

**BETWEEN:**

**COLLEGE OF NURSES OF ONTARIO**

- and -

**SARAH A. CHOUJOUNIAN-ABULU  
REGISTRATION NO. JD83453**

**NOTICE OF HEARING**

**IT IS ALLEGED THAT:**

1. You have committed an act of professional misconduct as provided by subsection 51(1)(c) of the *Health Professions Procedural Code of the Nursing Act, 1991*, S.O. 1991, c. 32, as amended, and defined in subsection 1(1) of *Ontario Regulation 799/93*, in that while registered as a Registered Practical Nurse, you contravened a standard of practice of the profession or failed to meet the standards of practice of the profession in that you publicly made or shared statements, as set out in Appendix "A", or caused others to make such statements on your behalf, which contained information which you knew or ought to have known was inaccurate, false and/or misleading in relation to the COVID-19 pandemic and/or the public health response to the COVID-19 pandemic, and/or which encouraged non-compliance of public health orders in relation to the COVID-19 pandemic.
2. You have committed an act of professional misconduct as provided by subsection 51(1)(c) of the *Health Professions Procedural Code of the Nursing Act, 1991*, S.O. 1991, c. 32, as amended, and defined in subsection 1(37) of *Ontario Regulation 799/93*, in that while registered as a Registered Practical Nurse, you engaged in conduct relevant to the practice of nursing that would reasonably be regarded by members of the profession as disgraceful, dishonourable or unprofessional in that you publicly made or shared statements, as set out in Appendix "A", or caused others to make such statements on your behalf, which contained information which you knew or ought to have known was inaccurate, false and/or misleading in relation to the COVID-19 pandemic and/or the public health response to the COVID-19 pandemic, and/or which encouraged non-compliance of public health orders in relation to the COVID-19 pandemic.

### Appendix "A"

	Date	Platform	Conduct
1.	October 31, 2020	Public speech, YouTube	You stated "wearing a mask is unsafe for anyone, but it has even more detrimental effects on a growing child's brain development due to a decrease in oxygen intake, not only that, but facial recognition is super important for their social development, and lets not forget, that kids wearing masks makes them much harder for us to identify them, making it easier for predators to prey on them."
2.	October 26, 2020	Twitter	You posted a statement: "Very easily understand [thinking emoji] how harmless covid is compared to things like cardiovascular disease [heart emoji]"
3.	November 3, 2020	Instagram	You posted a quotation stating: "The RT-PCR test being used for COVID involves a cycling function. The more you cycle the test material in the lab, the more people test positive for COVID. If you cycle the test material 60 times, no one test positive. If you cycle it 30 times, some test positive and some don't. This means all our corrupt governments have full control of how many people test positive, depending on how many times they insist the test materials be cycled. They've picked this test purposely so they can up-regulate or down-regulate the pandemic at will..."
4.	November 3, 2020	Instagram	You posted a statement: "DID YOU KNOW? Those Blue Masks Mandated at grocery stores & airplanes are made of PTFE, a carcinogen made from synthetic fluoride. According to Cancer.Org it increases the risk of liver, testicle, pancreas, kidney and breast tumors + ulcerative colitis, thyroid disease, preeclampsia and high cholesterol. High exposure can cause influenza-like symptoms and haemorrhaging in the lungs, leading to suffocation. But no big deal...wear them everyday because it's the virtuous thing to do"
5.	November 9, 2020	Instagram	You posted a picture with the text "New COVID-19 Directives for PEEL REGION" setting out Peel Region's COVID-19 public health directives, with the following comment: "Here we go again!!! ... are we just going to sit here and let this happen? DO NOT COMPLY, these mandates and fines do not stand in court. We need to toughen up and disobey."

