



— COLLEGE OF —
CHIROPRACTORS
— OF ALBERTA —

*Hearing Tribunal Written Decision and
Orders for the Hearing of:*

Dr. Claudia Sacco

On:

January 15, 2026

Posting expiration date:

January 15, 2036

IN THE MATTER OF A HEARING OF THE HEARING TRIBUNAL
Into the Conduct of Dr. Claudia Sacco, a Regulated Member of the College of Chiropractors
of Alberta (the “College”), pursuant to

THE HEALTH PROFESSIONS ACT, being
Chapter H-7 of the Revised Statutes of Alberta, 2000

DECISION OF THE HEARING TRIBUNAL

1. Hearing

The hearing was conducted virtually, via Zoom, on December 4, 2025. The following individuals were present:

Hearing Tribunal Members:

Dr. Michael Stewart, Regulated Member (the “Chair”)
Dr. Qais Janmohamed, Regulated Member
Leanne Axelsen, Public Member
Pat Matusko, Public Member

Maya Claire Gordon, Independent Legal Counsel to the Hearing Tribunal

Linda Sahli, Acting Complaints Director
Blair Maxston, KC, Legal Counsel for the Acting Complaints Director

Dr. Claudia Sacco, Investigated Member (“Dr. Sacco” or “Investigated Member”)
Dana Schindelka, Legal Counsel for the Investigated Member

A Court Reporter and the College Hearings Director was also present at the hearing.

2. Preliminary Matters

There were no objections to the jurisdiction or composition of the Hearing Tribunal to proceed with the hearing. There were no other preliminary matters raised by either party.

3. Allegations

The allegations as they appeared in the Amended Notice of Hearing are as follows:

1. On or about June of 2020, you began a dating relationship with your patient, Patient A, which continued until February 15, 2025.

All of which constitutes unprofessional conduct for the purposes of section 1(1)(pp)(i),(ii) and/or (xii) of the *Health Professions Act* (“Act”) and/or breaching CCOA Standard of Practice 6.1 – Professional Boundaries with Patients, CCOA Standard of Practice 6.2 – Commencing a Dating Relationship with a Current Patient and/or CCOA Code of Ethics Article A14: Doctor-Patient Boundaries.

2. On or about October of 2023 and during a Part 4 investigation under the Act concerning the allegation in charge 1 above:
 - a) You failed to cooperate with and act professionally with the College’s Complaints Director and an investigator appointed pursuant to Part 4 of the Act; and
 - b) You failed to provide accurate and complete information to an investigator appointed pursuant to Part 4 of the Act and to the College’s Complaints Director.

All of which constitutes unprofessional conduct for the purposes of section 1(1)(pp)(i) of the *Act* and/or (vii)(B) and/or breaching CCOA Code of Ethics Article C2: Cooperation with the CCOA.

4. Background

In September of 2023, the Acting Complaints Director of the College of Chiropractors of Alberta (the “College”) received a complaint pursuant to s. 54 of the *Health Professions Act*, RSA 2000, c. H-7 (the “*Act*”). The complaint related to a dating relationship between Dr. Sacco and her patient, Patient A (the “Complaint”).

Linda Sahli, Acting Complaints Director for the College, subsequently referred the matter for investigation in accordance with s. 55(2)(d) of the *Act*. In response to the Complaint, pursuant to Part 4 of the *Act*, an investigator was appointed to investigate the Complaint and an Investigation Report was completed.

Following receipt of the Investigation Report, the Acting Complaints Director determined that the matter should be referred to the Hearings Director in accordance with s. 66(3)(a) of the *Act*. An Amended Notice of Hearing, Notice to Attend and Notice to Produce dated November 24, 2025 were served upon Dr. Sacco (**Exhibit 1**).

5. Evidence

The hearing was conducted by way of an Admission of Unprofessional Conduct (**Exhibit 2**) and an Agreed Statement of Facts (**Exhibit 3**).

Pursuant to the Agreed Statement of Facts, the following facts were agreed to by the parties:

1. This Agreed Statement of Facts (“ASF”) is being put forward jointly by Dr. Claudia Sacco (“Dr. Sacco”) and Ms. Linda Sahli, the Acting Complaints Director (the “Complaints Director”) of the College of Chiropractors of Alberta (the “College”) for the purpose of these proceedings.
2. Specifically, Dr. Sacco and the Complaints Director agree that the following facts may be taken as proven in evidence before the Hearing Tribunal and that there is no dispute between the parties with regard to these facts.

Introduction

3. Dr. Sacco has been a licensed Chiropractor and member of the College (and its predecessors) since January 1, 2013.

4. At all times Dr. Sacco was a regulated member of the College and was the owner of Quarry Park Chiropractic and Wellness Centre (sometimes referred to as “QPC”) in Calgary, Alberta (the “Clinic”).
5. Pursuant to the Health Professions Act of Alberta, R.S.A. 2000, c. H 7 (the “HPA”), the College is the regulatory body for the profession of chiropractic in Alberta.

Background Facts

6. In May of 2013, Dr. Sacco established the Clinic.
7. Between January of 2017 and June of 2023, Patient A was seen by Dr. Sacco as a patient at the Clinic and was intermittently seen by other chiropractors at the Clinic during that time period. Typically, Patient A averaged 15 visits per year focusing on musculoskeletal issues due to his physically demanding job.
8. In June of 2020, Dr. Sacco began a personal relationship with Patient A. Subsequently in June of 2020, Dr. Sacco commenced a dating relationship with Patient A. At all times during their dating relationship, Patient A was a patient of Dr. Sacco’s for the purposes of the Health Professions Act and the College’s Standards of Practice.
9. Dr. Sacco acknowledges that she was at all times aware that it was a serious breach of professional standards to date a patient. Regardless, Dr. Sacco continued to provide treatment to Patient A and Patient A remained a patient of Dr. Sacco’s from June 2020 until Patient A’s last appointment on June 19, 2023.
10. Dr. Sacco and Patient A were legally married on February 15, 2025.

The Complaint and the Investigation

11. In September of 2023, a complaint was filed with the College regarding the dating relationship between Dr. Sacco and Patient A (the “Complaint”).
12. In response to the Complaint, pursuant to Part 4 of the HPA an investigator was appointed to investigate the Complaint and an investigation report was completed. The Complaints Director of the College referred this matter to a hearing.

