

ALBERTA COLLEGE OF PHARMACY

IN THE MATTER OF  
THE *HEALTH PROFESSIONS ACT*

AND IN THE MATTER OF A HEARING  
REGARDING THE CONDUCT OF

**EMERY OSTROSKY**

Registration number: 4615

**DECISION OF THE HEARING TRIBUNAL  
ON SANCTION**

January 7, 2025

## I. INTRODUCTION

1. The Hearing Tribunal of the Alberta College of Pharmacy (the “College” or “ACP”) met by video conference on November 14, 2024, to consider the written submissions on sanction from counsel for the Complaints Director. Emery Ostrosky (“Mr. Ostrosky” or the “Investigated Member”), whose conduct was the subject of this hearing, did not provide written submissions for consideration by the Hearing Tribunal.
2. In attendance were the members of the Hearing Tribunal: Brad Couldwell (pharmacist and Chair), Tanner Bengry (pharmacist), Patricia Hull (public member), and Naz Mellick (public member). Also in attendance was Maya Gordon, independent legal counsel to the Hearing Tribunal.

## II. BACKGROUND

3. In its decision dated September 12, 2024, the Hearing Tribunal found that Allegation 1, relating to the provision of 210 Xeljanz tablets to a patient in the absence of a valid prescription, was proven. The Hearing Tribunal found that this was unprofessional conduct, as the conduct constituted breaches of the Standards of Practice for Pharmacists and Pharmacy Technicians and the ACP Code of Ethics, displayed a lack of knowledge or judgment in the provision of professional services, and harmed the integrity of the profession.
4. The Hearing Tribunal found that Allegation 2, relating to Mr. Ostrosky paying only for 38 of the 210 Xeljanz tablets provided to the patient, was proven. The Hearing Tribunal found that this was unprofessional conduct, as the conduct constituted breaches of the Standards of Practice for Pharmacists and Pharmacy Technicians and the ACP Code of Ethics, displayed a lack of knowledge or judgment in the provision of professional services, and harmed the integrity of the profession.
5. The Hearing Tribunal found that Allegation 3, relating to attempts by Mr. Ostrosky to conceal the number of Xeljanz tablets provided to a patient by replacing removed Xeljanz tablets with Vitamin B tablets, was proven. The Hearing Tribunal found that this was unprofessional conduct, as the actions of Mr. Ostrosky constituted breaches of the Standards of Practice for Pharmacists and Pharmacy Technicians and the ACP Code of Ethics, displayed a lack of knowledge or judgment in the provision of professional services, and harmed the integrity of the profession.
6. The Hearing Tribunal found that Allegation 4, relating to the unauthorized listing of Dr. ██████ as a prescriber on 70 prescription transaction records and inaccurately recording the dispensing of 38 tablets of Xeljanz instead of 210 tablets, to be proven. The Hearing Tribunal found that this was unprofessional conduct, as Mr. Ostrosky’s conduct constituted a breach of the Standards of Practice for Pharmacists and Pharmacy Technicians and the ACP Code of ethics, displayed a lack of knowledge or judgment in the provision of professional services, and harmed the integrity of the profession.

7. The Hearing Tribunal found that Allegation 6, relating to the provision of medication to Mr. Ostrosky, members of his immediate family, and friends whom he considered family in the absence of a valid prescription and when the medication was not for a minor condition or emergency or when another prescriber was not readily available, was proven. The Hearing Tribunal found that this was unprofessional conduct, as the actions of Mr. Ostrosky constituted breaches of the Standards of Practice for Pharmacists and Pharmacy Technicians and the ACP Code of Ethics, displayed a lack of knowledge or judgment in the provision of professional services, and harmed the integrity of the profession.
8. The Hearing Tribunal directed the parties to consider how to provide submissions on sanction. The Hearing Tribunal was subsequently advised that the Mr. Ostrosky did not respond to correspondence from the College in relation to the schedule and mode of providing submissions on sanction. As a result, submissions on sanction proceeded in writing, as proposed by the College.
9. The Hearing Tribunal has reviewed the email correspondence between the College and Mr. Ostrosky and is satisfied that Mr. Ostrosky was provided with notice of the fact that submissions on sanction would be proceeding in writing and of the deadlines for submissions on sanction to be provided.

