

Date(s) of Hearing: Written Submissions

Date of Decision: July 8, 2025

APEGA Discipline Case Number: 23-14

**APEGA
DISCIPLINE COMMITTEE**

DECISION ON SANCTIONS

**IN THE MATTER OF A HEARING OF THE DISCIPLINE COMMITTEE
OF THE ASSOCIATION OF PROFESSIONAL ENGINEERS AND
GEOSCIENTISTS OF ALBERTA (“APEGA”)**

**Pursuant to the Engineering and Geoscience Professions Act,
being Chapter E-11 of the Revised Statutes of Alberta 2000**

Regarding the Conduct of Ilhee Jang, P.Eng. (the “Member”)

INTRODUCTION

- 1 On April 10, 2025, the Hearing Panel of the Discipline Committee (the “**Hearing Panel**”) of APEGA issued a written decision (the “**Merits Decision**”), in which it found the Member had engaged in unprofessional conduct.
- 2 In a single allegation, it had been alleged that the Member, “had placed his hands on the Complainant’s neck area in an aggressive and unwanted manner that the Complainant perceived to be an attempt to choke him, and while doing so yelled that the Complainant was ‘stupid’.” Ultimately, the Hearing Panel found that a less-intense encounter was proven. The Hearing Panel found that, while the act was not overly aggressive, the Member had engaged in unprofessional conduct pursuant to Section 44 of the *Engineering and Geoscience Professions Act* (the “**EGPA**”) by placing his hands on the Complainant’s upper shoulder area in circumstances where such contact was not necessary, invited or encouraging and then calling the Complainant stupid.
- 3 The Hearing Panel then directed the parties to provide written submissions on sanctions, based on the following timeline:
 - a. The IC would provide submissions on sanctions and costs orders, if any, within two weeks of receipt of the Merits Decision;
 - b. The Member would provide submissions on sanctions and costs orders, if any, within two weeks of receipt of the Investigative Committee’s (“**IC’s**”) submissions; and

- c. The IC would provide a written Reply to the Member's submissions on sanctions and costs within one week of receipt of the Member's submissions.

- 4 The Hearing Panel received and reviewed the written submissions received from the parties. This decision reflects the consideration of such submissions by the Hearing Panel.
- 5 This timeline was amended in response to a request from the Member for a two-week extension to provide his response to the IC's submissions. This extension was granted.

JURISDICTION

- 6 The Hearing Panel's jurisdiction in sanctioning the unprofessional conduct in this case is found in s. 63 and 64 of the EGPA which address sanctions and costs.

Powers of the Discipline Committee

63 *If the Discipline Committee finds that the conduct of the investigated person is unprofessional conduct or unskilled practice of the profession, or both, the Discipline Committee may make any one or more of the following orders:*

- (a) reprimand the investigated person;*
- (b) suspend the registration of the investigated person for a specified period;*
- (c) suspend the registration of the investigated person either generally or from any field of practice until*
 - (i) the investigated person has completed a specified course of studies or obtained supervised practical experience, or*
 - (ii) the Discipline Committee is satisfied as to the competence of the investigated person generally or in a specified field of practice;*
- (d) accept in place of a suspension the investigated person's undertaking to limit the investigated person's practice;*
- (e) impose conditions on the investigated person's entitlement to engage in the practice of the profession generally or in any field of the practice, including the conditions that the investigated person*
 - (i) practice under supervision,*
 - (ii) not engage in sole practice,*
 - (iii) permit periodic inspections by a person authorized by the Discipline Committee, or*
 - (iv) report to the Discipline Committee on specific matters;*

- (f) *direct the investigated person to pass a particular course of study or satisfy the Discipline Committee as to the investigated person's practical competence generally or in a field of practice;*
- (g) *direct the investigated person to satisfy the Discipline Committee that a disability or addiction can be or has been overcome, and suspend the person until the Discipline Committee is so satisfied;*
- (h) *require the investigated person to take counselling or to obtain any assistance that in the opinion of the Discipline Committee is appropriate;*
- (i) *direct the investigated person to waive, reduce or repay a fee for services rendered by the investigated person that, in the opinion of the Discipline Committee, were not rendered or were improperly rendered;*
- (j) *cancel the registration of the investigated person;*
- (k) *any other order that it considers appropriate in the circumstances.*

1981 cE-11.1 s60

Order to pay costs or a fine

64(1) *The Discipline Committee may, in addition to or instead of dealing with the investigated person in accordance with [section 63](#), order that the investigated person pay*