Facts Relating to the Charges

13. On or about June of 2020, Dr. Sacco began a dating relationship with her patient, Patient A which continued until February 15, 2025. For clarity, during that time Dr. Sacco continued to provide chiropractic treatment to Patient A and at all times relevant to the charges in the Amended Notice of Hearing in these proceedings Patient A was Dr. Sacco’s patient. Dr Sacco was
14. In October of 2023 and during a Part 4 investigation under the HPA concerning the Complaint:
 - a. Dr. Sacco failed to cooperate with and act professionally with the College’s Complaints Director and an investigator appointed pursuant to the Act; and

- b. Dr. Sacco failed to provide accurate and complete information to an investigator appointed pursuant to the Act and to the College's Complaints Director.

The Prior Hearing

15. Dr. Sacco's conduct was originally the subject of a prior discipline hearing that occurred in May of 2025 (the "Prior Hearing").
16. The Prior Hearing ended during the liability phase of the Prior Hearing due to one of the members of the Hearing Tribunal declaring an unanticipated conflict of interest partway through the liability phase of the Prior Hearing.
17. Dr. Sacco and the Complaints Director agree that this Hearing Tribunal has the jurisdiction to hear this matter and to consider and decide on the charges in the Amended Notice of Hearing dated November 24, 2025.

6. Submissions

Submissions by Counsel for the Acting Complaints Director

Mr. Maxston began his opening statement. He discussed the processes by which the hearing would proceed, and outlined the documents that were before the Hearing Tribunal. Following his outline, Mr. Schindelka confirmed that he was comfortable with that approach.

Addressing the Exhibits, Mr. Maxston then marked the Exhibits in the hearing, which are summarized below:

1. **Exhibit 1** – Amended Notice of Hearing, Notice to Attend as Witness and Notice to Produce
2. **Exhibit 2** – Admission of Unprofessional Conduct
3. **Exhibit 3** – Agreed Statement of Facts
4. **Exhibit 4** – Joint Submission Regarding Penalty

Following this, Mr. Maxston reviewed the Allegations that were before the Hearing Tribunal. Mr. Maxston confirmed that the onus was on the Acting Complaints Director to prove the facts on a balance of probabilities. If those facts are found, the Acting Complaints Director must also demonstrate how that conduct is unprofessional under the *Act*.

Mr. Maxston also made submissions about what this hearing is not about. This is not a hearing about sexual abuse or sexual misconduct on the part of Dr. Sacco, and therefore the legislation relating to those types of conduct is not applicable in this case. The charges do not refer to sexual abuse nor sexual misconduct, and those concepts do not arise in the Notice of Hearing, nor the Agreed Statement of Facts.

At this point, Mr. Maxston reviewed the facts included in Exhibit 3, the Agreed Statement of Facts, which is set out in its entirety above.

He emphasized that in June 2020, Dr. Sacco began a personal relationship with Patient A, who was at all times during their dating relationship a patient of hers for the purposes of the *Act*. This

conduct related to Allegation 1. In addition, Mr. Maxston noted that during the investigation concerning the Complaint, Dr. Sacco failed to cooperate with and act professionally with the College's Acting Complaints Director. Further Dr. Sacco failed to provide accurate and complete information to an investigator appointed pursuant to the *Act*. That conduct related to Allegation 2.

In the Agreed Statement of Facts, acknowledgement was made relating to a prior hearing that took place in May 2025 (the "Prior Hearing"). The Prior Hearing ended during the Liability phase, due to an unanticipated conflict of interest. Importantly, both parties agree that this Hearing Tribunal has the jurisdiction to hear this matter and to decide on the charges in the Amended Notice of Hearing (Exhibit 1).

Mr. Maxston then reviewed the Admission of Unprofessional Conduct, which was entered as Exhibit 2. It states the following:

FURTHER to the Amended Notice of Hearing, Notice to Attend and Notice to Produce dated November 24, 2025 (the "Notice of Hearing") which I acknowledge was properly served upon me, I, Dr. Claudia Sacco, being a regulated member of the the [sic] College of Chiropractors of Alberta (the "College"), state and acknowledge:

1. That at all times respecting the charges described in the Notice of Hearing, I was a regulated member of the College.
2. That I hereby admit and acknowledge that I am guilty of unprofessional conduct with respect to the charge described in the Notice of Hearing as follows:

1. On or about June of 2020, you began a dating relationship with your patient, Patient A, which continued until February 15, 2025.

All of which constitutes unprofessional conduct for the purposes of section 1(1)(pp)(i), (ii) and/or (xii) of the *Health Professions Act* ("*Act*") and/or breaching CCOA Standard of Practice 6.1 – Professional Boundaries with Patients, CCOA Standard of Practice 6.3 – Commencing a Dating Relationship with a Current Patient, and/or CCOA Code of Ethics Article A14: Doctor-Patient Boundaries.

2. On or about October of 2023 and during a Part 4 investigation under the Act concerning the allegation in charge 1 above:
 - a) You failed to cooperate with and act professionally with the College's Complaints Director and an investigator appointed pursuant to Part 4 of the Act; and
 - b) You failed to provide accurate and complete information to an investigator appointed pursuant to Part 4 of the Act and to the College's Complaints Director.

All of which constitutes unprofessional conduct for the purposes of section 1(1)(pp)(i) and/or (vii)(B) of the Act and/or breaching CCOA Code of Ethics Article C2: Cooperation with the CCOA.

3. I agree and acknowledge that this Admission constitutes an admission of unprofessional conduct for the purposes of section 70 of the *Health Professions Act*.
4. That I have no objection to this Admission being entered as an Exhibit at the December 4, 2025 hearing before a Hearing Tribunal of the College.
5. I have no objection to the composition or jurisdiction of the Hearing Tribunal hearing this matter.
6. That, if applicable, I waive the thirty (30) day notice of the said hearing required by section 77(a) of the *Health Professions Act*.
7. That I am aware of my right pursuant to Section 72(1) of the *Health Professions Act*, to be represented by legal counsel regarding this matter, that I have had the opportunity to seek independent legal advice on this matter and that I am voluntarily executing this Admission of Unprofessional Conduct.

To conclude, Mr. Maxston submitted that both elements have been proven and that unprofessional conduct had been demonstrated: the Acting Complaints Director has proven the Allegations by virtue of the Agreed Statement of Facts, and the conduct is a marked departure from the ethical conduct expected of a regulated chiropractor.

Submissions from Counsel for Dr. Sacco

Mr. Schindelka echoed the submissions made by Mr. Maxston on behalf of the Acting Complaints Director.

Mr. Schindelka focussed his submissions on the case law relating to the deference that must be afforded to joint submissions of both parties. The *R. v. Anthony-Cook* decision was included in the Book of Authorities provided to the Hearing Tribunal and that case makes it clear that joint submissions are owed deference. The *Bradley* decision, also provided, confirms that the principles set out in *Anthony-Cook* apply to regulatory proceedings such as this one. The case law indicates that a joint submission should not be rejected lightly.

