

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

B E T W E E N :

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER

NOTICE OF HEARING

The Inquiries, Complaints and Reports Committee of the College of Naturopaths of Ontario (the “College”) has referred specified allegations against you to the Discipline Committee of the College. The allegations were referred in accordance with section 26 of the *Health Professions Procedural Code* which is Schedule II to the *Regulated Health Professions Act, 1991*. The statement of specified allegations is attached to this notice of hearing. A discipline panel will hold a hearing under the authority of sections 38 to 56 of the *Health Professions Procedural Code*, as amended, for the purposes of deciding whether the allegations are true. A **pre-hearing conference** will be held at a date and location to be set by the Presiding Officer. A discipline panel will convene by secure video connection at **9:30 a.m. on a date to be set by the Chief Executive Officer**, or as soon thereafter as the panel can be convened, for the purposes of conducting the **discipline hearing**.

IF YOU DO NOT ATTEND ON THE DATE FOR THE HEARING IN ACCORDANCE WITH THE PRECEDING PARAGRAPH, THE DISCIPLINE PANEL MAY PROCEED IN YOUR ABSENCE AND YOU WILL NOT BE ENTITLED TO ANY FURTHER NOTICE IN THE PROCEEDINGS.

If the discipline panel finds that you have engaged in professional misconduct, it may make one or more of the following orders:

1. Direct the Chief Executive Officer¹ to revoke your certificate of registration.
2. Direct the Chief Executive Officer (CEO) to suspend your certificate of registration for a specified period of time.
3. Direct the CEO to impose specified terms, conditions and limitations on your certificate of registration for a specified or indefinite period of time.
4. Require you to appear before the panel to be reprimanded.
5. Require you to pay a fine of not more than \$35,000 to the Minister of Finance.
6. If the act of professional misconduct was the sexual abuse of a patient, require you to reimburse the College for funding provided for that patient under the program required under section 85.7 of the *Health Professions Procedural Code*.
7. If the panel makes an order under paragraph 6, require you to post security acceptable to the College to guarantee the payment of any amounts the Registrant² may be required to reimburse under the order under paragraph 6.

The discipline panel may, in an appropriate case, make an order requiring you to pay all or part of the College's costs and expenses pursuant to section 53.1 of the *Health Professions Procedural Code*.

You are entitled to disclosure of the evidence against you in accordance with section 42(1) of the *Health Professions Procedural Code* and Rules 17-20 of the *Rules of Procedure of the Discipline Committee of the College of Naturopaths of Ontario*.

You, or your representative, may contact the solicitor for the College, Rebecca Durcan, in this matter:

Steinecke Maciura LeBlanc
Barristers & Solicitors
401 Bay Street
Suite 2308, P.O. Box 23
Toronto, ON M5H 2Y4

¹ The Chief Executive Officer has been appointed by the Council to oversee operations and perform the duties of the Registrar as set out in and defined in section 1(1) of the *Health Professions Procedural Code* (the Code).

² The Council of the College of Naturopaths of Ontario has directed that the College refer to individuals registered with the College as "Registrants". "Registrant", as it is used in this Notice of Hearing has the same meaning as "member" as defined in section 1(1) of the Code.

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Note that, Rules 17-20 of the *Rules of Procedure of the Discipline Committee of the College of Naturopaths of Ontario* also apply to you. Rules 18-20 state as follows:

RULE 18. Documentary Disclosure

- 18.1 Each Party to a Proceeding shall deliver to every other Party (a) a list of, and (b) if not previously produced, copies of, all documents and things that the Party intends to produce or enter as evidence at the Discipline Hearing, in the case of the College, as soon as is reasonably practicable after the Notice of Hearing is served, and in the case of any other party, as soon as is reasonably practicable after disclosure by the College under this Rule, but in any case at least ten (10) days before the commencement of the Pre-Hearing Conference.
- 18.2 A Party who does not disclose a document or thing in compliance with sub-rule 18.1 may not refer to the document or thing or introduce it in evidence at the Discipline Hearing without leave of the Panel, which may be on any conditions that the Panel considers just.
- 18.3 Where a party discovers a document or thing that it will refer to or give in evidence at the hearing after the disclosure date specified in subrule 18.1, the party shall make the disclosure immediately after the discovery.

RULE 19. Fact Witness Disclosure

- 19.1 A Party to a Proceeding shall serve every other Party a list of the witnesses the Party intends to call to testify on the Party's behalf at the Discipline Hearing, in the case of the College, as soon as is reasonably practicable after the Notice of Hearing is served, and in the case of any other Party, at least ten (10) days before the commencement of the Pre-Hearing Conference.
- 19.2 If no affidavit has been served in accordance with Rule 45 (Evidence by Affidavit), and material matters to which a witness is to testify have not

otherwise been disclosed, a Party to a Proceeding shall provide to every other Party a summary of the evidence that the witness is expected to give at the Discipline Hearing on the merits, in the case of the College, as soon as reasonably practicable after the Notice of Hearing is served, and in the case of any other party, as soon as is reasonably practicable after disclosure by the College under this Rule, but in any case at least ten (10) days before the commencement of the Discipline Hearing.

- 19.3 The disclosure obligations set out in Rule 19.2 shall not apply to witnesses called in Reply that the College had no reasonable expectation of calling in-chief.
- 19.4 A witness summary shall contain:
- (a) the substance of the evidence of the witness;
 - (b) reference to any documents to which that witness will refer; and
 - (c) the witness's name and address or, if the witness's address is not provided, the name and address of a person through whom the witness can be contacted.
- 19.5 A Party who does not include a witness in the witness list or provide a summary of the evidence a witness is expected to give in accordance with these rules may not call that person as a witness without leave of the Panel, which may be on any conditions as the Panel considers just.
- 19.6 A witness may not testify to material matters that were not previously disclosed without leave of the Panel, which may be on any conditions that the Panel considers just.

RULE 20. Expert Opinion Disclosure

- 20.1 A Party who intends to call an expert to give expert opinion evidence at a Hearing shall:
- (a) inform the other Parties of the intent to call the expert;
 - (b) identify the expert and the issue(s) on which the expert's opinion will be tendered;

- (c) serve the other Parties with a copy of the expert's written report or, if there is no written report, an affidavit in accordance with RULE 45 (Evidence by Affidavit), or a witness summary in accordance with sub-rule 19.3; and
 - (d) file an "Acknowledgement Form – Expert's Duty" signed by the expert, in the form appended to these rules.
- 20.2 The College shall serve any expert report or affidavit or witness summary upon which the College intends to rely at the Hearing at least sixty (60) days before the commencement of the Hearing.
- 20.3 The Member shall serve any expert report upon which he or she intends to rely at least thirty (30) days before the commencement of the Hearing.
- 20.4 The College may serve a reply expert report at least fifteen (15) days before the commencement of the Hearing.
- 20.5 Where an expert report is filed, it shall at a minimum include the following information:
- (a) qualifications of the expert;
 - (b) the instructions provided to the expert;
 - (c) the nature of the opinion being sought;
 - (d) the factual assumptions upon which the opinion is based; and
 - (e) a list of documents reviewed by the expert.
- 20.6 A Party who fails to comply with sub-rule 20.1 may not call the expert as a witness or file the expert's report or affidavit without leave of the Panel, which may be on any conditions that the Panel considers just.

Date: December 9, 2021 _____



Andrew Parr, CAE
Chief Executive Officer
College of Naturopaths of Ontario

TO: **Dr. Natasha Turner, ND**
c/o Symon Zucker, Professional Corporation
375 University Avenue, Suite 701
Toronto, ON M5G 2J5
sz@bondlaw.net

STATEMENT OF SPECIFIED ALLEGATIONS

The Registrant

1. Dr. Natasha Turner, ND (the “Registrant”) registered with the Board of Directors of Drugless Therapy – Naturopathy on or about October 28, 1999. The Registrant then became registered with the College of Naturopaths of Ontario (the “College”) on July 1, 2015.
2. The Registrant has not successfully completed a course on prescribing approved by Council and/or an examination on prescribing administered or approved by Council and therefore is not authorized to prescribe drugs and/or substances.
3. At all relevant times, the Registrant worked at and/or owned Clear Medicine in Toronto, Ontario (the “Clinic”).

Prescribing and/or Selling

4. It is alleged that between approximately March 1, 2018 and February 24, 2021, the Registrant:
 - a. Recommended and/or prescribed and/or sold Vitamin D to their patient(s) in excess of 1000 IU; and/or
 - b. Recommended and/or sold Vitamin D to the public in excess of 1000 IU and/or other treatments or substances via their Clinic website.
5. It is alleged that the Registrant prescribed or sold a drug or a substance for an improper purpose including but not limited to recommending or selling “treatment-specific kits” on the Clinic website and not within the context of a registrant-patient relationship and/or without conducting an assessment.

Recommending non-scheduled substances

6. It is alleged that the Registrant offered and/or sold and/or recommended non-scheduled products and/or services and/or drugs to the public on the Clinic website and not within the context of a registrant-patient relationship and/or without conducting an assessment.

Advertising

7. It is alleged that the Registrant permitted statements to be posted on their social media and/or Clinic website as a guarantee of success including but not limited to the following:
 - a. “The book is based on their successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Their second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011”; and/or

- b. The Hormone Diet will result in eating less and exercising more.
8. It is alleged that the Registrant permitted the use of testimonial(s) from a patient, former patient and/or other person in respect of their practice and/or products on the Clinic website.
 9. It is alleged that the Registrant indicated and/or implied that they were a specialist in the profession including but not limited to publishing the following:
 - a. "one of North America's leading naturopathic doctors";
 - b. "natural health expert";
 - c. "health expert";
 - d. "a leader in her field"; and/or
 - e. "endorsed by New York Times best selling authors."
 10. It is alleged that the Registrant advertised a comparative or superlative statement about their service, quality, products or people including but not limited to publishing the following:
 - a. "one of North America's leading naturopathic doctors ... natural health expert .. a leader in her field ..endorsed by New York Times best selling authors ..." and/or
 - b. "With now over 1000 successfully transformed bootcampers, we are proud to say that The Hormone Diet Bootcamp is one of the top wellness programs in Canada."
 11. It is alleged that the Registrant made a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as a reasonable professional opinion including but not limited to publishing the following:
 - a. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011".
 12. It is alleged that the Registrant permitted advertising of their practice in a manner that was false or misleading and/or that includes statements that are not factual and verifiable including but not limited to publishing the following:
 - a. "one of North America's leading naturopathic doctors ...";
 - b. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, The Supercharged Hormone Diet, an accelerated 30 day

plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011”; and/or

- c. Immune Support Kit – “aids in immune function; provides natural antiviral support; useful for those who are immune compromised or HIV positive.”
13. It is alleged that the Registrant endorsed drugs, products and/or brands of equipment, including but not limited to “Clear” drugs, products and/or brands of equipment,” used in their practice.

