

IN THE MATTER OF THE *PROFESSIONAL GOVERNANCE ACT*, S.B.C. 2018, CHAPTER 47 (the "*PGA*")

AND

IN THE MATTER OF AMR AHMED SAYED HASSAN ELOUFY ENGINEERS AND GEOSCIENTISTS BC FILE NO. T23-034 CITATION

TO: Amr Ahmed Sayad Hassan Eloufy

TAKE NOTICE that a Panel of the Discipline Committee of the Association of Professional Engineers and Geoscientists of the Province of British Columbia, doing business as Engineers and Geoscientists BC, will meet on a date to be determined, for the purpose of conducting a discipline hearing pursuant to the *PGA*.

AND TAKE NOTICE that the allegations against you are that:

- 1. You engaged in conduct unbecoming a registrant by:
 - a. falsifying the identity of, contact information for, and/or commentary from, at least two of your competency validators in your application for registration as a professional engineer with Engineers and Geoscientists BC in or about October 2022:
 - b. misrepresenting yourself as a professional engineer to your now former employer and others outside that firm, by, without limitation:
 - (i) identifying yourself as a P.Eng. on your resume (the "Resume") submitted to when applying for a position as a Senior Mechanical Engineer in or about August 2022;

- (ii) describing your experience at a previous engineering design and consulting firm on the Resume as that of a Fire Suppression Engineer instead of a Fire Protection Specialist;
- (iii) utilizing "P.Eng." in your signature on documents and correspondence addressed to staff and or clients, including but not limited to emails and written engineering proposals; and
- (iv) failing to utilize "engineer-in-training" or "EIT" when identifying yourself on documents and correspondence addressed to staff or clients, including but not limited to emails and written engineering proposals.
- 2. You breached ss. 66(b) and (c) of the *PGA* by:
 - a. failing to attend an interview with the Engineers and Geoscientists BC Investigator (the "Investigator"), despite repeated requests to do so, including requests the Investigator:
 - (i) by letter dated January 3, 2024, and sent to you via email;
 - (ii) by letter dated January 11, 2024, and sent to you via email;
 - (iii) by letter dated January 29, 2024, and sent to you via email;
 - (iv) by email dated February 15, 2024; and
 - (v) by phone call and voicemail message on February 15, 2024.
 - 3. The conduct set out at paragraph 1(a) is contrary to s. 5.6(4)(c)(v)(D) of the *Bylaws* of Engineers and Geoscientists BC, which provides that an Applicant for registration as a professional engineer must provide evidence satisfactory to the Credentials Committee that the Applicant has engineering experience that is validated by:
 - (I) a minimum of 4 Professional Registrants or equivalent licensed engineering or geoscience practitioners from a Regulatory Authority, who
 - 1) practise in the same discipline of engineering as the Applicant or a related discipline, and
 - 2) have detailed knowledge of the work of the Applicant; or
 - (II) validators satisfactory to the Credentials Committee, where the Credentials Committee is satisfied that the Applicant cannot comply with the requirement in subsection (c)(v)(D)(I).

- 4. The conduct set out above at paragraph 1(b) is contrary to ss. 5.5.1(3) and (4) of the *Bylaws* of Engineers and Geoscientists BC, which require that:
 - (3) an engineer-in-training may only use a title containing the word "engineer" or any form or abbreviation of the word "engineer", if the designation "engineer-in-training" or "EIT" is used in close proximity to the title and given the same or higher degree of prominence.
 - (4) an engineer-in-training must not represent themselves as a professional Registrant.
- 5. The conduct set out above at paragraph 1(b) is contrary to ss. 51(1)(a) and 52 of the *PGA*, s. 4 of the *Engineers and Geoscientists Regulation*, BC Reg 14/2021, and s. 5.6(2) of the *Bylaws* of Engineers and Geoscientists BC, which require that only a Registrant who is a designated professional engineer may hold themselves out to be a professional engineer and use the post-nominal "P.Eng.".
- 6. The conduct set out in paragraph 2(a) is contrary to ss. 66(1)(b) and (c) of the *PGA* and s. 9.7.5(1)(f) of the *Bylaws* of Engineers and Geoscientists BC, which provide that an Investigator may issue a written notice to the Registrant subject to investigation requiring the Registrant to appear before the Investigator(s) to discuss the conduct and competence of the Registrant subject to investigation.
- 7. The conduct set out at paragraphs 1(a) (b) and 2(a) is contrary to the Introductory Statement of the Engineers and Geoscientists BC Code of Ethics (the "Code of Ethics"), which requires that registrants uphold the values of truth, honesty, and trustworthiness.
- 8. The conduct set out at paragraphs 1(a) (b) and 2(a) is contrary to Principle 4 of the Code of Ethics, which requires that registrants have regard for applicable standards, policies, plans and practices established by the government or Engineers and Geoscientists BC.
- 9. The conduct set out at paragraphs 1(a) (b) is contrary to Principle 6 of the Code of Ethics, which requires that registrants provide accurate information in respect of qualifications and experience.
- 10. The conduct set out at paragraphs 1(a) (b) and 2(a) is contrary to Principle 13 of the Code of Ethics, which requires that registrants conduct themselves with fairness, courtesy and good faith towards clients, colleagues and others, give credit where it is due and accept, as well as give, honest and fair professional comment.

AND FURTHER TAKE NOTICE that you, Amr Ahmed Sayad Hassan Eloufy, have the right, at your own expense, to be represented by counsel at the hearing by the Panel of the Discipline Committee pursuant to s. 79 of the *PGA*, and you or your counsel shall

have the full right to cross-examine all witnesses called and to call evidence in defence and reply in answer to the allegations.

AND FURTHER TAKE NOTICE that, pursuant to s. 78 of the *PGA*, in the event you fail to attend or remain in attendance at a discipline hearing under s. 75 of the *PGA*, the Panel of the Discipline Committee may, if satisfied that you have been notified of the hearing, proceed with the hearing in your absence and make any order that the discipline committee or panel could have made in your presence.

DATED this 25 day of July, 2024.

The Investigation Committee of the Association of Professional Engineers and Geoscientists of the Province of British Columbia

<original signed by>

Per: Peter Helland, P.Eng. Chair, Investigation Committee