# DISCIPLINE COMMITTEE OF THE COLLEGE OF NATUROPATHS OF ONTARIO

BETWEEN:

#### COLLEGE OF NATUROPATHS OF ONTARIO

- and -

# KARIM DHANANI (DC22-02)

### **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 twelve (12) months, to commence December 10, 2022, four (4) months of which shall be remitted if the Registrant complies with the provisions of paragraphs 3(a) through 3(d) 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 review the College's advertising resources, including:
    - i. Standard of Practice:
    - ii. Guideline for Advertising;
    - iii. Professional Misconduct Regulation;
    - iv. Advertising Do's and Don'ts; and
    - v. Social Media Tips;
  - c. Requiring that the Registrant meet with a Regulatory Expert selected by the College a minimum of one (1) and a maximum of three (3) times, at the discretion

# CONO v KARIM DHANANI (DC22-02) - Joint Submission as to Penalty and Costs

of the Regulatory Expert, to discuss the Registrant's completion of paragraphs 3(a) and (b) 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) and (b) into his practice, within one month of the final meeting or at any other time that the Regulatory Expert feels is appropriate;
- d. Requiring that the Registrant prepare an essay, to the satisfaction of the Chief Executive Officer, that sets out what the Registrant has learned from items 3(a) through 3(c) above and how he has and/or will implement his learnings into practice.
- 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 \$6,000 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 day of November, 2022

Karim Dhanani Registrant Signed this 7th 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

vsealie@sml-law.com

Lawyers for the College of Naturopaths

of Ontario