Fees and Billing

14. It is alleged that the Registrant charged block fees for the Hormone Diet Bootcamp and/or Clear Medicine Wellness Program.
15. It is alleged that the Registrant permitted the issuance of inaccurate and/or misleading naturopathic receipts in their name and/or in the name of the Clinic.

Acts of Professional Misconduct

16. It is alleged that the above noted conduct constitutes professional misconduct pursuant to section 51(1)(c) of the Health Professions Procedural Code, being Schedule 2 to the *Regulated Health Professions Act, 1991* (the “Code”) as set out in one or more of the following paragraphs of section 1 of Ontario Regulation 17/14 made under the *Naturopathy Act, 2007*:
- a. **Paragraph 1** – Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession, including but not limited to the following:
 - i. Core Competencies;
 - ii. Advertising;
 - iii. Fees and Billing;
 - iv. Prescribing;
 - v. Recommending Non-Scheduled Substances; and/or
 - vi. Selling.
 - b. **Paragraph 8** - Providing or attempting to provide services or treatment that the member knows or ought to know to be beyond the member’s knowledge, skill or judgment;
 - c. **Paragraph 10** - Performing a controlled act that the member is not authorized to perform;
 - d. **Paragraph 14** - Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose;

- e. **Paragraph 17** - Acting in a conflict of interest when acting in a professional capacity;
- f. **Paragraph 26** - Making a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as reasonable professional opinion;
- g. **Paragraph 27**- Permitting the advertising of the member or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable;
- h. **Paragraph 28** - Using or permitting the use of a testimonial from a patient, former patient or other person in respect of the member's practice;
- i. **Paragraph 31**- Inappropriately using a term, title or designation indicating or implying a specialization in the profession;
- j. **Paragraph 36** - Contravening, by act or omission, a provision of the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts including but not limited to Regulation 168/15 and/or s. 4 of the Act;
- k. **Paragraph 46** - Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional; and/or
- l. **Paragraph 47** - Engaging in conduct that would reasonably be regarded by members as conduct unbecoming a member of the profession.

APPENDIX

1. The documents to be tendered in evidence at the hearing have been sent with this Notice of Hearing.
2. The *Rules of Procedure of the Discipline Committee* have been sent with this Notice of Hearing.
3. Take notice that the documents that have been and may later be disclosed to you will be tendered as business documents pursuant to the *Evidence Act* of Ontario.
4. All documents that are disclosed to you in this matter are disclosed on the basis that they are to be used solely for the purpose of this proceeding and for no other purpose.

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER

DISCIPLINE COMMITTEE
OF THE COLLEGE OF
NATUROPATHS OF ONTARIO

NOTICE OF HEARING

STEINECKE MACIURA LEBLANC

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Lawyers for the College of
Naturopaths of Ontario

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

**This is Exhibit # 2
In CONO vs. Natasha Turner
(DC21-02) Date: May 2, 2022**

BETWEEN:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER
(FILE NO. 20-021R)

**AGREED STATEMENT OF FACTS
AND ADMISSION OF PROFESSIONAL MISCONDUCT**

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Naturopaths of Ontario

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

B E T W E E N:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER
(FILE NO. 20-021R)

**AGREED STATEMENT OF FACTS
AND ADMISSION OF PROFESSIONAL MISCONDUCT**

The parties hereby agree that the following facts and attachments may be accepted as true by the Discipline Committee of the College of Naturopaths of Ontario (the "College"):

The Registrant

1. Dr. Natasha Turner, ND (the "Registrant") registered with the Board of Directors of Drugless Therapy – Naturopathy on or about October 28, 1999. The Registrant then became registered with the College of Naturopaths of Ontario (the "College") on July 1, 2015. Attached as **Tab "A"** is a printout from the College's Naturopathic Doctor Register.
2. The Registrant has not successfully completed a course on prescribing approved by Council or an examination on prescribing administered or approved by Council and therefore is not authorized to prescribe drugs or substances.
3. At all relevant times, the Registrant worked at and owned Clear Medicine in Toronto, Ontario (the "Clinic").

Prescribing and Selling

4. It is agreed that between approximately March 1, 2018 and February 24, 2021, the Registrant did the following:
 - a. Recommended, prescribed and sold Vitamin D to her patients in excess of 1,000 International Units ("IU") without authorization.
 - b. Recommended and sold Vitamin D to the public via the Clinic website in excess of

1000 IU without authorization. An excerpt of the Clinic website with Clear Vitamin D3 Drops (60 mL) for sale to the general public is attached as **Tab "B"**. The website indicates that the recommended dosage is 2,000 IU per day.

- c. Recommended and sold other treatments or substances via her Clinic website without authorization. An excerpt of the Clinic website with "treatment-specific kits" for sale to the general public is attached as **Tab "C"**.
5. It is agreed that prescribing, dispensing, selling or compounding a drug is a controlled act, in accordance with section 27(2) of the *Regulated Health Professions Act, 1991*.
 6. Registrants are authorized to prescribe dispense, compound or sell a drug designated in the regulations in the course of engaging in the practice of naturopathy subject to the terms, conditions and limitations imposed on his or her certificate of registration, in accordance with section 4(1) of the *Naturopathy Act, 2007* (the "Act").
 7. It is agreed that the Registrant failed to comply with section 4 of the Act when she prescribed Vitamin D as indicated in paragraph 4(a) above.
 8. Vitamin D requires a prescription if it is prescribed in an oral dosage containing more than 1,000 ID per dosage or, where the largest daily dosage would, if consumed by a patient, result in the daily intake by that patient of more than 1,000 IUD of Vitamin D, in accordance with Table 3 of O Reg 168/15: General under the Act (the "General Regulation"). On or about February 24, 2021, the Prescription Drug List established under the *Food and Drugs Act* (Canada) was amended such that Vitamin D under 2500 IU per daily dose no longer required a prescription. As set out in section 2(2) of Ontario Regulation 168/15, where there is a conflict between Regulation 168/15 and a law of Canada, the law of Canada prevails.
 9. A registrant may only prescribe a drug designated in Table 3 of the General Regulation, including Vitamin D, if all of the standards of practice of the profession set out in section 9 of the General Regulation are met.
 10. It is agreed that the Registrant failed to comply with section 9 of the General Regulation when she prescribed Vitamin D as indicated in paragraph 4(a) above, which was prior to February 24, 2021.
 11. A registrant may only sell a Vitamin D in an oral dosage containing more than 1,000 ID per dosage or, where the largest daily dosage would, if consumed by a patient, result in the daily intake by that patient of more than 1,000 ID of Vitamin D if all of the standards of practice of the profession set out in section 12 of the General Regulation are met. On or about February 24, 2021, the Prescription Drug List established under the *Food and Drugs Act* (Canada) was amended such that Vitamin D under 2500 IU per daily dose no longer required a prescription. As set out in section 2(2) of Ontario Regulation 168/15, where there is a conflict between Regulation 168/15 and a law of Canada, the law of Canada prevails.
 12. It is agreed that the Registrant failed to comply with section 12 of the General Regulation when she sold Vitamin D as indicated in paragraph 4(a) and (b) above, which was prior to February 24, 2021.

13. It is further agreed that the Registrant prescribed and sold a drug or a substance for an improper purpose, including but not limited to recommending or selling "treatment-specific kits" on the Clinic website (see Tab "C" above).
14. It is agreed that the conduct described in paragraph 4 above was not done within the context of a registrant-patient relationship and was done without conducting an assessment.
15. It is further agreed that the conduct described in paragraph 4 is a breach of the College's standards of practice on Core Competencies, Prescribing, Recommending Non-Scheduled Substances and Selling.

Recommending Non-Scheduled Substances

16. It is agreed that the Registrant offered, sold and recommended non-scheduled products, services and drugs to the public on the Clinic website. An excerpt of the Clinic website with various supplements, including omega and melatonin among other things, for sale to the general public is attached as **Tab "D"**.
17. It is further agreed that the conduct described in paragraph 16 above was not done within the context of a registrant-patient relationship and was done without conducting an assessment.
18. It is agreed that the conduct described in paragraph 16 above is a breach of the College's standards of practice on Recommending Non-Scheduled Substances.

Advertising

19. It is agreed that the Registrant permitted statements to be posted on her social media and on the Clinic website that amount to a guarantee of success, including but not limited to the following statements:
 - a. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, *The Supercharged Hormone Diet*, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011". A copy of the "About Dr. Turner, ND" page of the Clinic website is attached as **Tab "E"**.
 - b. "My own new personal approach and that used with my patients is still based on balancing hormones but is now also based on a philosophy that is simple: when you exercise less, I want to help you to eat less; and when you exercise more, I will help you chose the right foods to eat more. According to the latest research, about 96 percent of people tend to gain weight back—plus more—with the typical approach of cutting calories/exercising more. Clearly, this does not work and only leads to future weight gain, to say nothing of metabolic damage as the stress it causes only furthers a greater drop in thyroid hormones drop and loss of precious metabolically active muscle.

You will never again – eat less and exercise more! [...]" A copy of an article entitled "How to boost your metabolism, gain energy and lose weight" written by the Registrant on August 1, 2018 is attached as **Tab "F"**.

20. It is further agreed that the statement at paragraph 19(a) above constitutes a claim respecting a treatment other than a claim that can be supported as a reasonable professional opinion.
21. It is agreed that the Registrant permitted the use of testimonials from a patient, former patient or other person in respect of her practice and products on the Clinic website. An excerpt of the Clinic website featuring numerous testimonials is attached as **Tab "G"**.
22. It is agreed that the Registrant indicated and implied that she is a specialist in the profession, including but not limited to by publishing the following statements:
- a. "Dr. Natasha Turner ND a New York Times bestselling author and one of North America's leading naturopathic doctors, a sought-after speaker, natural health expert and the founder of Clear Medicine Wellness Boutique in Toronto. In 2014 she was recognized by her professional organization as a leader in her field and in 2016 was awarded the top spot on a list of North America's Most Innovative Health Experts. [...] Her work has been endorsed by New York Times bestselling authors, Suzanne Somers, Dr. William Davis, and Dr. Christine Northrup, as well as Dr. Mache Seibel faculty member, Harvard Medical School and bestselling author of The Estrogen Window" (see Tab "E").
 - b. A "health expert". A copy of the Registrant's Twitter (handle @drnatasha) is attached as **Tab "H"**.
 - c. An "expert". A copy of the "About" section of the Registrant's Facebook for The Hormone Diet (handle @thehormonediet) is attached as **Tab "I"**.
23. It is further agreed that the statement at paragraph 22(a) above constitutes advertising with a comparative or superlative statement. It is agreed that the Registrant also published the following superlative statement on her Clinic website:
- a. "With now over 1000 successfully transformed bootcampers, we are proud to say that The Hormone Diet Bootcamp is one of the top wellness programs in Canada." An excerpt of the Clinic website for the "Clear Medicine Wellness (The Hormone Diet Bootcamp)" page is attached as **Tab "J"**.
24. It is agreed that the Registrant permitted advertising of her practice in a manner that was false or misleading and that included statements that are not factual and verifiable, including but not limited to publishing the following statements:
- a. "one of North America's leading naturopathic doctors ..." (see Tab "E").
 - b. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, *The Supercharged Hormone Diet*, an accelerated 30 day plan to restore your

metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011" (see Tab "E").