If the Hearing Tribunal were not to accept the joint submissions, Mr. Schindelka noted that there would have to be an analysis of the *Anthony-Cook* decision and the matter would have to be brought back to the parties for additional argument. These principles relating to joint submissions are widely accepted in regulatory proceedings under the *Act*.

Mr. Schindelka submitted that the stakes could not be higher for Dr. Sacco. She has made admissions in this case, which saves everyone, including the Acting Complaints Director, the patient, and the Hearing Tribunal a full-blown hearing on the merits. The admissions made by Dr. Sacco are explicitly set out in the signed Admission of Unprofessional Conduct (Exhibit 2), and were reviewed by Mr. Maxston in his submissions.

In summary, Dr. Sacco has admitted to the specific conduct set out in the Amended Notice of Hearing. She has agreed that her admission is a written admission of unprofessional conduct

pursuant to section 70 of the *Act*, and within the meaning of section 1(1)(pp) of the *Act*, and that it contravenes the College’s Code of Ethics and its Standards of Practice.

Mr. Schindelka concluded by speaking about the “intertwined” nature of the Agreed Statement of Facts, the Admission of Unprofessional Conduct and the Joint Submission on Penalty. He stated that those documents are all interdependent – the factual admissions would not have been made had the penalty not been agreed upon by the parties. If one element of the proposal before the Hearing Tribunal is disturbed, Mr. Schindelka submitted that the entire agreement would unravel.

With that, he concluded his submissions on behalf of Dr. Sacco.

Reply Submissions by Counsel for the Acting Complaints Director

Mr. Maxston endorsed Mr. Schindelka’s comments about deference, but he noted that he planned to speak about the deference required in the penalty phase of the hearing. He supported and endorsed the remainder of Mr. Schindelka’s comments.

Mr. Maxston also echoed Mr. Schindelka’s submission that all elements of this hearing – the wording in the Allegations, the admissions, the Agreed Statement of Facts, the Joint Submission of Penalty – are interrelated or codependent. Both counsel urged the Hearing Tribunal to adopt them, as presented, and he concluded by reminding the Hearing Tribunal that every element of the hearing today has been carefully considered and negotiated between the parties.

7. Findings and Reasons

After hearing submissions from the parties, the Hearing Tribunal adjourned to deliberate on the liability portion of the hearing.

After the adjournment, the Hearing Tribunal advised the parties that it accepted Dr. Sacco’s Admission of Unprofessional Conduct based on the evidence set out in the Agreed Statement of Facts. The Hearing Tribunal also advised that it agreed that the conduct established by the Agreed Statement of Facts rises to the level of unprofessional conduct as defined in s.1(1)(pp) of the *Act* in relation to each of the allegations. The Hearing Tribunal confirmed that it would provide written reasons in respect of these findings, which are now included in these written reasons.

Allegation 1

Allegation 1 was found to have been proven on a balance of probabilities. It reads as follows:

On or about June of 2020, you began a dating relationship with your patient, Patient A, which continued until February 15, 2025

The Hearing Tribunal reviewed section 1(1)(pp), which contains the definition of “unprofessional conduct” under the *Act*:

Interpretation

1(1) In this Act, ...

(pp) “unprofessional conduct” means one or more of the following, whether or not it is disgraceful or dishonourable:

- (i) displaying a lack of knowledge of or lack of skill or judgment in the provision of professional services;
- (ii) contravention of this Act, a code of ethics or standards of practice;
- (vii) failure or refusal
- (B) to comply with a request of or co-operate with an investigator,
- (xii) conduct that harms the integrity of the regulated profession;

Alongside Dr. Sacco’s Admission that the conduct under Allegation 1 was unprofessional conduct (Exhibit 2), the Hearing Tribunal finds that the conduct was “unprofessional conduct” under the *Act* for the following reasons:

i. Lack of knowledge, skill or judgment

- a. This conduct demonstrated a lack of judgment on the part of Dr. Sacco. She was a chiropractor with lengthy experience, being a member of the profession for 7 years at the time of the conduct. Unlike a mistake, Dr. Sacco intentionally entered this relationship knowing that Patient A was her patient at all relevant times, and she knew better than to have done so based on her training and her understanding of her ethics obligations.

ii. A contravention of a Code of Ethics or Standards of Practice

- a. The Hearing Tribunal finds that in relation to this Allegation, Dr. Sacco has breached the following:

- i. *CCOA Standards of Practice 6.1: Professional Boundaries with Patients:*

Aside from her admission of unprofessional conduct, the Member is an experienced practitioner and should have been well-aware of the Standards of Practice. Based on the Agreed Statement of Facts, the Member knew or should have known that her relationship with Patient A was in contravention of those Standards.

- ii. *CCOA Standards of Practice 6.2: The Definition of a “Patient”:*

A dating and/or sexual relationship with a current patient is prohibited even if the regulated member believes that the patient is “consenting.” The HPA does not recognize such alleged “consent” as a valid defence because of the existence of the inherent power imbalance that exists in the regulated member-patient relationship.

iii. *CCOA Standards of Practice 6.3: Commencing a Dating Relationship with a Current Patient:*

In addition to the Member's admission, the Tribunal concludes that, given her professional experience, she should have been aware that the relationship was inappropriate. Regulated members are prohibited from initiating a dating and/or sexual relationship with a current patient.

iv. *CCOA Code of Ethics Article A14: Doctor-Patient Boundaries:*

The Member, as an experienced professional, is required to be familiar with and adhere to the Code of Ethics. In addition to her admission of unprofessional conduct, the Hearing Tribunal is of the opinion that the inherent imbalance of power between a doctor and a patient is a well-established concept and should have been recognized by the Member as rendering the conduct inappropriate.

iii. Conduct that harms the integrity of the profession

- a. The Hearing Tribunal acknowledges that there is an inherent power imbalance in chiropractor-patient relationships. A patient may not be aware of that inequality of power, or their vulnerability as a patient, and therefore it is the responsibility of the professional, in this case Dr. Sacco, to ensure appropriate boundaries with patients. The public would expect that the College and its members would not allow these types of relationships to occur, and that these relationships – regardless of the patient's perspective or how the relationship unfolds – are always seen as unprofessional.

Allegation 2

Allegation 2 was found to have been proven on a balance of probabilities. It reads as follows:

2. On or about October of 2023 and during a Part 4 investigation under the Act concerning the allegation in charge 1 above:
 - a) You failed to cooperate with and act professionally with the College's Complaints Director and an investigator appointed pursuant to Part 4 of the Act; and
 - b) You failed to provide accurate and complete information to an investigator appointed pursuant to Part 4 of the Act and to the College's Complaints Director.

