

**NOTICE OF PUBLICATION BAN**

In the matter of College of Early Childhood Educators and Malgorzata (Margaret) Lulek, this is notice that the Discipline Committee ordered that no person shall publish or broadcast the identity of, or any information that could identify, any person who is under 18 years old and is a witness in the hearing, or the subject of evidence in the hearing or under subsection 35.1(3) of the *Early Childhood Educators Act, 2007*.

**DISCIPLINE COMMITTEE  
OF THE COLLEGE OF EARLY CHILDHOOD EDUCATORS**

**PANEL:** Kristine Parsons, RECE, Chairperson  
Barney Savage  
Susan Quaiff, RECE

**BETWEEN:** )  
)  
COLLEGE OF EARLY ) Vered Beylin  
CHILDHOOD EDUCATORS ) for the College of Early Childhood Educators  
)  
)  
- and - )  
)  
MALGORZATA (MARGARET) LULEK ) Self-represented  
REGISTRATION # 08287 )  
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) Elyse Sunshine, Rosen Sunshine LLP  
) Independent Legal Counsel  
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)  
) Heard: February 11, 2020

## DECISION AND REASONS

This matter was heard by a panel of the Discipline Committee of the College of Early Childhood Educators (the "Panel") on February 11, 2020.

### PUBLICATION BAN

The Panel ordered a publication ban following a motion by College Counsel, on consent of the Member, pursuant to section 35.1(3) of the *Early Childhood Educators Act, 2007* (the "Act"). The order bans the public disclosure, publication and broadcasting outside of the hearing room, any names or identifying information of any minor children who may be the subject of evidence in the hearing.

### THE ALLEGATIONS

The allegations against the Member as stated in the Notice of Hearing dated January 21, 2020 (Exhibit 1) were as follows:

1. At all material times, Malgorzata (Margaret) Lulek (the "Member") was a member of the College of Early Childhood Educators (the "College") and was employed as an Early Childhood Educator at the Rainbow Academy Learning and Child Care Centre (the "Centre"), located in Bolton, Ontario.

#### **The Incident**

2. On or about March 3, 2017, at approximately 3:45pm, the Member and other Registered Early Childhood Educators ("RECEs") were supervising children at the Centre's indoor play area, including a 2½ year old girl (the "Child").
3. The Child was pushing other children, so she was removed from the play area and placed on a bench so that she was sitting beside the Member. The Member said to the Child words to the effect of "How would you like it, if you were pushed". The Member then pushed the Child off the bench, causing her to fall forward. The Child landed on her stomach and her head hit the floor. The Child began to cry.
4. The Member did not report the incident to the Centre's management or the Child's parents.

5. The incident was observed by two RECEs and captured on video. One of the RECEs reported the incident to the Centre's supervisor and later to the Peel Children's Aid Society ("CAS").
6. While CAS was investigating the incident, the Member said to one of the RECEs who observed what happened words to the effect of "You reported on me. You know I was joking. Make sure you're on my back".
7. CAS verified that the Member used excessive physical force with a child, placing the child at risk of physical harm.

#### **Criminal Court Proceedings**

8. CAS reported the incident to Caledon Ontario Provincial Police, who then arrested the Member and laid an assault charge against her.
9. In January 2018, the Member pleaded guilty to assaulting the Child, as described in the Incident above. The Member was found guilty, conditionally discharged and placed on probation for 18 months.

#### **Professional Misconduct Alleged**

10. By engaging in the conduct set out in paragraphs 2 – 6 and 9 above, the Member engaged in professional misconduct as defined in subsection 33(2) of the Act, in that:
  - a) she physically abused a child who was under her professional supervision, contrary to Ontario Regulation 223/08, subsection 2(3.1);
  - b) she psychologically or emotionally abused a child who was under her professional supervision, contrary to Ontario Regulation 223/08, subsection 2(3.2);
  - c) she failed to maintain the standards of the profession, contrary to Ontario Regulation 223/08, subsection 2(8), in that:
    - i. she failed to provide a nurturing learning environment where children thrive, contrary to Standard I.D of the Standards of Practice;
    - ii. she failed to establish professional and caring relationships with children and/or to respond appropriately to the needs of children, contrary to Standard I.E of the Standards of Practice;
    - iii. she failed to maintain a safe and healthy learning environment, contrary to Standard III.A.1 of the Standards of Practice;
    - iv. she failed to support children in developmentally sensitive ways and to provide caring, stimulating, and respectful opportunities for learning and care that are welcoming to children and their families, contrary to Standard III.C.1 of the Standards of Practice;