- (a) *all or part of the costs of the hearing in accordance with the bylaws;*
- (b) *a fine not exceeding \$10 000 to the Association; or*
- (c) *both the costs under clause (a) and a fine under clause (b), within the time fixed by the order.*

(2) *If the investigated person ordered to pay a fine, costs, or both, under subsection (1) fails to pay the fine, costs, or both, within the time ordered, the Discipline Committee may suspend the registration of that person until the person has paid the fine, costs or both.*

(3) *A fine or costs ordered to be paid to the Association under this section is a debt due to the Association and may be recovered by the Association by civil action for debt.*

7 As it relates to costs, section 36 of the EGPA Bylaws provides:

Where the Discipline Committee, Practice Review Board or the Appeal Board orders an investigated person to pay the costs of the hearing, or the costs of the appeal, or both the costs of the hearing and the costs of the appeal, those costs may include all or any of the following costs and expenses:

- (a) *any honorarium, payment, or professional fees paid to a person retained to participate in the hearing or appeal;*
- (b) *costs of any transcripts of evidence taken in the proceedings;*

- (c) costs of reproduction of all or any documents including drawings and plans relating to the proceedings;
- (d) witness fees;
- (e) cost of renting rooms, renting recording equipment, or hiring a reporter to take transcript of the evidence;
- (f) fees payable to the solicitor acting on behalf of the Association in the proceedings;
- (g) any other expenses incurred that are attributable to the hearing or an appeal resulting from it.

WRITTEN SUBMISSIONS OF THE IC

- 8 The IC requested the following order be imposed on the Member as a result of the findings in the Merit Decision:
- (a) A reprimand and the written sanction decision will serve as the reprimand;
 - (b) A fine of \$2,500.00, with such fine being a debt owing to APEGA and shall be paid within six (6) months of the Hearing Panel's written decision on sanction;
 - (c) Within three (3) months of the Hearing Panel's written decision on sanction, provide written confirmation or other evidence of successful completion, of an anger management course, such as the AMRI online anger management course (<https://angermanagement.ca/online-course>), undertaken at the Member's expense;
 - (d) If the Member fails to complete (c) within the timelines specified or any extended timeline granted by APEGA, the Member shall be suspended from the practice of engineering for a minimum of thirty (30) days. If not completed within six months of suspension date, the Member's registration shall be cancelled;
 - (e) The Member shall pay half of the hearing costs within two years or twenty-four (24) months of the date of the sanction decision; and
 - (f) The matter and its outcome will be published by APEGA.

Sanctions

- 9 The IC referred to the case of *Jaswal v Newfoundland (Medical Board)*, 1996 CanLII 11630, para. 35, wherein the Court outlined a number of factors that should guide a discipline tribunal when considering sanctions. The IC reviewed these factors and applied them to the findings in the Merit Decision, which analysis is summarized below.

Nature and Gravity of the Proven Allegations

- 10 The IC submitted that while unwanted and unnecessary physical contact with a colleague is a serious matter, the Merit Decision did not find in this case that such contact was done in an aggressive manner and noted it did not result in injury. The IC submitted this contact was unprofessional but not at the most severe end of the range of conduct.

Age and Experience

- 11 The IC referred to the decision of *Merchant v Law Society of Saskatchewan*, 2009 SKCA 33 for the principle that senior members of a profession bear a higher professional obligation. While this is not an aggravating factor, the IC noted that Member is not able to benefit from being junior or inexperienced. Therefore, his age and experience are not mitigating factors.

Presence or absence of prior complaints or convictions

- 12 The IC noted it was unaware of any prior APEGA complaints or convictions under the EGPA regarding the Member. This is a mitigating factor.

Number of times offence occurred

- 13 This was a single occasion of a single incident. This is also a mitigating factor.

Acknowledgement of what occurred

- 14 The IC stated that where a professional has acknowledged their conduct and accepted responsibility for it, this can be a mitigating factor. In this case, however, the IC suggested that the Member has not acknowledged nor accepted responsibility for what occurred and has persisted in providing his version of events. Although this is not an aggravating factor, there is no mitigation credit that can be given either.

Are there serious financial or other penalties as a result of the allegations having been made?

- 15 The IC noted it was not aware of any serious financial or other penalties the Member is facing, outside of the jeopardy he faces due to the disciplinary proceedings.

Impact of the incident upon the affected person

- 16 The IC noted the anxiety felt by the complainant about his job security and whether he could lodge a complaint. The complainant had expressed that he was worried about the impact of this complaint, which carried over into the hearing and the complainant's reluctance to solicit accommodations from his employer to attend the hearing.