Alongside Dr. Sacco's Admission that the conduct under Allegation 2 was unprofessional conduct (Exhibit 2), the Hearing Tribunal finds that the conduct was "unprofessional conduct" under the *Act* for the following reasons:

i. Lack of knowledge, skill or judgment

- a. Compliance with the regulatory process of one's College is a principal tenant of the self-regulation of professions and is emphasized to regulated members regularly as critical to ensuring the standards of the profession are met. Members of the profession are often reminded to review the Act, the Code of Ethics, and the Standards of Practice and to ensure that their conduct is in keeping with them, and that they are cooperative and forthright with the College at all times.
- b. In addition to the Member's admission, the Hearing Tribunal considers the Member to be a seasoned professional rather than an inexperienced novice. As such, she would have received regular reminders and prompts from her College to review the Standards of Practice and the Code of Ethics throughout the seven years of her practice.

ii. A contravention of a Code of Ethics or Standards of Practice

- a. The Hearing Tribunal finds that in relation to this Allegation, Dr. Sacco has breached the following:

- i. *CCOA Code of Ethics Article C2: Cooperation with the CCOA:*

The Tribunal, together with society at large, considers a College's self-regulation of its members to be a privilege - one that is earned and maintained through the honesty and integrity of those members. The Investigated Member's failure to respect this trust not only negatively impacts the profession as a whole but also undermines public confidence.

iii. Failure or refusal to comply with a request of or co-operate with an investigator

- a. As noted above, Dr. Sacco admitted that she failed to cooperate with and act professionally with an investigator, which is clearly under the definition of "unprofessional conduct" in the *Act* (sec. 1(1)(pp)(vii)(B)). In addition to her admission, the Hearing Tribunal, as noted above, considers self-regulation a privilege. The concept and existence of self-regulation must be guided by professionalism, discipline, and cooperation. Failure to uphold these principles implies an abdication of professional status.

For the reasons set out above, the Hearing Tribunal finds that Allegations 1 and 2 are proven on a balance of probabilities, and that the conduct is "unprofessional".

8. Joint Submission Regarding Penalty

Following the ruling with respect to the allegations, Mr. Maxston reviewed the Joint Submission Regarding Penalty which was submitted on behalf of the Acting Complaints Director and Dr. Sacco.

The Joint Submission proposed that the Hearing Tribunal impose the following orders:

1. Dr. Sacco's practice permit will be suspended for a period of one (1) year. The suspension must commence within thirty (30) days of the date of the Hearing Tribunal hearing and their presumed verbal acceptance of the admission of unprofessional conduct made by Dr. Sacco and the penalties in the Joint Submission. The actual date for the commencement of the suspension would be selected by the Complaints Director in her sole discretion but after consultation with Dr. Sacco to minimize patient continuity of care issues.
2. Within one (1) year of the date of the Hearing Tribunal hearing, Dr. Sacco will successfully complete the following course:
 - a. PROBE: Ethics & Boundaries Program – Canada – CPEP

Within the same one (1) year period Dr. Sacco will provide evidence satisfactory to the Complaints Director of Dr. Sacco's successful completion of this course. Dr. Sacco will be solely responsible for the costs of this course and the course will not count towards her College Continuing Competence credits.

3. After the completion of the one (1) year suspension and successful completion of the PROBE course in order #2, Dr. Sacco may apply for the reinstatement of her practice permit, including complying with all required steps and documents and paying all required fees.
4. After the completion of the one (1) year suspension and immediately after reinstatement of Dr. Sacco's practice permit, Dr. Sacco shall enrol in the PROBE Plus Monitoring Program. Within twelve (12) months after reinstatement of Dr. Sacco's practice permit, Dr. Sacco will provide evidence satisfactory to the Complaints Director of Dr. Sacco's successful completion of the PROBE Plus Monitoring Program. Dr. Sacco will be solely responsible for the cost of the PROBE Plus Monitoring Program and it will not count towards her Continuing Competence credits.

This is a 6-month ethics monitoring program involving regular and structured interaction with a PROBE faculty member.

5. After the completion of the one (1) year suspension and successful completion of the PROBE course in order #2, after the date of reinstatement of Dr. Sacco's practice permit there shall be in-person practice visits every six (6) months by a College-approved delegate for a period of two (2) years regarding Dr. Sacco's practice (including written reports to the Complaints Director) (4 practice visits in total). Dr. Sacco will be solely responsible for the cost of the costs of the practice visits.
6. Dr. Sacco will pay 100% of the costs of the investigation and the Prior Hearing (as the term "Prior Hearing" is defined in the Agreed Statement of Facts in these proceedings) and this current hearing as follows:
 - a) Costs of \$124,000.00 representing the costs of the investigation and the Prior Hearing up to October 21, 2025; and
 - b) All remaining costs incurred after October 21, 2025.
7. Dr. Sacco will pay a fine of \$10,000 for each of the two findings of unprofessional conduct for a total of \$20,000.00.

8. The said fines and costs are payable within the later of (i) 36 months from the date of the post-suspension recommencement of Dr. Sacco's chiropractic practice and, more specifically, the reinstatement of her suspended practice permit or (ii) 36 months from the date of the Hearing Tribunal's written decision.

During the hearing, Mr. Maxston advised that the parties' joint proposal lacked one element – paragraph 9, related to publication. Following the decision on the liability portion, Mr. Maxton sent the Hearing Tribunal the following proposed addition to the Joint Submission on Penalty as it is found in Exhibit 4:

9. Publication of the Hearing Tribunal's decision including Dr. Sacco's name in accordance with College Bylaws 9.1 for a period of ten (10) years from the date of the Hearing Tribunal hearing on the assumption that the Hearing Tribunal accepts the admissions and the joint submission regarding penalties verbally at the hearing.

On the record during the proceedings, Mr. Schindelka confirmed his client's agreement to adding the above paragraph 9 to the parties' agreed upon Joint Submissions on Penalty.

Submissions by Counsel for the Acting Complaints Director

Mr. Maxston began with his submissions on penalty and costs.

He began by reviewing the Hearing Tribunal's orders that can be made under the *Act*, which include:

1. A variety of practice-related penalties as included in section 82 of the *Act*;
2. Section 82(j) allows the Hearing Tribunal to issue “costs of and fees related to the investigation or hearing or both”, as set out in that section; and
3. Section 82(k) allows the Hearing Tribunal to direct that the investigated person pay to the College within the time set in the order, a fine not exceeding the amount set out in the column of the unprofessional conduct fines table that is specified for the College in a schedule to this Act for each finding of unprofessional conduct or the aggregate amount set out in that column for all of the findings arising out of the hearing. Mr. Maxston noted that for this College, the maximum fee is \$10,000.00 per finding of unprofessional conduct.