### **III. DOCUMENTS PROVIDED**

10. The following documents were reviewed by the Hearing Tribunal for the sanction phase of the hearing:
  - a. Written Submissions of the Complaints Director and Authorities.
11. The Investigated Member did not provide submissions on sanction.

### **IV. SUBMISSIONS**

#### Submissions of the Complaints Director

12. The Complaints Director's written submissions noted that the Hearing Tribunal's authority to order sanctions is set out in section 82 of the *Health Professions Act* (the "**HPA**"). The Complaints Director seeks the following orders:
  - a. Mr. Ostrosky's registration from all College registers be cancelled;
  - b. Mr. Ostrosky pay a fine of \$10,000.00 within 90 days of the date of the Hearing Tribunal's written decision pursuant to a payment schedule acceptable to the Hearings Director;
  - c. Mr. Ostrosky is prohibited from serving as a pharmacy licensee or proprietor or owning some part of a pharmacy for 10 years from the date of the Hearing Tribunal's written decision; and

- d. Mr. Ostrosky shall pay 80% of the costs of the investigation and hearing of this matter within 24 months from the date of the written submissions on sanction pursuant to a payment schedule acceptable to the Hearings Director.
13. The Complaints Director outlined the purposes of sanctions in a discipline hearing, which include protection of the public, maintaining the integrity of the profession, fairness to the investigated member, and deterrence, both specific to the investigated member and general to the membership as a whole.
  14. The Complaints Director's submissions addressed the factors relevant to sanction outlined by the Court in *Jaswal v Medical Board* (Nfld), 1996 CarswellNfld 32 (NL SC), as follows:
    - a. *The nature and gravity of the proven allegations:* The proven allegations constitute very serious unprofessional conduct and reflect a failure to adhere to the fundamental responsibilities of Alberta pharmacists.
    - b. *The age and experience of the member:* Mr. Ostrosky was registered with the College as a clinical pharmacist from June 12, 1991, to June 30, 2004, from August 14, 2009, to June 30, 2018, and from March 8, 2019 to June 30, 2024, when he did not renew his practice permit. Inexperience is not a mitigating factor.
    - c. *The presence or absence of any prior complaints or convictions:* Mr. Ostrosky has received three prior formal complaints regarding his conduct which were investigated by the College. None of those complaints were referred to a Hearing Tribunal or resulted in a finding of unprofessional conduct. Two of the complaints were resolved by agreement through which Mr. Ostrosky was cautioned about providing professional or pharmacy services to close friends and family.
    - d. *The age and mental condition of the offended patient:* The patient to whom Mr. Ostrosky diverted Xeljanz tablets was his then girlfriend, who Mr. Ostrosky described as suffering from a medical condition which left her feeling "devastated" and brought her "to depths as far as a human being could go".
    - e. *The number of times the offence was proven to have occurred:* Allegations 1, 2, 3, and 4(c) occurred over a span of almost two months, between July 31, 2022, and September 20, 2022 during which time Mr. Ostrosky diverted 210 Xeljanz tablets. Mr. Ostrosky diverted one 30-tablet bottle at a time, which suggests the offence occurred multiple times. Allegations 4(b) and 6 occurred over a period of more than one year, during which Mr. Ostrosky processed 70 invalid prescriptions.
    - f. *The role of the member in acknowledging what occurred:* Acknowledgement is not a mitigating factor. While Mr. Ostrosky did not dispute the allegations, he did not appear at the hearing or take responsibility for his conduct.
    - g. *Whether the member has already suffered other serious financial or other penalties as a result of the allegations having been made:* The Complaints Director was not

aware of any evidence that Mr. Ostrosky suffered other consequences as a result of the allegations made against him.

