# DISCIPLINE COMMITTEE OF THE COLLEGE OF NATUROPATHS OF ONTARIO

BETWEEN:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

### ALLAN BORTNICK

### JOINT SUBMISSION AS TO PENALTY AND COSTS

The College of Naturopaths of Ontario and Allan Bortnick (the "Registrant") agree and jointly submit that the Discipline Committee make an order:

1. Directing the CEO to suspend the Registrant's certificate of registration for a period of twelve months.

The Registrant acknowledges that this Joint Submission as to Penalty and Costs is not binding upon the Discipline Committee.

The Registrant acknowledges and understands that he is executing this document voluntarily, unequivocally, free of duress, free of bribe, and that he has been advised of his right to seek legal advice.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Signed this  $\overrightarrow{B}$  day of  $\cancel{\#p0}$ , 2022

Signed this 28 day of April

, 2022

Dr. Allan Bortnick, ND

Registrant

Andrew Parr, CAE

CEO

College of Naturopaths of Ontario

# DISCIPLINE COMMITTEE OF THE COLLEGE OF NATUROPATHS OF ONTARIO

## JOINT SUBMISSION AS TO PENALTY AND COSTS (18-031R)

### STEINECKE MACIURA LEBLANC

Barristers & Solicitors 401 Bay Street Suite 2308 Toronto, ON M5H 2Y4

## Rebecca Durcan, LSO No. 45930V

Telephone: (416) 644-4783 Facsimile: (416) 593-7867

Email: rdurcan@sml-law.com

Lawyers for the College of Naturopaths

of Ontario