- c. The Immune Support Kit "aids in immune function; provides natural antiviral support; useful for those who are immune compromised or HIV positive." A copy of the "Immune Support Kit (1-2 Months)" page from the Clinic website is attached as **Tab "K"**
25. It is agreed that the Registrant endorsed drugs, products and brands of equipment, including but not limited to "Clear" drugs, products and brands of equipment used in her practice (see Tabs "D" and "F").
26. It is further agreed that the conduct described in paragraphs 19-25 above, is a breach of the College's standards of practice on Advertising.

Fees and Billing

27. It is agreed that the Registrant charged block fees for the Hormone Diet Bootcamp and Clear Medicine Wellness Program.
28. It is further agreed that the Registrant permitted the issuance of inaccurate and misleading naturopathic receipts in her name and in the name of the Clinic. Specifically, the Registrant issued receipts for naturopathic services in her name and through the Clinic to participants of her Hormone Diet Boot Camp. It is agreed that the Hormone Diet Boot Camp is actually a group lecture series based on the Registrant's books. See Tab J.
29. It is further agreed that the conduct described in paragraphs 27-28 above, is a breach of the College's standards of practice on Fees and Billing.

Prior History

30. The Registrant has a prior history with the College.
31. On November 2, 2017, the Inquiries, Complaints and Reports Committee ("ICRC") of the College considered concerns that the Registrant was performing a controlled act that she was not authorized to perform, that the Registrant contravened the standards of the profession and that the Registrant used or permitted the use of a testimonial from a patient, former patient, or other person in respect of the Registrant's practice in her advertising. The ICRC ordered the Registrant to complete a SCERP, including requiring the Registrant to review the Advertising and Conflict of Interest Standards, complete a report of 750-1000 words providing an analysis of her online presence, and her compliance with the standards and guidelines. The ICRC also ordered the Registrant to attend for an oral caution.
32. In October 2021, the Registrant was found to have engaged in professional misconduct by a panel of the Discipline Committee relating to advertising and selling "immune boost" kits that allegedly prevented COVID-19. The Registrant admitted that she contravened the advertising and conflicts of interest standards, recommended ineffective treatment, provided services beyond her knowledge skill or judgement, sold a substance for an improper purpose, acted in a conflict of interest, made claims that could not be supported as a reasonable professional opinion, and engaged in unprofessional conduct. The penalty proceeded by way of agreement and included a reprimand, three (3) month suspension,

terms, conditions and limitations ("TCLs") including PROBE and a reflective essay, a fine, and costs in the amount of \$5,000.

Admissions of Professional Misconduct

33. It is agreed that the above-noted conduct constitutes professional misconduct pursuant to section 51(1)(c) of the Health Professions Procedural Code, being Schedule 2 to the *Regulated Health Professions Act, 1991* (the "Code"), as set out in the following paragraphs of section 1 of Ontario Regulation 17/14 made under the Act:
- a. **Paragraph 1** – Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession, including but not limited to the following:
 - i. Core Competencies (**Tab "L"**);
 - ii. Advertising (**Tab "M"**);
 - iii. Fees and Billing (**Tab "N"**);
 - iv. Prescribing (**Tab "O"**);
 - v. Recommending Non-Scheduled Substances (**Tab "P"**); and
 - vi. Selling (**Tab "Q"**).
 - b. **Paragraph 8** – Providing or attempting to provide services or treatment that the Registrant knows or ought to know to be beyond the Registrant's knowledge, skill or judgment;
 - c. **Paragraph 10** - Performing a controlled act that the member is not authorized to perform;
 - d. **Paragraph 14** – Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose;
 - e. **Paragraph 17** – Acting in a conflict of interest when acting in a professional capacity;
 - f. **Paragraph 26** – Making a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as reasonable professional opinion; and
 - g. **Paragraph 27**- Permitting the advertising of the member or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable;
 - h. **Paragraph 28** - Using or permitting the use of a testimonial from a patient, former patient or other person in respect of the member's practice;
 - i. **Paragraph 31**- Inappropriately using a term, title or designation indicating or implying a specialization in the profession;

- j. **Paragraph 36** - Contravening, by act or omission, a provision of the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts, including but not limited to the General Regulation and section 4 of the Act;
- k. **Paragraph 46** - Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable and unprofessional; and
- l. **Paragraph 47** - Engaging in conduct that would reasonably be regarded by members as conduct unbecoming a member of the profession.

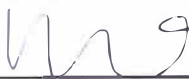
Acknowledgements

34. By this document, the Registrant states that:

- a. She understands fully the nature of the allegations made against her;
- b. She has no questions with respect to the allegations against her;
- c. She admits to the truth of the facts contained in this Agreed Statement of Facts and that the admitted facts constitute professional misconduct;
- d. She understands that by signing this document she is consenting to the evidence as set out in the Agreed Statement of Facts being presented to the Discipline Committee;
- e. She understands that by admitting the allegations, she is waiving her right to require the College to prove the allegations against her at a contested hearing;
- f. She understands that the decision of the Committee and a summary of its reasons, including reference to her name, will be published in the College's annual report and any other publication or website of the College;
- g. She understands that any agreement between her and the College with respect to the penalty proposed does not bind the Discipline Committee; and
- h. She understands and acknowledges that she is executing this document voluntarily, unequivocally, free of duress, and free of bribe and that she has been advised of her right to seek legal advice.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Signed this 4 day of April, 2022



 Dr. Natasha Turner, ND
 Registrant

Signed this 4th day of April, 2022



 Andrew Parr, CAE
 Chief Executive Officer
 College of Naturopaths of Ontario

TAB A



**College of
Naturopaths
of Ontario**

10

Status as of: 04-Apr-2022 16:38

NOT A PRACTICE PERMIT



● **Dr. Natasha Sepherha Turner, ND**

Registrant Number: 0894

Initial registration: 28-Oct-1999 (Initial Registration with the BDDT-N)

Nickname / abbreviation: N/A

Previous name: N/A

Current Registration

Class

General

Effective

01-Apr-2022

Status

In Good Standing

Expiry

31-Mar-2023

Terms, Conditions and Limitations

Condition of registration (Effective: 29-Oct-2021)

On October 29, 2021, the Discipline Committee imposed the following specified terms, conditions and limitations on the Registrant's certificate of registration:

- Requiring that the Registrant unconditionally pass, and at their own expense, the PROBE course in ethics and boundaries, no later than six months from the date of the order of the Discipline Committee; and
- Requiring that the Registrant write an essay between 1000 and 1500 words in length, and provide it to the Chief Executive Officer, no later than a date selected by the Chief Executive Officer that shall be published by the College at a time and in a format determined by the Chief Executive Officer, on the following issues:
 - i. The lessons they learned in completing the PROBE course; and
 - ii. The methods they will incorporate into their practice to ensure proper compliance with the standards and their obligations as a registrant of the College.

Findings

Hearing date: October 29, 2021

Decision date: November 26, 2021

The Panel finds that the Registrant committed acts of professional misconduct as admitted by the Registrant in the Agreed Statement of Facts.

Decision and Reasons of the Discipline Committee, file DC20-02

ICRC Outcomes

Appearance for a Caution

Date ordered: November 2, 2017

Date completed: March 1, 2018

On March 1, 2018, the Registrant attended before a panel of the Inquiries, Complaints and Reports Committee to be cautioned.

At the outset, the Panel noted that the Registrant's website indicated that the Registrant was trained in bio-identical hormone replacement and that she was able to prescribe this form of treatment prior to having met the Standard of Practice for Prescribing. The Registrant was reminded that the Prescribing course and exam are required by the College in order to ensure that appropriate knowledge, skill and judgment exist with regards to therapeutic prescribing. The Panel cautioned the Registrant that having BHRT training did not permit her to prescribe drugs or substances and that her failure to comply with this statutory requirement might have put her patients at risk.

The Panel further outlined its concerns with respect to the Registrant's advertising, which included issues with testimonials, prescribing, conflict of interest as well as use of restricted titles.

The Panel acknowledged that the Registrant had taken steps to amend her advertising in order to comply with the professional standards. Nevertheless, as the Registrant's website appeared to continue to advertise brand name products to the public, she was cautioned that endorsing products is in contravention of the College's Advertising Standard, and may also be perceived as a conflict of interest, regardless of whether or not the products were designed or formulated by the Registrant.

It was also concerning to the Panel that the Registrant appeared to advertise product kits, sell drugs or substances and recommend non-scheduled substances outside the context of the naturopathic doctor-patient relationship. The Panel reinforced with the Registrant that naturopaths in Ontario are only able to recommend or sell a compounded drug or substance to their patients within the context of the naturopathic doctor-patient relationship. In addition, registrants are expected to conduct a thorough assessment of the patient, to monitor and document the patient's response to the therapy and any adverse reactions, and adjust dosage or discontinue the therapy as appropriate.

The Panel further outlined its concerns with regard to the Registrant's billing practices. The Registrant was reminded that block fees are not available to naturopaths in Ontario and that issuing an invoice, bill or receipt that the Registrant knows or ought to know is false or misleading is an act of professional misconduct under the Naturopathy Act.

In conclusion, the Panel noted that should the Registrant commit similar or analogous conduct, the Panel will have no choice but to take stronger action, including a referral to the discipline committee.

ICRC Outcomes

Specified Continuing Education and Remediation Program (SCERP)

Date ordered: November 2, 2017

Date completed: February 14, 2018

On November 2, 2017, a panel of the Inquiries, Complaint and Reports Committee (ICRC) of the College determined that the Registrant shall review the Standards of Practice for Advertising, Conflict of Interest and

Restricted Titles, as well as the Practice Guidelines for Advertising and Conflict of Interest, and, within 45 days of the date of the Decision, deliver to the CEO a report of 750 - 1000 words acceptable to the CEO, providing a detailed analysis of her online presence, including her professional websites, online publications and television appearances, in terms of her current and future compliance with the aforementioned standards and guidelines.

ICRC Referrals

Referred To: Discipline Committee

Referral Date: November 4, 2021

Hearing Date: TBD

Notice of Hearing

STATEMENT OF SPECIFIED ALLEGATIONS

The Registrant

1. Dr. Natasha Turner, ND (the "Registrant") registered with the Board of Directors of Drugless Therapy – Naturopathy on or about October 28, 1999. The Registrant then became registered with the College of Naturopaths of Ontario (the "College") on July 1, 2015.
2. The Registrant has not successfully completed a course on prescribing approved by Council and/or an examination on prescribing administered or approved by Council and therefore is not authorized to prescribe drugs and/or substances.
3. At all relevant times, the Registrant worked at and/or owned Clear Medicine in Toronto, Ontario (the "Clinic").

