

IN THE MATTER OF THE VETERINARY PROFESSION ACT, RSA 2000, c. V-2,
AS AMENDED;

AND IN THE MATTER OF A HEARING INTO THE CONDUCT OF DR. JEFF SERFAS,
A MEMBER OF THE ALBERTA VETERINARY MEDICAL ASSOCIATION;

AND IN THE MATTER OF A PROFESSIONAL CONDUCT HEARING REGARDING
THE CONDUCT OF DR. JEFF SERFAS UNDERTAKEN VIRTUALLY (COVID 19);

AND IN THE MATTER OF A REFERRAL BY THE ALBERTA VETERINARY
MEDICAL ASSOCIATION COMPLAINTS DIRECTOR IN ACCORDANCE WITH
SECTION 41.1(3)(a)(b) OF THE VETERINARY PROFESSION ACT.

DECISION
OF THE HEARING TRIBUNAL OF THE
ALBERTA VETERINARY MEDICAL ASSOCIATION

I. Hearing

1. The hearing was conducted pursuant to the Veterinary Profession Act (“VPA”) and virtually on October 28, 2020 with the following individuals participating:

Hearing Tribunal: (the “**Hearing Tribunal**”)

- Dr. Calvin Booker, Chair
- Dr. Greg Evans
- Dr. Navjot Gosal
- Ms. Anne Rothery (public member)

Independent Legal Counsel to Hearing Tribunal

- Blair E. Maxston, Q.C.

Alberta Veterinary Medical Association (the “**ABVMA**”)

- Dr. Phil Buote, Complaints Director
- Karen Smith, Q.C. and Ashley Groeninweger, Legal counsel for the Complaints Director

Investigated Member

- Dr. Jeff Serfas
- Richard Rand, Q.C., Legal counsel for the Investigated member

II. Preliminary Matters

2. The Chair made opening comments, including introductions of the parties and a review of the six (6) charges in the Amended Notice of Hearing dated October 22, 2020.
3. There were no objections to conducting the hearing virtually and to the members of the Hearing Tribunal hearing this matter despite the fact that the same Hearing Tribunal members had issued a May 29, 2019 written decision concerning Dr. Serfas and conducted a previous hearing relating to these matters. No Hearing Tribunal members identified a conflict of interest and there were no objections to the jurisdiction of the Hearing Tribunal to proceed.
4. The hearing proceeded by way of an “Admission of Unprofessional Conduct” document pursuant to section 35.1 of the VPA and a “Consent Order”, including an Agreed Statement of Facts (the “**Agreed Statement of Facts**”) and joint Orders as to Sanctions. Accordingly, no witnesses were called to give evidence during the hearing.

III. Exhibits

5. The following exhibits were entered with the consent of both parties at the hearing:

- Exhibit #1: Amended Notice of Hearing (the “**Notice of Hearing**”)
- Exhibit #2: Notice to Attend dated October 22, 2020
- Exhibit #3: Disclosure Documents Binder
- Exhibit #4: Affidavit of Service
- Exhibit #5: Admission of Unprofessional Conduct (the “**Admission of Unprofessional Conduct**”)
- Exhibit #6: Consent Order (the “**Consent Order**”)

IV. Background

- 6. The facts in this matter are not in dispute, are set out in detail in the Agreed Statement of Facts and do not need to be repeated in detail in this Decision.
- 7. Briefly, the facts relate to Dr. Serfas practicing veterinary medicine during the time when his registration was suspended and Dr. Serfas’s failure to abide by prior Hearing Tribunal orders and the question of whether he is an “ungovernable professional”.

V. Allegations

8. Six (6) allegations are set out in the Notice of Hearing as follows:

Contravening the Order of the Hearing Tribunal

- (1) That you breached the May 29, 2019 Order of the Hearing Tribunal suspending you from the practice of veterinary medicine for the period of June 15, 2019 to June 15, 2020. Specifically, as follows:
 - That you undertook pregnancy checks on cattle (Johnson, Schellingburge, Lush, Lansing).
 - That you ordered pharmaceuticals and hospital supplies (equine uterine lavage kits, semen testing forms and microscope slides) from drug distributors including Western Drug Distribution Centre Ltd. (“WDDC”).
 - That you prescribed and dispensed large animal pharmaceuticals.
 - That you administered large and small animal pharmaceuticals such as Euthanyl and Ketamine.
 - That you administered vaccines (Ronsko).

