

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. ALEC OSKIN

**DECISION OF THE HEARING TRIBUNAL OF  
THE COLLEGE OF PHYSICIANS  
& SURGEONS OF ALBERTA  
April 15, 2026**

## I. INTRODUCTION

1. The Hearing Tribunal of the College of Physicians and Surgeons of Alberta (the "**College**") held a hearing into the conduct of Dr. Alec Oskin on February 24, 2026. The members of the Hearing Tribunal were:

Mr. Glen Buick as Chair (and public member);  
Dr. Don Yee;  
Dr. Kim Myers;  
Mr. Geoffrey Coombs (public member).

2. Appearances:

Mr. Craig Boyer, legal counsel for the Complaints Director;  
Dr. Alec Oskin, Investigated Person;  
Mr. David McKinnon and Ms. Helen Ross, legal counsel for Dr. Oskin;  
Ms. Julie Gagnon, independent legal counsel for the Hearing Tribunal.

## II. PRELIMINARY MATTERS

3. There was a preliminary hearing on May 7, 2025, regarding Dr. Oskin's application seeking dismissal based on a statutory time limit and, in the alternative, a stay for abuse of process due to delay. This application was dismissed in a decision dated June 25, 2025 and any residual delay concerns were left to be weighed at sanction.
4. There were no objections to the composition of the Hearing Tribunal or to its jurisdiction to proceed with the hearing.
5. The hearing was open to the public pursuant to section 78 of the *Health Professions Act*, RSA 2000, c. H-7 ("**HPA**"). There was no application to close the hearing.

## III. CHARGES

6. The Amended Notice of Hearing listed the following allegation (the "**Allegation**"):
  1. That during the period of 2007 to 2013 you did improperly represent yourself in courtroom testimony or professional reports for use in the Criminal Justice system that you were a psychiatrist, forensic psychiatrist or forensic adolescent psychiatrist when you did not possess certification by the Royal College of Physicians and Surgeons of Canada or recognition from the Registrar of the College of Physicians and Surgeons of Alberta that you were qualified to use the title of psychiatrist, forensic psychiatrist

or forensic adolescent psychiatrist, particulars of which include one or more of the following:

- a. Report dated March 18, 2008 to the Presiding Youth Court Judge in Lethbridge;
  - b. Report dated April 25, 2008 to Madame Justice ██████ in Court of Queen's Bench regarding ██████;
  - c. Report dated May 23, 2008 to Judge ██████ of the High Prairie Provincial Youth Court;
  - d. Report dated May 29, 2008 to the Presiding Judge of the Court of Queen's Bench regarding ██████;
  - e. Report dated June 28, 2008 to the Presiding Judge in Calgary Provincial Youth Court;
  - f. Report dated September 23, 2008 put before Judge ██████ as noted in R v. B.J. 2009 ABPC 180;
  - g. Report dated September 11, 2013 to the Presiding Judge of the Calgary Provincial Youth Court;
  - h. Report dated November 21, 2013 to the Presiding Judge of the Red Deer Provincial Youth Court;
  - i. When appearing in Court to provide expert testimony in matters in which you had assessed the accused, you did fail to clarify to the Court that you did not have the authority to use the title of "psychiatrist" or "forensic psychiatrist".
  - j. Your Curriculum Vitae presented to the Court inaccurately describes you as a psychiatrist.
7. Dr. Oskin admits the factual particulars of the Amended Notice of Hearing and admits that the conduct amounts to unprofessional conduct.

#### **IV. EVIDENCE**

8. The following Exhibits were entered into evidence during the hearing<sup>1</sup>:

**Exhibit 9:** Agreed Exhibit Book

Tab 1: Amended Notice of Hearing dated February 23, 2026

Tab 2: Letter from Dr. Hartfield to Dr. Oskin dated November 22, 2022 regarding section 56 complaint

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<sup>1</sup> Exhibits 1 to 8 were entered as part of the Preliminary Application on May 7, 2025.