Following this, Mr. Maxston spoke about the jurisprudence surrounding the public interest test applicable to joint submissions. In the *Anthony-Cook* decision, the public interest test is phrased as follows:

[34] In my view, these powerful statements capture the essence of the public interest test developed by the Martin Committee. They emphasize that a joint submission should not be rejected lightly, a conclusion with which I agree. Rejection denotes a submission so unhinged from the circumstances of the offence and the offender that its acceptance would lead reasonable and informed persons, aware of all the relevant circumstances, including the importance of promoting certainty in resolution discussions, to believe that the proper functioning of the justice system had broken down. This is an undeniably high threshold — and for good reason, as I shall explain.

In terms of why the significant deference is afforded to these agreements, Mr. Maxton submitted that if every hearing proceeded by way of a contested hearing, both Courts and regulators would be overwhelmed. The costs and time savings cannot be understated. In addition, there is uncertainty in contested hearings, and these types of joint submissions also decrease the likelihood of appeals.

The parties have the ability to have input into the matter and should have reasonable confidence that the decision-maker will accept the joint submission. That provides certainty and encourages these types of agreements to be made.

Mr. Maxton emphasized that there was an extensive amount of time, care and negotiation that went into this matter – the content of the Allegations, the nature of the admissions, the wording of the Agreed Statement of Facts, and most importantly, the Joint Submissions on Penalty.

All of the elements are interconnected, interrelated and interdependent. If the Hearing Tribunal were to disturb one, all of them would be affected.

The Joint Submission on Penalty being proposed in this case is fair and reasonable and the Hearing Tribunal is urged to adopt it as it is. If the Hearing Tribunal wished to make any changes to the Joint Submission on Penalty, they would be required to put these changes to the two counsel and allow them to make submissions on it.

Following this, Mr. Maxton reviewed the Joint Submission on Penalty, as set out in Exhibit 4 and set out in full above, including the addition of paragraph 9. He noted that both parties strongly encouraged the Hearing Tribunal to accept the Joint Submission on Penalty. He also confirmed that in the making of these joint submissions, Dr. Sacco has had the benefit of legal advice from a skilled and experienced lawyer in Mr. Schindelka.

In the view of the parties, the joint submissions are fair, reasonable and proportionate consequences in light of all circumstances. Specifically,

1. The Joint Submission contains a suspension of one (1) year. This is a significant suspension and is serious to address the serious unprofessional conduct.
2. Dr. Sacco must complete a PROBE course at her own expense. This is a comprehensive course on ethics and boundaries and has been adopted by many regulators in Alberta.
3. Following the suspension and the PROBE course, Dr. Sacco can return to practice.
4. Following the reinstatement of her Practice Permit, Dr. Sacco will enroll in the PROBE Plus Monitoring Program at her cost. This is included to ensure that there is continued, intensive, remedial tool available to professionals and is used throughout health care professions.

5. After the completion of the one (1) year suspension and successful completion of the PROBE course, there will be an in-person practice visit every 6 months by a College-approved delegate, at the cost of Dr. Sacco.
6. There are also two fines of \$10,000.00 each. There is a 36 month timeline for the payment of costs and fines, and as the fines are significant, this is a fair timeline for payment.
7. Finally, there is paragraph added by the parties which is the publication – this is standard for the College.

There is a critical statement in relation to the finalization and efficient disposition of this matter within the Joint Submissions on Penalty: “The Complaints Director and Dr. Sacco agree that, provided this Joint Submission is accepted by the Hearing Tribunal as presented, neither party shall appeal the findings and penalty decisions of the Hearing Tribunal”.

Mr. Maxston then went through the agreed-upon “Reasons” included in the Joint Submission on Penalty:

1. Dr. Sacco’s conduct represented a serious and significant lapse of professional judgment and breach of the professional and ethical obligations of chiropractors in terms of patient boundaries.
2. Dr. Sacco’s actions in terms of the dating relationship with Patient A were deliberate and occurred over at least three years.
3. Dr. Sacco’s conduct has harmed the integrity of the profession of chiropractic.
4. Dr. Sacco’s conduct when the investigation began was unprofessional, however, she ultimately cooperated with the investigator and the College’s Complaints Director.
5. Dr. Sacco has admitted her unprofessional conduct which demonstrates acceptance of responsibility for her actions.
6. Dr. Sacco’s admission of unprofessional conduct and agreement to proceed with a consent hearing avoids the time, cost and uncertainty of a lengthy contested hearing and almost certain appeals to the College Council and to the Alberta Court of Appeal.
7. These are Dr. Sacco’s first findings of unprofessional conduct.

In terms of Allegation 1, Mr. Maxston made the following contextual comments in relation to the *Jaswal* factors (set out in full below) to demonstrate his view that the proposed joint submissions were appropriate:

- It was a choice, over a lengthy period of time, and she was aware it was problematic.
- Patient A was a patient of hers, and there is always a power imbalance – per the Code of Ethics. This is not a grey area, it is a marked departure from acceptable conduct. The fact that they were ultimately married does not change what occurred in terms of the dating relationship.

- At the time, Dr. Sacco was a 7 year practitioner, and she should have known this was problematic conduct. She's acknowledged that she knew that was wrong. These were unfortunate choices that were made.
- This conduct occurred over a fairly extensive period of time.
- Clearly these penalties are serious and would be a signal both to Dr. Sacco and the profession that this will not be tolerated. Penalties of this nature would also uphold the public's confidence in the profession.
- There are no similar cases available to the Acting Complaints Director.

In terms of Allegation 2,

- Mr. Maxston noted that practicing in a self-regulated profession is a privilege, not a right. There is an obligation to be candid and forthright in corresponding with one's investigator and College; and
- Dr. Sacco made deliberate choices to not be cooperative and not be truthful in her dealings with the College, but did ultimately cooperate with the investigator and the College.

Relating to costs, the joint submission is that Dr. Sacco pay the following:

Dr. Sacco will pay 100% of the costs of the investigation and the Prior Hearing (as the term "Prior Hearing" is defined in the Agreed Statement of Facts in these proceedings) and this current hearing as follows:

- a) Costs of \$124,000.00 representing the costs of the investigation and the Prior Hearing up to October 21, 2025; and
- b) All remaining costs incurred after October 21, 2025.

These are significant cost consequences on the part of Dr. Sacco, although she does have 36 months to make those cost payments, along with the payment of the fines.

Mr. Maxston went over the *Charkhandeh v College of Dental Surgeons of Alberta, 2025 ABCA 258* decision ("*Charkhandeh*"). That recent decision of the Alberta Court of Appeal stated that costs in proceedings such as these should be awarded based on the wording of the *Act* and the wording of that decision. Key principles from that case include that statute guides but does not dictate on costs, that full indemnity is not the starting point or default, and that costs are in the discretion of the Hearing Tribunal.

