

**IN THE MATTER OF**

Stefan Zueff, a member of the College of Paramedics of Manitoba (the “College”)

**AND IN THE MATTER OF**

A hearing of the Inquiry Committee Panel of the College pursuant to Part 8 of *The Regulated Health Professions Act*, C.C.S.M., c. R117 (the “Act”)

**Panel**

Cathy Kozminski-Kirby (Chair/Member)  
Deanna Douglas (Public Representative)  
Dean Scaletta (Public Representative)  
Janice Johnson (Member)  
Charles Thomas (Member)

**Counsel**

William Haight, for the Complaints Investigation Committee (the “CIC”)  
Michael D. Zacharias, for Stefan Zueff  
Joseph A. Pollock for the Inquiry Committee Panel (the “Panel”)

**DECISION AND ORDER OF THE INQUIRY COMMITTEE**

Pursuant to a Notice of Hearing dated the 25<sup>th</sup> day of August 2023, amended by consent of counsel for the Complaints Investigation Committee (the “Committee”) and counsel for Stefan Zueff (“Zeuff”) on the 24<sup>th</sup> day of November, 2025 (the “Notice”), a hearing was convened by a panel of the Inquiry Committee (the “Panel”) of the College of Paramedics of Manitoba (the “College”) at the offices of Marr Finlayson Pollock, 240 River Avenue Winnipeg, Manitoba, R3L 0B4, on Monday, November 25, 2025, with respect to charges formulated by the College alleging that:

1. On or about April 25, 2022, Zeuff sent an email, as Superintendent of the Fisher Ambulance Service (the “Service”), to the Percy E. Moore Hospital (the “Hospital”) advising that, as a result of a disagreement regarding the provision of a duplicate copy of a transferring patient’s chart to the Service, the Service would be suspending all inter-facility transfer operations out of the Hospital. The April 25, 2022 email further advised that should a patient require an inter-facility transfer and a duplicate copy of the chart not be provided, the sending physician was expected to accompany and maintain care and control of the patient during inter-facility transfers.
2. On or about May 30, 2022, as Superintendent of the Service, Zeuff threatened that the Service would not carry out an inter-facility transfer of a high-risk patient and/or imposed unreasonable conditions on the transfer unless his demands regarding provision of a second copy of the patient’s chart was accepted by the Hospital. This threat was made without reference to the health condition of the patient requiring the inter-facility transfer.

3. On or about May 30, 2022, Zeuff acted in a disrespectful, abusive, aggressive and threatening manner towards the Director of Patient Services at the Hospital when Zeuff confronted her in her office regarding the transfer of the patient referenced in the immediately preceding paragraph and the Service's request for a duplicate copy of that patient's chart. Zeuff did so as Superintendent of the Service and while in the presence of a subordinate member of the Service.
4. Between October 6, 2021, and April 25, 2022, Zeuff engaged in unprofessional communications with the Hospital. The culminative effect of these communications was disrespectful and unprofessional. Details of these communications are as follows:
  - a) On or about October 6, 2021, without making reasonable enquiries, Zeuff sent an email, copied to the Director of Patient Services at the Hospital, in which Zeuff accused hospital personnel of lying when completing forms regarding the availability of beds in the Hospital.
  - b) On or about October 9, 2021, Zeuff accused hospital personnel of "a lack of general common sense and also a blatant attempt to transport a new baby in an unsafe manner".
  - c) On or about April 25, 2022, Zeuff accused hospital personnel of uttering "absolutely ignorant" statements when referring to hospital personnels' concerns regarding providing a second copy of patients' charts to the Service.
5. Between February of 2022 and December 2022, Zeuff spoke with subordinate female members of the Service in a disrespectful, sexist and degrading manner when Zeuff said:
  - a) when women have children, their vaginas look like a floppy elastic band. Zeuff held up an old and stretched out elastic band in order to demonstrate what he was saying; and
  - b) when referring to a pregnant or labouring patient, Zeuff indicated to subordinate personnel that "the vagina is my happy place, so let's not ruin that image for me".
6. Between December 14, 2022, and January 24, 2023, Zeuff conducted himself in an unprofessional manner when, after being suspended from his employment as Superintendent of the Service, and being specifically instructed by his employer to not be involved or interfere with the Services' operations in any way, Zeuff:

- a) contacted subordinate personnel of the Service and asked that they start a petition requesting Zeuff's return to the position of Superintendent;
  - b) asked about specific information relating to patients and communications from the Service with the stated intention of leaking this information to the public or press;
  - c) advised subordinate personnel within the Service that Zeuff believed certain other members of the Service had betrayed him; and
  - d) requested that subordinate personnel within the Service provide him with screen shots of emails from the Service regarding the handling of an aggressive patient.
7. During the course of an interview on April 5, 2023 with the investigator retained by the Complaints Investigation Committee to investigate his conduct, Zeuff informed the investigator that he was the subject of a prior complaint while practicing paramedicine in the Province of Saskatchewan and the complaint arose from Zeuff's poor documentation, his illegible handwriting and his inability to read patient care records and reconcile documentation versus clinical practice.