Prescribing and/or Selling

4. It is alleged that between approximately March 1, 2018 and February 24, 2021, the Registrant:
 - a. Recommended and/or prescribed and/or sold Vitamin D to their patient(s) in excess of 1000 IU; and/or
 - b. Recommended and/or sold Vitamin D to the public in excess of 1000 IU and/or other treatments or substances via their Clinic website.
5. It is alleged that the Registrant prescribed or sold a drug or a substance for an improper purpose including but not limited to recommending or selling "treatment-specific kits" on the Clinic website and not within the context of a registrant-patient relationship and/or without conducting an assessment.

Recommending non-scheduled substances

6. It is alleged that the Registrant offered and/or sold and/or recommended non-scheduled products and/or services and/or drugs to the public on the Clinic website and not within the context of a registrant-patient relationship and/or without conducting an assessment.

Advertising

7. It is alleged that the Registrant permitted statements to be posted on their social media and/or Clinic website as a guarantee of success including but not limited to the following:
 - a. "The book is based on their successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Their second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011"; and/or

b. The Hormone Diet will result in eating less and exercising more.

8. It is alleged that the Registrant permitted the use of testimonial(s) from a patient, former patient and/or other person in respect of their practice and/or products on the Clinic website.

9. It is alleged that the Registrant indicated and/or implied that they were a specialist in the profession including but not limited to publishing the following:

- a. "one of North America's leading naturopathic doctors";
- b. "natural health expert";
- c. "health expert";
- d. "a leader in her field"; and/or
- e. "endorsed by New York Times best selling authors."

10. It is alleged that the Registrant advertised a comparative or superlative statement about their service, quality, products or people including but not limited to publishing the following:

- a. "one of North America's leading naturopathic doctors ... natural health expert .. a leader in her field ..endorsed by New York Times best selling authors ..." and/or
- b. "With now over 1000 successfully transformed bootcampers, we are proud to say that The Hormone Diet Bootcamp is one of the top wellness programs in Canada."

11. It is alleged that the Registrant made a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as a reasonable professional opinion including but not limited to publishing the following:

- a. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011".

12. It is alleged that the Registrant permitted advertising of their practice in a manner that was false or misleading and/or that includes statements that are not factual and verifiable including but not limited to publishing the following:

- a. "one of North America's leading naturopathic doctors ...";
- b. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011"; and/or
- c. Immune Support Kit – "aids in immune function; provides natural antiviral support; useful for those who are immune compromised or HIV positive."

13. It is alleged that the Registrant endorsed drugs, products and/or brands of equipment, including but not limited to "Clear" drugs, products and/or brands of equipment," used in their practice.

Fees and Billing

14. It is alleged that the Registrant charged block fees for the Hormone Diet Bootcamp and/or Clear Medicine Wellness Program.

15. It is alleged that the Registrant permitted the issuance of inaccurate and/or misleading naturopathic receipts in their name and/or in the name of the Clinic.

Acts of Professional Misconduct

16. It is alleged that the above noted conduct constitutes professional misconduct pursuant to section 51(1)(c) of the *Health Professions Procedural Code*, being Schedule 2 to the *Regulated Health Professions Act, 1991* (the "Code") as set out in one or more of the following paragraphs of section 1 of Ontario Regulation 17/14 made under the *Naturopathy Act, 2007*:

a. **Paragraph 1** – Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession, including but not limited to the following:

- i. Core Competencies;
- ii. Advertising;
- iii. Fees and Billing;
- iv. Prescribing;
- v. Recommending Non-Scheduled Substances; and/or
- vi. Selling.

b. **Paragraph 8** - Providing or attempting to provide services or treatment that the member knows or ought to know to be beyond the member's knowledge, skill or judgment;

c. **Paragraph 10** - Performing a controlled act that the member is not authorized to perform;

d. **Paragraph 14** - Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose;

e. **Paragraph 17** - Acting in a conflict of interest when acting in a professional capacity;

f. **Paragraph 26** - Making a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as reasonable professional opinion;

g. **Paragraph 27** - Permitting the advertising of the member or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable;

h. **Paragraph 28** - Using or permitting the use of a testimonial from a patient, former patient or other person in respect of the member's practice;

i. **Paragraph 31** - Inappropriately using a term, title or designation indicating or implying a specialization in the profession;

j. **Paragraph 36** - Contravening, by act or omission, a provision of the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts including but not limited to Regulation 168/15 and/or s. 4 of the Act;

k. **Paragraph 46** - Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional; and/or

l. **Paragraph 47** - Engaging in conduct that would reasonably be regarded by members as conduct unbecoming a member of the profession.

Show:

Registration History

Employment

15

TAB B

HOME > SUPPLEMENTS FOR CONDITIONS > STRESS > CLEAR VITAMIN D3 DROPS (60 ML)

- ALL CATEGORIES
- SALES 10-25% OFF

New Arrivals

Hormonal Health >

Supplements For Conditions >

Treatment-Specific Kits

Diet, Strength & Fat Loss >

Detox >

Digestive Health >

Exercise & Fitness >

Protein & Foods >


Plant-Based Hormone Diet >

Vitamins & Minerals >

Anti-Aging & Natural Skincare >

Dr. Natasha Turner ND's Books

DR NATASHA TURNER ND



MEET DR. TURNER ND

ABOUT DR TURNER ND

Dr. Natasha Turner ND a New York Times bestselling author and one of North America's leading naturopathic doctors, a sought-after speaker, natural health expert and the founder of Clear Medicine Naturopathic Clinic in Toronto

Read More



SIDEBAR

Clear Medicine

Clear Vitamin D3 Drops (60 mL)

★★★★★1 Review

CAD \$23.90

Brand

Clear Medicine

Quantity:

1

^


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Pure Form Omega - Org...
☆☆☆☆☆ (0)

Clear Detox - Digi
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Powered by 

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Reviews (1)





Hannah W. Verified Buyer

☆☆☆☆☆

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A simple way to get your daily dose of sunshine. Love this product because it's effortless, doesn't taste like much or anything and gives you enough vitamin D when you can't get enough of it on your own.

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04/26/20

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- > [SALES 10-25% OFF](#)



TAB C



Treatment-Specific Kits

SIDEBAR

SORT BY:

Best Selling

VIEW AS:

Foundation Kit -Detox (The Hormone Diet...
★★★★☆1 Review
★★★★★
CAD \$230.49

Stressed and Burned Out Belly Fat Type ...
★★★★★
CAD \$73.80
Choose Options

Marilyn Denis Thyroid Support Kit (30 Da...
★★★★☆1 Review
★★★★★
CAD \$101.40

Sluggish Belly Fat Type Kit (30 Day Supp...
★★★★★1 Review
★★★★★
CAD \$117.35

The Hormone Diet Summer Weight Loss...
★★★★☆1 Review
★★★★★
CAD \$137.89

The Hormone Diet 14 Day Metabolic Det...
★★★★★
CAD \$198.84

The Hormone Diet Alternative To Intermi...
★★★★★3 Reviews
★★★★★
CAD \$169.60 - CAD \$204.88

Foundation Kit -Weight Loss (Whey-Bas...
★★★★☆1 Review
★★★★★
CAD \$284.37

The Hormone Diet Ketosis & Fat Loss Kit ...
★★★★★
CAD \$302.72

Immune Support Kit (1- 2 Months Supply)
★★★★★
CAD \$224.50
Choose Options

Digestive Flush & Constipation Kit (30 to...
★★★★★
CAD \$72.10

The Hormone Diet Belly Fat Add-On-To-...
★★★★★
CAD \$231.26

12Next

TAB D

| | | | | | | |
|--|---|----------------------|--------------------|--------------|---------------------------|-----------------------|
| | | <div>CAD</div> | | | | |
| | Clear Detox - Digestive Health (150 Capsules) | <div>3 Reviews</div> | <div>3 Stars</div> | CAD \$57.75 | <div>ADD TO CART</div> | <div>Heart icon</div> |
| | Clear Fiber (361 G) - Hypoallergenic Fiber Supplement (Psyllium-Free) | <div>1 Review</div> | <div>3 Stars</div> | CAD \$33.55 | <div>ADD TO CART</div> | <div>Heart icon</div> |
| | Pure Form Omega - Organic Vegan Based (120 Capsules) | <div>3 Reviews</div> | <div>3 Stars</div> | CAD \$49.95 | <div>ADD TO CART</div> | <div>Heart icon</div> |
| | Clear Magnesium Calm - Magnesium Glycinate 150mg (120 Capsules) | <div>4 Reviews</div> | <div>3 Stars</div> | CAD \$38.00 | <div>ADD TO CART</div> | <div>Heart icon</div> |
| | Clear zzz's - Melatonin 3mg (60 Lozenges) | <div>2 Reviews</div> | <div>3 Stars</div> | CAD \$15.95 | <div>ADD TO CART</div> | <div>Heart icon</div> |
| | Clear CLA - Metabolic Enhancement Formula (120 Capsules) | | <div>4 Stars</div> | CAD \$46.16 | | <div>Heart icon</div> |
| | Foundation Kit -Detox (The Hormone Diet Step 1 Kit) -30 Day Plan | <div>1 Review</div> | <div>3 Stars</div> | CAD \$230.49 | <div>CHOOSE OPTIONS</div> | <div>Heart icon</div> |

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TAB E



DR. NATASHA TURNER ND

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ABOUT DR. NATASHA TURNER ND



Dr. Natasha Turner ND a *New York Times* bestselling author and one of North America's leading naturopathic doctors, a sought-after speaker, natural health expert and the founder of Clear Medicine Wellness Boutique in Toronto. In 2014 she was recognized by her professional organization as a leader in her field and in 2016 was awarded the top spot on a list of North America's Most Innovative Health Experts. Bright, energetic and practicing what she preaches, her goal is to inspire others to make positive lifestyle choices in order to enjoy healthier lives. Her passion for promoting wellness, fitness and integrated medicine makes her a sought-after speaker for corporations, the public and the education of other medical professionals. Her work has been endorsed by *New York Times* bestselling authors, Suzanne Somers, Dr. William Davis, and Dr. Christine Northrup, as well as Dr. Mache Seibel faculty member, Harvard Medical School and bestselling author of *The Estrogen Window*.

Dr. Turner ND's first book, *The Hormone Diet*, became a #1 bestseller within one week of its release in the spring of 2009 and was the top selling health book in Canada for that year. The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, *The Supercharged Hormone Diet*, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011. Upon its USA release in November 2011 it became a *New York Times* bestseller. Her third book, *The Carb Sensitivity Program: Discover Which Carbs Will Curb Your Cravings*,

Control Your Appetite and Banish Belly Fat made the bestseller list the first week of its release in March 2012. In December 2016, Dr. Turner ND released her fourth book *The Hormone Boost*, which became a #1 bestseller as well. It is a simple and effective wellness plan that harnesses the power of the six hormones linked to weight loss, strength and energy.

Dr. Turner ND has been referred to as a friend of [The Dr. Oz Show](#) by Dr. Oz and has appeared more than nine times on the show. She is also a regular guest on [The Marilyn Denis Show](#). She contributes to various magazines, radio and television programs as a natural health expert and a regular columnist to [Vitalize Magazine](#).