- That you undertook semen testing of bulls (Brown et al.).
 - That you euthanized large and small animals (Ponto).
 - That you received payments for veterinary medical services performed (Buckholz, Zimmer, Hutchinson, Rowland, Davidson, Butterfield, Rajewski, Kennedy, Bexston, Ronsko).
 - That you performed equine dental procedures.
 - That you performed post-mortem examinations (Bexston).
 - That you performed a quill removal (Kennedy).
 - That you performed castration of steers (Kennedy).
- (2) That FVC failed to satisfy the Practice Inspection Practice Standards (“PIPS”) inspection of May 20th, 2020.
- (3) That in failing to meet the minimum PIPS on May 20, 2020, FVC failed to maintain the appropriate minimum PIPS.

Such conduct constitutes unprofessional conduct pursuant to section 1(n.1)(i), (ii), (x) and/or (xi) of the Veterinary Profession Act, R.S.A. 2000, c. V-2, as amended.

Failure to Conduct yourself with Professionalism

- (4) That you attempted to deceive the ABVMA with respect to your conduct in the practice of veterinary medicine between June 15, 2019 – June 15, 2020, as follows:
- That you removed and replaced narcotics from FVC between the period of May 20, 2020 and June 1, 2020.
 - That you altered the FVC narcotic log book.
 - That you directed the conduct of the responsible veterinarian of FVC.
 - That you maintained the practice of providing undated invoicing for veterinary medical services provided during the period of suspension,
 - That you attended at FVC during times when your activities practicing veterinary medicine could not be observed during your period of suspension.
 - That you attempted to obtain cash payments to avoid the detection of unauthorized veterinary medical practices during your period of suspension

- (5) That you failed to conduct yourself with appropriate courtesy and integrity in your interactions with Mr. Miller and Mr. Workman on May 20th, 2020.
- (6) That you filed a false police report with Killam RCMP regarding an unsubstantiated claim of impaired driving regarding Mr. Workman on May 20th, 2020.

VI. Admission of Unprofessional Conduct

9. Section 35.1 of the VPA permits an investigated member to make an admission of unprofessional conduct. An admission under section 35.1 of the VPA must be acceptable in whole or in part to the Hearing Tribunal.
10. In the Consent Order, Dr. Serfas made admissions to the following two (2) charges of unprofessional conduct:
 - (1) That Dr. Serfas breached the May 29, 2019 Order of the Hearing Tribunal suspending him from the practice of veterinary medicine for the period of June 15, 2019 to June 15, 2020. Specifically, as follows:
 - That he undertook pregnancy checks on cattle (Johnson, Schellingburge, Lansing).
 - That he ordered, directly or indirectly, pharmaceuticals and hospital supplies (equine uterine lavage kits, semen testing forms and microscope slides) from drug distributors including Western Drug Distribution Centre Ltd. ("WDDC).
 - That he prescribed and dispensed large animal pharmaceuticals.
 - That he administered large and small animal pharmaceuticals such as Euthanyl and Ketamine.
 - That he undertook semen testing of bulls (Brown et al.).
 - That he euthanized animals (Hayes).
 - That he received payments for veterinary medical services performed (Buckholz, Zimmer, Rowland, Davidson, Butterfield, Rajewski, Kennedy, Bexson, Ronsko).
 - That he performed equine dental procedures.
 - That he performed post-mortem examinations (Ronsko).
 - That he performed a quill removal (Kennedy).

- That he performed castration of colts (Kennedy).

Such conduct constitutes unprofessional conduct pursuant to s. 1(n.1)(i), (ii), (x) and/or (xi) of the *Veterinary Profession Act*, R.S.A. 2000, c. V-2, as amended.

- (2) That Dr. Serfas attempted to deceive the ABVMA with respect to his conduct in the practice of veterinary medicine between June 15, 2019 – June 15, 2020, as follows:

- That witnesses advised that he removed and replaced controlled substances from FVC between the period of May 20, 2020 and June 1, 2020 but he has no recollection of doing so.
- That witnesses advised that he altered the FVC narcotic log book but he has no recollection of doing so.
- That he directed the conduct of the responsible veterinarian of FVC.
- That he maintained the practice of providing undated invoicing for veterinary medical services provided during the period of suspension,
- That he attended at FVC during times when his activities practicing veterinary medicine could not be observed during your period of suspension.
- That he obtained cash payments to avoid the detection of unauthorized veterinary medical practices during his period of suspension, some cash payments solicited by himself, some offered by the client.