In fact, the complaint in Saskatchewan alleged and Zeuff plead guilty to the following conduct:

- a) administering Fentanyl, contrary to the Drug Monograph Fentanyl Protocol;
- b) administering Fentanyl and Versed simultaneously without obtaining physician orders to administer the Versed and by administering Fentanyl contrary to the Drug Monograph Fentanyl Protocol;
- c) administering two-doses of nitroglycerin followed by concomitant administration of nitroglycerine and morphine contrary to the Chest Pain and Morphine Protocol;
- d) failing to acquire a 12-lead in a case of syncope contrary to the Cardiac Monitoring Protocol;
- e) failing to check blood glucose levels contrary to the Pediatric Advance Life Support Guidelines;
- f) not meeting the standards of the profession in ensuring the patient assessment and care was adequately documented.

Zeuff's attempt to minimize the scope of the acknowledged misconduct in Saskatchewan was an intentional attempt to mislead the investigation and constitutes ungovernable conduct.

THE NOTICE further alleges that the alleged conduct set out in the Notice are breaches of the following provisions of the Code of Ethics of the College of Paramedics of Manitoba:

a) Responsibility to the Patient and Others by:

- i. Failing to provide the most effective, efficient, and safe patient care as is reasonably possible within the level of their competencies and seek consultation with other health care professionals when necessary;
- ii. Failing to respect and maintain appropriate relationship boundaries;
- iii. Failing to communicate clearly and respectfully and recognize the rights of the patient; and
- iv. Failing to demonstrate patience, compassion, courtesy and respect.

b) Responsibility to the Profession

- i. Failing to honour the profession by ensuring that their conduct reflects positively on the integrity of the profession;
- ii. Failing to exhibit conduct that always meets the requirements of the health, legal and professional boundaries of the profession;
- iii. Failing to demonstrate leadership;
- iv. Failing to foster respectful, professional, and positive work and learning environments;
- v. Failing to ensure comments made in public and social media do not demean the profession of paramedicine, individuals within the profession and/or the College of Paramedics of Manitoba.

c) Responsibility to Self

- i. Failing to maintain and demonstrate professional accountability, integrity, good character and reputation; and

THE NOTICE further alleges that the alleged conduct set out in the Notice are breaches of the following provisions of the Standards of Practice for the Paramedic Profession:

a) Professional and Practice Proficiency by:

- i. Failing to apply foundational knowledge and evidence in informed practice including clinical and social sciences, leadership, management, health and social services and public safety systems.

b) Health and Social by:

- i. Failing to seek feedback from stakeholders in the planning, delivery and evaluation of health care provided to ensure safe practice and public safety; and

As a result of the above actions and breaches separately and/or in combination Zeuff has caused damage to the profession and has the potential to impair the public's confidence in the profession and has therefore demonstrated that he is guilty of professional misconduct.

### **Hearing**

Mr. William Haight appeared as counsel on behalf of the Committee. Mr. Michael D. Zacharias appeared on behalf of Zeuff. Mr. Joseph A. Pollock appeared as counsel to the Panel.

A Statement of Agreed Facts (the "Statement") was filed in which Zeuff admitted:

1. his membership in the College.
2. valid service of the Notice.
3. the College has jurisdiction and authority to deal with the allegations set out in the Notice.
4. the truth and accuracy of the facts in the Statement.
5. the contents of the Statement constitute admissible evidence to establish the facts stated therein and may form the basis for finding of fact by the Panel as proof of the allegations set out in the Notice, and that witnesses and other evidence available to the Committee if called and/or adduced as evidence, would substantially be in accordance with those facts.
6. he was licensed and registered as a technician paramedic in Manitoba in 1995.
7. on June 22, 2015, he became an advanced care paramedic with the Saskatchewan College of Paramedics.
8. he has performed paramedic work in three Canadian provinces, has taught paramedic principles and practices, and has provided emergency paramedic training for various professional colleges.
9. he has no disciplinary record with the College but was the subject of a 2017 order from the Professional Conduct Committee of the Saskatchewan College of

Paramedics for which he was ordered to participate in and complete five remedial courses, the requirements of which were fulfilled as of January 28, 2021.

## Plea

Zeuff tendered no evidence and made no submissions other than to admit that the conduct described in the Notice demonstrated a contravention of the Code of Ethics of the College, a contravention of the Standards of Practice for the Paramedic Profession and is professional misconduct as described in *The Regulated Health Professions Act* (the Act”).

Zeuff entered a plea of guilty to the charges referenced in paragraphs 2 3, 5, and 6 of the Notice.

Counsel for the Committee advised that the Committee was entering a stay of the charges referenced in paragraphs 4 and 7 of the Notice.

Zeuff confirmed his understanding that even though a joint recommendation was made with respect to the appropriate sanction, the Panel - subject to the law applying to joint recommendations - was not bound to follow the joint recommendation, and that the Panel would determine the appropriate penalty after considering the evidence and the submissions of counsel.