	Date	Platform	Conduct
6.	November 23, 2020	Facebook	You posted a link to a video in relation to the COVID-19 pandemic titled, "Maker of COVID Tests Says Pandemic is Biggest Hoax Ever Perpetrated" with the following comment: "For those of you who haven't heard the recording yet...here's Dr. Hodkinson, maker of the covid test, stating that the whole pandemic is a hoax"
7.	December 6, 2020	Facebook	You posted a link to a video in relation to the COVID-19 pandemic and/or vaccine and made the following comment: "I keep getting asked about this video so here it is again...ingredients include MRC-5 which is aborted fetal tissue(vomit emoji)...please always make sure to do your own research my friends(peace emoji)"
8.	December 7, 2020	Facebook	You posted a link to a video in relation to the COVID-19 pandemic with the title "THE QUESTION ON EVERYONES MIND..."
9.	December 8, 2020	Facebook	You posted a link to a video in relation to the COVID-19 pandemic titled, "Cancel laced va\$\$ines" and made the following comment: "Watch Rachel Cellar RN go into details about what MRC-5 really is....they've been injecting us with this stuff for a very long time (vomit emoji)"
10.	December 28, 2020	Instagram, Facebook	You posted a statement: "Reminder: As nurses we took an oath to do no harm ... promoting & advertising taking an experimental unsafe vaccine is a crime against humanity & in direct conflict with that oath."
11.	January 17, 2021	Facebook	You posted a link to a video with an interview in relation to the COVID-19 pandemic with an individual who identified themselves as "Dr. Lee Merritt"
12.	February 10, 2021	Instagram, Facebook	You posted a link to a video titled "25 questions to ask people who still believe that we are in a pandemic (smile emoji)"

The allegations respecting professional misconduct on your part will be heard by a panel of the Discipline Committee of the College of Nurses of Ontario ("CNO"), pursuant to the *Nursing Act, 1991*, S.O. 1991, c.32, as amended, and subsection 38(1) of the *Health Professions Procedural Code*, on **March 10, 15, 16, 17, 20 & 23, 2023 and April 10 & 14, 2023 at 0930 hours**, via electronic hearing by way of teleconference or videoconference.

The details for participating in the electronic hearing will be provided to you by a Hearings Administrator. If you have not heard from a Hearings Administrator at least 48 hours in advance of the hearing, you should contact the Hearings Administration Team at: Admin-

Business.Support-Hearings@cnomail.org to obtain the details for participating in the electronic hearing.

If you believe that holding an electronic hearing rather than an oral hearing is likely to cause you significant prejudice, please communicate in writing the basis for asserting such prejudice to the Hearings Administration Team at the email address listed above. To ensure the claim of prejudice can be considered by the Discipline Committee, any such concerns should be communicated to the Hearings Administration Team as soon as possible, and no later than 21 days in advance of the hearing.

**Take notice that at least 48 hours before the electronic hearing is scheduled to commence, you must provide notice to the Hearings Administration Team, at the email address listed above, of the telephone number and email address where you can be reached for the electronic hearing.**

If you fail to participate in the electronic hearing in person or by representative, the panel of the Discipline Committee may proceed in your absence and you are thereafter not entitled to any further notice of the proceedings.

Where the panel of the Discipline Committee finds a member has committed an act of professional misconduct, it may make an Order doing any one or more of the following:

1. directing the Registrar to revoke the member's certificate of registration;
2. directing the Registrar to suspend the member's certificate of registration for a specified period of time;
3. directing the Registrar to impose specified terms, conditions and limitations on the member's certificate of registration for a specified or indefinite period of time;
4. requiring the member to appear before the panel to be reprimanded;
5. requiring the member to pay a fine of not more than \$35,000.00 to the Minister of Finance;
6. requiring the member to reimburse CNO for funding provided for a program of therapy and counselling for a person if the act of professional misconduct was the sexual abuse of that person; and
7. requiring the member to post security acceptable to CNO to guarantee the payment of any amounts the member may be required to reimburse CNO for a

program of therapy and counselling for a person who was sexually abused by the member.

Furthermore, the panel may suspend the effect of its Order for a specified period of time and on specified conditions and where it makes an Order under paragraph 2 or 3 above, it may specify criteria to be satisfied for the removal of a suspension or the removal of terms, conditions and limitations imposed by the Order on the member's certificate of registration.

Where a panel of the Discipline Committee finds a member has committed an act of professional misconduct, it may make an Order requiring the member to pay all or part of the following costs and expenses:

1. CNO's legal costs and expenses;
2. CNO's costs and expenses incurred in investigating the matter; and
3. CNO's costs and expenses incurred in conducting the hearing.

**CNO intends to introduce as business records, under section 35 of the *Evidence Act*, any writings or records that were made in the usual and ordinary course of business. Without limiting the generality of the foregoing, and where applicable, CNO intends to introduce as business records medical and hospital charts.**