~ Instagram [@drnatashaturner](#)

~ Facebook [@natashaturner](#) or [@thehormonediet](#)

~ Twitter [@drnatasha](#)

Contact **416.579.9105** or email clinic@clearmedicine.com to become a patient, join an upcoming **Hormone Diet Bootcamp** or find out more about our corporate wellness seminars. [Download more information about Dr. Natasha Turner ND](#)

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Jul 3, 2020

Kerry Constantinou



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TAB F



How to boost your metabolism, gain energy and lose weight

BY NATASHA TURNER | AUGUST 1, 2018

Why “*Summerize*” your body and your metabolism right after spring cleaning your home, decluttering your space and shaping up your finances? Well, it makes good sense and I suggest that you think of it as a required “metabolic wake-up” after transitioning from winter, the season where our metabolism is naturally the slowest.

Yes, it's true, we are physiologically and mentally set-up for weight gain and lethargy in the winter due to a drop in thyroid hormone, your metabolic master, and mood hormones, which control your cravings for comfort food.

At 47, I have learned that the same [Hormone Diet](#) tricks that worked at 30 years old, need some adjustments now. So, over the past year, I have made it my mission to find a solution! And as a result of my research and clinical experience, I've come up with an overview of the perfect “*Hormone Diet Day for Fat Loss*”. In real simple terms these are the benefits you can expect:

- More Energy – which inspires you to do more and start to move more.
- Better Brain Power – for increased motivation, focus, drive, energy.
- Shedding of Excess Winter Weight – without a subsequent decrease in metabolism or energy, while only losing fat and maintaining muscle. You'll also keep your hunger, energy, and cravings in check – to stay on track.

Here are my top five tips for a metabolic boost and fat loss reset. Aim to adopt at least one of these habits at certain times of the day – but it's even better if you can achieve them all!

Morning: It's ALL about the tracking!

After my own research, experimentation and clinical experience, my patients have been taught to become metabolic detectives and fat loss experts by measuring ketones along with their weight. Ketones present in the urine indicate that your body is burning fat. We can cause our body to burn fat by restricting carbohydrates and sugar, reducing calories, moving more and fasting (when done correctly). Measuring ketones does not mean following “The Keto Diet”, which I do not recommend, especially for women and we can discuss at another time.

My own new personal approach and that used with my patients is still based on balancing hormones but is now also based on a philosophy that is simple: when you exercise less, I want to help you to eat less; and when you exercise more, I will help you choose the right foods to eat more. According to the latest research, about 96 percent of people tend to gain weight back—plus more—with the typical approach of cutting calories/exercising more. Clearly, this does not work and only leads to future weight gain, to say nothing of metabolic damage as the stress it causes only furthers a greater drop in thyroid hormones drop and loss of precious metabolically active muscle.

You will never again – eat less and exercise more! Your dietary habits, how much you move, and how much you exercise are inseparable. I want you to start living each day by asking yourself this question: *How much am I going to move today?*

Then you must spend only five minutes in the morning to record two numbers:

1. Your urinary ketone measurements, tested by ketone strips you can purchase from your local pharmacy or through shop.drnatashaturner.com, which indicate if your body is burning fat;
2. Your weight.

Record these on the tracking sheet. An example I have specifically designed for my patients and for use myself is [available on my blog](#).

I believe consistent tracking is the most important part – even if you do not change your diet at all as you can begin to see your activity or your diet can influence fat loss, as well as both in unison together. These two numbers will always reflect the impact of your dietary habits and your activity completed in the previous day.

Morning: Take my 3-month breakfast challenge – you won't believe the benefits!

Go to your local health food store and pick up these simple items to mix in a shaker cup with as much water as you prefer (I prefer less water!) and begin your day by drinking these three ingredients:

- **Creatine:** Did you know this is one of the only supplements proven to increase energy, muscle growth/recovery, and brain power? Yes, it's true – it is not just for muscle-bound body builders anymore because almost everyone can take it for mental function, energy, and preserving muscle mass. It is also excellent for concussion victims. Take 5 grams – about 1 tsp. per day and make sure its pure and simple creatine with no added sugars or caffeine. My mixture is clean with some extra benefits, such as glutamine and amino acids that aid in muscle recovery, and it is called Clear Recovery.

- **Marine Collagen** (hydrolyzed and with Vitamin C): As we age, our body's ability to produce new collagen declines and existing collagen begins to break down. The loss of collagen affects skin, joints, and bones. The decreased collagen may also lead to increased digestive problems, weakened immune system, and increased risk of chronic illness. A recent article in the *Globe and Mail* turned me on to collagen's benefits for tendons, bones, ligaments, and repair after exercise as the scientists gave 15 grams to the athletes (so you will need to take about one and a half tablespoons). The researchers saw great improvements in the 15-gram dose. By the way, 5 – 10 grams didn't do the trick – it must be 15g or more. Since then I have gone on to find these additional benefits of marine collagen: it builds bone strength, boosts thyroid, improves skin, hair, and nails – and even wrinkles, stabilizes blood sugar, boost the mood hormone and brain function, reduces inflammation, heals inflammation and immunity within the gut and helps with joint pain.
- **Whey Protein:** For immunity, muscle, metabolic, antioxidant and strength benefits toss 1 to 2 scoops (at least 20 to 30 grams for women; and 30 to 40 grams for most men) in your cup. I prefer vanilla flavor because it can mix easily with the creatine and collagen. If you can't take **whey protein, pea or hemp protein can work too.**

Shake, drink and devour all these wonderful metabolic, energy, and body benefits from the one simple concoction of these three supplements. I can tell you something else – I am never ever sore from my intense workouts and I feel energized and focused all morning. Best to shake and not to blend as these are delicate proteins.

Afternoon: Pay attention to how you feel: You may need to change when you eat certain foods and in which combinations.

- Craving muffins or pastries at 3 pm? Definitely cut the carbs from breakfast, increase your protein to hit your 30 to 40 gram goal per meal and add a fiber supplement to your smoothies at breakfast.
- Add fibre or water-based foods. The perfect afternoon snack is watermelon or berries with soluble fibre supplement, as this fibre makes you full and aids in decreasing inflammation in the gut. **Read more here.**
- If you have strength trained on a certain day, include protein here like sliced turkey with two cups of spicy zucchini green beans (check out **Oh MY Sprice**, they are great!).

Evening: It's ALL about the tracking and you must get results weekly! If one week goes by without favorable changes, while you are following your plan, get help – change your plan and reset your approach.

- Return to your tracker from the morning for 5 more minutes. Track your diet intake daily – as well as how you feel – your energy, hunger, cravings and activity. You need to become a metabolic detective – everybody is different, and diets always need adjustments – how you feel at the end of the day is a direct result of your dietary intake and activity during each day.
- Assess your protein intake for the day – if you are low drink a protein supplement or chocolate meal replacement (low in carbs and fats) and go to bed!
- Still no results – test your thyroid levels (TSH, Free T3 and Free T4) you can visit my clinic **Clear Medicine** or see an ND in your area. The most important thing is stay motivated and to approach your health with a sense of urgency and proper direction for results!

TAB G

Control Your Appetite and Banish Belly Fat made the bestseller list the first week of its release in March 2012. In December 2016, Dr. Turner ND released her fourth book *The Hormone Boost*, which became a #1 bestseller as well. It is a simple and effective wellness plan that harnesses the power of the six hormones linked to weight loss, strength and energy.

Dr. Turner ND has been referred to as a friend of [The Dr. Oz Show](#) by Dr. Oz and has appeared more than nine times on the show. She is also a regular guest on [The Marilyn Denis Show](#). She contributes to various magazines, radio and television programs as a natural health expert and a regular columnist to [Vitalize Magazine](#).

~ Instagram [@drnatashaturner](#)

~ Facebook [@natashaturner](#) or [@thehormonediet](#)

~ Twitter [@drnatasha](#)

Contact **416.579.9105** or email clinic@clearmedicine.com to become a patient, join an upcoming **Hormone Diet Bootcamp** or find out more about our corporate wellness seminars. [Download more information about Dr. Natasha Turner ND](#)

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Hannah W. Verified Buyer



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Dr. Natasha Turner

@drnatasha

Founder @ClearMedicineTO; NYT Bestselling Author The Supercharged & The Hormone Diet. Speaker & Health Expert; Regular Guest @DrOz & @MarilynDenisCTV Shows

Toronto, Ontario Canada drnatashaturner.com Joined April 2009

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Dr. Natasha Turner Retweeted

**Shaun Gauthier** @FitnessShaun · Mar 4

@drnatasha I have never heard of you until just seeing you on the @MarilynDenisCTV Extremely refreshing and impressive you are! #fanforlife



1

4



Dr. Natasha Turner Retweeted

**Dr. Theresa Nicassio** @TheresaNicassio · Feb 13

OMG-what an incredible interview with @drnatasha about #ketodiet #IntermittentFasting #dieting #hormones #HealthyLife #HealthyEating! theresanicassio.com/portfolio/nata... #WUVIP #EliminationDiet #Hormones #womenshealth #shiatsuwife #fertility #estrogen #breastcancer #ketosis #losingfat #carbs



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**Dr. Theresa Nicassio** @TheresaNicassio · Feb 11

#KETOSIS #HORMONES & #WomensHealth theresanicassio.com/portfolio/nata... Hear @drnatasha #Naturopath

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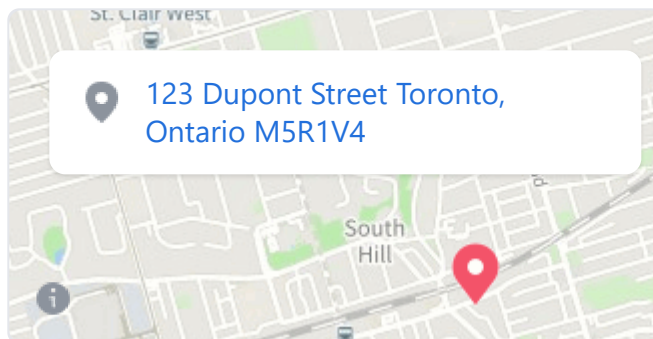
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Natasha Turner ND, NYT Bestselling author inc. US News Best Diet Supercharged Hormone Diet; Hormone Diet #69 CBC top books decade; Founder ClearMedicine; expert Doctor Oz, Marilyn Denis Shows.

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TAB J



DR. NATASHA TURNER ND

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CLEAR MEDICINE WELLNESS (THE HORMONE DIET BOOTCAMP)

With now over 1000 successfully transformed bootcampers, we are proud to say that The Hormone Diet Bootcamp is one of the top wellness programs in Canada. In FIVE short weeks you will build the foundation for better hormonal health. This group program is based on Dr. Turner ND's [The Hormone Diet](#) and [The Supercharged Hormone Diet](#) books.

