DISCIPLINARY COMPLAINT RESOLUTION AGREEMENT

pursuant to section 55(2)(a.1) of the Health Professions Act

BETWEEN:

VICTOR LANDAVERDE, #85,041 (the "Registrant")

and

College and Association of Registered Nurses of Alberta also known as College of Registered Nurses of Alberta (the "College")

A Disciplinary Complaint Resolution Agreement ("**DCRA**") was executed between the Registrant and the College, dated with effect **October 19, 2022**. The below constitutes a summary of such DCRA:

Through a DCRA with the College, VICTOR LANDAVERDE, #85,041 (the "**Registrant**"), acknowledged and admitted that their behaviour constituted unprofessional conduct. Particulars of the Registrant's unprofessional conduct arises from one (1) complaint to the College include the following:

- The Registrant failed to act professionally and failed to treat their colleagues with respect when:
 - In December 2020, the Registrant sent the following unwanted images to female Colleague 1: an unwanted image of the Registrant's underwear while sitting on a toilet at work; and an unwanted frontal nude image while at work, and again when Colleague 1 was at home;
 - In May 2019, the Registrant touched female Colleague 1's breast without consent outside of work;
 - On an unspecified date, the Registrant kissed female Colleague 1 without consent after escorting Colleague 1 to her car after work, which was also unwanted;
 - In April 2022, the Registrant pulled on female Colleague 2's underwear without consent; and
 - On an unspecified date, the Registrant sent female Colleague 2 an unwanted and explicit sexual image.

The Registrant shall be suspended for sixty (60) days, with ten (10) days to be served and fifty (50) days held in abeyance on the condition that the Registrant complies with the DCRA and there are no further complaints that raise professionalism, harassment, or boundary concerns within the next three (3) years. The Registrant shall also pay a fine of \$2,500. The Registrant must complete course work on professionalism and professional boundaries, as well as a behavior improvement plan The Registrant agreed to provide practice report letters covering 660 hours of practice, indicating they are practicing at the standard expected of a RN, and must provide ongoing employer notifications for two (2) years. Conditions shall appear on the College register and on the Registrant's practice permit.