

**IN THE MATTER OF THE DENTAL DISCIPLINES ACT, SS 1997, c D-4.1, AND
BYLAWS**

AND

**IN THE MATTER OF A FORMAL COMPLAINT DATED AUGUST 15, 2024,
AGAINST DR. CAMERON CHIANG, A MEMBER OF THE COLLEGE OF
DENTAL SURGEONS OF SASKATCHEWAN**

DECISION ON PENALTY OF THE DISCIPLINE COMMITTEE

Discipline Committee Members:

Dr. Cameron Roberts, Chair

Dr. Mina Patel

Dr. Heather Torrie

Dr. Erika Ridgway

Don Robinson, Public Representative

Faith Baron, Stevenson Hood Thornton Beaubier LLP, Counsel for the Discipline Committee

Candice Grant and Tessa Dyer, Robertson Stromberg LLP, Counsel for the Professional Conduct Committee

Robert Barbiero, Torkin Manes LLP, Counsel for the Member

A. INTRODUCTION

1. The College of Dental Surgeons of Saskatchewan (the “**College**”) received a complaint against Dr. Cameron Chiang (the “**Member**”), which was referred to the Professional Conduct Committee (the “**PCC**”) for investigation. The Member’s license was thereafter suspended on April 3, 2024, by the Registrar of the College and the matter was referred to the Discipline Committee of the College (the “**Discipline Committee**”) to hear and determine the Formal Complaint. A hearing was conducted on February 24, 2025, in Saskatoon, Saskatchewan. The Member did not participate in the hearing, did not appear, and made no submissions. The Discipline Committee proceeded in the Member’s absence pursuant to subsection 33(10) of *The Dental Disciplines Act*, SS 1997, c D-4.1 (the “**Act**”).

2. In a decision dated August 21, 2025, the Discipline Committee determined that the Member was guilty of professional incompetence and misconduct, pursuant to sections 26 and 27 of the Act. The findings addressed multiple charges and involved several patients.

3. The Discipline Committee then invited submissions on penalty from the parties and received such submissions from the PCC but did not receive any submissions from the Member.

4. On September 25, 2025, the Member (through his legal counsel) contacted the College and requested permission to participate in the proceedings. The PCC indicated that it was not opposed to providing an opportunity for counsel to provide written submissions on behalf of the Member with respect to penalty. Therefore, the Discipline Committee agreed to postpone their deliberations on penalty until the Member had some time to consider his position and make submissions or come to an agreement on penalty in cooperation with the PCC.

5. A Joint Submission on Penalty was provided to the Discipline Committee on May 4, 2026, and is attached to this decision at Appendix A. For the reasons that follow, the Discipline Committee accepts the penalty, as jointly submitted, as appropriate in the circumstances.

B. REASONS

6. The disciplinary powers of the Discipline Committee are laid out in the Act at section 34, which includes expulsion, suspension, conditions on practice, reprimands, and any other order that the Discipline Committee considers just. In addition, the Discipline Committee may order a fine not exceeding \$5,000.00 and may order the costs of the investigation and hearing.

7. The Discipline Committee was mindful of the factors to be taken into account when determining an appropriate penalty in professional discipline cases. There are many cases in Saskatchewan that identify these factors, including *Camgoz v College of Physicians and Surgeons (Sask)*, 114 Sask R 161, [1993] SJ No 557 (QL), where the court stated:

[49] In my respectful view, in determining an appropriate sentence to be imposed on a member of the medical profession found guilty of unbecoming, improper, unprofessional and discreditable conduct, the factors which the respondent ought to take into account include:

1. The nature and gravity of the proven allegations;
2. The age of the offending physician;
3. The age of the offended patient;
4. Evidence of the frequency of the commission of the particular acts of misconduct within particularly, and without generally, the Province;

5. The presence or absence of mitigating circumstances, if any.
6. Specific deterrence;
7. General deterrence;
8. Previous record, if any, for the same, or similar, misconduct; the length of time that has elapsed between the date of any previous misconduct and conviction thereon; and, the member's (properly considered) conduct since that time;
9. Ensuring that the penalty imposed will, as mandated by s. 69.1 of the Act, protect the public and ensure the safe and proper practice of medicine;
10. The need to maintain the public's confidence in the integrity of the respondent's ability to properly supervise the professional conduct of its members;
11. Ensuring that the penalty imposed is not disparate with penalties previously imposed in this jurisdiction, particularly, and in other jurisdictions in general, for the same, or similar acts of misconduct.

