

ALBERTA COLLEGE OF PHARMACISTS

IN THE MATTER OF
THE HEALTH PROFESSIONS ACT

AND IN THE MATTER OF A HEARING REGARDING
THE CONDUCT OF **POURAN MANZOURI**

DECISION OF THE HEARING TRIBUNAL

July 11, 2018

I. INTRODUCTION

The Hearing Tribunal held a hearing into the conduct of Pouran Manzouri. In attendance on behalf of the hearing tribunal were Peter Macek, pharmacist and chairperson, Sarah Gutenberg, pharmacist and Pat Matusko, public member. Katrina Haymond acted as independent counsel to the Hearing Tribunal.

The hearing took place on the 16th day of May 2018 at the second-floor conference center, 8215 112 St. NW, Edmonton, AB. The hearing was held under the terms of Part 4 of the *Health Professions Act* (“HPA”).

In attendance at the hearing were James Krempien, Complaints Director and Aman Athwal legal counsel for the Complaints Director. Alexis Moulton represented the member, Ms. Manzouri. Ms. Manzouri was not in attendance at the hearing but was available by telephone if required.

Prior to the start of the hearing, Ms. Moulton submitted a request to have the hearing held via teleconference or video conference to reduce costs of the hearing. Additionally, a request was made to waive the need for Ms. Manzouri to attend the hearing in person as there was a plan to proceed via an agreed statement of facts and joint submission on sanctions. Ms. Manzouri’s request was considered, but both parties were informed that an alternate hearing format was not supported by the HPA and did not allow for the hearing to be open to the public. However, it was agreed that Ms. Manzouri would not be required to attend the hearing in person, but it was requested she was available by telephone if required.

There were no objections to the composition of the hearing tribunal or the jurisdiction of the Hearing Tribunal to proceed with a hearing.

II. ALLEGATIONS

The Notice of Hearing was entered into the record and marked as Exhibit 1. During the course of the hearing, paragraph 1(a)(b) and (c) of the Notice of Hearing were amended by agreement of the parties. The amended Notice of Hearing alleged that between July 28, 2017 and October 28, 2017, Ms. Manzouri:

1. Disregarded the Hearing Tribunal’s order of July 28, 2017 stating that:

1. [Your] practice permit shall be suspended for a period of 3 months from the date of the Hearing Tribunal’s written decision

by practicing as a licensed pharmacist at Alberta Health Services’ Poison and Drug Information Service

- (a) on approximately 19 to 30 occasions while your practice permit was suspended;

- (b) on approximately 17 to 27 occasions from August 2, 2017 when you knew or should have known that your practice permit was suspended after the Hearings Director read you the Hearing Tribunal's July 28, 2017 written decision over the phone; and
 - (c) on approximately 6 to 13 occasions after August 25, 2017 when you were notified in writing of the Hearing Tribunal's July 28, 2017 written decision; and
2. Misrepresented yourself to your pharmacy employer and members of the public as a pharmacist in good standing with the Alberta College of Pharmacists while:
- (a) your practice permit was suspended;
 - (b) after August 2, 2017 when you knew or should have known that your practice permit was suspended after the Hearings Director read you the Hearing Tribunal's July 28, 2017 written decision over the phone; and
 - (c) after August 25, 2017 when you were notified in writing of the Hearing Tribunal's July 28, 2017 written decision;
- and that by engaging in this conduct you:
- 1. Disregarded the authority of the Alberta College of Pharmacists and the Hearing Tribunal; and
 - 2. Called into question the trust placed in you as a member of a self-regulating profession.

IT IS ALLEGED THAT your conduct in these matters:

- a. Undermined the integrity of the profession;
- b. Failed to exercise the professional and ethical conduct expected and required of an Alberta pharmacist; and
- c. Was contrary to accepted pharmacist practice.

III EVIDENCE AND SUBMISSIONS

The hearing proceeded by way of an Agreed Statement of Facts and other agreed exhibits, including an Admission of Unprofessional Conduct. No witnesses were called to testify.

