















appropriate sanction.<sup>11</sup> The choice of sanction is not a mechanistic determination, but rather a case-by-case analysis tailored to the specific facts and circumstances presented in each case.<sup>12</sup>

<sup>20</sup> The Sanctions Board is required to consider the factors set forth in Section 0.02 of the





misconduct. However, the Respondent provides no further details about these asserted measures and presents no evidence that the measures had in fact been implemented as to