[50] The above factors are not to be considered as being an exhaustive list of the factors to be considered by the respondent in its future considerations of like matters. Nor are the factors identified by me listed in order of their importance. The noted factors identified by me are those which I consider to be generally applicable to the consideration of a proper penalty to be imposed following conviction of a member for unbecoming, improper, unprofessional and discreditable conduct. The factors to be considered in a particular case will of course vary, as will their particular relevance, in each case under consideration.

8. In *R v Anthony-Cook*, 2016 SCC 43. The Supreme Court of Canada emphasized that joint submissions should not be rejected unless they are “markedly out of line” or “unhinged from the circumstances and the offender”:

[32] Under the public interest test, a trial judge should not depart from a joint submission on sentence unless the proposed sentence would bring the administration of justice into disrepute or is otherwise contrary to the public interest. But, what does this threshold mean? Two decisions from the Newfoundland and Labrador Court of Appeal are helpful in this regard.

[33] In *Druken*, at para. 29, the court held that a joint submission will bring the administration of justice into disrepute or be contrary to the public interest if, despite the public interest considerations that support imposing it, it is so “markedly out of line with the expectations of reasonable persons aware of the circumstances of the case that they would view it as a break down in the proper

functioning of the criminal justice system”. And, as stated by the same court in *R. v. B.O.2*, 2010 NLCA 19, at para. 56 (CanLII), when assessing a joint submission, trial judges should “avoid rendering a decision that causes an informed and reasonable public to lose confidence in the institution of the courts”.

[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.

[emphasis added]

9. In *Rault v. Law Society of Saskatchewan*, 2009 SKCA 81, the Saskatchewan Court of Appeal confirmed that a discipline committee must consider joint submissions on penalty unless it can be demonstrated that they are unfit, inappropriate, unreasonable and/or contrary to the public interest. See also *Pankiw v. Board of Chiropractors' Association of Saskatchewan*, 2009 SKQB 268, where Justice Gabrielson stated the following:

34) Joint submissions are to be encouraged, not ignored. If joint submissions are ignored, plea bargains such as occurred here will be much less likely to occur. Lengthy discipline hearings and increased costs to be borne initially by members of the profession and perhaps ultimately by the public they serve will result. Joint submissions are in the public interest and should be followed by administrative tribunals in the same fashion as is done by the Courts unless it can be clearly demonstrated they are unfit, unreasonable or contrary to the public interest.

10. The Supreme Court of Canada in *R v Anthony-Cook*, *supra*, went on to describe the evaluative process to be followed when considering a joint submission:

[50] Courts across the country are generally in agreement on the procedure judges should follow when they are inclined to depart from a joint submission (see, for example, *B.O.2*, at paras. 74-82; *R. v. Sinclair*, 2004 MBCA 48, 185 C.C.C. (3d) 569, at para. 17; *G.W.C.*, at para. 26). The parties and interveners emphasize the importance of procedure. It ensures that joint submissions are given proper consideration, and that accused persons — who have already entered a plea of guilty — are treated fairly. The following procedures reflect practical wisdom gained from the experience of our trial and appellate courts. They are meant to apply only to those cases where the joint submission is contentious and raises concerns with the trial judge. As I mentioned earlier, most joint submissions are unexceptional and are readily approved by trial judges without any difficulty.[3]

[51] First, trial judges should approach the joint submission on an “as-is”

basis. That is to say, the public interest test applies whether the judge is considering varying the proposed sentence or adding something to it that the parties have not mentioned, for example, a probation order. If the parties have not asked for a particular order, the trial judge should assume that it was considered and excluded from the joint submission. However, if counsel have neglected to include a mandatory order, the judge should not hesitate to inform counsel. The need for certainty in joint submissions cannot justify failing to impose a mandatory order.

[52] Second, trial judges should apply the public interest test when they are considering “jumping” or “undercutting” a joint submission (*DeSousa*, per Doherty J.A.). That is not to say that the analysis will be the same in either case. On the contrary, from the accused’s perspective, “undercutting” does not engage concerns about fair trial rights or undermine confidence in the certainty of plea negotiations. In addition, in assessing whether the severity of a joint submission would offend the public interest, trial judges should be mindful of the power imbalance that may exist between the Crown and defence, particularly where the accused is self-represented or in custody at the time of sentencing. These factors may temper the public interest in certainty and justify “undercutting” in limited circumstances. At the same time, where the trial judge is considering “undercutting”, he or she should bear in mind that the community’s confidence in the administration of justice may suffer if an accused enjoys the benefits of a joint submission without having to serve the agreed-upon sentence (see *DeSousa*, at paras. 23-24).