- v. she failed to know, understand and abide by the legislation, policies and procedures that are relevant to her professional practice and to the care and learning of children under her professional supervision, contrary to Standard IV.A.2 of the Standards of Practice;
  - vi. she failed to make decisions, resolve challenges and/or provide behaviour guidance in the best interests of the children under her professional supervision, contrary to Standard IV.B.4 of the Standards of Practice;
  - vii. she conducted herself in a manner that could reasonably be perceived as reflecting negatively on the profession of early childhood education, contrary to Standard IV.E.2 of the Standards of Practice; and
  - viii. she physically, verbally, psychologically or emotionally abused a child under her professional supervision, contrary to Standard V.A.1 of the Standards of Practice;
- d) she acted or failed to act in a manner that, having regard to the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional, contrary to Ontario Regulation 223/08, subsection 2(10);
  - e) she contravened a law, which contravention is relevant to her suitability to hold a certificate of registration, contrary to Ontario Regulation 223/08, subsection 2(20);
  - f) she contravened a law, which contravention has caused a child who was under her professional supervision to be put at risk, contrary to Ontario Regulation 223/08, subsection 2(21); and
  - g) she conducted herself in a manner that is unbecoming a member, contrary to Ontario Regulation 223/08, subsection 2(22).

## **EVIDENCE**

Counsel for the College and the Member advised the Panel that agreement had been reached on the facts and introduced an Agreed Statement of Facts (Exhibit 2), which read as follows:

### **The Member**

1. The Member has had a certificate of registration with the College for approximately 10 years. She is in good standing with the College and does not have a prior discipline history with the College.

2. At all material times, the Member was employed as an RECE at the Centre, located in Bolton, Ontario.

### **The Incident**

3. On or about March 3, 2017, at approximately 3:45pm, the Member and other RECEs were supervising children at the Centre's indoor play area, including the Child.
4. The Child was pushing other children, so she was removed from the play area and placed on a bench so that she was sitting beside the Member. The Member said to the Child words to the effect of "How would you like it, if you were pushed". The Member then pushed the Child off the bench, causing her to fall forward. The Child landed hard on her stomach, her head went forward and her face appeared to have hit the floor. The Child began to cry. The Member then quickly picked the Child up and put her back on the bench.
5. The Member did not report the incident to the Centre's management or the Child's parents.
6. The incident was observed by two RECEs and captured on video. One of the RECEs reported the incident to the Centre's supervisor (the "**Supervisor**") and later to the CAS.
7. After CAS began investigating the incident the Supervisor met with the Member and suspended her employment at the Centre. After the meeting with the Supervisor, and prior to leaving the Centre, the Member said to one of the RECEs who observed what happened words to the effect of "You reported on me. You know I was joking. Make sure you're on my back".
8. CAS verified that the Member used excessive physical force with a child, placing the child at risk of physical harm.

### **Criminal Court Proceedings**

9. CAS reported the incident to Caledon Ontario Provincial Police, who then arrested the Member and laid an assault charge against her.
10. In January 2018, the Member pleaded guilty to assaulting the Child, as described in paragraphs 3 – 4 above, and admitted her conduct as described in paragraphs 5 – 7 above. The Member was found guilty, conditionally discharged, and placed on probation for 18 months.

### **Additional Information**

11. The Child was not physically injured and did not have any marks as a result of the incident.
12. The Child's father read a victim impact statement during the Member's sentencing in criminal court. He emphasized that the Member's conduct was a breach of trust and that this incident led to the family experiencing fear and anxiety when they drop off the Child at daycare.
13. In the course of the incident the Member violated the Centre's Prohibited Practices policy, which was last reviewed by her 3 months prior to incident.
14. One of the terms of the Member's probation order was that, for a 12 month period between January 23, 2018 and January 23, 2019, she was prohibited from seeking, obtaining, or continuing employment, or from volunteering with children under the age of 6, except while in the presence of a person approved in writing by her probation officer.
15. The probation order also required the Member to complete anger management counselling. In April 2018, the Member completed the anger management counselling to the satisfaction of her probation officer.
16. If the Member were to testify, she would advise the following:
  - a. She regrets the incident which stemmed from her "lack of judgement" and is "deeply sorry" for her conduct.
  - b. The anger management counselling the Member attended assisted her in developing strategies to control her conduct. She also learned how to make appropriate decisions in the heat of the moment.
  - c. She was did not work as an RECE since the date she pleaded guilty and was sentenced in criminal court.