11. At page 5 of the Consent Order, Dr. Serfas acknowledges that his conduct described above constitutes unprofessional conduct and that he has accepted responsibility for his conduct pursuant to section 35.1 of the VPA.
12. The other charges from the Notice of Hearing are stayed.

VII. Submissions of the Parties

A. Submissions from the Complaints Director

13. Ms. Smith's submissions on behalf of her client can be summarized as follows:
- Ms. Smith reviewed the exhibits and the orders of the Hearing Tribunal from its May 29, 2019 Hearing Tribunal decision. Ms. Smith also reviewed the facts in the Agreed Statement of Facts and submitted that there was clear and overwhelming evidence that Dr. Serfas was engaging in the practice of veterinary medicine during the time that his registration was suspended.

- Ms. Smith urged the Hearing Tribunal to carefully review the breadth and level of practice that occurred during the period of suspension and noted that the evidence of Dr. Serfas practicing veterinary medicine was extensive including bank records, multiple invoices, daytimer records and text messages.
- Ms. Smith reviewed the Admission of Unprofessional Conduct and argued that there were complete admissions regarding charges 1 and 4 from the Notice of Hearing.
- Ms. Smith reviewed the Consent Order and referred to the Hearing Tribunal's responsibility to ensure that facts are proven and that the facts rise to unprofessional conduct under the VPA.
- Ms. Smith submitted that the Hearing Tribunal's first responsibility was an easy task in the circumstances due to the overwhelming information establishing that Dr. Serfas practiced while he was suspended, all of which was a breach of the clear and unequivocal prior orders of the Hearing Tribunal.
- In addition to submitting that there was little challenge for the Hearing Tribunal in determining the factual matrix and in making findings of unprofessional conduct (including as described in the VPA), Dr. Serfas displayed a blatant refusal to be governed which harmed the integrity of the profession.
- Ms. Smith submitted that the Hearing Tribunal also had the obligation to determine appropriate sanctions and penalty orders and reviewed the joint submission on penalty set out in the Consent Order, including the difference between suspension versus permanent cancellation and the amount of the costs order.
- Ms. Smith emphasized that Dr. Serfas is the ABVMA's "most prolific offender" with eight (8) discipline matters and that there is little interest in rehabilitating Dr. Serfas as he has deliberately chosen to fail to abide by prior Hearing Tribunal orders and is an ungovernable professional.
- Ms. Smith then reviewed the seriousness of cancellation of registration as a penalty order but submitted that the ABVMA had no other choice due to the breadth of the unprofessional conduct and the breach of the Hearing Tribunal's prior orders. Ms. Smith also reviewed the factors set out in the cases she provided to the Hearing Tribunal for determining an ungovernable professional.
- Ms. Smith reviewed the *Jaswal* case and penalty order factors as well as the public interest test requirement for accepting Joint Submissions Regarding Penalty.
- Ms. Smith argued that the public interest test was met and that the jointly submitted penalty orders are fair and proportional and preserve the integrity of the veterinary medicine profession. Ms. Smith urged the Hearing Tribunal to accept the admission of Dr. Serfas and the joint penalty proposal.

B. Submissions from Dr. Serfas

14. Mr. Rand's submissions on behalf of his client were brief and can be summarized as follows:
 - Mr. Rand acknowledged that the maximum fines and most severe penalty --- cancellation of registration --- were being jointly proposed and that cancellation was the appropriate penalty in light of all of the facts supporting the admissions of unprofessional conduct.
 - Mr. Rand advised the Hearing Tribunal that Dr. Serfas has a loyal following of clients who may in fact have been lying to protect him and that Dr. Serfas does not agree with everything in the Disclosure of Documents binder.
 - Mr. Rand advised that the loss of his professional registration has been very hard for Dr. Serfas but that, having regard to the circumstances of this matter, the Hearing Tribunal cannot consider something less than "professional death" that is caused by cancellation of registration.
15. The Hearing Tribunal had no questions for Ms. Smith or Mr. Rand.