- h. *The impact of the incident on the offended patient:* The Complaints Director acknowledged that there was no evidence of actual patient harm. However, there existed the potential for patient harm. The Complaints Director referred to findings of the Hearing Tribunal that, with respect to the Xeljanz tablets Mr. Ostrosky substituted with vitamin tablets, another pharmacist could have dispensed those vitamin tablets in lieu of correct tablets to another patient who would not have received the medication they required. Further, creation of inaccurate records puts patient care at risk as other health professionals rely on that information.
- i. *The presence or absence of any mitigating circumstances:* The Complaints Director is not aware of any mitigating circumstance in this case.
- j. *The need to promote specific and general deterrence:* It is imperative that the sanctions reflect the importance of upholding the obligations expected of an Alberta pharmacist both for Mr. Ostrosky and other members of the profession. The sanctions imposed must make clear to the profession that the diversion and substitution of drugs and creation of fraudulent prescriptions breaches legal and ethical duties and necessitates a severe sanction.
- k. *The need to maintain the public's confidence in the integrity of the profession:* The public must be able to see that the College takes this conduct very seriously and that such conduct will not be tolerated. The public will not maintain confidence in the College's integrity as a self-regulating profession if the College tolerates or permits Mr. Ostrosky to divert medication and create false patient records.
- l. *The degree to which the offensive conduct is clearly outside the range of permitted conduct:* The conduct is clearly outside the range of permitted conduct.
- m. *The range of sentence in other similar cases:* The Complaints Director provided the cases regarding the conduct of Kevin Charles Zapf, Shivangi Patel, and David Hiebert.

In the Zapf decision, Dr. Zapf had forged ten prescriptions from four different doctors and fraudulently obtained drugs, including amphetamines, based on those prescriptions. Dr. Zapf appeared to take pride in the forgeries during the merits hearing and showed a total disregard for responsibility for his actions. The Hearing Tribunal in Zapf suspended his practice permit for 30 months. Reinstatement was conditional on a number of factors, including completion of an educational course. After reinstatement, Dr. Zapf would be subject to direct supervision for a minimum of 12 months and was to advise the pharmacies at which he was employed of the Hearing Tribunal's decision for a period of five years. The Hearing Tribunal also ordered fines totaling \$5,000, and payment of all costs of the hearing and investigation.

In the Patel decision, Ms. Patel admitted to knowingly dispensing Prednisone in lieu of Suboxone for a patient and failing to take steps thereafter to identify, rectify, and take accountability for the drug substitution. The Hearing Tribunal suspended Ms. Patel's practice permit for 18 months, with direct supervision for a minimum of 6 months upon reinstatement. Ms. Patel was required to successfully complete an educational course and to provide a copy of the Hearing Tribunal's decision to any proprietor or licensee of a pharmacy in which she applied to work for five years. Ms. Patel was not permitted to be an owner, proprietor or licensee of a pharmacy for three years following reinstatement. The Hearing Tribunal also ordered fines of \$10,000.00 and all costs payable by Ms. Patel for the hearing and investigation.

In the Hiebert decision, Mr. Hiebert diverted fentanyl patches on multiple occasions and manually adjusted the pharmacy's electronic inventory records to conceal the diversions. Mr. Hiebert then failed to cooperate with the investigation and did not provide a written response to concerns raised by the complainant. The Hearing Tribunal ordered that Mr. Hiebert's registration be cancelled. Mr. Hiebert was not permitted to be an owner or proprietor of a pharmacy for a period of five years, and he was to pay the full costs of the investigation and hearing.

The Complaints Director submitted that more severe sanctions should be levied in Mr. Ostrosky's case, because Mr. Ostrosky was not a pharmacy student or new pharmacist, as in the Zapf and Patel decisions. Further, Mr. Ostrosky not only created fraudulent prescriptions, but also diverted medication for others' use. Mr. Ostrosky's conduct was repetitive in nature. The Complaints Director submitted that similar sanctions to the Hiebert decision would be appropriate, as Mr. Ostrosky failed to renew his practice permit, suggesting he had forfeited the right to work as a pharmacist. Mr. Ostrosky also did not participate in the hearing of this matter.

15. With respect to the order for cancellation of registration, the Complaints Director submitted that Mr. Ostrosky used his position as a pharmacist to divert medication, stole significant money from his employer and substituted the drugs he diverted, putting patients at risk of harm. As a result, the Complaints Director indicated that Mr. Ostrosky could not be trusted to act with honesty and integrity in the performance of his duties as a pharmacist or to address his conduct when it was called into question. As a result, he could not be regulated and must be removed from practice.
16. With respect to the fine sought, the Complaints Director submitted a total fine of \$10,000 for Allegations 1, 2, 3, 4, and 6 was appropriate given that the allegations were serious enough to warrant a substantial fine but arose out of the same underlying acts.
17. The Complaints Director submitted that the Hearing Tribunal should make an order prohibiting Mr. Ostrosky from directly or indirectly serving as an owner, licensee or proprietor of a licensed pharmacy. Mr. Ostrosky's conduct demonstrated that he could not be trusted to serve in these roles and uphold the subsequent statutory and regulatory obligations required of someone in these positions.