### **Admissions of Professional Misconduct**

17. The Member admits that she engaged in and is guilty of professional misconduct as described in paragraphs 3 - 7 and 9 - 10 above, and as defined in subsection 33(2) of the Act, in that:
  - d. she physically abused a child who was under her professional supervision, contrary to Ontario Regulation 223/08, subsection 2(3.1);
  - e. she psychologically or emotionally abused a child who was under her professional supervision, contrary to Ontario Regulation 223/08, subsection 2(3.2);

- f. she failed to maintain the standards of the profession, contrary to Ontario Regulation 223/08, subsection 2(8), in that:
- i. she failed to provide a nurturing learning environment where children thrive, contrary to Standard I.D of the Standards of Practice;
  - ii. she failed to establish professional and caring relationships with children and/or to respond appropriately to the needs of children, contrary to Standard I.E of the Standards of Practice;
  - iii. she failed to maintain a safe and healthy learning environment, contrary to Standard III.A.1 of the Standards of Practice;
  - iv. she failed to support children in developmentally sensitive ways and to provide caring, stimulating, and respectful opportunities for learning and care that are welcoming to children and their families, contrary to Standard III.C.1 of the Standards of Practice;
  - v. she failed to know, understand and abide by the legislation, policies and procedures that are relevant to her professional practice and to the care and learning of children under her professional supervision, contrary to Standard IV.A.2 of the Standards of Practice;
  - vi. she failed to make decisions, resolve challenges and/or provide behaviour guidance in the best interests of the children under her professional supervision, contrary to Standard IV.B.4 of the Standards of Practice;
  - vii. she conducted herself in a manner that could reasonably be perceived as reflecting negatively on the profession of early childhood education, contrary to Standard IV.E.2 of the Standards of Practice; and
  - viii. she physically, verbally, psychologically or emotionally abused a child under her professional supervision, contrary to Standard V.A.1 of the Standards of Practice;
- g. she acted or failed to act in a manner that, having regard to the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional, contrary to Ontario Regulation 223/08, subsection 2(10);
- h. she contravened a law, which contravention is relevant to her suitability to hold a certificate of registration, contrary to Ontario Regulation 223/08, subsection 2(20);

- i. she contravened a law, which contravention has caused a child who was under her professional supervision to be put at risk, contrary to Ontario Regulation 223/08, subsection 2(21); and
- j. she conducted herself in a manner that is unbecoming a member, contrary to Ontario Regulation 223/08, subsection 2(22).

## **THE MEMBER'S PLEA**

The Member admitted to the allegations in the Agreed Statement of Facts.

The Panel received a written plea inquiry (Exhibit 3) which was signed by the Member. The Panel also conducted a verbal plea inquiry and was satisfied that the Member's admission was voluntary, informed and unequivocal.

## **DECISION ON THE ALLEGATIONS**

Having regard to the facts set out in the Agreed Statement of Facts, the Committee accepted the Member's admission and found that she committed acts of professional misconduct as set out in the Notice of Hearing as outlined above.

## **REASONS FOR DECISION**

The Panel considered the Agreed Statement of Facts and the Member's plea and found that the evidence supported findings of professional misconduct as alleged.

The allegations in the Notice of Hearing are supported by paragraphs three through nine in the Agreed Statement of Facts. The evidence shows that the Member physically and emotionally abused the Child when she spoke harshly to her and pushed her. The Member further contravened the standards of practice when she made use of physical force to correct and address the behaviour of a young child. In addition, she made inappropriate comments to a colleague with regard to an investigation underway into the incident.



The Member plead guilty to and was found guilty of a criminal offence thereby contravening a law relevant to her suitability to hold a certificate of registration and that such contraventions caused a child under her supervision to be put at risk,

The Panel finds that the Member's conduct would reasonably be regarded by members of the profession as disgraceful, dishonourable or unprofessional. The Member failed to know, understand and abide by the legislation, policy and procedures relevant to professional practice. She violated the trust with the parents by failing to establish and maintain a safe and caring environment. RECEs are expected to be models of professionalism, and exhibit respectful collaboration among peers. In fact, she violated the trust of her colleagues by making a comment intended to influence the outcome of an investigation underway into the incident. For these reasons, the Panel concludes that such conduct would be considered disgraceful, dishonourable or unprofessional and that she conducted herself in a manner that is unbecoming a member.

