

COLLEGE OF PHYSICIANS & SURGEONS OF ALBERTA

IN THE MATTER OF
A HEARING UNDER THE *HEALTH PROFESSIONS ACT*,
RSA 2000, c. H-7

AND IN THE MATTER OF A HEARING REGARDING
THE CONDUCT OF DR. MICHEL RONALD PREVOST

**DECISION OF THE HEARING TRIBUNAL OF
THE COLLEGE OF PHYSICIANS
& SURGEONS OF ALBERTA
February 4, 2026**

I. INTRODUCTION

1. The Hearing Tribunal held a hearing into the conduct of Dr. Michel Ronald Prevost on November 18, 2025. The members of the Hearing Tribunal were:

Dr. John Pasternak as Chair;
Dr. Sandi Culo;
Mr. Emeka Ezike-Dennis (public member);
Ms. Georgeann Wilkin (public member).

2. Appearances:

Mr. Craig Boyer, legal counsel for the Complaints Director;
Dr. Michel Prevost;
Mr. Tim Ryan, legal counsel for Dr. Prevost;
Ms. Kimberly Precht acted as independent legal counsel for the Hearing Tribunal.

II. PRELIMINARY MATTERS

3. Neither party objected to the composition of the Hearing Tribunal or its jurisdiction to proceed with the hearing. There were no matters of a preliminary nature.

III. CHARGES

4. The Notice of Hearing listed the following allegations:
 1. Between January 1, 2021 to January 2024, you did provide Botox injections on approximately 114 occasions to patients for the treatment of migraine headaches care in contravention of the conditions on your practice permit restricting you to only esthetic medicine and hair transplantation.
 2. You did fail to disclose on your annual renewal information forms for your 2020 to 2024 practice permits that you were practicing beyond your practice permit conditions restricting your practice to esthetic medicine and hair transplantation.
5. At the outset of the hearing, counsel for the Complaints Director advised that, with respect to the allegation in Charge 1, Dr. Prevost admitted that between September 2021 and January 2024, he administered Botox injections to 42 patients contrary to the restrictions set by practice conditions on his practice permit and to that extent Dr. Prevost was admitting that Charge 1 in the Notice of Hearing was true and amounted to unprofessional conduct. The admission was made under s. 70 of the *Health Professions Act* (HPA).
6. Counsel for the Complaints Director further advised that the Complaints Director was withdrawing the allegation in Charge 2.

7. This was confirmed by Dr. Prevost's counsel and was reflected in the Admission and Joint Submission Agreement entered as Exhibit 2.

IV. EVIDENCE

8. By agreement, the following Exhibits were entered into evidence during the hearing:

Exhibit 1 – Agreed Exhibit Book

Tab 1 – Notice of Hearing dated June 27, 2025

Tab 2 – Complaint from ■ dated February 14, 2025

Tab 3 – Response letter from Dr. Michel Prevost dated April 5, 2024 with patient record for ■

Tab 4 – Alberta Health Care billings by Dr. Prevost using HSC 12.590 from January 2020 to January 2024

Tab 5 – Dr. Prevost's CPSA practice permits for 2020 to 2024

Tab 6 – CPSA Hearing Tribunal decision dated April 19, 2021

Tab 7 – Notice of Hearing dated August 16, 2021

Tab 8 – Signed Admission and Joint Submission Agreement dated November 2021

Tab 9 – Letter from PAI Medical Clinic dated November 14, 2025

Tab 10 – Letter from Oasis Skin Institute, undated

Exhibit 2 – Admission and Joint Submission Agreement

V. SUBMISSIONS

9. Counsel for the Complaints Director summarized key evidence in the Agreed Exhibit Book. The Complaints Director received a complaint from ■ dated February 14, 2024 (Exhibit 1, Tab 2), regarding Botox injections for migraine headaches she had received from Dr. Prevost for the past three years, which practice conditions on Dr. Prevost's practice permit did not allow him to provide. ■ complained after learning of the practice restrictions.
10. Counsel for the Complaints Director explained the background of the conditions on Dr. Prevost's practice permit. Dr. Prevost previously practiced in Ontario as an obstetrician and gynecologist. Following a 2015 decision from a discipline tribunal of the College of Physicians & Surgeons of Ontario (CPSO), Dr. Prevost resigned voluntarily and undertook not to apply for reinstatement in Ontario. When Dr. Prevost became registered in Alberta, he was registered subject to practice restrictions that he was restricted to practicing esthetic medicine and hair transplantation, and that a chaperone must be in attendance when he examines or interviews patients (Exhibit 1, Tab 5).