VIII. Decision of the Hearing Tribunal and Reasons

16. The Hearing Tribunal is faced with a two-part task in considering whether an investigated member is guilty of unprofessional conduct. First, the Hearing Tribunal must make findings as to whether the facts of the alleged unprofessional conduct occurred. If the Hearing Tribunal finds that the alleged conduct did occur, it must then proceed to determine whether that conduct rises to the threshold of unprofessional conduct under the circumstances and as defined in the VPA.
17. With respect to the first task, the Hearing Tribunal carefully reviewed all of the exhibits and the verbal submissions of both parties, as well as Dr. Serfas's Admission of Unprofessional Conduct. There is no disputing the facts relating to the events that took place and the Hearing Tribunal finds that the facts support the allegations admitted by Dr. Serfas.
18. For the purposes of section 35.1 of the VPA, the Hearing Tribunal accepts Dr. Serfas's admission of unprofessional conduct based on the evidence as set out in the Agreed Statement of Facts and the acknowledgement of responsibility by Dr. Serfas in the Consent Order.
19. With respect to the second task, the Hearing Tribunal finds that the conduct admitted to by Dr. Serfas clearly meets the threshold for unprofessional conduct as defined in the VPA.
20. The Hearing Tribunal unanimously agreed with the submissions made by Ms. Smith in terms of the facts being proven, the extreme seriousness of the unprofessional conduct and the clear, consistent and lengthy pattern of conduct by Dr. Serfas demonstrating his ungovernability and lack of respect for his regulatory body, the ABVMA.

21. Item 4 of the Agreed Statement of Facts and Item 1 of the Admission of Unprofessional Conduct clearly show that Dr. Serfas practiced veterinary medicine from June 15, 2019 to June 15, 2020, which was clearly in breach of the May 29, 2019 Order of the Hearing Tribunal of the ABVMA suspending him from practice during that period.
22. Furthermore, the facts and admissions were based on an abundance of evidence compiled in the Exhibit 3 Disclosure Documents. The breadth and frequency of practicing veterinary medicine while under suspension by the ABVMA was extremely widespread and pervasive.
23. The Hearing Tribunal agrees with Ms. Smith that there is overwhelming evidence establishing that Dr. Smith was breaching the Hearing Tribunal order, including bank records, invoices, daytimer documents and text messages. The Hearing Tribunal also noted that Dr. Serfas had involvement in distracting the efforts of the responsible veterinarian and that the breadth and extent of prohibited practice was overwhelmingly significant.
24. Based on the totality of the evidence, there is no doubt that Dr. Serfas practiced veterinary medicine during the prohibited time period and it encompassed many veterinary activities on a frequent and repeated basis.
25. As well, item 5 of the Agreed Statement of Facts and Item 2 of the Admission of Unprofessional Conduct clearly show that Dr. Serfas attempted to deceive the ABVMA with respect to his practice of veterinary medicine between June 15, 2019 and June 15, 2020, all of which is clearly a failure of Dr. Serfas to conduct himself with the professionalism expected and required of ABVMA members.
26. Additionally, the admissions were clearly supported by the abundance of evidence compiled in the Disclosure Documents and the deception was not a single isolated incident. Instead, it was a purposeful coordinated series of actions and events designed to deceive the ABVMA with respect to his conduct in the practice of veterinary medicine while under suspension by the ABVMA.
27. Together, these facts unquestionably show that Dr. Serfas's actions in these matters rise to the level of unprofessional conduct as defined in the VPA.

IX. Joint Submission on Sanction

28. As reflected in the Consent Order, the Complaints Director and Dr. Serfas jointly submit and agree that the following penalty orders are appropriate:
 - (1) A written reprimand shall be issued against Dr. Serfas.
 - (2) Dr. Serfas' registration with the ABVMA shall be cancelled effective the date of the Consent Order. Such cancellation shall remain in effect for a minimum period of five (5) years at which time Dr. Serfas may be permitted to apply for registration pursuant to section 2 of the Veterinary Profession General Regulation, RSA 2000, C-27, as amended.

- (3) Dr. Serfas shall not be entitled to maintain any ownership interest in FVC. Specifically, he is not be entitled to be a shareholder of FVC or any corporation approved as a permit holder effective the date of the Consent Order.

[NOTE: The Hearing Tribunal has replaced “should” from penalty order 3 as written in the Consent Order with the term “shall” in order to be consistent with the mandatory wording in orders 2, 4, 5, 7 and 8 and the use of “shall” in those orders.]