There is nothing prohibiting the Hearing Tribunal from making this large costs award and it is a critical element of the settlement which has been reached.

Therefore, this satisfies the *Charkhandeh* principles and it must be viewed in accordance with the principles found in *Anthony-Cook*, that overall settlement agreement should be provided deference. The public interest test is satisfied with respect to the overall costs order, and it should not be disturbed.

In closing, Mr. Maxston submitted that the consequences being proposed were significant and serious and intended to send a message to the profession and Dr. Sacco. Both parties urge the Hearing Tribunal to accept them. However, the sanctions are all intended to be a pathway for Dr. Sacco to return to her career and a lifetime of chiropractic practice. That is a priority of the Acting Complaints Director. There is no intention to interrupt Dr. Sacco's ability to continue as a chiropractor, following compliance with these penalties and costs.

Mr. Maxston concluded by thanking Mr. Schindelka and his client for working together on all the joint submissions put before the Hearing Tribunal.

Submissions by Counsel for Dr. Sacco

In his submissions, Mr. Schindelka fully supported the submissions of counsel for the Acting Complaints Director – including the submissions about the deference owed and the costs jurisprudence under the *Charkhandeh* case.

Dr. Sacco is reliant on her chiropractic income, and she will not have income during the suspension, so the 36 months is to allow her to pay the costs and fines over time.

The stakes could not be higher for her in this case. She has made admissions, which saves everyone that is present a lot of time and costs and energy in having this matter concluded. In cases where there are no joint submissions, the Hearing Tribunal has a great deal of discretion regarding an appropriate sanction. However, in cases like this, the Hearing Tribunal should show deference to the joint submissions.

He added the following factors for consideration pursuant to the *Jaswal* decision:

- Regarding the nature and gravity of this conduct, Dr. Sacco acknowledges that the Allegations that she had admitted are very serious, which is why she has agreed to the proposed penalties. She knows she will be suspended, she will be completing the course, being monitored, having practice visits and the fines and costs.
- Dr. Sacco is now 38 years old, and was 33 when the conduct commenced. She acknowledges that she is responsible for her actions, regardless of her age.
- Dr. Sacco has not been the subject of prior complaints or findings of unprofessional conduct.
- This conduct occurred between June 2020 and Feb 2025, when Dr Sacco and Patient A got married, and they are happily married at this time.

- In terms of her acknowledgement of what happened, regarding Allegation 2, Dr. Sacco had a prior counsel before she retained Mr. Schindelka. That conduct under Allegation 2 relates to conduct that occurred while she was represented by another lawyer. She has admitted the underlying facts and is not disputing them, and this should be a mitigating factor for the penalty in this matter.
- Relating to serious financial or other penalties, Dr. Sacco has already suffered significant sanctions to date. The very fact that allegations have been brought is damaging to her reputation. Her reputation is her most valuable asset. If the Hearing Tribunal awards these penalties, she cannot practice for one year. She takes immense pride in the profession and has built her own business from scratch. This is a profound punishment for her to experience. Her only source of income is her chiropractic practice. She will also have to pay a huge amount of costs and fines. These are serious financial and other penalties which will have a punitive effect. She is 38 years old, recently married, and is still building her practice. She is not about to retire, with a nest egg. She has suffered personal and professional humiliation, upset, and pain. This is not an honourable thing to experience during your career, and her reputation has been harmed. So there have been significant consequences to her actions, and this penalty will add to those repercussions.
- In relation to mitigating factors, Mr. Schindelka said that Dr. Sacco is not offering the fact that Patient A and her ultimately married as a mitigating factor, or the fact that Patient A, now her husband, is 42 years old. She admits that this is unprofessional conduct.
- Finally, Mr. Schindelka submitted that the need to promote specific and general deterrence and thereby protect the public is fully met by the Joint Submissions, and these will maintain confidence in profession.

In conclusion, Dr. Sacco respectfully requested that the Hearing Tribunal accept the Joint Submissions, noting that she would like to continue in this profession, and that she is very remorseful for this conduct.

Reply Submissions by Counsel for the Acting Complaints Director

Mr. Maxston did not have any reply submissions.

Questions of the Hearing Tribunal

Following an adjournment, the Hearing Tribunal asked the following questions, and received the following responses:

1. What would be the consequences if Dr. Sacco failed to complete or pay any of the proposed penalties?
 - a. In response, Mr. Maxston noted that the Acting Complaints Director had no concerns it that regard. Any outstanding fines or costs that are not paid would

adversely affect her practice permit, and there is the ability to cancel the practice permit at renewal time, although there is a three-year time period to address that.

- b. Mr. Schindelka understood the basis for the question, but these costs and fines will be paid within the time period. He reassured the Hearing Tribunal that his client will ensure that it gets completed. The College, if it wished to, could pursue Dr. Sacco for the costs and fines and there would be potentially very serious repercussions to her if they were not paid. Separate and apart from the decision, she has entered into an agreement that those costs will be paid, and that agreement could be relied upon for costs collection. There have been extensive discussions between Mr. Schindelka and his client about how she will ensure that these costs and fees be paid, so he reaffirmed that this should not be an issue.
 - c. The Chair clarified that the Hearing Tribunal was concerned also about the course and monitoring being completed. Mr. Schindelka replied to state that Dr. Sacco's intention is to focus on continuity of care and getting it those measures in place by early 2026, if the Hearing Tribunal accepts the Joint Submissions. Thereafter, her intention is to get involved in the PROBE course sooner rather than later, likely in January 2026. The intention is not to get anywhere close to the deadlines for those elements to be completed.
 - d. The Hearing Tribunal accepted Mr. Schindelka's submissions reassuring it that his client would abide by the conditions of the Order, if granted. It also accepted Mr. Maxston's submissions that Dr. Sacco and the College have made arrangements to the satisfaction of the College that these elements will be fulfilled.
2. During the period of suspension, is Dr. Sacco able to participate in the day to day running of the clinic?
- a. Mr. Maxston said that typically what occurs, there is a suspension of the practice permit meaning one cannot practice chiropractic care, so there is the ability to assist in limited, reasonable management and administration, but no ability to practice chiropractic care.
 - b. Mr. Schindelka noted that the College and Dr. Sacco have not communicated about that, but what Mr. Maxston has outlined is entirely agreeable to Dr. Sacco. Hypothetically, if the suspension begins in early 2026, for that one-year period, Dr. Sacco would do nothing other than having limited involvement in the management and administration of the business but not the practice of chiropractic.
 - c. Mr. Maxston said that that could be included in the decision, but the Hearing Tribunal chose to maintain the original agreement of the parties, however it notes that Dr. Sacco's counsel and the Acting Complaints Director's counsel appear to have a mutual understanding of what her role in her clinic can be during the term of her suspension.