[53] Third, when faced with a contentious joint submission, trial judges will undoubtedly want to know about the circumstances leading to the joint submission — and in particular, any benefits obtained by the Crown or concessions made by the accused. The greater the benefits obtained by the Crown, and the more concessions made by the accused, the more likely it is that the trial judge should accept the joint submission, even though it may appear to be unduly lenient. For example, if the joint submission is the product of an agreement by the accused to assist the Crown or police, or an evidentiary weakness in the Crown’s case, a very lenient sentence might not be contrary to the public interest. On the other hand, if the joint submission resulted only from the accused’s realization that conviction was inevitable, the same sentence might cause the public to lose confidence in the criminal justice system.

[54] Counsel should, of course, provide the court with a full account of the circumstances of the offender, the offence, and the joint submission without waiting for a specific request from the trial judge. As trial judges are obliged to depart only rarely from joint submissions, there is a “corollary obligation upon counsel” to ensure that they “amply justify their position on the facts of the case as presented in open court” (Martin Committee Report, at p. 329). Sentencing — including sentencing based on a joint submission — cannot be done in the dark. The Crown and the defence must “provide the trial judge not only with the

proposed sentence, but with a full description of the facts relevant to the offender and the offence”, in order to give the judge “a proper basis upon which to determine whether [the joint submission] should be accepted” (*DeSousa*, at para. 15; see also *Sinclair*, at para. 14).

[55] This is not to say that counsel must inform the trial judge of “their negotiating positions or the substance of their discussions leading to the agreement” (*R. v. Tkachuk*, 2001 ABCA 243, 293 A.R. 171, at para. 34). But counsel must be able to inform the trial judge why the proposed sentence would not bring the administration of justice into disrepute or otherwise be contrary to the public interest. If they do not, they run the risk that the trial judge will reject the joint submission.

[56] There may, of course, be cases where it is not possible to put the main considerations underlying a joint submission on the public record because of safety or privacy concerns, or the risk of jeopardizing ongoing criminal investigations (see Martin Committee Report, at p. 317). In such cases, counsel must find alternative means of communicating these considerations to the trial judge in order to ensure that the judge is apprised of the relevant considerations and that a proper record is created for appeal purposes.

[57] A thorough justification of the joint submission also has an important public perception component. Unless counsel put the considerations underlying the joint submission on the record, “though justice may be done, it may not have the appearance of being done; the public may suspect, rightly or wrongly, that an impropriety has occurred” (C. C. Ruby, G. J. Chan and N. R. Hasan, *Sentencing* (8th ed. 2012), at p. 73).

[58] Fourth, if the trial judge is not satisfied with the sentence proposed by counsel, “fundamental fairness dictates that an opportunity be afforded to counsel to make further submissions in an attempt to address the . . . judge’s concerns before the sentence is imposed” (*G.W.C.*, at para. 26). The judge should notify counsel that he or she has concerns, and invite further submissions on those concerns, including the possibility of allowing the accused to withdraw his or her guilty plea, as the trial judge did in this case.

[59] Fifth, if the trial judge’s concerns about the joint submission are not alleviated, the judge may allow the accused to apply to withdraw his or her guilty plea. The circumstances in which a plea may be withdrawn need not be settled here. However, by way of example, withdrawal may be permitted where counsel have made a fundamental error about the legality of the proposed joint submission, for example, where a conditional sentence has been proposed but is unavailable.

[60] Finally, trial judges who remain unsatisfied by counsel’s submissions should provide clear and cogent reasons for departing from the joint submission. These reasons will help explain to the parties why the proposed sentence was

unacceptable, and may assist them in the resolution of future cases. Reasons will also facilitate appellate review.