18. With respect to costs, the Complaints Director submitted that costs of 80% of the investigation and hearing should be ordered. The costs of the College prior to the sanction phase were \$62,887.33. The Complaints Director reviewed the decisions of the Courts in Alberta regarding costs, including the recent decision of the Alberta Court of Appeal in *Jinnah v Alberta Dental Association and College*, 2022 ABCA 336.
19. The Complaints Director noted that the nature of the conduct falls into one or more of the categories identified in *Jinnah* for which it is appropriate for a significant portion of costs to be ordered. The Complaints Director submitted that Mr. Ostrosky's conduct is a marked departure from the standard of conduct expected of a pharmacist. Further, Mr. Ostrosky sought multiple adjournments at the last minute and failed to attend the merits portions of the hearing. This required the Complaints Director to spend additional time and resources to ensure that the allegations against Mr. Ostrosky could be proven.
20. In support of the order for costs, the Complaints Director addressed the factors set out in *K.C. v College of Physical Therapists of Alberta*, 1999 ABCA 253, as follows: the success in proving five of six allegations in the Notice of Hearing; the proven allegations are very serious, the investigation and hearing costs to date are reasonable; and there is no evidence that 80% of the costs would impose a crushing financial blow to Mr. Ostrosky.
21. Finally, the Complaints Director addressed s. 80(2) of the *HPA* which requires the Hearing Tribunal to direct the Hearings Director to send a copy of the written decision to the Minister of Justice if there are reasonable and probable grounds to believe that an investigated person has committed a criminal offence. The Complaints Director submitted that Mr. Ostrosky may have committed theft against his employer and impersonated a physician for personal gain. Therefore, there were reasonable and probable grounds that Mr. Ostrosky committed a criminal offence, and the Hearing Tribunal should direct the Hearings Director to send a copy of the Merits Decision to the Minister of Justice.

## **VI. DECISION OF THE HEARING TRIBUNAL**

22. The Hearing Tribunal carefully considered the written submissions of the Complaints Director and the circumstances of Mr. Ostrosky's conduct.

### *Cancellation of Registration*

23. In considering whether to impose cancellation of Mr. Ostrosky's registration, the Hearing Tribunal reviewed the *Jaswal* factors identified above and weighed those factors against the purposes of sentencing: maintaining the integrity of the profession, fairness to the member, protection of the public, and deterrence. In weighing those factors, the Hearing Tribunal has determined that this is not an appropriate case for cancellation of Mr. Ostrosky's registration.
24. The Hearing Tribunal wishes to emphasize that the conduct exhibited by Mr. Ostrosky constituted serious misconduct and must be treated as such. However, cancellation in these circumstances would be out of step with the range of sentences ordered in similar cases. In reviewing the cases presented by the Complaints Director, the Hearing Tribunal found the

conduct of Mr. Ostrosky to be most similar to the conduct of Dr. Zaph and Ms. Patel, where cancellation was not ordered. In some respects, the conduct of Ms. Patel was even more egregious than that of Mr. Ostrosky. Ms. Patel lied to her patient when questioned about her substitution of the prescribed drug and continued to lie to many others who became involved.

25. Rather than cancellation, the Hearing Tribunal finds a suspension on the following conditions to be an appropriate sanction:
- a. Mr. Ostrosky's practice permit will be suspended for a period of 30 months from the date of this decision;
  - b. Following the suspension, Mr. Ostrosky's practice permit shall not be reinstated until he:
    - i. Completes all the requirements of the College's registration department;
    - ii. Provides proof that he has satisfactorily completed the Center for Personalized Education for Professional's PROBE course within the 6-month period directly prior to seeking reinstatement, the cost of which would be borne by Mr. Ostrosky; and
    - iii. Provides proof that he has satisfactorily completed the ACP Ethics & Jurisprudence Exam, in coordination with the College reinstatement requirements, the costs of which would be borne by Mr. Ostrosky; and
  - c. Upon reinstatement, Mr. Ostrosky's practice permit will be subject to the following conditions:
    - i. He must practice under direct supervision for a minimum of 500 hours, under a supervising pharmacist approved by the Complaints Director who will provide a report to the Complaints Director confirming satisfactory completion of the supervised practice hours and
    - ii. For a period of five years after his reinstatement, Mr. Ostrosky must provide the Complaints Director with verification that he has advised the licensee and proprietor of any pharmacy in which he is employed of the Hearing Tribunal's written decisions in this matter.
26. The Hearing Tribunal carefully considered the degree of risk presented to the public by Mr. Ostrosky. The Hearing Tribunal is satisfied that the lengthy suspension, coupled with the conditions on reinstatement stipulated above will provide a sufficient degree of protection for members of the public, send a strong message of general and specific deterrence, and provide a foundation upon which Mr. Ostrosky may seek to rehabilitate himself as a professional, should he demonstrate the necessary skill and judgment to do so. The length of the suspension reflects the serious nature of Mr. Ostrosky's misconduct.