9. Decision on Penalty

The Hearing Tribunal first considered the range of orders that it can make under section 82 of the *Act*. It found that the orders being requested by the parties in the Joint Submission on Penalty were within its powers under the legislation.

Notwithstanding the broad range of powers expressed in the *Act*, the Hearing Tribunal is aware that what has come before it is a Joint Submission on Penalty, negotiated by and agreed to both parties. Both parties made it very clear during the hearing that the Joint Submission on Penalty is linked to, and cannot be divorced from, the Agreed Statement of Facts and the Admission of Unprofessional Conduct. It seemed to be important to both parties that all these elements be considered in their totality, and to ensure the Hearing Tribunal was aware that the parties had come to these sanctions and costs after lengthy and fulsome negotiations.

The Hearing Tribunal acknowledges that it must give significant deference to a joint submission on penalty, in accordance with the principles set out in *R v Anthony-Cook*, 2016 SCC 43. A joint submission should only be rejected if it is so unhinged from the circumstances of the case that it would bring the administration of justice into disrepute or otherwise be contrary to the public interest.

Although the Hearing Tribunal is surprised at the severity of this sanction, it does not find that it is so unhinged from the circumstances of the case that it would bring the administration of justice into disrepute, or otherwise be contrary to the public interest. Accordingly, it meets the *Anthony-Cook* public interest test and should receive significant deference.

Notwithstanding the deference owed to joint submissions, the Hearing Tribunal still wishes to ensure that the order that it makes is in line with the non-exhaustive list of sentencing principles found in the leading decision of *Jaswal v. Medical Bd.* (1996), 138 Nfld. & P.E.I.R. 181 (NFTD); 431 A.P.R. 181 (“*Jaswal*”), which include:

- i. **The nature and gravity of the proven allegations, or the degree to which the conduct was clearly regarded, by consensus, as being the type of conduct that would fall outside the range of permitted conduct** – As acknowledged by Dr. Sacco and the Acting Complaints Director in the Joint Submission on Penalty, this conduct represented a “serious and significant lapse of professional judgment”. The Hearing Tribunal finds that boundary violations and relationships within a power imbalance are serious elements of misconduct. While the conduct was grave, it was not alleged to have verged into sexual misconduct or sexual abuse, and therefore it is not the most extreme form of unprofessional conduct that a chiropractor can engage in.
- ii. **The age and experience of the chiropractor** – At the time of the conduct, Dr. Sacco was 32 years old and been a member of the profession for 7 years. She was not a new or inexperienced member of the profession, and these boundary obligations are so fundamental within the profession that a chiropractor of any vintage would have been cognizant of and expected to follow those obligations.

- iii. **The previous character of the chiropractor, and in particular the presence or absence of any prior complaints or convictions** – According to the parties, these are Dr. Sacco’s first findings of unprofessional conduct (Exhibit 4). No evidence was provided that she had any prior complaints before this complaint arose.
- iv. **The age and mental condition of the patient** – The Hearing Tribunal knows very little about Patient A, other than that Dr. Sacco’s counsel noted that he is 42 years old (older than Dr. Sacco) and is now her husband. Regardless of his age, all patients are vulnerable to members of the profession due to the imbalance of power inherent in the patient-chiropractic relationship.
- v. **The number of times the offence was proven to have occurred** – Between June 2020 to February 2025, Dr. Sacco and Patient A had a personal and dating relationship. Accordingly, this was not an instance of a one-time lapse in judgment, but rather a longstanding and serious relationship that Dr. Sacco should never have commenced with her patient.
- vi. **The role of the chiropractor in acknowledging what had occurred** – In this case, Dr. Sacco ultimately, in consultation with her current lawyer, accepted responsibility and demonstrated insight into her actions. The Hearing Tribunal does accept this as a mitigating factor, as the agreements made did avoid the time, cost and uncertainty of a lengthy contested hearing and the possibility of appeals. During the hearing, counsel for Dr. Sacco expressed her sincere remorse over these events and the Hearing Tribunal accepted her remorse as genuine.
- vii. **Whether the offending chiropractor had already suffered other serious financial or other penalties as a result of the allegations having been made** – Counsel for Dr. Sacco expressed that she has already experienced consequences such as reputational harm and embarrassment in relation to the Allegations. She has experienced personal, public upset, and pain. These are expressed above, in our summary of her counsel’s submissions on this point. It is clear that Dr. Sacco has suffered already as a result of this conduct.
- viii. **The impact of the incident on the offended patient** – The Hearing Tribunal had no information about the impact of this conduct on Patient A.
- ix. **The presence or absence of any mitigating circumstances** – Counsel for Dr. Sacco expressed that there were no mitigating factors at play in this case.
- x. **Specific and general deterrence, and the need to maintain public confidence in the regulation of chiropractic practice** – The Hearing Tribunal is aware that crafting appropriate penalties is a way to ensure that the public continues to uphold its confidence in the regulation of chiropractic practice. The penalty that has been offered by the parties is very serious in nature, and contains a lengthy suspension, an ethics course and monitoring, practice visits, and two maximum fines. There is also a very significant costs award. These sanctions and costs demonstrate that both the College

and the Hearing Tribunal take this conduct extremely seriously, and that similar conduct in the future will be followed by similarly harsh consequences.

- xi. **The range of sanctions in comparable cases** – Counsel for Dr. Sacco and the Acting Complaints Director could not locate or provide any similar cases, and therefore none were provided or considered by the Hearing Tribunal.

Following a consideration of the factors expressed in the *Jaswal* decision, and acknowledging the deference required by *Anthony-Cook* when a joint submission does not offend the public interest test, the Hearing Tribunal decided to accept the joint submission as it relates to the penalties against Dr. Sacco. That decision was relayed to the parties at the conclusion of the hearing, and the written reasons for that decision are set out in this decision.

10. Decision on Costs

The Hearing Tribunal took some additional time to consider the costs award being requested by both parties, which was:

Dr. Sacco will pay 100% of the costs of the investigation and the Prior Hearing (as the term “Prior Hearing” is defined in the Agreed Statement of Facts in these proceedings) and this current hearing as follows:

- a) Costs of \$124,000.00 representing the costs of the investigation and the Prior Hearing up to October 21, 2025; and
- b) All remaining costs incurred after October 21, 2025.

This is a significant costs award for both this hearing and the Prior Hearing, which appears to have been adjourned by no fault of Dr. Sacco. Given the extreme nature of this costs award, which will have a significant financial impact on Dr. Sacco, the Hearing Tribunal considered it closely against the evolving law in the area of costs in regulatory proceedings.

