

REQUEST FOR CITATION

BETWEEN:

The College of Complementary Health Professionals
of British Columbia (“the College”)

AND:

[Robert Paradis](#), former Massage Therapist
(the “Respondent”)

This proposed citation is submitted to the Director of Discipline for approval pursuant to section 136 (2) (b) of the *Health Professions and Occupations Act*, [SBC 2022] c 43.

The College requests the Director of Discipline to issue a citation to the Respondent based on the following:

1. At all times material to the events and matters described in this Citation, the Respondent was a registrant of the College and practiced as a massage therapist.
2. The Complainant was a patient of the Respondent and submitted a complaint to the College on March 4, 2024, in relation to the provision of massage therapy services by the Respondent in Nanaimo, B.C earlier that day.
3. On April 23, 2025, pursuant to section 35 of the *Health Professions Act* (the “HPA”), in force at the subject time, limits and conditions were placed on the Respondent’s practice.
4. On March 24, 2026, an Inquiry Committee of the College convened and directed the Registrar to issue a citation pursuant to section 33(6)(d) of the *HPA*.
5. The Respondent’s alleged conduct may constitute professional misconduct contrary to the following sections of the HPOA:
 - a. Section 11(1)(b)
 - b. Section 11(1)(d)(i)
 - c. Section 11(1)(e)(ii)
 - d. Section 11(1)(f)

e. Section 11(2).

Dated at Vancouver, British Columbia, this 10th day of June, 2026.

A handwritten signature in black ink, appearing to read 'Marta Kumor Fane', written in a cursive style.

Marta Kumor Fane, Deputy Registrar
College of Complementary Health
Professions of British Columbia