Counsel for the Committee and Zeuff jointly recommended that Zeuff:

- (a) receive a reprimand.
- (b) be fined the all-inclusive sum of \$5,000.00, to be paid by the member within two months of the disposition of this matter.
- (c) have the following conditions imposed on his practice license of paramedicine pursuant to subsections 126(1)(f) and (g) of the Act:
  - (i) Zeuff shall continue to see Dr. [REDACTED] at a frequency directed by Dr. [REDACTED] and comply with Dr. [REDACTED]'s treatment recommendations to address the areas of concern identified in Dr. [REDACTED]'s fitness to practice assessment dated August 7, 2024 (the “Areas of Concern”). Zeuff will authorize Dr. [REDACTED] to report every three months to the Registrar of the College as to whether he has attended appointments as scheduled and been compliant with treatment recommendations. Upon Zeuff being compliant with treatment and attending scheduled appointments for a period of 6 months (the “Treatment Period”) he will authorize Dr. [REDACTED] to report to the Registrar as to whether further treatment is necessary to address the Areas of Concern. Should Dr. [REDACTED] determine, at the conclusion of the Treatment Period, that further treatment is not required, this condition on practice will terminate. Should Dr. [REDACTED] report, at the conclusion of the Treatment Period, that further treatment is required then the Registrar and Dr. [REDACTED], in consultation with Zeuff, will agree upon the frequency of appointments and the further period of treatment. Zeuff will comply with such further treatment.
  - (ii) Until Dr. [REDACTED] has reported to the Registrar that further treatment is not

required, Zeuff shall not provide services regulated by the College except at [REDACTED]

- (d) Pay costs to the College for the investigation and hearing of \$5,000.00.

### **Decision**

After reviewing the authorities, documentary evidence, the Statement, and hearing the submissions of counsel for the Committee and Zeuff, the Panel has:

1. accepted the Committee's request to enter a stay of the charges referred to in paragraphs 4 and 7 set out in the Notice.
2. found that pursuant to sections 124 (b) of the RHPA, Zeuff has contravened the College's Code of Ethics and Standards of Practice.
3. found that pursuant to section 124(a) of the RHPA, Zeuff is guilty of professional misconduct.
4. accepted Zeuff's plea of guilty to the charges referred to in paragraphs 2, 3, 5, and 6 of the Notice.
5. The Panel resolved to accept the joint recommendation particularized above.

In making this decision, the Panel wishes to emphasize the seriousness of these charges against Zeuff.

The Panel would like this decision to act not only as a specific deterrent to Zeuff, but as a general deterrent to all paramedics. The conduct was rude and disrespectful; it reflected badly on Zeuff and on the profession as a whole.

In arriving at this decision, the Panel is satisfied that this disposition should serve to act as a deterrent, both general and specific, while at the same time ensuring that the public's interest will be protected and the public's confidence maintained. Additionally, the Panel is considered the following;

1. Zeuff has accepted responsibility for his conduct, and has consented to a significant penalty.
2. He has a long history of professional service to the public, and no prior history of relevant misconduct.
3. The penalty is in line with sanctions imposed in similar circumstances.
4. Pursuant to the relevant authorities, the joint recommendation is entitled to considerable deference; the very high threshold for rejection of a joint recommendation was not met in this case.

### **Order**

This Panel hereby:

1. reprimands Zeuff for his conduct
2. orders that Zeuff pay the College a fine in the all-inclusive sum of \$5,000.00, to be paid by him within two months of November 24, 2025.
3. imposes the following conditions - effective November 24, 2025 - on Zeuff's

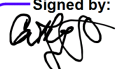
practice license of paramedicine pursuant to subsections 126(1)(f) and (g) of the Act,:

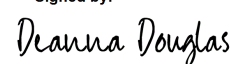
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- (ii) Until Dr. [REDACTED] has reported to the Registrar that further treatment is not required, Zeuff shall not provide services regulated by the College except at [REDACTED].

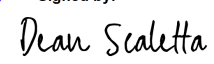
4. orders that Zeuff pay costs to the College for the investigation and hearing of \$5,000.00.

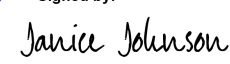
DATED at Winnipeg, Manitoba this 18th day of December 2025.

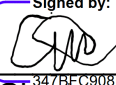
THE COLLEGE OF PARAMEDICS OF MANITOBA

Signed by:   
 Per: \_\_\_\_\_  
 Cathy Kozminski-Kirby  
 Chair, Inquiry Committee Panel

Signed by:   
 \_\_\_\_\_  
 Deanna Douglas  
 (Public Representative)

Signed by:   
 \_\_\_\_\_  
 Dean Scaletta  
 (Public Representative)

Signed by:   
 \_\_\_\_\_  
 Janice Johnson (Member)

Signed by:   
 \_\_\_\_\_  
 Charles Thomas (Member)

TO: Stefan Zueff