Presence or absence of mitigating factors

- 17 The IC did not identify any other mitigating factors that applied.

Need to promote deterrence

- 18 The IC noted that deterrence in this context relates to two aspects of deterrence. Firstly, a sanction must deter the Member to whom the sanction applies from engaging in the unprofessional conduct. Secondly, the sanction must send a deterrent message to the profession generally that such conduct will be addressed and is not to be tolerated.
- 19 In this case, the IC submitted it was important the sanction create a specific deterrence to the Member given his reticence to take responsibility for his actions. Further, the IC submitted it was necessary to signal to the profession that this behavior is unacceptable and sanctionable.

- 20 The IC submitted that the proposed reprimand, fine and additional training in anger management will serve these purposes.

Need to maintain the public's confidence in the integrity of the profession

- 21 The IC submitted that the public must continue to have confidence in APEGA's willingness to take steps to address unprofessional conduct and to prevent recurrence of similar unprofessional conduct.

Degree to which the conduct is outside the range of permitted conduct

- 22 On this point, the IC submitted that unwanted physical conduct is never permitted and should not be tolerated. That said, this was not a severe departure from the norm.

Range of sentences in similar cases

- 23 The IC identified other cases and contextualized the sanctions being sought in this case. Two examples were provided, both of which were, the IC recognized, more serious instances of unwanted comments or physical contact and both of which involved a consent disposition. In one case, additional education was ordered along with \$10,000.00 in costs. The other matter, which proceeded without a hearing, resulted in a reprimand and fine of \$500.00.

Costs

- 24 The IC noted that the total costs of the hearing were approximately \$100,650.02. The IC requested an order that the Member pay half of these costs. The IC summarized the key considerations as:

1. The parties' success or failure at the hearing;
2. The conduct of the parties;
3. The seriousness of the charge(s); and
4. The reasonableness of the amounts.¹

- 25 The IC submitted that the following principles also apply:

1. Costs orders must be sensitive to a member's financial circumstances;
2. Costs orders delivering a "crushing financial blow" must be scrutinized carefully; and
3. Routinely awarding "exorbitant" costs to the regulator "may deny an investigated person a fair chance to dispute allegations of professional misconduct."²

- 26 The IC referred to the *Jinnah v Alberta Dental Association and College*³ decision. In this decision, the Court held that self-regulating bodies should be responsible for the costs of such regulation, unless there are compelling reasons to impose a more significant portion of costs on the member. It identified circumstances where this may be appropriate. However, the IC also pointed out that this decision arose in

¹ *Dr. Ignacio Tan III v Alberta Veterinary Medical Association*, 2022 ABCA 221, citing *KC v College of Physical Therapists of Alberta*, 1999 ABCA 253.

² *Zuk v Alberta Dental Association and College*, 2018 ABCA 270

³ 2022 ABCA 336

the context of a profession governed under the *Health Professions Act* and, therefore, it may be distinguished from these proceedings.

27 In terms of how the foregoing considerations should be considered by the Hearing Panel in this case, the IC argued the following points bear consideration:

- The single charge was proven;
- The failure to be proficient in English led to the requirement to have translation services which extended the time for the hearing;
- The charge is serious but not at the most serious end of the spectrum of unprofessional conduct;
- The hearing costs were reasonable and fifty per cent (50%) is a reasonable proportion of hearing costs to require the Member to pay (subject to receiving evidence from the Member about his financial situation, ability to pay, and the impact of a costs award on his situation).

WRITTEN SUBMISSIONS OF THE MEMBER

28 The Member made a number of submissions related to sanctions and costs. He also provided a significant amount of information that, effectively, was a rearguing of the Merit Decision. The Hearing Panel did not consider the information that addressed the Member's rearguing of the Merit Decision. The Hearing Panel did consider any submissions by the Member that addressed the issue of sanctions. These submissions are summarized below:

- The potential costs award would be difficult for him to pay. The Member submitted that he does not have steady (if any) employment and is responsible for the living expenses of his wife and son. He suggests he is dependent on pension amounts that are modest. The Hearing Panel notes that these matters were submitted by the Member but no corroborating or documentary evidence was submitted to support these submissions;
- The Member requested that, if required to take a course, he be permitted to undertake a Conflict Management course from Coursera.org and complete it within 18 months;
- The Member submitted that any fine should be waived;
- The Member requested that any decision not be published.

