immediately due and enforceable.

## **Reasons for Penalty Decision**

[21] The Panel understands that the penalty ordered should protect the public and enhance public confidence in the ability of the College to regulate dental technologists. This is achieved through a penalty that addresses specific deterrence, general deterrence and, where appropriate, rehabilitation and remediation. The Panel also considered the penalty in light of the principle that joint submissions should be respected unless they fall so far outside the range of an appropriate

<sup>&</sup>lt;sup>3</sup> The essay obligation must be fulfilled in a professional manner. If the essay is not completed in a professional manner to the satisfaction of the Registrar, the Registrar may, at her discretion, provide a further opportunity for the Former Member to complete the essay before a suspension is imposed.

sanction that they would bring the administration of justice at the College into disrepute, or are otherwise contrary to the public interest.

- [22] The Panel concluded that the proposed order is reasonable and in the public interest. The Former Member has co-operated with the College and, by agreeing to the facts and a proposed order, has accepted responsibility. These are important mitigating factors and show that the Former Member is amenable to rehabilitation should he return to practice in the future. The Panel finds that the penalty satisfies the principles of specific and general deterrence, rehabilitation and remediation, and public protection.
- [23] The penalty will serve as a general deterrent to the profession as it sends a clear message regarding the consequences of professional misconduct by registered dental technologists in Ontario, particularly in relation to members' supervision obligations. This decision will demonstrate to members that if they engage in similar misconduct, they can expect to be suspended from practising as a registered dental technologist in Ontario for a significant period of time and that their practice, after a suspension, will be monitored by another member of the College. Those terms also have a specific deterrent effect for this Former Member should he reregister in the General Class. The Panel is also of the opinion that the rehabilitation and remediation of the Former Member is advanced by the oral reprimand and, if he re-registers in the General Class, will be further addressed through the supervision of the Member's practice and the requirement that the Member submit an essay to the Registrar on the importance of adhering to the Standard of Supervision.
- [24] The panel agrees that the order related to costs is appropriate in this case.

# Reprimand

- [25] At the conclusion of the hearing, the Member indicated that he was prepared to receive the reprimand ordered by the Panel. The Member confirmed orally, on the record, that he waived his right of appeal. Accordingly, the Panel delivered the reprimand.
- I, Terence Price, sign this decision and reasons for the decision as Chairperson of this Discipline panel and on behalf of the members of the Discipline panel as listed below:

Terence Price, Chairperson

Michael Karrandjas, Professional Member

Sarah Cheah, Professional Member

Terence Price

03/31/2020 Date