11. In a decision issued on April 19, 2022 (Exhibit 1, Tab 6), a CPSA Hearing Tribunal found Dr. Prevost had engaged in unprofessional conduct with respect to several allegations which were admitted by Dr. Prevost (Exhibit 1, Tab 8), including that between August 1, 2018 and August 31, 2019, he provided Botox injections on approximately 79 occasions to patients for the treatment of migraine headaches care in contravention of the conditions on his practice permit. Counsel for the Complaints Director noted that the Notice of Hearing setting out those allegations was issued in August 2021 (Exhibit 1, Tab 7).
12. In response to questions from the Hearing Tribunal, counsel for the Complaints Director clarified that the timing of the Notice of Hearing in the previous CPSA hearing was why the Complaints Director had accepted Dr. Prevost's admission with respect to the period from September 2021 until January 2024, instead of the earlier period starting January 1, 2021. Once the Notice of Hearing in the previous matter was issued in August 2021, it should have been completely clear to Dr. Prevost that the Complaints Director viewed providing Botox injections for migraine headache care as a contravention of Dr. Prevost's practice conditions, and as unprofessional conduct.
13. The evidence showed that Dr. Prevost had submitted 42 billings for Botox injections for migraine headache care between September 2021 and January 2024 (Exhibit 1, Tab 4).
14. Counsel for the Complaints Director submitted that the information provided in the Agreed Exhibit Book was more than adequate for the Hearing Tribunal to find the admitted conduct occurred and amounted to unprofessional conduct under the HPA.
15. Dr. Prevost's counsel confirmed his client's agreement and did not make additional submissions.

VI. FINDINGS

16. The Hearing Tribunal accepted Dr. Prevost's admission, made in accordance with s. 70 of the HPA, that between September 2021 and January 2024 he administered Botox injections to 42 patients contrary to the conditions on his practice permit restricting him to only esthetic medicine and hair transplantation, and that the admitted conduct amounts to unprofessional conduct.
17. Further, the Hearing Tribunal accepted the Complaints Director's withdrawal of the allegation in Charge 2 and considers that Dr. Prevost's admission fully addresses the matters complained of and investigated for the purposes of s. 70 of the HPA.

VII. DECISION WITH REASONS

18. The HPA defines "unprofessional conduct" to include "contravening ... conditions imposed on a practice permit" (s. 1(1)(pp)(viii)).

19. The documents in the Agreed Exhibit Book clearly establish the restrictions on Dr. Prevost's practice permit, which restrict him to practicing esthetic medicine and hair transplantation. The Hearing Tribunal agrees that administering Botox to treat migraine headaches is not esthetic medicine and is therefore a contravention of the conditions on Dr. Prevost's practice permit.
20. Further, the Hearing Tribunal agrees that if Dr. Prevost had any confusion about this, the confusion should have been resolved in August 2021 when he received the Notice of Hearing for the earlier CPSA hearing in which he ultimately admitted to the same kind of conduct at issue in this hearing: administering Botox to treat migraine headaches in contravention of the restrictions on his practice permit. Continuing to do so on 42 occasions between September 2021 and January 2024 was a contravention of the conditions on Dr. Prevost's practice permit and amounted to unprofessional conduct.
21. Even more concerning, Dr. Prevost continued to engage in this conduct even after signing an admission in the earlier CPSA hearing on November 2021, in which he *admitted* that he had provided Botox injections to patients for the treatment of migraine headaches in contravention of the conditions of his practice permit restricting him to only esthetic medicine and hair transplantation, and that his conduct amounted to unprofessional conduct. The last of the Botox injections at issue in this hearing happened in January 2024.
22. There is serious harm done to the profession when a member disregards conditions that have been imposed on his practice permit, made worse when a member continues to engage in conduct that he has *admitted* is unprofessional conduct. There was no excuse for Dr. Prevost's conduct, which the Hearing Tribunal finds is conduct that harms the integrity of the profession.
23. As for the Complaints Director's withdrawal of the allegation in Charge 2, the Hearing Tribunal noted Dr. Prevost's explanation that in his Renewal Information Form for 2022 and 2024 under the question "Have you significantly added to or changed your scope of practice in the last year", he answered in the affirmative, adding the explanation: "Wishing to add Botox injection for treatment of diagnosed migraine headaches and hyperhidrosis in patients prior diagnosed and already suggested neuromodulator treatment." While indicating that one *wishes* to engage in a certain area of practice is different than disclosing that one *is doing so*, the Hearing Tribunal is satisfied that Dr. Prevost's admission on Charge 1 sufficiently addresses the conduct in issue.