Dr. Turner ND's passion and fascination about the interconnectedness of hormones and the number of bodily functions they influence fostered the motivation behind her first book, The Hormone Diet. She found her own issues of hormonal imbalance and early experiences in clinical practice swiftly demonstrated the standard treatment for a seemingly uncomplicated hormonal issue such as low metabolism/thyroid hormone (a.k.a subclinical hypothyroidism, currently estimated to impact as many as 4 out of 13) or full-blown hypothyroidism—via simply replacing thyroid hormone—was by no means the complete solution. In fact, it was frighteningly inadequate in many cases.

Today, at Clear Medicine, we rarely rush to treat thyroid deficiency right away. Instead we start by working to detoxify our patient's liver and digestive system that influences the production of active thyroid hormone; to balance stress hormones with good sleep and stress management; to level out blood sugar and insulin; to replenish the nutrients needed to make essential hormones; and to address hormone imbalance, which impact vitality and wellness.

I currently wrote a blog All The Ways That The Hormone Diet Tackles Belly Fat. [Please read it here.](#)

The Hormone Diet Bootcamp: Curb Cravings, Beat Belly Fat and Feel Younger Longer

And so from Dr. Turner ND's bestselling books, the [5-Week Hormone Diet Bootcamp](#) was born. This interactive, engaging and effective group approach has allowed hundreds of participants to successfully determine why they haven't been able to beat those stubborn pounds and, most importantly, attain total health. It outlines a strategy that

ensures hard work in the gym and a healthy kitchen is rewarded in the way you've always hoped they would be.

The mere mention of “hormones” can conjure images of menopausal women or nefarious food additives. Indeed, many patients seek to address these specific concerns. But this program is definitely not only for those with hormonal issues. It is not even strictly directed at people seeking to lose weight. We have used this approach to successfully treat thousands of patients with a broad spectrum of health goals. Some needed to gain much-needed muscle. Others wanted healthier looking skin. Still, others wanted to get rid of headaches, improve their sleep, ease their digestion, increase their energy, improve their fertility or sharpen their memory.

While many of us believe we can get healthy by losing weight. The truth is we must be healthy to lose weight. When you complete the steps outlined in this 5-week plan, you will optimize your hormonal balance, lose unwanted fat and restore your health in the process. This process is for everyone because, unlike so many other “diet” programs these days, The Hormone Diet Bootcamp offers a complete wellness plan that addresses every cause of health imbalance because it promotes vital bodily functions from head to toe, inside and out.

A Proven Method for Restoring Health Balance

Pre-Bootcamp: Designed to set the stage for your success! Your Best Body Assessment will uncover your metabolic rate, muscle mass, waist-to-hip ratio, and body fat percentage. Do you need to gain muscle? Is your current body composition placing you at risk for diabetes, heart disease, osteoporosis and/or obesity?

Week 1 – Begin Your Detox:

Discover the five most common hormonal imbalances: high insulin, high cortisol, toxic estrogen, low thyroid, and inflammation (not a hormonal imbalance but inflammation influences how your hormones work and your ability to lose weight).

How to optimize your digestion and optimize liver function via detox

The Hormone Diet Detox prescription – including permitted foods,

Based on **The Supercharged Hormone Diet** book.

Week 2 – Repair and Rejuvenate:

What happens when your body is acidic

How your sleep affects your hormones, appetite, and cravings

Recommendations to combat sleep problems

Stress management techniques that really work

Based on The Supercharged Hormone Diet book.

Week 3 – Transition Week From Your Detox:

Eliminate gas, bloating, headaches, water retention, puffy eyes and more

Learn the rules for hormonally-balanced eating

How to avoid hidden sugars and beat cravings

Best fiber sources to flatten your stomach

Based on The Supercharged Hormone Diet book.

Week 4 – Learn the Rules of Eating for Hormonal Balance:

Discover what hormone-disrupting foods you should avoid
The best protein, fat and carb selections in the grocery store
Learn how to eat at the right time and in the right amounts
Nutrition tips to increase energy, prevent cravings and remain slim

Based on **The Hormone Boost** book.

Week 5 – Next Steps and Hormone Optimization Training:

Discover the 10 most common workout mistakes
Hormonally balanced breakfast, lunch and dinner meal plans
How to cheat once a week and still lose weight
Recommendations for dining out and staying on track

Post-Bootcamp: Book an appointment for your final weigh-in and Best Body Assessment. Continue to work with one of our Naturopaths or Nutritionists one-on-one to discuss your specific blood values, results of your hormonal health profile and any health concerns, if desired.

Bootcamp (Co-Ed)

Best of all, the Bootcamp is taught by a naturopathic doctor so the majority of the program fees is covered under your health insurance provider under Naturopathic Services. Please check your individual provider to confirm. Another bonus – you get all the basic detox supplements included as well as a copy of The Supercharged Hormone Diet. As a bonus, bootcamp participants also receive Dr. Turner ND's new book The Hormone Boost.

Next Session:

WEDNESDAY APRIL 17TH EVENING CLASS 6:40 pm (parking on north side of Dupont as of 6:30 pm)

THURSDAY APRIL 18TH – DAYTIME CLASS 11:30 AM (parking on north side of Dupont until 3:30 pm) *please note we will need a minimum of 12 participants for the afternoon class

Location:

Clear Medicine: 123 Dupont Street Toronto, On, M5R 1V4

The program runs for 5 consecutive weeks. All classes are taught by Dr. Natasha Turner ND and the Clear Medicine Team. All classes take place at 123 Dupont Street, corner Davenport Road in Toronto. Payment and pre-registration is required to reserve your spot.

Program Add-Ons:

Program Add-on (Additional fees apply): Dr. Turner ND has partnered with **Gamma Dyna Care Laboratories** to provide our patients with access to a specialized list of blood

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Dr. Natasha Turner ND's Books

DR NATASHA TURNER ND



MEET DR. TURNER ND


ABOUT DR TURNER ND

Dr. Natasha Turner ND a New York Times bestselling author and one of North America's leading naturopathic doctors, a sought-after speaker, natural health expert and the founder of Clear Medicine Naturopathic Clinic in Toronto


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Clear Medicine

Immune Support Kit (1- 2 Months Supply)

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Brand

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DESCRIPTION

Please Note: Clear Immune Essential is on back-order. This has been removed from the kit in the meantime.

Kit Benefits:

- ✓ Aids In Immune Function
- ✓ Provides Antioxidant Activity
- ✓ Provides Natural Antiviral Support Due To The Olive Leaf Extract In The Clear Immune Essential
- ✓ Safe For Use For Men And Women. If You Are Taking Immuno-Suppressive Drugs Contact Your Medical Professional
- ✓ Useful For Those Who Are Immune Compromised Or HIV Positive

Medical Studies:

Vitamin C - immune support: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3783921/>

Vitamin D3: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3356951/>

Zinc: <https://www.ncbi.nlm.nih.gov/pubmed/9701160>

Probiotics: <https://www.ncbi.nlm.nih.gov/pubmed/25594887>

Quercetin: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4808895/> (contained in the vitamin C tables)

Phytosterols: <https://www.ncbi.nlm.nih.gov/pubmed/10383481>

Olive Leaf Extract: <https://www.ncbi.nlm.nih.gov/pubmed/29149822>

Bulk Pricing:

Save 10 % if you purchase 3 or more kits. You may need to add more of an individual item depending on how long you would like to take it for.

Ingredients:

Stellar C: Per Capsule: Vitamin C (Ascorbic acid) 600mg; Acerola (Malpighia glabra) 200mg; Citrus bioflavonoids (Citrus limon-Fruit 50% Hesperidin) 100mg; Quercetin 50mg; Rutin 50mg.

Recommended Dosage: Adults: take 1 capsule per day with food, or as directed by your health care practitioner. Consult a health care practitioner for use beyond 12 weeks.

Contraindications: Consult a health care practitioner prior to use if you are pregnant, breastfeeding, or if you are taking any other medications or natural health care products, as black pepper may alter their effectiveness

Clear D3 Drops: Per drop: Vitamin D3 (as Cholecalciferol) 1000IU

Recommended Dose: 1 drop per day or as directed by your health care practitioner. Shake well before using.

Contraindications: Consult your healthcare practitioner prior to use. Individuals taking medication should discuss potential interactions with their healthcare practitioner. Do not use if tamper seal is damaged.

Clear Flora: Per capsule: Lactobacillus acidophilus 14.4 billion, Lactobacillus Plantarum 0.3 billion, Bifidobacterium longum 0.3 billion per capsule

Recommended Dose: Take 1 capsule on rising or before bed, away from food. This product does not require refrigeration.

Contraindications: None known at time of publication

Clear Zinc 30: Per Capsule: Vitamin B2 - 5mg; Vitamin B6 - 50 mg; Zinc glycinate chelate - 30 mg; Molybdenum glycinate chelate - 250 mcg; Taurine - 400mg; Malic acid - 30mg

Recommended Dose: 1 capsule at bed.

Clear Greens: Per 1.5 scoops: Lecithin 2500mg; Spirulina (speciality grade) 1500mg; Broccoli Powder 1000mg; Parsley Leaf Powder 1000mg; Barley Grass Juice 600mg; Wheat Grass 600mg; Chlorella 500mg; SunFiber® (partially hydrolyzed Guar Gum) 500mg; Red Beet Root 500mg; Rose Hips 500mg; Beta Berries™ Antioxidant Blend 300mg; Dandelion Root 4:1 200mg; Quercetin 150mg; Carrot Powder 100mg; Ginger Root 100mg; Grapeseed Extract 95% 100mg; Nettles 1% 100mg; Spinach Powder 100mg; Burdock Root 50mg; Biocore® Optimum Enzymes 20mg

Recommended Dose: 1 serving per day.

Contraindications: Consult a health care practitioner prior to use if you

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escription medication, as resveratrol may alter the effectiveness of these medications. Consult a health care practitioner prior to use if you have diabetes, a gastrointestinal lesion/ulcer, are taking an anticoagulant/blood thinner or anti-inflammatory, or are having surgery. Do not use if you are pregnant or breastfeeding, or if you have celiac disease.

Quercetin + Nettles: Per capsule: Quercetin 200mg; Nettle (Urtica dioica) (1% Silicic acid, 12:1) 200mg
Recommended Dose: Take 3 capsules per day with or without meals, or as directed by your health care practitioner. For use beyond 12 weeks, consult a health care practitioner.
Contraindications: Consult a health care practitioner if symptoms persist or worsen. Do not use if you are pregnant or breastfeeding.

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TAB L



Core Competencies

Introduction

Naturopathic Doctors provide primary and adjunctive health care to people of all ages, focusing on the use of natural therapies to support and stimulate healing processes. Naturopathic Doctors promote health and prevent illness, and diagnose and treat disease in a manner consistent with the body of knowledge and standards of practice for the profession.

The following Core Competencies articulate the knowledge, skill and judgment required of Naturopathic Doctors at entry-to-practice.

Naturopathic Medical Knowledge

The competent Naturopathic Doctor:

1. Integrates naturopathic philosophy, theory and principles with naturopathic medical knowledge in the care of patients and case management including the assessment, diagnostic and treatment phases.

- Evaluates and integrates clinical arts and science knowledge within the context of naturopathic principles and philosophy in clinical practice.
- Formulates diagnoses and treatment plans consistent with naturopathic philosophy and principles.