Tab 3: Letter from B. Mellett to Dr. [REDACTED] dated December 14, 2022 with copy of a version of Dr. Oskin's Curriculum Vitae

Tab 4: Letter of Response from Dr. Oskin dated February 15, 2023 with copy of 2012 version of his Curriculum Vitae

Tab 5: Alberta Court of King's Bench Access order by Justice [REDACTED] dated June 16, 2023

Tab 6: Alberta Court of Justice Access order by Associate Chief Justice [REDACTED] [REDACTED] dated January 23, 2024

Tab 7: Dr. Oskin's Report for Provincial Court dated March 18, 2008

Tab 8: Dr. Oskin's Report for Court of Queen's Bench dated April 25, 2008

Tab 9: Dr. Oskin's Report for Provincial Court dated May 23, 2008

Tab 10: Dr. Oskin's Report for Court of Queen's Bench dated May 29, 2008

Tab 11: Dr. Oskin's Report for Provincial Court dated June 28, 2008

Tab 12: Dr. Oskin's Report for Provincial Court dated September 11, 2013

Tab 13: Dr. Oskin's Report for Provincial Court dated November 21, 2013

Tab 14: Curriculum Vitae of Dr. Oskin submitted to the Court

Tab 15: Decision of Court in R. v. Bird 2008 ABQB 327

Tab 16: Decision of Court in R. v. C.H.C. 2009 ABQB 125

Tab 17: Decision of Court in R. v. B.J. 2009 ABPC 180

Tab 18: CPEP "PROBE" Program Flyer and CPEP 2023 Impact Report

**Exhibit 10:** Admission and Joint Submission Agreement dated February 23, 2026

## **V. SUBMISSIONS REGARDING THE ALLEGATION**

### **Submission on Behalf of the Complaints Director**

9. Mr. Boyer made submissions on behalf of the Complaints Director. He stated that the hearing was proceeding on the basis of an admission by Dr. Oskin to the Allegation. He tendered the Agreed Exhibit Book as Exhibit 9 and the Signed Admission and Joint Submission Agreement as Exhibit 10.

10. Mr. Boyer stated that the matter arose from information received by the College in 2022, following which a section 56 complaint was opened.
11. Mr. Boyer highlighted several court records and reports from the Agreed Exhibit Book which demonstrated that between approximately 2007 and 2013 Dr. Oskin used protected titles including "psychiatrist", "forensic psychiatrist", and "forensic adolescent psychiatrist" in written reports and oral testimony.
12. Mr. Boyer noted that the College came under the HPA on December 16, 2009. Section 128(5) of the HPA addresses restrictions on titles. In Schedule 21 for the College, section 2 states that regulated members can use titles as allowed by the Regulations. The *Physicians, Surgeons and Osteopaths and Physician Assistants Profession Regulation, Alta Reg 200/2020* ("**Regulation**") notes that approval is required by the Registrar for the use of titles listed in section 2 of Schedule 21. Dr. Oskin did not have approval of the Registrar at the time to use the titles Psychiatrist or Forensic Psychiatrist.
13. Mr. Boyer submitted that some of the conduct occurred under the *Medical Profession Act, RSA 2000, c M-11*, (the "**MPA**"). Reports prepared prior to December 16, 2009 fall under the MPA. Section 89 of the MPA addresses the improper use of protected titles unless an approval has been given by Council.
14. Mr. Boyer submitted that the conduct contravened the restricted-title provisions under the HPA and the MPA and constitutes unprofessional conduct. He emphasized the importance of accurate representation of credentials and asked the Tribunal to accept the admission and find the Allegation proven.