#### **POSITION OF THE PARTIES ON PENALTY**

Counsel for the College and the Member made a joint submission as to an appropriate penalty. The joint submission as to penalty proposed that the Panel make an order as follows:

1. Requiring the Member to appear before a Panel of the Discipline Committee to be reprimanded immediately following the hearing of this matter.
2. Directing the Registrar to suspend the Member's certificate of registration for a period of 6 months. The suspension will take effect from the date of this Order and will run without interruption as long as the College has not otherwise prohibited the Member from practising or suspended the Member for any other reason.
3. Directing the Registrar to impose the following terms, conditions and limitations on the Member's certificate of registration:

#### **Mentorship**

- a. Prior to the Member commencing or resuming employment as a RECE or engaging in the practice of early childhood education, as defined in section 2 of the Act, the Member, at her own expense, will arrange a mentoring relationship with a Mentor, who:

- i. is an RECE in good standing with the College,
- ii. is employed in a supervisory position,
- iii. has never been found guilty of professional misconduct and/or incompetence by the Discipline Committee of the College,
- iv. is not currently found to be incapacitated by the Fitness to Practise Committee of the College,
- v. is not currently the subject of allegations referred to the Discipline Committee or the Fitness to Practise Committee of the College, and
- vi. is pre-approved by the Director of Professional Regulation (the “**Director**”). In order to pre-approve the Mentor, the Member will provide the Director with all requested information, including (but not limited to) the name, registration number, telephone number, address and résumé of the Mentor.

For clarity, the Member can commence or resume employment as an RECE after arranging a mentorship relationship with a pre-approved Mentor.

- b. Within 14 days of commencing or resuming employment as an RECE, the Member will ensure that the Director is notified of the name, address and telephone number of all employers.
- c. The Member will provide the Mentor with a copy of the following documents within 14 days of being notified that the Mentor has been approved by the Director, or within 14 days after the release of such documents, whichever is earliest:
  - i. the Panel’s Order,
  - ii. the Agreed Statement of Facts,
  - iii. the Joint Submission on Penalty and Costs, and
  - iv. the Panel’s Decision and Reasons.
- d. The Member will meet with the Mentor at least every 2 weeks after the Mentor has been approved by the Director to discuss the following subjects:
  - i. review of the College’s Code of Ethics and Standards of Practice,
  - ii. the acts or omissions by the Member, which resulted in the Discipline Committee finding the Member guilty of professional misconduct,
  - iii. the potential consequences of the misconduct to the parents/children affected, and to the Member’s colleagues, profession and self,
  - iv. strategies for preventing the misconduct from recurring, and

- v. the Member's daily practice and any issues that arise, to ensure that she is meeting the College's Standards of Practice (without disclosing personal or identifying information about any of the children under the Member's care, or clients of her employer(s)).
  - e. After a minimum of 5 sessions, the Member can seek the Director's permission to stop participating in the mentorship sessions by providing the Director with a report by the Mentor that sets out the following:
    - i. the dates the Member attended the sessions with the Mentor,
    - ii. that the Mentor received a copy of the documents referred to in paragraph 3(c),
    - iii. that the Mentor reviewed the documents set out in paragraph 3(c) and discussed the subjects set out in paragraph 3(d) with the Member, and
    - iv. the Mentor's assessment of the Member's insight into her behaviour.
  - f. All documents delivered by the Member to the College or the Mentor will be delivered by email, registered mail or courier, and the Member will retain proof of delivery.
  - g. The College may require proof of compliance with any of the terms in this Order at any time.
- 4. Requiring the Member to pay the College's costs fixed in the amount of \$1,000, to be paid within 4 months of the date of this Order and in accordance with the following payment schedule:
  - a. \$200 on the date of this Order;
  - b. \$200 thirty (30) days following the date of the Order;
  - c. \$200 sixty (60) days following the date of the Order;
  - d. \$200 ninety (90) days following the date of the Order; and
  - e. \$200 one hundred and twenty (120) days following the date of the Order.