2. Develops, maintains and respects a comprehensive naturopathic medical knowledge base.

- Demonstrates knowledge of the history and philosophy of Naturopathic Medicine.
- Demonstrates knowledge of the clinical arts and sciences essential to the practice of Naturopathic Medicine.
- Demonstrates knowledge of the theory and practice of therapeutics including botanical medicine, homeopathic medicine, traditional Chinese medicine and acupuncture, physical medicine, clinical nutrition, and lifestyle counselling.
- Updates knowledge base continuously through the review of relevant research and ongoing continuing education.

3. Conducts an assessment to formulate a diagnosis.

- Gathers information necessary to formulate a diagnosis.
- Incorporates knowledge of the determinants of health and disease into assessment.
- Formulates diagnoses based on a clinical assessment including but not limited to a medical history, physical examination and diagnostic testing.

4. Critically evaluates medical information.

- Understands, respects and incorporates evidence-based medicine¹ in his/her practice.
- Appraises evidence critically to address clinical questions.

- Integrates new information appropriately into clinical reasoning.
- Evaluates and reflects on patient outcomes.

Inter-professional Practice and Collaboration

The competent Naturopathic Doctor:

1. Develops and maintains relationships with other health care professionals in the care of his/her patients.

- Demonstrates an understanding of the scope of practice of other health care professionals.
- Collaborates with others to support health promotion and disease prevention.
- Utilizes community resources in professional practice.
- Collaborates with other health care professionals in the care of his/her patients when necessary.

Communication

The competent Naturopathic Doctor:

1. Communicates effectively.

- Articulates information clearly and concisely and in a timely manner, listens actively and responds appropriately.
- Communicates appropriately with patients or their authorized representatives, colleagues, other health professionals, the community, his/her regulator, and other legal authorities.
- Requests from and provides to other health care professionals relevant patient information.
- Advances naturopathic principles and philosophy in communication with patients, health care professionals and the public.
- Maintains patients confidentiality and privacy.

Patient Care and Health Promotion

The competent Naturopathic Doctor:

1. Exemplifies the principle of doctor as teacher in patient interactions.

- Teaches the principles of healthy living and preventative medicine.
- Educates the patient regarding the etiology and development of disease.
- Educates the patient about the contributing factors to disease and dysfunction and the ways in which they impact health.
- Educates the patient about treatment options and their potential risks, benefits, and side effects.

2. Provides safe and effective patient care.

- Provides compassionate, ethical, effective and safe care.
- Utilizes naturopathic therapeutics effectively including botanical medicine, homeopathic medicine, traditional Chinese medicine and acupuncture, physical medicine, clinical nutrition and lifestyle counselling.
- Identifies and assesses the actions of and interactions between drugs, substances and therapies being used by or provided to the patient.
- Communicates a diagnosis.
- Creates, implements, monitors and revises effective individualized treatment plans.
- Documents patient care.

- Refers to other health care professionals when indicated.
- Engages patients in establishing a long-term strategy for their personal health.
- Maintains professional boundaries and refrains from conflicts of interest.

3. Promotes the principles and philosophy of Naturopathic Medicine to patients and the community.

- Promotes naturopathic principles and philosophy.
- Promotes sustainable health practices.
- Educates others on the significance of environmental factors on health.
- Promotes a wider acceptance of Naturopathic Medicine in the health care system.

Practice Management

The competent Naturopathic Doctor:

1. Establishes, develops and manages his/her practice.

- Practices in a compassionate, ethical and legal manner.
- Engages in short and long term business planning.
- Organizes and manages systems and resources relevant to practice needs.
- Maintains a safe and secure workplace.
- Manages time effectively.
- Recognizes the importance of establishing and maintaining a personal/professional life balance.

Education and Learning

The competent Naturopathic Doctor:

1. Ensures professional competence through ongoing self-assessment and professional development.

- Integrates learning into practice.
- Recognizes limitations in knowledge, skill, judgment and scope of practice.
- Engages in on-going professional development and learning.
- Understands the significance of research with respect to predicting health outcomes.
- References and employs empirical, literary and information-technology sources.
- Self-assesses professional knowledge and skills regularly.

2. Supports the advancement of Naturopathic Medicine through the development, critical assessment and dissemination of research and information.

- Participates in research activities as appropriate for professional practice.

3. Supports the mentorship of students and Members.

- Participates in mentorship as appropriate.

Legislation/Ethics

The competent Naturopathic Doctor:

1. Complies with all relevant laws and regulation.

- Complies with federal, provincial, and municipal legislation, regulations and bylaws.

- Understands and complies with the *Regulated health Professions Act, Naturopathy Act* and all College regulations and standards of practice.

2. Demonstrates ethical conduct and integrity in professional practice and personal conduct.

- Practices with integrity and without prejudice.
- Abides by the naturopathic oath.
- Demonstrates accountability for practice decisions.
- Places the protection of the public ahead of self-interest.

TAB M



Standard of Practice:

Advertising

Introduction

The intent of this standard is to advise Members on the appropriate and acceptable methods of advertising that may be used as a part of their practice.

The College supports Members' use of appropriate advertising to communicate the type and availability of services to the public or other health care professionals so that potential and existing patients and referral sources can make choices based on their respective needs.

Definitions

Advertisement: Any message communicating information about a Member's practice and/or the professional services he/she offers, the content of which he/she controls or influences, directly or indirectly, which is expressed in any language with the intent to influence choice, opinion or behavior and communicated in any public medium to anyone.

Advertising is not the same as providing information to prospective referral sources or sending out health care notices and reminders.

Public Medium: Any form of communication that is, generally speaking, equally available to anyone who chooses to use it and that is directed to the public, or a specific subsection of the public rather than to an individual person or persons. For example radio, television, websites, flyers, and the yellow pages are all forms of public media. Emails targeted to individuals are not an acceptable advertising medium.

1. Advertising

The Member may use any public medium to advertise professional services offered within the scope of practice of Naturopathic Medicine to members of the public, or other health care professionals, to assist them in making informed choices about the health care services provided by Naturopathic Doctors.

The Member's advertisements are accurate, verifiable, comprehensible, professionally appropriate and in compliance with the standards of practice of the profession. The Member is always responsible for advertisements about his or her practice regardless of whether or not the advertisement is made by the individual Member. The Member takes reasonable steps to ensure that advertisements placed by others about his/her services meet these standards.

Performance Indicators

The Member ensures the information in advertisements is:

- accurate;
- true;
- verifiable by the Member;
- not misleading by either omitting relevant information or including non-relevant information;
- professional;
- comprehensible to its intended audience;
- in accordance with the generally accepted standards of good taste.

References to professional qualifications used in advertisements are consistent with the College's Standard of Practice for Restricted Titles.

Any reference to the cure of symptoms or diseases, or appealing to the public's fears does not meet the standard.

Professional services offered by a Member advertising in her/her capacity as a Naturopathic Doctor are within the scope of practice of Naturopathic Medicine.

Advertisements do not include anything that could be interpreted as intending to promote a demand for unnecessary services.

Reference to fees or prices used in advertisements meet the expectations for truth and accuracy described in this standard. The Member's advertisements may:

- display or distribute a fee schedule and/or explanation of the way fees are calculated;
- provide information about fees or charges in response to a request for this information;
- provide information on the funding models or insurance plans accepted;
- indicate the forms of payment accepted.

The Member ensures that advertisements do not include:

- any information that could be interpreted to be an endorsement by a Naturopathic Doctor including an expressed or implied endorsement or recommendation for the exclusive use of a drug, product or brand of equipment used in her/her practice;
- a guarantee of the success of the service provided;
- a comparative or superlative statement about service quality, products or people;
- a direct, indirect or implied testimonial by any patient, former patient or other person in respect of the Member's practice
- any references to third-party websites or publications that carry testimonials or endorsements of the Member.

The Member avoids directly or indirectly soliciting patients in person, by telephone, e-mail, or any other means of communication that is not considered to be a public medium. This does not prevent the Member from advertising to the general public or calling/emailing a patient to remind him or her of an upcoming appointment/service. Rather, the Member should not target advertising to individuals or use communication techniques that can pressure potentially vulnerable persons.

Related Standards & Guidelines

Conflict of Interest

Dual Registration

Fees and Billing
Restricted Titles
College of Naturopaths of Ontario's Guideline on Advertising

Legislative Framework

[Professional Misconduct Regulation](#)

Approval

Original Approval Date: October 15, 2012

Latest Amendment Date: December 6, 2017

Disclaimer

In the event of any inconsistency between this standard and any legislation that governs the practice of Naturopathic Doctors, the legislation shall govern.

TAB N



Standard of Practice:

Fees and Billing

Introduction

The intent of this standard is to advise Members with respect to fees and billing for naturopathic services, drugs, substances, products or devices.

Definitions

Block Fee: A flat fee charged for a predetermined set of services or unlimited services.

1. Fees and Billing

The Member establishes and maintains fair and ethical fees and billing practices.

Performance Indicators

The Member:

- ensures that a fee schedule is established and posted that outlines:
 - the fees for all visits or services;
 - any administrative fees; and
 - penalties for missed or cancelled appointments.
- ensures that patients are informed of the fees to be charged for naturopathic services;
- ensures that the fees charged:
 - are not excessive in relation to the services proposed;
 - for drugs, substances, products and devices are only marked-up to cover the direct overhead expenses incurred in obtaining, storing, dispensing and selling these items; and
 - are an accurate reflection of the services provided to each patient.
- ensures that any departure from an established or documented fee is consented to by the patient and documented in the patient record;
- provides information to patients that includes:
 - any relevant financial policies and payment expectations;
 - information on fees and the fee schedule specific to the patient circumstances;
 - the basis upon which a bill for services is calculated; and
 - the acceptable methods of payment.
- audits invoices and billing practices at periodic intervals to ensure:
 - the accuracy of invoices;
 - an understanding of the fees that are being charged for their services;

- an understanding of how their registration or billing number is being used; and
- when abnormalities are discovered, reasonable steps are taken to remedy the situation.
- ensures that processes exist for the timely:
 - notification of any balance due or owing; and
 - provision of applicable refunds.
- does not charge a block fee;
- does not charge a dispensing fee;
- does not offer or give a reduction in fees for prompt payment of services.

2. Receipts

The Member issues a receipt for all payments.

Performance Indicators

Receipts clearly and legibly record:

- name of treating Member, clinic name, address, telephone number;
- Member's registration number;
- patient's name and address;
- date of service;
- services billed;
- fees for supplements, injectable substances, devices, special testing, etc.;
- payments received;
- balance owing;
- HST registration number, if applicable.

If a replacement receipt is issued it is clearly marked "COPY".

Receipts are clearly itemized. Fees for naturopathic consultation are separated from all other fees. Fees for supplements, injectable substances, devices, special testing, etc., are individually listed, either on the same or another receipt.

The purchase and redemption of vouchers or gift certificates are clearly documented.