- (4) Dr. Serfas shall be obliged to abide by all previous Orders of all Hearing Tribunals including but limited to the Orders of the Hearing Tribunal issued on May 29, 2019.
- (5) Dr. Serfas shall pay a fine in the sum of TEN THOUSAND (\$10,000.00) DOLLARS with respect to contravening the Order of the Hearing Tribunal and pay a fine in the sum of TEN THOUSAND (\$10,000.00) DOLLARS with respect to the failure to conduct himself with professionalism for a total fine of TWENTY THOUSAND DOLLARS (\$20,000.00) representing the maximum fine of \$10,000.00 for both admissions of unprofessional conduct referenced above. These fines shall be paid within sixty (60) days of the date of the Consent Order.
- (6) In the event that the ABVMA is required to proceed with an injunction application with respect to unauthorized veterinary medical practice by Dr. Serfas, the ABVMA shall be entitled to full indemnity with regards to costs should the application be successful. This applies to any related applications with respect to unauthorized practice including but not limited to contempt of court applications.
- (7) Dr. Serfas shall pay the lesser sum of the actual costs of this investigation and hearing or \$80,000.00, within sixty (60) days of the date of the Consent Order.
- (8) There shall be publication of the Consent Order on a “with names” basis.
29. The Hearing Tribunal acknowledges that rejection of a carefully crafted joint penalty submission would undermine the goal of fostering cooperation through joint submissions and may significantly impair the ability of the Complaints Director and ABVMA members to enter into such agreements.

X. Decision on Penalty and Conclusions of the Hearing Tribunal

30. The Hearing Tribunal carefully reviewed the joint submission for sanctions from the ABVMA and Dr. Serfas and the Hearing Tribunal is satisfied that those sanctions meet the public interest test and uphold the integrity of the profession and the ABVMA disciplinary process. As such, the Hearing Tribunal accepts the proposed Orders as to Sanctions as presented in the Consent Order. Further, the Hearing Tribunal orders that these sanctions take effect immediately upon signature of the Consent Order on October 28, 2020 by the Chair of this Hearing Tribunal, Dr. Calvin Booker.

31. In terms of the sanctions, the Hearing Tribunal agreed with Ms. Smith's submissions on penalty and found that each order is important and warranted to protect the public, maintain the integrity of the veterinary profession and to deter Dr. Serfas and members of the ABVMA from similar actions.
32. As stated in the Hearing Tribunal's May 29, 2019 decision, the order to issue a reprimand against Dr. Serfas emphasizes the severity of these matters and protects the interests of the public, particularly if Dr. Serfas seeks registration as a licensed veterinarian in other jurisdictions. This written reprimand serves as a deterrent to Dr. Serfas and other members of the ABVMA from similar unprofessional conduct in the future. In addition, this sanction protects the integrity of the profession in Alberta.
33. The order to immediately cancel Dr. Serfas's registration for a minimum five (5) year time period, after which time Dr. Serfas may be permitted to apply for registration pursuant to the VPA, emphasizes the severity of this matter and is a proper and justified response to the breadth and repeated nature of Dr. Serfas's actions clearly demonstrating that he refuses to abide by all the orders and sanctions issued by the Hearing Tribunal of the ABVMA.
34. Given that Dr. Serfas has repeatedly refused to be governed by the regulatory body for the veterinary profession in Alberta, cancelling his registration with the ABVMA is the appropriate course of action to protect the public and maintain the integrity of the veterinary profession and the disciplinary process.
35. The Hearing Tribunal recognizes that cancelling a veterinarian's registration with ABVMA is generally considered to be the most serious sanction that can be issued by a Hearing Tribunal for findings of unprofessional conduct as defined in the VPA. However, the seriousness of Dr. Serfas's actions and his repeated failure to comply with and his contempt for orders issued by Hearing Tribunals of the ABVMA over many years warrant cancellation.
36. The issuance of the penalty orders in this decision for these egregious acts of unprofessional conduct also demonstrates that the ABVMA and the Hearing Tribunal are committed to upholding the self-disciplinary process contained in the VPA in a professional and responsible manner.
37. The order to prohibit Dr. Serfas from maintaining ownership in FVC, or any corporation approved as a permit holder by the ABVMA, protects the public, maintains the integrity of the profession, and serves as a deterrent to other ABVMA members from similar acts of unprofessional conduct. It would not be reasonable or prudent to allow Dr. Serfas to maintain ownership in FVC or any other corporation approved as a permit holder by the ABVMA.
38. The order that Dr. Serfas shall be obliged to abide by all previous Orders of all Hearing Tribunals is necessary to maintain the integrity of the profession and the disciplinary process, as well as to deter other ABVMA members from similar acts of unprofessional conduct. Registered members of the ABVMA are accountable for their actions while a member of the ABVMA and that accountability does not end when a veterinarian or a registered veterinary technologist is no longer a registered member of the ABVMA. This sanction emphasizes this point.