#### **Submission on Behalf of Dr. Oskin**

15. Counsel for Dr. Oskin, Ms. Ross, advised that Dr. Oskin admits the Allegation and accepts responsibility. The misuse of titles occurred early in his career after substantial training, including residency and a forensic fellowship, but before Registrar authorization.
16. Ms. Ross noted that Dr. Oskin ceased improper title use around 2013 when the Royal College of Physicians and Surgeons of Canada started to recognize forensic psychiatry as a subspecialty. This prompted him to realize the need to clarify his qualifications.
17. Ms. Ross clarified that there is no allegation of clinical incompetence or patient harm. The Allegation concerns misrepresentation of title, not scope-of-practice or standard-of-care issues.

## VI. DECISION REGARDING THE ALLEGATION

18. The Hearing Tribunal accepted Dr. Oskin's admission to the Allegation in the Amended Notice of Hearing and found all particulars of the Allegation to be proven.
19. The Hearing Tribunal found that Dr. Oskin's conduct constitutes unprofessional conduct as defined by section 1(1)(pp)(ii) and (iii) of the HPA, as follows:
  - ii. contravention of the HPA, a code of ethics or standards of practice;
  - iii. contravention of another enactment that applies to the profession.

## VII. FINDINGS AND REASONS REGARDING THE ALLEGATION

20. The Hearing Tribunal considered Dr. Oskin's admission under section 70 of the HPA. An admission of unprofessional conduct by a regulated member may only be acted upon if it is acceptable to the Hearing Tribunal. The admission was acceptable to the Hearing Tribunal, and the Hearing Tribunal considered whether the admitted conduct amounted to unprofessional conduct.
21. The facts and evidence before the Hearing Tribunal support the Allegation that between approximately 2007 and 2013, Dr. Oskin used protected titles including "psychiatrist", "forensic psychiatrist", and "forensic adolescent psychiatrist" in written reports and in oral testimony.
22. The Agreed Exhibit Book provides copies of letters and reports authored by Dr. Oskin where Dr. Oskin uses the term "forensic adolescent psychiatrist" and "forensic psychiatrist". There are court decisions referring to Dr. Oskin as a "psychiatrist" and a "forensic psychiatrist" and noting his training and expertise in forensic adolescent psychiatry. His C.V. in the Agreed Exhibit Book refers to being a staff psychiatrist and to his forensic psychiatry experience, and that he has been recognized as "Expert in Psychiatry" in Alberta and Ontario Provincial Courts.
23. The Hearing Tribunal found that the evidence provided in the Agreed Exhibit Book supports each of the particulars in Allegation 1. As such, the Hearing Tribunal found Allegation 1(a) to (j) proven on a balance of probabilities.
24. The MPA, which regulated physicians prior to December 16, 2009 provided at section 89:
 

**89(1)** No registered practitioner shall advertise or hold out to the public that the registered practitioner is a specialist or is specially qualified in any branch of any class or system of practice without having received from the registrar a certificate indicating the registered practitioner's compliance with all conditions precedent to qualification or fitness to practise that may be prescribed by the council.

25. The evidence established that from 2007 to December 2009, Dr. Oskin held himself out as a specialist in psychiatry, forensic psychiatry and adolescent psychiatry contrary to section 89 of the MPA.
26. Following December 2009, to 2013, the evidence established that Dr. Oskin used the titles "psychiatrist", "forensic psychiatrist" and adolescent psychiatrist contrary to the HPA. Usage of the protected titles requires authorization from the Registrar in accordance with section 17 of the Regulation. The Regulation (section 17) requires the Registrar to approve the use of titles in section 2 of Schedule 21. The same requirement existed under the prior regulation, the *Physicians, Surgeons and Osteopaths Profession Regulation*, AR 350/2009, at section 16.
27. By using those titles without authorization by the Registrar, Dr. Oskin contravened the Regulation, as well as section 2 of Schedule 21 and section 128(5) of the HPA.
28. The Hearing Tribunal found that by improperly referring to himself and representing himself as a psychiatrist, forensic psychiatrist, or forensic adolescent psychiatrist without proper authorization, Dr. Oskin's conduct contravened the MPA, the Regulation and the HPA.
29. Such conduct is serious. The public, patients and the courts rely on physicians for their expertise and credentials. While there was no evidence that Dr. Oskin practiced outside of his scope of expertise, the improper use of titles undermines the trust placed in Dr. Oskin by the public, his patients and the courts.
30. The Hearing Tribunal found the breaches were sufficiently serious to constitute unprofessional conduct as defined in section 1(1)(pp)(ii) and 1(1)(pp)(iii) of the HPA.