### **Submissions of the Parties**

Counsel for the College submitted that the proposed order was appropriate and reasonable in light of the facts agreed upon. The penalty should send a message that this type of conduct is unacceptable and deter other RECEs from engaging in this type of conduct while also, ensuring that the penalty would deter this specific member and rehabilitate her.

The College provided two cases in support of the proposed penalty and submitted that these cases represented conduct of a similar nature and established that the proposed penalty was proportionate and reasonable and would not bring the administration of justice into disrepute. These cases were:

*College of Early Childhood Educators v. Kelly Anne Eusebio 2019 ONCECE 6 (CanLII)*

*College of Early Childhood Educators v. Victoria Maria Alves 2019 ONCECE 5 (CanLII)*

The College further submitted that the prime aggravating factors in this case were:

- The age of the child – The Child was 2.5 years old and not old enough to make an independent report on the incident.
- Impact on the child – There was evidence that the Child was emotionally impacted by the incident, as she cried immediately after it happened.
- No reason for the intervention used by the Member – In this case, there was no threat to the safety of the Child or other children and as such, the force was used as a corrective measure with respect to behaviour that had already occurred. There was no justification for physical contact with the Child.
- Failure to report – The Member did not report the incident to her supervisor, nor to the Child's parents.
- Impact on family – There was evidence of significant impact on the Child's family, as evidenced by the mistrust of RECEs described in the father's evidence in the criminal court proceedings.
- Comments to colleague – The Member downplayed the incident in comments to a colleague and attempted to interfere with a CAS investigation of the incident.

The College also submitted that the mitigating factors in this case were:

- Acknowledgement of wrongdoing – The Member acknowledged her wrongdoing and fully cooperated with the College's investigation.

- Guilty plea – The Member pled guilty to the charges of professional misconduct, thus saving the College the time and expense of a contested hearing.
- Professional history – The Member has been an RECE for 10 years and this is her first time before the Discipline Committee.
- Probation – As a result of the criminal proceeding and penalty, the Member has already undergone 12 months with significant restrictions on her professional practice.
- Counselling – The Member has completed anger management counselling to address her conduct, to the satisfaction of her probation officer.

College Counsel also asked the Panel to consider two other important factors:

- No physical injury – There was no evidence that the Child incurred a physical injury as a result of the incident.
- Isolated incident – There was no report of a pattern of inappropriate conduct, and this appears to have been an isolated incident.

Finally, College Counsel submitted to the Panel that the existence of a criminal charge and conviction does not, *per se* add to the seriousness of the professional misconduct. The Member should not be punished more harshly because of the Court finding.

## **PENALTY DECISION**

The Panel accepted the joint submission on penalty and makes the following Order as to penalty:

1. The Member is required to appear before a Panel of the Discipline Committee to be reprimanded immediately following the hearing of this matter.
2. The Registrar is directed to suspend the Member's certificate of registration for a period of 6 months. The suspension will take effect from the date of this Order and will run without interruption as long as the College has not otherwise prohibited the Member from practising or suspended the Member for any other reason.
3. The Registrar is directed to impose the following terms, conditions and limitations on the Member's certificate of registration:

## **Mentorship**

- a. Prior to the Member commencing or resuming employment as a RECE or engaging in the practice of early childhood education, as defined in section 2 of the Act, the Member, at her own expense, will arrange a mentoring relationship with a Mentor, who:
  - i. is an RECE in good standing with the College,
  - ii. is employed in a supervisory position,
  - iii. has never been found guilty of professional misconduct and/or incompetence by the Discipline Committee of the College,
  - iv. is not currently found to be incapacitated by the Fitness to Practise Committee of the College,
  - v. is not currently the subject of allegations referred to the Discipline Committee or the Fitness to Practise Committee of the College, and
  - vi. is pre-approved by the Director. In order to pre-approve the Mentor, the Member will provide the Director with all requested information, including (but not limited to) the name, registration number, telephone number, address and résumé of the Mentor.

For clarity, the Member can commence or resume employment as an RECE after arranging a mentorship relationship with a pre-approved Mentor.