REPLY SUBMISSIONS OF THE IC

29 The IC responded to the substantive points raised by the Member with the following points:

- The request for a substantial reduction in the hearing costs award was not supported by any evidence or a principled rationale for the reduction;
- The Member's conduct and the findings of fact in the Merits Decision support a more intensive and formal anger management course;
- A fine is indicative of the seriousness of the incident and is a specific and general deterrent, which should not be foregone when the Member has not acknowledged their conduct as they would have in a Recommended Discipline Order ("**RDO**"). In other words, there is not a good reason to revert to the offer by the IC in a proposed RDO when, ultimately, a full hearing was required.
- Publication is in the Hearing Panel's hands. The Complainant does not wish to be identified.

DECISION OF THE HEARING PANEL ON SANCTION

- 30 The Hearing Panel has carefully considered the submissions by the parties. The Hearing Panel finds that an appropriate order in this case is:
- (a) A reprimand, with this written sanctions decision serving as the reprimand;
 - (b) A fine of \$1,000.00, with such fine being a debt owing to APEGA which shall be paid within six (6) months of the date of this sanction decision;
 - (c) Within three (3) months of the date of this sanction decision the Member shall provide APEGA with written confirmation or other evidence of successful completion of the AMRI online anger management course (<https://angermanagement.ca/online-course>) or equivalent course where such equivalent course is approved in advance by the Discipline Manager. In any case, such course is to be paid for at the Member's expense;
 - (d) If the Member fails to complete (c) within the timelines specified or any extended timeline granted in writing by the Discipline Manager, the Member shall be suspended from the practice of engineering for a minimum of thirty (30) days. If (c) is not completed within six (6) months of the last day of the initial thirty (30) day suspension, the Member's registration shall be cancelled;
 - (e) The Member shall pay \$8,000.00 in costs within two years or twenty-four (24) months of the date of the sanction decision; and
 - (f) The matter and its outcome will be published by APEGA with the name of the Member identified.

REASONS OF THE HEARING PANEL

Sanction

- 31 The Hearing Panel considered the seriousness of the conduct at issue in this matter. The Hearing Panel noted that the facts ultimately found were not as serious as initially alleged and, while rising to the level of unprofessional conduct, were not at the more serious end of the spectrum of conduct.
- 32 Further, this was an isolated finding, in an otherwise unblemished career. That said, the unwanted and uninvited physical contact with another colleague is not conduct that should be condoned, allowed or permitted in any way. Therefore, the Hearing Panel has found that a fine is appropriate, but that it should be at a level lower than that suggested by the IC. In the Hearing Panel's view, a fine of \$1,000.00 is significant enough to provide for specific and general deterrence. While it is more than any fine ordered in the previous APEGA cases cited by the IC, each of these were ordered pursuant to a joint submission or RDO, which mitigates the need for specific deterrence to some degree. Therefore, the Hearing Panel considers a fine of \$1,000.00 is appropriate, while not being at a value ordered in cases where the conduct is more severe or is repetitive.
- 33 As it relates to the anger management course, the Hearing Panel's findings suggest that the Member allowed his frustration to interfere with his professional treatment of his colleagues in the workplace. It is for this reason that the Hearing Panel has ordered that the Member take an anger management course which focuses on appropriate means of calming and reacting to strong feelings of anger or frustration. This course allows for a certificate to be issued and has content that the Hearing Panel feels is important to guide the Member in future interactions.