11. With these factors and guidelines in mind, the Discipline Committee considered the Joint Submission on Penalty in terms of its acceptability and appropriateness in these circumstances.
12. The findings of incompetence and misconduct against the Member were plentiful and egregious. Several involved patients that were actually physically harmed by the Member's actions. The evidence at the hearing was overwhelming in terms of the amount of people effected and the serious nature of the pain and suffering caused. The gravity of the Member's misconduct and incompetence demonstrated a serious disregard for patient welfare as well as a pervasive practice of charting inconsistencies and sloppiness, at best, or deliberate dishonesty, at worst.
13. The Discipline Committee was not made aware of any previous disciplinary actions against the Member, which is a mitigating factor. Further, the Joint Submission on Penalty indicated that the Member had suffered from significant mental health issues at the time of the events. While these issues were not detailed further in the joint submission, the PCC specifically accepted this as a relevant consideration in assessing an appropriate sanction. The Discipline Committee was satisfied that this aspect of the Member's circumstances should be considered as a generally accepted fact despite the lack of detailed information submitted.
14. Despite these mitigating factors, the nature and extent of the incompetence and misconduct displayed by the Member easily justified the conclusion that he is unfit to continue in the practice of dentistry. A strong disciplinary response is warranted. Protection of patients and the public generally was at the forefront of the Discipline Committee's concerns. While the Joint Submission on Penalty did not request an order to expel the Member, the requested order imposes a permanent inability to obtain licensure from the College in the future, effectively banning him from practicing dentistry in Saskatchewan. The Discipline Committee accepted that this was absolutely appropriate.
15. Disciplinary decisions are regularly published by the College on their website and, in addition to that usual course of action, the Discipline Committee was in support of alerting other dental regulators in Canada specifically of the findings against the Member. Such an alert is entirely warranted in these circumstances to ensure protection of the public and the safeguarding of the standards of the profession generally. Again, the Discipline Committee was very concerned about the Member's ability to practice dentistry at all given the gravity of the offences.
16. The Member's total lack of communication and participation in the proceedings caused a great deal of expense, time, and planning for the College, the PCC, and the Discipline Committee. The Member demonstrated a general unwillingness to be accountable to or even acknowledge communications and notifications from the

Member's professional regulating body, which was viewed by the Discipline Committee as deserving of a significant costs award against him.

17. The Joint Submission on Penalty refers to the Member paying the costs incurred *after* September 25, 2025, which was the date the Member initially communicated his desire to be involved in the proceedings. The Discipline Committee pondered whether it would make more sense for the Member to pay the actual costs incurred *prior* to his direct involvement in the process (which are undoubtedly much larger) but nonetheless accepted that the PCC and the Member agreed to this method of calculation as part of the compromising process of agreement on penalty, a process which is to be encouraged. The process did facilitate the more timely and less costly resolution on the matter of an appropriate penalty.
18. For these reasons, the Discipline Committee accepts the Joint Submission on Penalty in the form it was received. The Discipline Committee thanks counsel and the parties for their efforts to bring this matter to conclusion.

D. ORDER

18. The Discipline Committee therefore orders that:
 1. Dr. Chiang shall be formally reprimanded for his professional misconduct and professional incompetence by way of letter issued by the Discipline Committee. Dr. Chiang shall provide his written acknowledgment of the formal reprimand with thirty (30) days of receipt thereof.
 2. Dr. Chiang shall permanently refrain from seeking registration or licensure as a dentist in the Province of Saskatchewan. In the event that Dr. Chiang does seek such registration or licensure, the order of the Discipline Committee shall act as a complete bar to such application, and the CDSS shall be entitled to reject such application without consideration except as may be required by law.
 3. Dr. Chiang shall reimburse the CDSS for the actual costs of the proceedings (including the legal costs and disbursements incurred by both the Discipline Committee and the PCC) which have been reasonably incurred on or after September 25, 2025, being the date on which Dr. Chiang sought to participate in these proceedings. The CDSS shall advise Dr. Chiang within thirty (30) days of the Discipline Committee's order as to sanction as to the final amount of costs. Dr. Chiang shall pay those costs directly to the CDSS within twelve (12) months of receiving such notification.
 4. The findings of the professional misconduct, professional incompetence and sanction against Dr. Chiang as well as the fact that his conduct was

caused by serious mental health challenges shall be published by the CDSS upon its website in its usual course. In addition, the CDSS shall notify all other dental regulators in Canada of the findings of professional misconduct, professional incompetence and sanction against Dr. Chiang.

DATED at Saskatoon, Saskatchewan, this 22 day of July, 2026.



Dr. Cameron Roberts
Chair, the Discipline Committee
College of Dental Surgeons for Saskatchewan

Appendix A

IN THE MATTER OF *THE DENTAL DISCIPLINES ACT, 1997 S.S.C. D-4.1*
OF THE PROVINCE OF SASKATCHEWAN.