- b. Within 14 days of commencing or resuming employment as an RECE, the Member will ensure that the Director is notified of the name, address and telephone number of all employers.
- c. The Member will provide the Mentor with a copy of the following documents within 14 days of being notified that the Mentor has been approved by the Director, or within 14 days after the release of such documents, whichever is earliest:
  - i. the Panel's Order,
  - ii. the Agreed Statement of Facts,
  - iii. the Joint Submission on Penalty and Costs, and
  - iv. the Panel's Decision and Reasons.
- d. The Member will meet with the Mentor at least every 2 weeks after the Mentor has been approved by the Director to discuss the following subjects:
  - i. review of the College's Code of Ethics and Standards of Practice,

- ii. the acts or omissions by the Member, which resulted in the Discipline Committee finding the Member guilty of professional misconduct,
  - iii. the potential consequences of the misconduct to the parents/children affected, and to the Member's colleagues, profession and self,
  - iv. strategies for preventing the misconduct from recurring, and
  - v. the Member's daily practice and any issues that arise, to ensure that she is meeting the College's Standards of Practice (without disclosing personal or identifying information about any of the children under the Member's care, or clients of her employer(s)).
- e. After a minimum of 5 sessions, the Member can seek the Director's permission to stop participating in the mentorship sessions by providing the Director with a report by the Mentor that sets out the following:
  - i. the dates the Member attended the sessions with the Mentor,
  - ii. that the Mentor received a copy of the documents referred to in paragraph 3(c),
  - iii. that the Mentor reviewed the documents set out in paragraph 3(c) and discussed the subjects set out in paragraph 3(d) with the Member, and
  - iv. the Mentor's assessment of the Member's insight into her behaviour.
- f. All documents delivered by the Member to the College or the Mentor will be delivered by email, registered mail or courier, and the Member will retain proof of delivery.
- g. The College may require proof of compliance with any of the terms in this Order at any time.

## **REASONS FOR PENALTY**

The Panel understands that the penalty ordered should protect the public and enhance public confidence in the ability of the College to regulate registered early childhood educators. This is achieved through a penalty that addresses specific deterrence, general deterrence and, where appropriate, rehabilitation and remediation. The penalty should be proportionate to the misconduct.

In considering the joint submission, the Panel was mindful that a jointly proposed penalty should be accepted unless its acceptance would bring the administration of justice into disrepute or it is otherwise not in the public interest.

The Panel is aware that no two cases are exactly alike. However, reviewing earlier cases can help determine the level of appropriate penalty. The Panel therefore considered the previous cases that were presented.

In this case, the Panel found that the Member cooperated with the College and, by agreeing to the facts and proposed penalty, has accepted responsibility for her actions.

Having considered all of these factors, the Panel was satisfied that the proposed penalty in this case was appropriate and in the public interest.

The Panel found that the penalty satisfies the principles of general deterrence and public protection. The proposed suspension is in keeping with the range of suspensions that were imposed in the previous cases that were put before the Panel. The suspension is appropriate given the aggravating factors in this case. In this particular case, the Panel accepted the submissions of College Counsel that it consider the facts as presented, and not impose a higher penalty based on the fact that there was a criminal conviction. The suspension and the reprimand will act as a specific deterrent to the Member and a general deterrent to other members of the profession from engaging in such conduct. The Panel was satisfied that with the remedial mentorship – along with the steps the Member had already undertaken – the Member will be provided with the guidance and advice she requires in order to return to professional practice.

#### **ORDER AS TO COSTS**

Subsection 33(5)(4) of the ECE Act provides that in an appropriate case, a panel may make an order requiring a member who the panel finds has committed an act of professional misconduct to pay all or part of the College's legal costs and expenses, investigation costs and hearing costs.



The parties are in agreement with respect to costs and the amount of costs to be ordered. The Panel agrees that that this is an appropriate case for costs to be awarded and the amount proposed by the parties is reasonable.

The Panel orders that the Member pay the College's costs fixed in the amount of \$1,000, to be paid within 4 months of the date of the Panel's Order and in accordance with the following payment schedule:

- a. \$200 on the date of the Order;
- b. \$200 thirty (30) days following the date of the Order;
- c. \$200 sixty (60) days following the date of the Order;
- d. \$200 ninety (90) days following the date of the Order; and
- e. \$200 one hundred and twenty (120) days following the date of the Order.

**I, Kristine Parsons sign this decision and reasons for the decision as Chairperson of this Discipline panel and on behalf of the members of the Discipline panel.**



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Kristine Parsons, Chairperson

February 24, 2020

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Date