The following exhibits were entered by agreement of the parties:

- Exhibit 1: Notice of Hearing
- Exhibit 2: Agreed Statement of Facts
- Exhibit 3: Admission of Unprofessional Conduct
- Exhibit 4: Record of Decision
- Exhibit 5: Investigation Records
- Exhibit 6: Joint Submission on Sanctions

Agreed Statement of Facts:

The following are the Agreed Statement of Facts in this matter (from Exhibit 2) and was signed by both Ms. Manzouri and the Complaints Director. Ms. Athwal indicated that the date in paragraphs 4 and 6 of the Agreed Statement of Facts should be amended and should be August 21, 2017 instead of August 14, 2017, which was agreed to by Ms. Moulton. The amended Agreed Statement of Facts was as follows:

1. Pouran Manzouri has been a registered regulated pharmacist with the Alberta College of Pharmacists since December 14, 2001.
2. From July 28, 2017 to October 28, 2017, Ms. Manzouri's practice permit was suspended pursuant to a decision of a Hearing Tribunal of the Alberta College of Pharmacists ("ACP") dated July 28, 2017 (the "July 28, 2017 decision").
3. On July 27, 2017, Ms. Manzouri called Margaret Morley, the ACP Hearings Director, and requested that Ms. Morley provide the July 28, 2017 decision to her by email.
4. A copy of the July 28, 2017 decision was sent to Ms. Manzouri by email on July 31, 2017 and by Canada Post registered mail on August 21, 2017. On or about July 31, 2017, Ms. Manzouri received Ms. Morley's email.
5. Since Ms. Manzouri had a problem opening the email from Ms. Morley, Ms. Manzouri called Ms. Morley on August 2, 2017, and Ms. Morley read Ms. Manzouri the orders in the July 28, 2017 decision over the phone.
6. On August 25, 2017, Ms. Manzouri signed for the copy of the July 28, 2017 decision sent to her by Canada Post registered mail on August 21, 2017.
7. Between July 28, 2017 and October 28, 2017, Ms. Manzouri practiced as a pharmacist at Poison and Drug Information Service ("PADIS"), in Calgary, Alberta, while her practice permit was suspended. There is

some uncertainty with respect to the number of shifts Ms. Manzouri was scheduled for and ended up working while she was suspended. As the exact number of shifts cannot be confirmed with any degree of certainty, between July 28, 2017 and October 28, 2017, Ms. Manzouri worked between 19 and 30 shifts at PADIS.

8. As a pharmacist at PADIS, Ms. Manzouri provided advice to the public, but did not dispense or prescribe medication, administer medication by injection, or provide narcotics.
9. Ms. Manzouri did not practice as a pharmacist outside of PADIS while her practice permit was suspended.
10. As a condition of her employment at PADIS, Ms. Manzouri was required to have an “active registration” as a pharmacist.
11. At no time between July 28, 2017 and October 25, 2017 did Ms. Manzouri inform her pharmacy employer, [REDACTED], Manager of Alberta Health Services PADIS, that her practice permit was suspended.
12. Ms. Manzouri misrepresented to her PADIS employer and members of the public that she was a pharmacist in good standing with the ACP, while her practice permit was suspended as a result of the July 28, 2017 decision.
13. Ms. [REDACTED], as the pharmacy employer for Ms. Manzouri, filed a complaint, which was received by the ACP on December 6, 2017.
14. Ms. Manzouri admitted to the Complaints Director, James Krempien, that she knowingly chose to work as a pharmacist at PADIS while her practice permit was suspended because:
 - a. of personal financial pressures;
 - b. her shifts had already been scheduled and she was embarrassed to advise her employer of her suspension;
 - c. she was taking prescribed medications that may have affected her judgment; and
 - d. the stresses in her life over the past year have caused her to make poor decisions.
15. Ms. Manzouri accepted that she has made a mistake and is remorseful for her actions.
16. Since December 11, 2017, Ms. Manzouri has voluntarily removed herself from active practice but maintains a current practice permit.