## **VIII. SUBMISSIONS ON SANCTION**

### **Submission on Behalf of the Complaints Director**

31. Mr. Boyer outlined the sanction proposal from the Admission and Joint Submission Agreement ("**Joint Submission on Sanction**") as follows:
  1. A three-month suspension of Dr. Oskin's practice permit, to commence on a date acceptable to the Complaints Director;
  2. Completion at his own expense, and unconditional passing of the CPEP Probe course by the end of June 2026, or such later date if the course is not available;
  3. If the CPEP Probe course is unconditionally passed, the three-month suspension would be deemed served;

4. If the CPEP Probe course is not unconditionally passed, Dr. Oskin would, at his own expense, conduct a one-on-one ethics remediation with a medical ethicist and the suspension would have to be served;
  5. The Hearing Tribunal would retain jurisdiction to determine any issues arising from performance of the terms of the Order;
  6. Payment of \$25,000 in costs, payable over time starting May 1, 2026.
32. Mr. Boyer urged acceptance of the Joint Submission on Sanction under *R v Anthony-Cook*, 2016 SCC 43, which states that considerable deference should be given to a joint submission on sanction. He stated that the Hearing Tribunal should only reject a joint submission if it is not in the public interest or would be manifestly unjust.
  33. Mr. Boyer referenced factors from *Jaswal v Medical Board (Nfld.)*, 1996 CanLII 11630 (NL SC), which include considering other similar cases where sanctions have been ordered. He cited the case of *Berge v. College of Audiologists and Speech-Language Pathologists of Ontario*, 2016 ONSC 7034, where a 3-month suspension for misuse of protected title was upheld.
  34. Addressing costs, Mr. Boyer submitted that \$25,000 reflects approximately 50–60% of total recoverable costs, and appropriately accounts for the preliminary application and the efficiencies gained by proceeding on admission, per *Charkhandeh v College of Dental Surgeons of Alberta*, 2025 ABCA 258.
  35. Mr. Boyer concluded by submitting that the Joint Submission on Sanction was the product of careful negotiation, reflects a fair and principled resolution, and should be accepted by the Tribunal in accordance with the deference owed to a joint submission on sanction under *R. v Anthony-Cook*.

#### **Submission on Behalf of Dr. Oskin**

36. Ms. Ross further emphasized that the Tribunal should give considerable deference to the Joint Submission on Sanction under the public-interest test in *Anthony-Cook* and submitted that the agreed outcome is a fair penalty in the specific circumstances of the case.
37. Applying the *Jaswal* factors, Ms. Ross submitted that while the conduct is serious, it is at the lower end of the spectrum for title misuse given that the conduct occurred early in Dr. Oskin's career and was corrected more than a decade ago. She further submitted that there was no intent to deceive; no concerns about competence or patient harm; no prior findings of unprofessional conduct; and that Dr. Oskin's admission saved time and expense.

38. Ms. Ross also noted the financial impact of the sanction, including the \$25,000 costs and the cost of the PROBE course, as well as the costs to Dr. Oskin's career that resulted from the proceedings.
39. Citing *Kherani v Alberta Dental Association*, 2025 ABCA 2, as well as the decision from the preliminary hearing, Ms. Ross submitted that the long delay between the events and the hearing was a significant mitigating factor that diminished the need for severe sanctions.
40. Ms. Ross submitted that the proposed sanction is within the acceptable range of outcomes in comparable title-misuse cases. She cited several cases which indicated a range of acceptable sanctions in similar title misuse situations.
41. Ms. Ross concluded that the proposed sanction is significant but proportional considering the mitigating circumstances of the case.