39. The order that Dr. Serfas pay the maximum fines on both findings of unprofessional conduct highlight the seriousness of the unprofessional conduct and serve to deter other members from acts of unprofessional conduct. The issuance of these maximum fines for these egregious acts of unprofessional conduct also demonstrates that the ABVMA and the Hearing Tribunal are committed to upholding the discipline process contained in the VPA in a professional and responsible manner.
40. The agreement by Dr. Serfas for the ABVMA to be entitled to full indemnity with regards to costs for any future injunction applications with respect to unauthorized veterinary medical practice by Dr. Serfas is a significant inclusion in the Orders as to Sanctions because it provides an additional deterrent to Dr. Serfas to comply with the cancellation of his registration as it relates to the practice of veterinary medicine. It also demonstrates that the ABVMA is committed to upholding the integrity of the profession and it serves as precedent if needed in future situations that may arise with other members of the ABVMA.
41. The order that Dr. Serfas pay \$80,000.00 costs associated with the investigation and hearing serves as a deterrent to Dr. Serfas and other members of the ABVMA from committing similar acts of unprofessional conduct. In addition, the issuance of that order maintains the integrity of the profession, demonstrates that the ABVMA and the Hearing Tribunal are committed to upholding the self-disciplinary process contained in the VPA in a professional and responsible manner and establishes that Dr. Serfas shall bear significant financial consequences for his disregard of his regulatory body and orders issued by its Hearing Tribunals.
42. The order for publication on a “with names” basis protects the public by informing them of Dr. Serfas’s actions. In addition, it serves as a deterrent to other members of the ABVMA from committing similar acts of unprofessional conduct and helps to uphold the integrity of the profession and the self-disciplinary process afforded to the veterinary profession in Alberta by the VPA.
43. Practicing veterinary medicine is a privilege and not a right. Dr. Serfas’s conduct demonstrates a complete lack of understanding of that privilege.

XI. Orders of the Hearing Tribunal

44. The Hearing Tribunal makes the following orders:
 1. A written reprimand shall be issued against Dr. Serfas.
 2. Dr. Serfas’ registration with the ABVMA shall be cancelled effective the date of the Consent Order. Such cancellation shall remain in effect for a minimum period of five (5) years at which time Dr. Serfas may be permitted to apply for registration pursuant to section 2 of the Veterinary Profession General Regulation, RSA 2000, C-27, as amended.
 3. Dr. Serfas shall not be entitled to maintain any ownership interest in FVC. Specifically, he is not be entitled to be a shareholder of FVC or any corporation approved as a permit holder effective the date of the Consent Order.

4. Dr. Serfas shall be obliged to abide by all previous Orders of all Hearing Tribunals including but limited to the Orders of the Hearing Tribunal issued on May 29, 2019.
5. Dr. Serfas shall pay a fine in the sum of TEN THOUSAND (\$10,000.00) DOLLARS with respect to contravening the Order of the Hearing Tribunal and pay a fine in the sum of TEN THOUSAND (\$10,000.00) DOLLARS with respect to the failure to conduct himself with professionalism for a total fine of TWENTY THOUSAND DOLLARS (\$20,000.00) representing the maximum fine of \$10,000.00 for both admissions of unprofessional conduct referenced above. These fines shall be paid within sixty (60) days of the date of the Consent Order.
6. In the event that the ABVMA is required to proceed with an injunction application with respect to unauthorized veterinary medical practice by Dr. Serfas, the ABVMA shall be entitled to full indemnity with regards to costs should the application be successful. This applies to any related applications with respect to unauthorized practice including but not limited to contempt of court applications.
7. Dr. Serfas shall pay the lesser sum of the actual costs of this investigation and hearing or \$80,000.00, within sixty (60) days of the date of the Consent Order.
8. There shall be publication of the Consent Order on a "with names" basis.

DATED the 13th day of November, 2020 in the City of Okotoks, Alberta.