

**DISCIPLINE COMMITTEE OF THE  
COLLEGE OF NATUROPATHS OF ONTARIO**

B E T W E E N:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

KARIM DHANANI  
(DC21-01)

**JOINT SUBMISSION AS TO PENALTY AND COSTS**

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

1. Requiring the Registrant to appear before the Panel to be reprimanded immediately following the hearing of this matter.
2. Directing the Chief Executive Officer to suspend the Registrant's certificate of registration for a period of fourteen (14) months, to commence December 10, 2022, six (6) months of which shall be remitted if the Registrant complies with the provisions of paragraphs 3(a) through 3(e) no later than August 9, 2023.
3. Directing the Chief Executive Officer to impose the following specified terms, conditions and limitations on the Registrant's certificate of registration, all of which shall be at the expense of the Registrant, to the satisfaction of the Chief Executive Officer, prior to February 29, 2024:
  - a. Requiring that the Registrant unconditionally pass the PROBE ethics course;
  - b. Requiring that the Registrant successfully complete the College's Jurisprudence course;
  - c. Requiring that the Registrant review the following:
    - i. All standards of practice (as set out in the General Regulation and issued by the College) that were determined to have been contravened;
    - ii. Any and all College guidelines related to the above noted standards of practice;
    - iii. Professional Misconduct Regulation; and
    - iv. College Program requirements for registered intravenous infusion therapy premises;

## CONO v KARIM DHANANI (DC21-01) – Joint Submission as to Penalty and Costs

- d. Requiring that the Registrant meet with a Regulatory Expert selected by the College a minimum of five (5) and a maximum of seven (7) times, at the discretion of the Regulatory Expert, to discuss the Registrant's completion of paragraphs 3(a) through (c) and the Decision and Reasons of the Discipline Committee;
    - i. The Registrant shall undertake to have the Regulatory Expert deliver a report to the Chief Executive Officer, that is deemed to be satisfactory to the Chief Executive Officer, setting out the Regulatory Expert's opinion as to whether the Registrant has developed insight into the Discipline Committee's findings and whether the Registrant will incorporate the learnings of paragraphs 3(a) through (c) into his practice, within one month of the final meeting or at any other time that the Regulatory Expert feels is appropriate;
  - e. Requiring that the Registrant prepare an essay, to the satisfaction of the Chief Executive Officer, that sets out what the Registrant has learned from paragraphs 3(a) through 3(d) above and how he has and/or will implement his learnings into practice; and
  - f. Requiring the continuation of the terms of the interim order dated October 18, 2020 until such time as the Registrant meets the standards of prescribing and intravenous infusion therapy.
4. Requiring the Registrant to pay a fine of \$500 to the Minister of Finance, within two (2) months of the date of the hearing of this matter.
  5. Requiring the Registrant to pay the College's costs fixed in the amount of \$11,000 on a schedule to be set by the Chief Executive Officer.
  6. The Registrant acknowledges that this Joint Submission as to Penalty and Costs is not binding upon the Discipline Committee.
  7. 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 7<sup>th</sup> day of November, 2022

**Karim Dhanani**  
Registrant

Signed this 7<sup>th</sup> day of November, 2022

**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**

**STEINECKE MACIURA LEBLANC**

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

**Rebecca Durcan  
Valreen Sealie**

Telephone: (416) 644-4783  
(416) 583-2552  
Facsimile: (416) 593-7867  
Email: [rdurcan@sml-law.com](mailto:rdurcan@sml-law.com)  
[vsealie@sml-law.com](mailto:vsealie@sml-law.com)

Lawyers for the College of Naturopaths  
of Ontario