## **IX. DECISION REGARDING SANCTION**

42. The Hearing Tribunal carefully considered the submissions of the parties and the Joint Submission on Sanction. The Hearing Tribunal determined that the proposed sanction was reasonable and accepted the proposed Joint Submission on Sanction.

## **X. FINDINGS AND REASONS FOR SANCTION**

43. The Hearing Tribunal found that the admitted conduct was serious. Dr. Oskin used protected titles without proper authorization in a manner which misrepresented his credentials.
44. As submitted by Mr. Boyer, Canadian courts have held that an expert misrepresenting their credentials to the court is akin to perpetrating a fraud on the court. Courts rely heavily on the honesty of expert testimony and the Hearing Tribunal emphasizes that physicians must accurately represent qualifications and titles in all professional contexts to maintain confidence in the profession.
45. The Hearing Tribunal also carefully considered the significant passage of time between the conduct and this hearing. That 13-year delay between the last instance of unprofessional conduct and the sanction reduces the need for specific deterrence. The Tribunal further acknowledges that Dr. Oskin completed a medical degree, a psychiatry residency and a forensic psychiatry fellowship. Although he was unsuccessful in completing his Royal College examinations to attain his formal designation following his fellowship, he was a trained professional throughout the period in question. There is no evidence that he practiced outside his scope of practice, nor that there were any breaches of standards of care or patient-safety concerns.

46. These mitigating features, together with his admission, weigh in favour of affording Dr. Oskin the opportunity to avoid a suspension through successful completion of the CPEP Probe course.
47. The agreed costs of \$25,000 represent a portion of recoverable costs and are proportionate to the complexity of the proceeding, the preliminary application, and the efficiencies achieved through Dr. Oskin's admission.
48. The Tribunal considered that the order for costs was appropriate and that deference should be given to the costs agreed to by the parties.
49. Overall, the Hearing Tribunal found the Joint Submission on Sanction to be reasonable and appropriate after considering the parties' submissions and applicable authorities. Deference is owed to the Joint Submission on Sanction unless accepting it would be contrary to the public interest or bring the administration of justice into disrepute. Given the seriousness of the misconduct, the acknowledged mitigating circumstances, and the remedial elements of the sanction, the Tribunal concluded that the proposed sanctions meet the public-interest test. The proposed sanction is proportionate to the conduct and recognizes the passage of time. The Hearing Tribunal found that the proposed sanction will protect the public, achieve deterrence both specific and general, and maintain the public's confidence in the integrity of the medical profession.

## **XI. ORDERS**

50. For the reasons set out above, the Hearing Tribunal hereby orders pursuant to section 82 of the HPA:
  1. Dr. Oskin's practice permit shall be suspended for a period of three months to be served starting on a date acceptable to the Complaints Director.
  2. Dr. Oskin shall undertake, at his own expense, and unconditionally pass the CPEP Probe course by June 30, 2026, or such later date acceptable to the Complaints Director if the CPEP Probe course is not available to be completed by Dr. Oskin by June 30, 2026;
  3. In the event that Dr. Oskin does not unconditionally pass the CPEP Probe course, he shall then engage, at his own cost, in a one-on-one remediation program with a medical ethicist acceptable to the Complaints Director, such as Dr. Brendan Leier.
  4. If Dr. Oskin obtains an unconditional pass on his CPEP Probe course by June 30, 2026, or such later date acceptable to the Complaints Director, then the three-month suspension shall be deemed to have been served.
  5. The Hearing Tribunal shall retain jurisdiction to determine any issues arising from performance of the terms of this Order.

6. Dr. Oskin shall pay a portion of the costs of the investigation and hearing, being in the amount of \$25,000, payable on terms acceptable to the Complaints Director by equal monthly installments beginning on May 1, 2026.

Signed on behalf of the Hearing Tribunal by the Chair:



Mr. Glen Buick

Dated this 15<sup>th</sup> day of April, 2026.