27. The PROBE course and ACP Ethics & Jurisprudence Exam will help to ensure that Mr. Ostrosky understands his professional obligations relating to the treatment of close family and friends, and the substitution of tablets. Similarly, the supervision hours are designed to ensure that Mr. Ostrosky has retained the knowledge learned from these courses and is conducting himself accordingly.

*Prohibition on Being an Owner and Proprietor of a Pharmacy*

28. The Hearing Tribunal is satisfied that the prohibition on Mr. Ostrosky serving as a pharmacy licensee or proprietor or owning some part of a pharmacy for 10 years from the date of the Hearing Tribunal's written decision proposed by the Complaints Director is appropriate.
29. Pharmacists, pharmacy owners and proprietors are required to be aware of and uphold the legislative and regulatory requirements that govern the operation of licensed pharmacies in Alberta. As Mr. Ostrosky has failed to be aware of and uphold those regulatory requirements, he subsequently cannot be trusted to uphold the increased obligations as an owner or proprietor.

*Fines*

30. The Hearing Tribunal may deliver fines of up to \$10,000 for each proven allegation of unprofessional conduct, to a maximum of \$50,000. The Complaints Director submitted that a single fine of \$10,000 would be appropriate in these circumstances, given that the allegations arise out of the same set of acts.
31. The Hearing Tribunal finds that a single fine of \$5,000 for all of Allegations 1, 2, 3, 4, and 6 is appropriate in the circumstances. The conduct of Mr. Ostrosky constituted serious misconduct warranting the imposition of a fine. A fine serves to publicly denounce Mr. Ostrosky's conduct and to deter other members of the profession from conducting themselves in a similar fashion.
32. The Hearing Tribunal agrees with the Complaints Director that the proven allegations arise out of the same set of facts and that a single fine would be most appropriate in these circumstances, as opposed to multiple fines associated with each proven allegation. In light of the suspension and restrictions on practice already ordered by the Hearing Tribunal and the costs that would be incurred by Mr. Ostrosky to complete the PROBE course and ACP Ethics & Jurisprudence exam should he wish to be reinstated; the Hearing Tribunal finds that \$5,000 is an appropriate quantum in these circumstances.
33. A fine of \$5,000 is consistent with what was ordered by the tribunal in the Zapf decision and is therefore within the range of fines that have been ordered in similar circumstances.

*Costs of the Investigation and Hearing*

34. The Alberta Court of Appeal in *Jinnah* provided guidance to hearing tribunals on the issue of costs. While *Jinnah* will ultimately be reconsidered by the Court of Appeal, the guidance

provided by the Court in *Jinnah* remains instructive for the Hearing Tribunal at this time. The Court of Appeal indicated that costs should not be ordered by default or on a formulaic basis. The College should bear the significant costs of an investigation and hearing unless a compelling reason to do so otherwise exists.