17. Ms. Manzouri advises that Alberta Health Services is open to accepting resignation of her employment with PADIS and rescinding their letter of December 6, 2017.

Admission of Unprofessional Conduct:

In the Admission of Unprofessional Conduct, Ms. Manzouri admitted responsibility for all of the allegations. She also admitted that her conduct constituted unprofessional conduct and breached the following standards of practice and code of ethics governing the practice of pharmacy:

- Section 117 of the HPA;
- Standard 1 (sub-sections 1.1 and 1.2) of the Standards of Practice for Pharmacists and Pharmacy Technicians;
- Principles 10(1) and 10(2) of the Alberta College of Pharmacists Code of Ethics;

and that her conduct and the breach of some or all of these provisions constitutes unprofessional conduct pursuant to the provisions of sections 1(1)(pp)(ii) and 1(1)(pp)(iv), 1(1)(pp)(viii) and 1(1)(pp)(xii) of the HPA.

Ms. Manzouri acknowledged that by engaging in the admitted allegations, she:

- a. disregarded the authority of the Alberta College of Pharmacists and the Hearing Tribunal;
- b. called into question the trust placed in her as a member of a self-regulating profession;
- c. undermined the integrity of the profession;
- d. failed to exercise the professional and ethical conduct expected and required of an Alberta pharmacist; and
- e. acted contrary to accepted pharmacist practice.

In the Admission of Unprofessional Conduct the Complaints Director acknowledged the cooperation of Ms. Manzouri and her legal counsel. It was further acknowledged that Ms. Manzouri received legal advice prior to entering into the Admission of Unprofessional Conduct.

Record of Decision:

Ms. Athwal entered into evidence the Record of Decision (Exhibit 4). This document is based on the Complaints Director's investigation into the complaint initiated by a representative from Alberta Health Services. The Record of Decision outlined the Complaints Director's reasons for referring this matter to a hearing tribunal. The reasons cited reflect the allegations noted in the Notice of Hearing dated March 12, 2018.

Investigation Records:

Ms. Athwal took the Hearing Tribunal through various supporting documents obtained as a result of the investigation. The documents provided the Hearing

Tribunal with background information to support the Agreed Statement of Facts. The Hearing Tribunal identified several key supporting documents.

- Pages 42-46: a transcript of the telephone conversation between Ms. Manzouri and the Complaints Director, where she acknowledges practicing as a pharmacist while her practice permit was suspended.
- Page 65: a copy of an email dated October 22, 2017 from a PADIS staff member informing Ms. Manzouri's employer of the July 28, 2017 Hearing Tribunal decision.
- Page 68: job qualifications for pharmacists at PADIS, which included current registration in good standing with the Alberta College of Pharmacists.
- Page 74: statement from Ms. Manzouri during an Alberta Health Services internal investigation, where she stated that she considered informing her manager of the hearing tribunal's decision, dated July 28th, a few times but was embarrassed and ashamed.

Ms. Moulton stated that she had no additional submissions at this point in the hearing.

The Hearing Tribunal adjourned the hearing to review the submissions and exhibits. Following this review, the Hearing Tribunal reconvened and advised the parties that it accepted Ms. Manzouri's admission of unprofessional conduct and found the allegations as outlined in the amended Notice of Hearing were proven.