VIII. ORDERS

24. After advising the parties that it accepted Dr. Prevost's admission, the Hearing Tribunal then received submissions on penalty.
25. Citing the factors identified in the *Jaswal* case, counsel for the Complaints Director reviewed the prior decision of the CPSO, which gave rise to Dr.

Prevost's loss of practice privileges as an obstetrician and gynecologist. Counsel also noted the earlier CPSA decision, submitting that Dr. Prevost had already been through a hearing that dealt with this same matter in the past and ought to have had sufficient understanding of his professional obligations regarding the restrictions on his practice permit.

26. In terms of sanctions imposed in similar cases, counsel cited several cases involving physicians who continued to practice prohibited types of medical and surgical procedures (Kriel, 2020; Wachtler, 2012; Idahosa, 2022). Each resulted in practice suspension between three months and one year, and in each case the physician was ordered to pay the full costs of the investigation and hearing. Counsel submitted that the violation of practice restrictions by physicians has been seen as a very serious breach of professional obligations.
27. Counsel for the Complaints Director explained how the Alberta Court of Appeal's recent decision in *Charkhandeh* affected the parties' negotiations on costs and that they had agreed on the types of costs which should be borne by Dr. Prevost and estimated that those costs would amount to \$7500.00.
28. Counsel for the Complaints Director made submissions on the law regarding the deference a decision-maker should show to joint submissions under the public interest test set out by the Supreme Court of Canada in *R v Anthony-Cook*, a case that has been consistently followed by Hearing Tribunals of the CPSA. Applying it to the professional disciplinary context, the Complaints Director submits that a tribunal should take a joint submission on sanction very seriously and only disregard it if it is manifestly unjust and not in the public interest to accept. This high threshold is essential because, for joint submissions to be possible, the parties must have a significant degree of confidence they will be accepted.
29. Dr. Prevost's counsel emphasized the parties' agreement that the Hearing Tribunal should accept the joint submission. He explained as per the *Jaswal* factors, that his client cooperated with the process once the complaint was brought to his attention. He emphasized the rigour of the PROBE course, which Dr. Prevost was required to complete at his own cost. He submitted that the proposed sanctions reflected the nature of what happened, Dr. Prevost's participation in the investigation, an appropriate approach to remediation, and a reasonable agreement as to costs.
30. Additionally, Dr. Prevost's counsel asked that due to physician shortages at his clinic, that in the interests of minimizing disruption to patient care, the suspension not commence until Dec 22, 2025. This was supported by two letters included in the Agreed Exhibit Book (Exhibit 1, Tabs 9 and 10), and the Complaints Director did not object.
31. As identified by counsel for the Complaints Director, the underlying concern in this case is how Dr. Prevost thought it was appropriate to continue to provide Botox injections for migraines when it was already identified as unprofessional conduct in an earlier CPSA hearing. This is an aggravating factor, as there was

no excuse for Dr. Prevost to engage in this conduct, especially after admitting that such conduct was unprofessional conduct in the previous CPSA hearing. Such serious conduct justifies a significant period of suspension, as jointly proposed by the parties.

32. Based on the cases presented, the Hearing Tribunal was satisfied that the proposed sanctions were consistent with sanctions ordered in similar cases, which supported the reasonableness of the proposed sanction.
33. Accordingly, the Hearing Tribunal advised the parties that it accepted the joint submission on penalty, and made the following orders:
 - a. Dr. Prevost's practice permit shall be suspended for a period of nine months, of which six months shall be served commencing on December 22, 2025, and the remaining three months held in abeyance pending fulfillment of the remaining orders of the Hearing Tribunal.
 - b. Dr. Prevost shall, at his own expense, complete and unconditionally pass the CPEP Probe course on ethics and professionalism. If Dr. Prevost fails to unconditionally pass the CPEP Probe course, he shall, at his own expense, participate in a one-on-one ethics remediation program with a medical ethicist, such as Dr. Brendon Leier.
 - c. Dr. Prevost shall pay costs to a maximum of \$7,500.00, payable on terms acceptable to the Complaints Director commencing after the completion of his six months of suspension to be served.

Signed on behalf of the Hearing Tribunal by the Chair:



Dr. John Pasternak

Dated this 4th day of February, 2026.