Costs

- 34 As it relates to costs, the Hearing Panel took note of the Member's submissions relating to his challenging financial circumstances. However, the Hearing Panel also noted that the Member did not provide supporting evidence of financial hardship. Therefore, while the Hearing Panel was conscious of reviewing the reasonableness and proportionality of its costs award, it did not do so with any specific attention to particular financial hardships experienced by the Member.
- 35 The Hearing Panel did not consider the Member's submissions regarding what had previously been suggested by the IC as a potential RDO in this case.
- 36 This is for a number of reasons. Firstly, there was no acceptance of responsibility or admission of facts in advance of the contested hearing, as there would be with an RDO or even an agreed statement of facts. While this is not an aggravating circumstance, it removes the opportunity to argue a sanction should be less because (i) there has been accountability for the conduct on the part of the Member (which may reduce the need for specific deterrence) and (ii) costs should be less because of savings resulting from the elimination or streamlining of a hearing. In those circumstances, there are reasons the sanctions agreed to in an RDO may be distinct and less than those requested after a contested hearing.
- 37 Secondly, discussions and communications between a member and the IC with respect to an RDO or joint submission on sanction often occur between the parties on a without-prejudice basis. This means that the parties' discussions are in pursuit of a resolution of outstanding issues. These discussions are not, subject to specific exceptions which do not arise here, permitted to be raised before, or considered by, the Hearing Panel. As a result, the Hearing Panel has not considered or given any weight to the submissions of the Member that relate to what the IC had previously communicated to him in respect of sanctions.
- 38 The Hearing Panel noted the IC's submissions regarding how language issues and the use of a translator lengthened the hearing and how this factor may have increased the costs of the hearing. This is accurate; however, the Hearing Panel has not factored these increased costs into its determination of the costs the Member has been ordered to pay. While language issues did initially prevent the hearing from proceeding, thereafter, the Member supplied an acceptable translator and this allowed the hearing to proceed properly, while enabling the Member to be heard and understand the proceedings. The Hearing Panel is not prepared, in such circumstances, to increase the costs to be borne by the Member on that basis. The Hearing Panel recognizes the contribution of the Member to an efficient hearing process through the provision of a translator and the additional costs the Member would have incurred for that purpose. Therefore, the Hearing Panel did not consider the Member's language issues as justifying a higher costs award.
- 39 In making its determination that the Member would be ordered to pay only \$8,000.00 of the hearing costs, the Hearing Panel was guided by the following quote from *Dr. Ignacio Tan III v Alberta Veterinary Medical Association*, 2022 ABCA 221:

Costs

[39] *The Committee of Council directed that the appellant pay 80% of the costs associated with the appeal, which were approximately \$23,000. The appellant argues that this costs award is excessive and impedes access to justice. He does not challenge the reasonableness of any specific*

items of costs, such as the expense of having independent counsel for the tribunal, but challenges the allocation of 80% of the costs to him.

[40] In its reasons on costs, the Committee of Council proceeded from an assumption that a member subject to conduct proceedings “quite properly ought to be responsible for most or all of the costs of those proceedings”. When an appeal is unsuccessful, “the costs incurred should not be the responsibility of the [Association] and the profession at large”. A “reduction” of 20% of the costs was therefore reasonable.

[41] The costs of misconduct proceedings are a significant factor both for the Association and the member charged. Contrary to what is suggested in **Hoff v Alberta Pharmaceutical Ass’n** (1994), [1994 CanLII 8950 \(AB KB\)](#), 151 AR 146 at para. 22, 18 Alta LR (3d) 387 (ABQB) there is no presumption that the member is or should be responsible for most or all of the costs incurred.

[42] Professions in Alberta are extended the privilege of self-regulation. With that comes the responsibility to supervise and, when necessary, discipline members. The disciplinary process must necessarily involve costs, and any professional regulator must accept some of those costs as an inevitable consequence of self-regulation. It is acceptable for the profession to attempt to recover some of those costs back from disciplined members, but some burden of the costs of regulation is unavoidable and a proper consequence of the regulator’s mandate.

[43] Costs awards serve several purposes. One of them is to indemnify the party that has incurred the costs, in this case the Association. The corollary is that some of those costs can properly be shifted to the member who has been found guilty of misconduct. However, full indemnity for costs is seldom appropriate. Leaving some of the burden of the costs of disciplinary proceedings on the professional regulator helps to ensure that discipline proceedings are commenced, investigated, and conducted in a proportional matter, with due regard to the expenses being incurred.

[44] For example, leaving some residual costs on the regulator discourages overcharging. Here the appellant was charged with 13 offences, but only found guilty of six. Some of the charges (for example counts six and seven) overlapped significantly. Leaving residual costs on the regulator also serves to moderate the expenses incurred in investigating and prosecuting a complaint. Further, the regulator must always ascertain whether perceived shortcomings in the professional are serious enough to justify the expense of disciplinary proceedings. Of course, the approach taken by the professional to the allegations will have a significant impact on whether a hearing is required, and how it proceeds.

[45] Another aspect is the right of a professional to a reasonable opportunity to defend the charges. Allegations of misconduct against a professional are serious matters, as they impact not only the professional’s reputation but his or her livelihood. In many cases, as in this one, the costs of the hearing and the appeal are far in excess of the monetary penalties imposed. The disciplinary system should not include a cost regime that precludes professionals raising a legitimate defence: **Alsaadi v Alberta College of Pharmacy**, [2021 ABCA 313](#) at paras. 114-15.