AND IN THE MATTER OF A HEARING BY THE DISCIPLINE COMMITTEE OF THE
COLLEGE OF DENTAL SURGEONS OF SASKATCHEWAN
CONCERNING A FORMAL COMPLAINT AGAINST

DR. CAMERON CHIANG

JOINT SUBMISSION ON PENALTY

WHEREAS:

- A. On or about August 15, 2024, the Professional Conduct Committee (hereinafter the “**PCC**”) of the College of Dental Surgeons of Saskatchewan (hereinafter the “**CDSS**”), recommended that the Discipline Committee of the CDSS hear and determine the Formal Complaint (hereinafter the “**Formal Complaint**”) against Dr. Cameron Chiang (hereinafter “**Dr. Chiang**”) alleging that Dr. Chiang committed professional misconduct pursuant to section 27 of *The Dental Disciplines Act*, and professional incompetence pursuant to section 26 of *The Dental Disciplines Act*, in the course of his treatment of several patients;
- B. On or about April 3, 2024, Dr. Chiang was suspended by the CDSS on an interim basis pursuant to subsection 31(1) of *The Dental Disciplines Act* and on or about May 22, 2024, his license with the CDSS was cancelled. He has not practiced, or sought to practice, dentistry in Saskatchewan since his suspension;
- C. A hearing into the Formal Complaint was held in Saskatoon, Saskatchewan on February 14, 2025. Dr. Chiang did not attend, respond to, or participate in the hearing;
- D. On the basis of the evidence before it, the Discipline Committee found Dr. Chiang guilty of professional misconduct and professional incompetence, as reflected in the Discipline Committee’s written decision of August 21, 2025;
- E. Dr. Chiang has indicated that the professional misconduct and professional incompetence were caused or contributed to by significant mental health challenges suffered by him at the time of the events in issue. He has suggested that these challenges should be taken into account in determining an appropriate sanction;

- F. The PCC accepts that Dr. Chiang suffered from significant mental health issues at the time of the events giving rise to the finding by the Discipline Committee and agrees that these challenges are among the relevant considerations in assessing an appropriate sanction. The PCC submits that other relevant considerations include protection of the public, accountability of the member and the regulator, and the maintenance of the standards of the profession;
- G. Dr. Chiang and the PCC have reached agreement on a sanction which they each believe appropriately reflects the nature and extent of the professional misconduct and professional incompetence found by the Discipline Committee, and which also appropriately reflects the mental health struggles suffered by Dr. Chiang;
- H. Each of Dr. Chiang and the PCC have had the benefit of independent legal counsel in relation to this Joint Submission on Penalty. It is their shared intention to bring finality to these matters without the necessity of further contested legal proceedings; and
- I. Upon a finding of professional misconduct or professional incompetence, the Discipline Committee is empowered pursuant to section 34 of *The Dental Disciplines Act* to make certain disciplinary orders, including any order that the Discipline Committee considers just.

NOW THEREFORE, the PCC by their solicitor and Dr. Chiang by his solicitor hereby jointly propose the following sanction in relation to the Formal Complaint:

1. Dr. Chiang shall be formally reprimanded for his professional misconduct and professional incompetence by way of letter issued by the Discipline Committee. Dr. Chiang shall provide his written acknowledgment of the formal reprimand within thirty (30) days of receipt thereof.
2. Dr. Chiang shall permanently refrain from seeking registration or licensure as a dentist in the Province of Saskatchewan. In the event that Dr. Chiang does seek such registration or licensure, the order of the Discipline Committee shall act as a complete bar to such application, and the CDSS shall be entitled to reject such application without consideration except as may be required by law.

3. Dr. Chiang shall reimburse the CDSS for the actual costs of the proceedings (including the legal costs and disbursements incurred by both the Discipline Committee and the PCC) which have been reasonably incurred on or after September 25, 2025, being the date on which Dr. Chiang sought to participate in these proceedings. The CDSS shall advise Dr. Chiang within thirty (30) days of the Discipline Committee's order as to sanction as to the final amount of costs. Dr. Chiang shall pay those costs directly to the CDSS within twelve (12) months of receiving such notification.
4. The findings of professional misconduct, professional incompetence and sanction against Dr. Chiang as well as the fact that his conduct was caused by serious mental health challenges shall be published by the CDSS upon its website in its usual course. In addition, the CDSS shall notify all other dental regulators in Canada of the findings of professional misconduct, professional incompetence and sanction against Dr. Chiang.

THIS JOINT SUBMISSION IS AGREED TO THIS 04 DAY OF MAY, 2026.

TORKIN MANES LLP

Per: _____

Solicitors for Dr. Cameron Chiang

THIS JOINT SUBMISSION IS AGREED TO THIS 4th DAY OF MAY, 2026.

ROBERTSON STROMBERG LLP

Per: _____

Solicitors for the Professional Conduct Committee