IV. FINDINGS

With respect to allegations 1 and 2, the Hearing Tribunal found that the information within the Agreed Statement of Facts (Exhibit 2) supported Ms. Manzouri's admission of unprofessional conduct. The Hearing Tribunal finds the following points from the Agreed Statement of Facts prove the allegations:

- Point 2: Ms. Manzouri's practice permit was suspended from July 28, 2017 to October 28, 2017.
- Point 5: Ms. Manzouri was read the orders from the decision dated July 28, 2017 on August 2, 2017.
- Point 6: Ms. Manzouri signed for the written copy of the decision dated July 28, 2017 on August 25, 2017.
- Point 7: Ms. Manzouri practiced as a pharmacist at PADIS on multiple occasions between July 28, 2017 and October 28, 2017, while her practice permit was suspended.
- Point 11: Ms. Manzouri did not inform her pharmacy employer at PADIS that her practice permit was suspended.

The Hearing Tribunal also finds that the conduct in issue constitutes “unprofessional conduct” which is defined in s. 1(1)(pp) of the HPA to include conduct that contravenes the HPA.

Ms. Manzouri breached section 117 of the HPA which states that ‘a regulated member whose practice permit is suspended shall not provide professional services unless the college notifies the regulated member the suspension has been lifted or the suspension has expired’. This is well supported in the Agreed Statement of Facts.

Ms. Manzouri’s actions also contravened several sub-sections of section 1(1)(pp) of the HPA. All breaches are serious matters, but of particular concern to the Hearing Tribunal were:

- Section 1(1)(pp)(iv) – representing or holding out that a person was a member in good standing while the person’s registration or practice permit was suspended or cancelled; and
- Section 1(1)(pp)(viii) – contravening an order under Part 4, conditions imposed on a practice permit.

Pharmacists are a self-regulated profession and as such, they must hold themselves to the highest standards. It is a tremendous privilege to have the autonomy that self-regulation allows. There is never a situation where it is acceptable for a member to practice while their practice permit is suspended. Ms. Manzouri noted that she was embarrassed to share the previous Hearing Tribunal decision with her employer at PADIS – her inaction is inexcusable. The implications of practicing without a valid permit are significant and ultimately place members of the public at unnecessary risk. It is not appropriate for the member to put her financial situation above her professional obligations.

Ms. Manzouri’s contempt of the orders from the previous decision is disturbing to the Hearing Tribunal. Misrepresenting herself to the public as a pharmacist in good standing, failing to cease practice and neglecting to inform her employer were significant lapses in Ms. Manzouri’s judgement. This type of inaction undermines the College’s ability to regulate its membership. Patients need to trust that each pharmacist respects and follows our code of ethics, laws, standards and regulations. Situations such as this one have the potential to damage the overall trust the public has in our profession.

The Standards of Practice for Pharmacists and Pharmacy Technicians provide a minimum standard in which to practice pharmacy in this province. It is the responsibility of each member to ensure their practice is in alignment with these standards. The standard of practice specifically breached by Ms. Manzouri was Standard 1 (sub-section 1.1 and 1.2).

Standard 1 addresses the need for pharmacists and pharmacy technicians to act professionally. Sub-standards 1.1 and 1.2 speak to compliance with the laws that govern practice and how compliance with applicable laws is necessary to ensure

protection of the public. Ms. Manzouri's breach of sub-standards 1.1 and 1.2 is well supported by the Agreed Statement of Facts.

The Tribunal finds that both Ms. Manzouri's actions and inactions constitute unprofessional conduct in this matter.

V. **SUBMISSIONS ON PENALTY**

After the Hearing Tribunal confirmed that the allegations were proven, the Hearing Tribunal invited both parties to make submissions on penalty.

Joint Submission on Sanctions

A Joint Submission on Sanctions was entered as Exhibit 6 on the issue of penalty. Ms. Manzouri and the Complaints Director submitted the following joint submission on penalty:

Ms. Manzouri and the College make the following joint submission on the issue of sanctions, respectfully requesting that the Hearing Tribunal make the following orders under section 82 of the *Health Professions Act*:

1. Ms. Manzouri's practice permit shall be suspended for a period of 18 months, with 6 months to be served starting on a date acceptable to the Complaints Director and being no later than 30 days after the date of the Hearing Tribunal's written decision, and the remaining 12 months of suspension being held in abeyance for a period of four (4) years pending her completion of the orders listed below in paragraphs 2 to 4 and there being no further complaints or findings of unprofessional conduct that are referred to a hearing before a Hearing Tribunal.
2. For the same period of four (4) years, set out above in Order 1, Ms. Manzouri must provide any person who employs her in her capacity as a regulated member of the College or any pharmacy employer or licensee, with a copy of the decision of this Hearing Tribunal and the decision dated July 28, 2017 of the Hearing Tribunal so that the employer or licensee is aware of the decisions and these orders. Once Ms. Manzouri has done so, she must provide the Complaints Director with written confirmation that she has provided the employer or licensee with a copy of the decisions within 5 days of the commencement date of her employment.
3. For the same period of four (4) years, set out above in Order 1, Ms. Manzouri shall not be permitted to be an owner, proprietor or licensee of a pharmacy.

4. Ms. Manzouri shall pay a fine of \$5,000. The fine shall be due to the College within 90 days of the date of the Hearing Tribunal's written decision.
5. Ms. Manzouri shall be responsible for the full costs of the hearing. Payment will occur in accordance with a reasonable monthly payment schedule as directed by the Hearings Director. The costs shall be paid in full within 36 months starting from one month after the last scheduled payment due date of the costs from the previous hearing (Hearing Tribunal decision dated July 28, 2017).

Submissions from the Complaints Director

Ms. Athwal noted that the estimated costs prior to the hearing tribunal were \$6,200.

Ms. Athwal referenced the relevant principles for consideration referenced from *Jaswal v. Newfoundland Medical Board*, [1996] N.J. No. 50 and described the application of the factors in this matter. Key points were:

- Nature and gravity of the proven allegations: the allegations were serious and Ms. Manzouri consciously disobeyed and ignored the order from the previous hearing tribunal decision, thus disregarding the college, the tribunal and the self-regulating nature of the profession. Ms. Manzouri had received verbal, electronic and written notification of the hearing decision. In spite of being aware of the previous order to suspend her practice, Ms. Manzouri chose to misrepresent herself as a pharmacist in good standing.
- Age and experience; Ms. Manzouri has been a licensed pharmacist in Alberta since December 2001 and is 57 years old. Her conduct cannot be excused due to a lack of experience.
- Presence of a prior complaint: Ms. Manzouri was found to have conducted herself in an unprofessional manner in a previous complaint.
- Ms. Manzouri practiced as a pharmacist while suspended for 19 to 30 times – this number of occurrences is significant.
- Ms. Manzouri acknowledged the issues and took responsibility for her actions. This was a mitigating factor.
- The need for deterrence, both specific to the member and to the general membership in order to protect the public. Pharmacists have an obligation to comply with orders from the hearing tribunal. Breaching the order to suspend her practice has serious consequences and will not be tolerated.
- Ms. Manzouri's disregard of an order on multiple occasions harmed the integrity of the profession. The integrity of the profession requires that the

public has confidence that pharmacists will follow the rules of the hearing tribunal. Ms. Athwal did note that Ms. Manzouri has voluntarily removed herself from active practice.

- Ms. Manzouri's conduct fell far outside what would be regarded as acceptable.
- Regarding the range of sentence in other similar cases, Ms. Athwal shared the details of two cases with the hearing tribunal:
 - The first was the decision on Mr. Andrew Wong. Ms. Athwal noted that the case was much more extreme than the current matter. Mr. Wong intentionally misled the ACP investigation and continued to deceive the College during follow up visits to his pharmacies. Mr. Wong's practice permit was revoked and he was assessed a \$10,000 fine for professional misconduct.
 - The second was the decision on Mr. Mohammad Farooq. Ms. Athwal stated that this decision was more similar to the current matter concerning Ms. Manzouri. Mr. Farooq breached an order to practice under supervision at multiple pharmacies over a longer period of time. Mr. Farooq did not inform any of the licensees of the condition on his practice permit and was not cooperative with the College. Mr. Farooq was suspended from practice for two years and assessed a \$10,000 fine for each of the 3 proven allegations. Ms. Athwal noted that Mr. Farooq's breaches were more serious than those of Ms. Manzouri, but the circumstances of the case were similar.