[46] An appropriate approach to costs in the disciplinary process of self-regulated professions is found in **K.C. v College of Physical Therapists of Alberta**, [1999 ABCA 253](#) at para. 94, 72 Alta LR (3d) 77, 244 AR 28:

The fact that the Act and Regulation permit the recovery of all hearing and appeal costs does not mean that they must be ordered in every case. Costs are discretionary, with the discretion to be exercised judicially. . . . Costs awarded on a full indemnity basis should not be the default, nor, in the case of mixed success, should costs be a straight mathematical calculation based on the number of convictions divided by the number of charges. In addition to success or failure, a discipline committee awarding costs must consider such factors as the seriousness of the charges, the conduct of the parties and the reasonableness of the amounts. Costs are not a penalty, and should not be awarded on that basis. When the magnitude of a costs award delivers a crushing financial blow, it deserves careful scrutiny: . . . If costs awarded routinely are exorbitant they may deny an investigated person a fair chance to dispute allegations of professional misconduct: . . .

Costs awards are reviewed for reasonableness. The standard is not whether they deliver a “crushing blow” or are “exorbitant,” but whether considering all the circumstances they are reasonable and proportionate.

[47] In this appeal the only issue is the costs of the appeal to the Committee of Council, not the underlying costs of the hearing. There is no indication that either of the parties was unreasonable in the way they approached or conducted the appeal proceedings. Success is a relevant factor, and the appellant appealed all six of the counts on which he was found responsible, and was unsuccessful on all of them. On the other hand, there were some legitimate concerns about the evidentiary record.

[48] Costs awards in professional disciplinary matters are reviewed for reasonableness. The Committee of Council unfortunately erred in assuming that there was a presumption or expectation that the professional would pay most or all of the costs, and that the “discount” of 20% was reasonable. There were some legitimate concerns about the evidentiary record, and even though the appellant was unsuccessful it cannot be said that it was unreasonable to launch this appeal. Considering all of the relevant factors, the Committee of Council’s approach on costs was unreasonable, and the appellant’s responsibility for the costs of the appeal should be reduced to 50%.

- 40 Having regard for the foregoing, the Hearing Panel’s view is that fifty percent (50%) of the hearing costs would still result in a cost award that is disproportionate to the behavior ultimately found to be unprofessional. The effect of such a disproportionate cost award could be to deter other Members from reasonably exercising their rights to challenge allegations of unprofessional conduct. Further, having regard for the Member’s stage in life and age (around 60 years old), a large costs award would have a significant economic impact with a reduced opportunity to make up such amounts in the future.
- 41 In the Hearing Panel’s view, a costs award of \$8,000.00 strikes the right balance of requiring the Member to make a contribution towards the costs of the contested hearing, while ensuring the amount remains in proportion to the single event that resulted in the hearing.

CONCLUSION

- 42 The Hearing Panel thanks the parties for their submissions and makes the following order:
- (a) A reprimand, with this written sanctions decision serving as the reprimand;
 - (b) A fine of \$1,000.00, with such fine being a debt owing to APEGA which shall be paid within six (6) months of the date of this sanction decision;

- (c) Within three (3) months of the date of this sanction decision the Member shall provide APEGA with written confirmation or other evidence of successful completion of the AMRI online anger management course (<https://angermanagement.ca/online-course>) or equivalent course where such equivalent course is approved in advance by the Discipline Manager. In any case, such course is to be paid for at the Member's expense;
- (d) If the Member fails to complete (c) within the timelines specified or any extended timeline granted in writing by the Discipline Manager, the Member shall be suspended from the practice of engineering for a minimum of thirty (30) days. If (c) is not completed within six (6) months of the first day of the initial thirty (30) day suspension, the Member's registration shall be cancelled;
- (e) The Member shall pay \$8,000.00 in costs within two years or twenty-four (24) months of the date of the sanction decision; and
- (f) The matter and its outcome will be published by APEGA with the name of the Member identified.

Dated this 8th day of July, 2025.

On behalf of the Hearing Panel of the APEGA Discipline Committee:

Robert Swift

Signed with ConsignO Cloud (2025/07/08)
Verify with verifio.com or Adobe Reader.



Robert Swift, P.Eng., Discipline Committee
Panel Chair

Tim Moran

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Timothy Moran, P.Eng., Discipline Committee
Panel Member

Jeff Pieper

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Dr. Jeffrey Pieper, P.Eng., Discipline
Committee Panel Member

Muriel Dunnigan

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Muriel Dunnigan, Discipline Committee Panel
Member