

IN THE MATTER OF *THE PARAMEDICS ACT* AND BYLAWS

- and -

**IN THE MATTER OF COMPLAINTS AGAINST SIMON KARDOS OF
WARMAN, SASKATCHEWAN**

TO: Simon Kardos
c/o Logan Marchand
Ward Mischuk Thomson LLP
#403 – 402 21st Street East
Saskatoon, SK S7K 0C3

NOTICE OF HEARING

TAKE NOTICE THAT the Professional Conduct Committee of the Saskatchewan College of Paramedics has issued a report to the Discipline Committee of the College recommending that the Discipline Committee conduct a hearing into the complaints against you as follows:

That Simon Kardos, a member of the Saskatchewan College of Paramedics, is guilty of:

(a) professional misconduct, contrary to section 25 of *The Paramedics Act*, by engaging in conduct that is harmful to the best interests of the public or its members, tends to harm the standing of the profession, or is a breach of that *Act* or the bylaws made pursuant to the *Act*;

as a consequence of:

Simon Kardos is alleged to be guilty of professional misconduct contrary to section 25 of *The Paramedics Act*, in that, on or about March 2, 2022, he acted in contravention of the Code of Professional Conduct contained in Appendix A to the Regulatory Bylaws of the Saskatchewan College of Paramedics, compliance with which is required by section 10 of those Bylaws, and, in particular, in contravention of items 2, 3, 5, 6, and 9 under the heading “Responsibilities to the Profession” and/or in contravention of the provisions of The Saskatchewan Employment Act relating to harassment and sexual harassment, in that he acted in the following manner while alone with a female colleague, AB:

a) while in a wash bay at a car wash where they were washing an ambulance, he swung a key card with the intention to hit AB with the key card and actually hit her on the buttocks;

b) while at the WPD Ambulance Service workplace, he asked AB if her buttocks still hurt and then touched her buttocks; and/or

- c) while in the back of the ambulance at the WPD Ambulance Service workplace:
- A) he leaned forward into AB while she was in a seated position in a corner seat, so that his abdomen was pressing into her head and chest;
 - B) he placed both hands around AB's neck in a choking motion while she was seated in a corner; and/or
 - C) he placed his hands on AB's shoulders with her back against the side of the ambulance; and/or
- d) while AB was against the side of the ambulance at the WPD Ambulance Service workplace:
- A) he grabbed both of her wrists and held her arms above her head; and/or
 - B) he leaned into AB and placed his left cheek against her left cheek and his right hand on her left breast.

TAKE FURTHER NOTICE THAT the Discipline Committee of the Saskatchewan College of Paramedics has established the following time, date and place to conduct a hearing into the aforesaid complaints, namely:

DATE: November 24, 2023
TIME: 9:00 a.m.
PLACE: over video conference
<https://us02web.zoom.us/j/85332534680?pwd=RU1QdGZqQ01JRVRaC9GMDIPSW5UQT09>

TAKE FURTHER NOTICE THAT under the provisions of *The Paramedics Act* you are entitled to be personally present and to be represented by legal counsel or agent.

AND, TAKE FURTHER NOTICE THAT if you do not attend at the hearing, then the Discipline Committee may proceed in your absence.

You are entitled to disclosure of the evidence against you. You or your legal counsel or agent or agent representatives may contact the solicitor appointed for the Professional Conduct Committee of the Saskatchewan College of Paramedics in this matter, namely:

Jaime Carlson
Rasmussen & Compnay
Barristers & Solicitors
3301 College Avenue
Regina, Saskatchewan S4T 1W3
(306) 525-8911
jaime@rasmussenco.ca

DATED at Regina, Saskatchewan, this 9th day of November, 2023.

SASKATCHEWAN COLLEGE OF PARAMEDICS

PER: _____
Jacquie Messer-Lepage
Executive Director