As noted by both parties, the current leading case on costs in regulatory proceedings is the *Charkhandeh* decision of the Alberta Court of Appeal, released this year. In that decision, the Alberta Court of Appeal established a revised framework for costs awards in professional disciplinary proceedings. The Court held that tribunals must not proceed on any presumption that costs should be awarded to either party, but rather must carefully consider in each case whether costs are warranted and, if so, in what amount. The Court articulated several key principles: first, that costs should ordinarily be limited to expenses discretely associated with the hearing itself, as opposed to overhead expenses which are an inherent component of self-regulation and properly fall on the regulator; second, that costs must be reasonable, requiring an assessment of the choices made by the regulator in conducting the proceedings; and third, that the litigation conduct of both parties is a relevant factor, including whether either party engaged in unreasonable or inefficient conduct that increased costs.

In this case, the Hearing Tribunal was not provided with any evidence by either party as to the principles expressed in *Charkhandeh* – there was no information about where the costs arose or

what they related to, no information on the choices made by the College in conducting these proceedings. There was no evidence that either party engaged in unreasonable or inefficient conduct, other than for the facts outlined in Allegation 2 relating to Dr. Sacco's conduct during the investigation.

This lack of information along with the considerable costs award did cause the Hearing Tribunal some concern. However, it agrees to order the costs order as requested by the parties for the following reasons:

- The costs award was proposed and supported by both parties, and most notably by Dr. Sacco's own lawyer;
- Dr. Sacco was represented in these proceedings by Mr. Schindelka, a senior and experienced lawyer who works regularly in this area of law;
- Both counsel were aware of the *Charkhandeh* decision and included it in their materials, and therefore the Hearing Tribunal believes that the principles therein factored into their negotiations in this matter;
- Counsel for Dr. Sacco expressed to the Hearing Tribunal during the hearing that Dr. Sacco is well aware of the financial impact of the proposed costs order on her, and that they have had discussions about the arrangements she will make to ensure it is paid over the 36 month timeframe being proposed;
- There was no evidence from either party that the costs award would represent a "crushing financial blow" to Dr. Sacco; and
- In accordance with the principles expressed above from the *Anthony-Cook* decision, a joint submission such as this deserves a high degree of deference. Both counsel made submissions that suggested that the entire package – costs and all – must be considered in its totality, and the Hearing Tribunal wished to ensure that the deference required by law was applied even to a costs award such as this.

Accordingly, the Hearing Tribunal accepts the parties' joint submission on the costs to be awarded in this case. Although this seems to be a uniquely high costs award given the climate on regulatory costs in Alberta, the Hearing Tribunal accepts both parties' submissions that the costs award was part of the larger negotiations between the parties to bring this matter to a conclusion, and therefore the Hearing Tribunal will make the order as requested.

11. Conclusion

The Hearing Tribunal orders the following pursuant to section 82 of the *Act*:

1. Dr. Sacco's practice permit will be suspended for a period of one (1) year. The suspension must commence within thirty (30) days of the date of the Hearing Tribunal hearing and their presumed verbal acceptance of the admission of unprofessional conduct made by Dr. Sacco and the penalties in the Joint Submission. The actual date for the commencement of the

suspension would be selected by the Acting Complaints Director in her sole discretion but after consultation with Dr. Sacco to minimize patient continuity of care issues.

2. Within one (1) year of the date of the Hearing Tribunal hearing, Dr. Sacco will successfully complete the following course:

- a. PROBE: Ethics & Boundaries Program – Canada – CPEP

Within the same one (1) year period Dr. Sacco will provide evidence satisfactory to the Complaints Director of Dr. Sacco's successful completion of this course. Dr. Sacco will be solely responsible for the costs of this course and the course will not count towards her College Continuing Competence credits.

3. After the completion of the one (1) year suspension and successful completion of the PROBE course in order #2, Dr. Sacco may apply for the reinstatement of her practice permit, including complying with all required steps and documents and paying all required fees.
4. After the completion of the one (1) year suspension and immediately after reinstatement of Dr. Sacco's practice permit, Dr. Sacco shall enrol in the PROBE Plus Monitoring Program. Within twelve (12) months after reinstatement of Dr. Sacco's practice permit, Dr. Sacco will provide evidence satisfactory to the Complaints Director of Dr. Sacco's successful completion of the PROBE Plus Monitoring Program. Dr. Sacco will be solely responsible for the cost of the PROBE Plus Monitoring Program and it will not count towards her Continuing Competence credits.

This is a 6-month ethics monitoring program involving regular and structured interaction with a PROBE faculty member.

5. After the completion of the one (1) year suspension and successful completion of the PROBE course in order #2, after the date of reinstatement of Dr. Sacco's practice permit there shall be in-person practice visits every six (6) months by a College-approved delegate for a period of two (2) years regarding Dr. Sacco's practice (including written reports to the Complaints Director) (4 practice visits in total). Dr. Sacco will be solely responsible for the cost of the costs of the practice visits.
6. Dr. Sacco will pay 100% of the costs of the investigation and the Prior Hearing (as the term "Prior Hearing" is defined in the Agreed Statement of Facts in these proceedings) and this current hearing as follows:
 - c) Costs of \$124,000.00 representing the costs of the investigation and the Prior Hearing up to October 21, 2025; and
 - d) All remaining costs incurred after October 21, 2025.

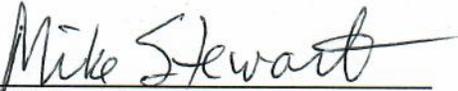
7. Dr. Sacco will pay a fine of \$10,000 for each of the two findings of unprofessional conduct for a total of \$20,000.00.

8. The said fines and costs are payable within the later of (i) 36 months from the date of the post-suspension recommencement of Dr. Sacco's chiropractic practice and, more specifically, the reinstatement of her suspended practice permit or (ii) 36 months from the date of the Hearing Tribunal's written decision.

9. Publication of the Hearing Tribunal's decision including Dr. Sacco's name in accordance with College Bylaws 9.1 for a period of ten (10) years from the date of the Hearing Tribunal hearing on the assumption that the Hearing Tribunal accepts the admissions and the joint submission regarding penalties verbally at the hearing.

DATED THIS 15th DAY OF JANUARY 2026, IN THE CITY OF CALGARY, ALBERTA.

COLLEGE OF CHIROPRACTORS OF ALBERTA

A handwritten signature in cursive script that reads "Mike Stewart". The signature is written in black ink and is positioned above a horizontal line.

Dr. Michael Stewart
Chair, Hearing Tribunal
CCOA