Submissions from Ms. Manzouri

Ms. Moulton expressed gratitude on behalf Ms. Manzouri to allow the hearing to proceed in her absence due to her emotional state. Ms. Moulton noted that Ms. Manzouri was remorseful but attending the hearing in person was too much for her to handle.

Ms. Moulton stressed that she was not disputing the Agreed Statement of Facts, but did wish to share some further background on behalf of Ms. Manzouri:

- Ms. Manzouri had worked for PADIS since December 2011 and was working there at the time of her incident at Costco pharmacy in June 2016. She didn't take on a new job at PADIS after the incident.
- Ms. Manzouri has been fully cooperative with the investigation and feels extreme remorse about her conduct.
- AHS has agreed to reclassify Ms. Manzouri's termination from PADIS to a resignation.

- Ms. Manzouri noted that there was some question about the nature of her role at PADIS as she was not dispensing or prescribing drugs. Ms. Manzouri wasn't certain if her position at PADIS required active registration, as she had been working there for several years.
- Ms. Manzouri was so embarrassed and remorseful that she attempted on 2 or 3 occasions to tell her supervisor at PADIS about her suspension.
- Ms. Manzouri has been the sole provider for her family since they emigrated from Iran and is solely supporting her 3 children and house payments. She has also gone through a divorce where her husband remained in the family house. These issues caused Ms. Manzouri significant stress.
- Ms. Manzouri was pressured to take the oxycodone from the previous pharmacy by her family to help a sick relative in Iran.
- Ms. Manzouri is stopping practice as a pharmacist for 12 months to focus on herself and to finalize her personal issues.
- Ms. Manzouri appreciates that the College is allowing her to pay off the costs from the previous hearing prior to paying the costs of the current hearing.

Regarding factors from *Jaswal v. Newfoundland Medical Board* Ms. Moulton submitted:

- Ms. Manzouri acknowledges the seriousness of the proven allegation.
- Ms. Manzouri is 57 years old and hopes to continue her career as a pharmacist that she has been very proud of until the events of the past 2 years.
- Ms. Manzouri should not have worked even one shift during her suspension. She noted that she was unclear if working at PADIS was a breach of that order. She felt embarrassed to cancel her shifts and felt that to do so would be dishonorable.
- Ms. Manzouri has suffered emotionally, financially and mentally from her actions.
- Regarding the two similar cases:
 - Mr. Wong was essentially unreachable and showed clear disregard for the College and its authority. The matter concerning Ms. Manzouri is opposite to this.
 - Mr. Farooq breached the orders in more instances. Additionally, Ms. Moulton noted that Mr. Farooq had not made any attempts

to address the fines and penalties with the College. Ms. Manzouri has been making regular payments to the College and wishes to resolve this matter.

Ms. Moulton submitted that Ms. Manzouri's actions do not meet the threshold of ungovernability and asks that the Hearing Tribunal accept the Joint Submission on Sanctions as both the College and Ms. Manzouri have agreed to it.

VI. ORDERS AND REASONS FOR ORDERS

The Hearing Tribunal considered the submission of the parties and the appropriateness of the Joint Submission on Sanctions. Some of the considerations were the following:

- The number of times Ms. Manzouri practiced as a pharmacist while her practice permit was suspended. She was informed of the decision electronically, verbally and in writing. Despite this, she continued to work at least 19 shifts at PADIS as a pharmacist. Furthermore, Ms. Manzouri admitted during the investigation that she knew she should have informed her employer but chose not to. She did not cease practicing until her manager was made aware of the decision. The number of instances she chose to practice was significant.
- Ms. Manzouri has practiced as a pharmacist for a number of years, and her error in judgment was not related to inexperience.
- Ms. Manzouri had a previous finding of unprofessional conduct when she diverted opioids while working as a pharmacist.
- Practicing without a valid permit is a serious breach and undermines the ability of the College to regulate its members. The orders reflect the significance of Ms. Manzouri's breach.
- The Hearing Tribunal acknowledges the mitigating factors in this case:
 - Ms. Manzouri cooperated fully with the Complaints Director and his investigation.
 - Ms. Manzouri has voluntarily ceased practicing as a pharmacist, despite being on the clinical register.
 - Ms. Manzouri had several personal issues occurring in her life when the breaches occurred.

The Hearing Tribunal considered the sanctions in the similar cases shared during the submissions on sanction and agreed that the case of Mr. Farooq was the most similar to this matter. The Hearing Tribunal also notes that the events of this case are less extreme than those in Mr. Farooq's case.

The Hearing Tribunal determined that the orders in the Joint Submission on Sanctions will protect the public, provide deterrence both to Ms. Manzouri and pharmacists in general and protect the integrity of the profession.

- Protection of the public: The public will be protected as there are additional checks and balances included in this decision by providing the Complaints Director confirmation within 5 days of employment that she has shared a copy of the decision with her employer. The six-month suspension will allow sufficient time for this decision to be posted on the ACP website, allowing for further awareness of the decision by other pharmacists in the province.
- General and specific deterrence: The Hearing Tribunal finds that the orders are significant and reflective of the seriousness of Ms. Manzouri's unprofessional conduct. The Hearing Tribunal believes that the orders will be a deterrent, both for the member and to the membership at large.
- Maintain the integrity of the profession: The public needs to trust that pharmacists will respect and abide by the direction provided to them from the College. The orders ensure the public confidence in the profession is maintained.

Deference: The Hearing Tribunal respects the principle of deference and did not find the Joint Submission to be manifestly unjust, unreasonable or contrary to public interest. The Hearing Tribunal found the orders in the Joint Submission on Sanctions to be appropriate in consideration of the seriousness of proven allegations.

In light of the foregoing, the Hearing Tribunal hereby orders the following pursuant to s. 82 of the HPA:

1. Ms. Manzouri's practice permit shall be suspended for a period of 18 months, with 6 months to be served starting on a date acceptable to the Complaints Director and being no later than 30 days after the date of the Hearing Tribunal's written decision, and the remaining 12 months of suspension being held in abeyance for a period of four (4) years pending her completion of the orders listed below in paragraphs 2 to 4 and there being no further complaints or findings of unprofessional conduct that are referred to a hearing before a Hearing Tribunal.
2. For the same period of four (4) years, set out above in Order 1, Ms. Manzouri must provide any person who employs her in her capacity as a regulated member of the College or any pharmacy employer or licensee, with a copy of this decision of the Hearing Tribunal and the decision dated July 28, 2017 of the Hearing Tribunal so that the employer or licensee is aware of the decisions and these orders. Once Ms. Manzouri has done so, she must provide the Complaints

Director with written confirmation that she has provided the employer or licensee with a copy of the decisions within 5 days of the commencement date of her employment.

3. For the same period of four (4) years, set out above in Order 1, Ms. Manzouri shall not be permitted to be an owner, proprietor or licensee of a pharmacy.
4. Ms. Manzouri shall pay a fine of \$5,000. The fine shall be due to the College within 90 days of the date of the Hearing Tribunal's written decision.
5. Ms. Manzouri shall be responsible for the full costs of the hearing. Payment will occur in accordance with a reasonable monthly payment schedule as directed by the Hearings Director. The costs shall be paid in full within 36 months starting from one month after the last scheduled payment due date of the costs from the previous hearing (Hearing Tribunal decision dated July 28, 2017).

Sign on behalf of the Hearing Tribunal by the Chair on July 11, 2018

Per: Peter Macek