35. The Complaints Director has sought to recover 80% of the total costs incurred in the investigation and hearing of this matter, which are expected to exceed \$70,000.
36. The conduct of Mr. Ostrosky did constitute serious unprofessional conduct. The diversion of medication without a valid prescription and the creation of inaccurate records in relation to the same undermine the integrity of the profession and have warranted serious sanction. The Complaints Director has proven five of the six allegations against Mr. Ostrosky. This is the type of conduct which does justify some recovery of costs by the Complaints Director. However, the Hearing Tribunal does not view the conduct of Mr. Ostrosky as falling within the category of serious misconduct as defined by the Court in *Jinnah* warranting recovery of a significant portion of the hearing costs, which the Court identified as including sexual assault on a patient or the performance of restricted services while suspended.
37. The Hearing Tribunal considered the complexity of the hearing and the conduct of Mr. Ostrosky during the investigation and hearing. Mr. Ostrosky was forthcoming during the investigation process. He did not appear to dispute the allegations and apologized in his call with Ms. Mosher. Mr. Ostrosky requested and obtained two adjournments. He did not attend at the hearing on merits and did not prepare any submissions on sanction. The late-stage adjournments requested by Mr. Ostrosky likely did result in some additional delay and costs occasioned on behalf of the Complaints Director.
38. The Hearing Tribunal does not accept the submissions of the Complaints Director that Mr. Ostrosky's failure to participate in the hearing process required the Complaints Director to spend additional time and resources to ensure the allegations against Mr. Ostrosky could be proven on a balance of probabilities. It is the Complaints Director's obligation to prove the allegations on a balance of probabilities regardless of whether the member participates in the proceeding or not. Mr. Ostrosky's failure to participate, and thereby, failure to contest, the allegations likely resulted in some cost savings for the Complaints Director as the hearing proceeded with no cross-examination and no case for Mr. Ostrosky, which would have taken additional time and resources.
39. In weighing the factors above, the Hearing Tribunal finds that it is appropriate in the circumstances for Mr. Ostrosky to pay 25% of the hearing and investigation costs in this matter.

*Section 80(2) of the HPA*

40. Section 80(2) of the *HPA* requires the Hearing Tribunal to direct the Hearings Director to send a copy of the written decision of the Hearing Tribunal to the Minister of Justice if there are reasonable and probable grounds to believe the investigated person has committed a criminal offence.

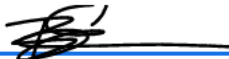
41. The proven allegations against Mr. Ostrosky raise issues relating to fraud or potentially forgery. While the Hearing Tribunal makes no findings in relation to whether the proven allegations constitute criminal offences, as that is not the role of the Hearing Tribunal, the Hearing Tribunal is of the opinion that there are reasonable and probable grounds to believe that Mr. Ostrosky has committed a criminal offence.
42. Therefore, the Hearing Tribunal directs the Hearings Director to send a copy of the written decisions of the Hearing Tribunal in this matter to the Minister of Justice.

## **VI. ORDERS**

43. Pursuant to section 82 of the HPA, the Hearing Tribunal orders as follows:
  1. Mr. Ostrosky's practice permit will be suspended for a period of 30 months from the date of this decision;
  2. Following the suspension, Mr. Ostrosky's practice permit shall not be reinstated until he:
    - a. Completes all the requirements of the College's registration department;
    - b. Provides proof that he has satisfactorily completed the Center for Personalized Education for Professional's PROBE course within the 6-month period directly prior to seeking reinstatement, the cost of which would be borne by Mr. Ostrosky; and
    - c. Provides proof that he has satisfactorily completed the ACP Ethics & Jurisprudence Exam, in coordination with the College reinstatement requirements, the costs of which would be borne by Mr. Ostrosky; and
  3. Upon reinstatement, Mr. Ostrosky's practice permit will be subject to the following conditions:
    - a. He must practice under direct supervision for a minimum of 500 hours under a supervising pharmacist approved by the Complaints Director who will provide a report to the Complaints Director confirming satisfactory completion of the supervised practice hours and
    - b. For a period of five years after his reinstatement, he must provide the Complaints Director with verification that he has advised the licensee and proprietor of any pharmacy in which he is employed of the Hearing Tribunal's written decisions in this matter.
  4. Mr. Ostrosky is prohibited from serving as a pharmacy licensee or proprietor or owning some or part of a pharmacy for 10 years from the date of the Hearing Tribunal's written decision.

5. Mr. Ostrosky shall pay a one-time fine of \$5,000.00.
6. Mr. Ostrosky shall pay 25% of the costs of the investigation and hearing of this matter within 24 months from the date of the written decision on sanction, pursuant to a payment schedule acceptable to the Hearings Director.
7. The Hearings Director shall send a copy of this written decision to the Minister of Justice pursuant to section 80(2) of the *HPA* and will provide a copy of the record of the hearing to the Minister of Justice if there is a request to do so.

Signed on behalf of the hearing tribunal by the Chair on January 7, 2025.

Per:   
Brad Couldwell (Jan 7, 2025 15:04 MST)  
Brad Couldwell