Related Standards

Conflict of Interest

Consent

Dispensing

Prescribing

Recommending Non-Scheduled Substances

Record Keeping

Selling

Legislative Framework

[Professional Misconduct Regulation](#)

Disclaimer

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TAB O



Standard of Practice:

Prescribing



Introduction

The intent of this standard is to advise Members of the requirements to prescribe drugs and substances listed on Table 3 of the General Regulation safely, ethically and competently.

Prescribing is a component of the controlled act: "Prescribing, dispensing, compounding or selling a drug designated in the regulations." (*Regulated Health Professions Act, 1991, S.O. 1991, CHAPTER 18, s. 27*).

Members are authorized to prescribe a drug designated in the regulations under *the Naturopathy Act, 2007, S.O. 2007, CHAPTER 10, Sched. P, s.4.1*.

Definitions

Drug and Substance: For the purposes of this Standard of Practice a drug and/or substance is anything listed on Table 3 of the General Regulation.

1. Competency

The Member has the knowledge, skill and judgment to prescribe drugs or substances safely, ethically and competently.

Performance Indicators

Prior to prescribing drugs or substances, the Member will:

- achieve and maintain all prerequisites required for performing the procedure including the successful completion of:
 - a course on prescribing approved by the Council; and
 - an examination on prescribing administered or approved by the Council;
- fulfill all requirements for maintenance of competence for performing the procedure (e.g., continuing education, College's Quality Assurance Program).

2. Prescribing

The Member conducts an assessment and formulates a working diagnosis based on subjective and/or objective findings, prior to prescribing a drug or substance.

Performance Indicators

The Member has a Naturopathic Doctor-patient relationship with the patient for whom the drug or substance is being prescribed.

Before prescribing a drug or substance, the Member:

- assesses the patient and conducts laboratory and diagnostic investigations as appropriate;
- determines that the patient's condition warrants prescribing the drug or substance, having considered the risks and benefits and other circumstances relevant to the patient;
- documents symptoms and/or conditions being treated;
- reviews the patient's available medication history.

The Member who prescribes drugs or substances:

- does so in compliance with any limitations and in accordance with the route of administration and dosage specifications included in Table 3 of the General Regulation;
- informs each patient that they have a choice where they can purchase the prescribed drug or substance;
- provides a written prescription;
- provides a verbal prescription in emergency situations only and documents the verbal order as soon as possible;
- documents the drug or substance prescribed in the patient record;
- provides relevant information about drugs or substances, including but not limited to risks, contraindications, and proper usage, to the patient and/or authorized patient representative; and
- notifies the patient's other primary health care providers, if any, of the details of the prescription, with the patient's consent.

When preparing a prescription for a drug or substance, the Member includes the following on the prescription:

- date;
- patient's name and address;
- prescribed drug or substance's name or scientific binomial, strength, dose and quantity to be dispensed;
- directions for use including the administration route, frequency, dose, duration and any special instructions;
- number of allowable refills; and
- prescriber's name, address, telephone number, signature, and College registration number.

After prescribing a drug or substance, the Member:

- monitors and documents the patient's response to the therapy;
- monitors, documents and reports adverse reactions;
- continues therapy, adjusts dosage or discontinues the therapy as appropriate; and
- consults with an appropriate health care professional when the patient's response to the therapy is other than what the Member anticipated.

When a Member continues a drug or substance initiated by another health care professional, the Member:

- provides ongoing assessment;
- monitors and documents the patient's response to therapy;
- continues therapy, adjusts dosage or discontinues therapy depending on the patient's response;
- informs the initiating health care professional of changes in therapy, where appropriate and with the patient's consent.

3. Record Keeping

The Member makes specific notations regarding prescribing drugs and substances.

Performance Indicators

In addition to the Standard of Practice for Record Keeping, the Member maintains in the patient record:

- a copy of the prescription;
- a record of any laboratory or other tests that the Member considered in making the decision to prescribe the drug or substance;
- the names and address of the patient's other primary health care providers, the date on which the Member notified those other providers about the prescription and the method by which the notification occurred.

Related Standards & Guidelines

Compounding

Conflict of Interest

Delegation

Dispensing

Record Keeping

Selling

Legislative Framework

[General Regulation](#)

[Naturopathy Act, 2007](#)

[Professional Misconduct Regulation](#)

[Regulated Health Professions Act, 1991](#)

Disclaimer

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TAB P



Standard of Practice:

Recommending Non-Scheduled Substances



Introduction

The intent of this standard is to advise Members, who recommend non-scheduled substances in the provision of Naturopathic care, how to perform the act safely, ethically and competently.

Definitions

Non-Scheduled Substances: for the purpose of this Standard a non-scheduled substance is anything that is publicly available and is not listed on Table 3 of the General Regulation.

Recommendation: For the purpose of this Standard a recommendation is an advised course of treatment using non-scheduled substances.

1. Competency

The Member has the knowledge, skill and judgment to recommend non-scheduled substances safely, ethically, and competently.

Performance Indicators

Prior to recommending non-scheduled substances, the Member:

- fulfills all requirements for maintenance of competence for performing the procedure (e.g., continuing education, College's Quality Assurance Program).

2. Recommending Non-Scheduled Substances

The Member conducts an assessment and formulates a working diagnosis based on subjective and/or objective findings, prior to recommending non-scheduled substances.

Performance Indicators

The Member recommends non-scheduled substances within the context of the doctor-patient relationship.

Before recommending a non-scheduled substance, the Member:

- assesses the patient and conducts laboratory and diagnostic investigations as appropriate;
- documents symptoms and/or conditions being treated; and
- reviews the patient's available medication history.

The Member who recommends non-scheduled substances:

- provides a written recommendation except in emergency situations; and

- documents the recommendation in the patient record.
- provides relevant information about non-scheduled substances, including but not limited to risks, contraindications, and proper usage, to the patient and/or authorized patient representative.

When preparing a recommendation for a non-scheduled substance, the Member includes the following:

- date;
- patient's name;
- name of substance/product, strength, dose and quantity to be dispensed;
- directions for use including the administration route, frequency, duration and any special instructions; and
- Member's name, address, signature, and College registration number.

After recommending a non-scheduled substance, the Member:

- monitors and documents the patient's response to the therapy;
- monitors, documents and reports adverse reactions; and
- continues therapy, adjusts dosage or discontinues the therapy as appropriate.

Related Standards & Guidelines

Communicating a Diagnosis

Conflict of Interest

Prescribing

Record Keeping

Selling

Therapeutic Relationships and Professional Boundaries

Legislative Framework

[General Regulation](#)

[Naturopathy Act, 2007](#)

[Professional Misconduct Regulation](#)

[Regulated Health Professions Act, 1991](#)

Disclaimer

In the event of any inconsistency between this standard and any legislation that governs the practice of Naturopathic Doctors, the legislation shall govern.

TAB Q



Standard of Practice:

Selling



Introduction

The intent of this standard is to advise Members of the requirements to sell substances safely, ethically and competently. This standard applies to the selling of drugs, substances and devices.

Selling scheduled substances is a component of the controlled act: "Prescribing, dispensing, compounding or selling a drug designated in the regulations." (*Regulated Health Professions Act, 1991, S.O. 1991, CHAPTER 18, s. 27*).

Members are authorized to sell scheduled substances under the *Naturopathy Act, 2007, S.O. 2007, CHAPTER 10, Sched. P, s. 4.1*

Definitions

Drug: for the purposes of this Standard of Practice, a drug is anything referred to in Table 6 of the General Regulation or anything that is injected.

Substance: For the purposes of this Standard of Practice, a substance is anything that is publicly available and not listed in the General Regulation. This may include botanical tinctures, botanical powders or loose herbs, fluid/solid extracts, base creams, salves and ointments, homeopathic remedies, pharmaceutical grade ethyl alcohol, vitamins, minerals and amino acids.

1. Competency

The Member has the knowledge, skill and judgment to sell drugs, substances and devices safely, ethically and competently.

Performance Indicators

Prior to selling drugs, the Member is in compliance with the Standard of Practice for Prescribing.

2. Selling Drugs, Substances or Devices

The Member will minimize the risks to patients, self and others that are associated with the selling of drugs, substances or devices.

Performance Indicators

The Member has a Naturopathic Doctor-patient relationship with the patient, or if no such relationship exists:

- the member possesses the prescription/recommendation from another member for the drug/substance;
- verifies and documents the accuracy and validity of the prescription/recommendation prior to selling the drug or substance; and
- retains a copy of the prescription/recommendation in the Member's records.

The Member only sells a compounded drug or substance directly to their patient.

The Member:

- does not sell drugs, substances or devices while being in an unmanaged conflict of interest;
- sells the drugs, substances or devices for therapeutic purposes only;
- sells the drugs in accordance with any limitations respecting the drugs listed in the General Regulation;
- informs the patient or the patient's authorized representative that they may be able to purchase the drug or substance from a pharmacy;
- is satisfied that the patient:
 - does not have reasonable or timely access to a pharmacy;
 - would not otherwise buy the drug;
 - does not have the financial resources to obtain the drug if not sold by the member; or
 - the drug is not reasonably available in a pharmacy.
- does not sell a drug if the selling provides a profit or a direct or indirect personal or financial benefit;
- ensures that the drugs, substances and devices sold have been obtained and stored in accordance with applicable laws; and
- ensures that the drug or substance sold has not expired and will not expire before the date on which the patient is expected to take the last of the drug or substance.

The sale of all drugs, substances and devices is documented.

Related Standards & Guidelines

Compounding
 Conflict of Interest
 Dispensing
 Fees and Billing
 Prescribing
 Record Keeping

Legislative Framework

[General Regulation](#)

[Naturopathy Act, 2007](#)

[Professional Misconduct Regulation](#)

[Regulated Health Professions Act, 1991](#)

Disclaimer

In the event of any inconsistency between this standard and any legislation that governs the practice of Naturopathic Doctors, the legislation shall govern.

DISCIPLINE COMMITTEE OF THE
COLLEGE OF NATUROPATHS
OF ONTARIO

**AGREED STATEMENT OF FACTS AND ADMISSION
OF PROFESSIONAL MISCONDUCT**

STEINECKE MACIURA LEBLANC

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Lawyers for the College of Naturopaths
of Ontario

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

**This is Exhibit # 3
In CONO vs. Natasha Turner
(DC21-02) Date: May 2, 2022**

B E T W E E N:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER
(FILE NO. 20-021R)

JOINT SUBMISSION ON PENALTY AND COSTS

STEINECKE MACIURA LEBLANC

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401 Bay Street, Suite 2308
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**Rebecca Durcan
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**DISCIPLINE COMMITTEE OF
THE COLLEGE OF NATUROPATHS OF ONTARIO**

B E T W E E N:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER
(FILE NO. 20-021R)

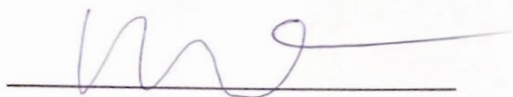
JOINT SUBMISSION ON PENALTY AND COSTS

1. The College of Naturopaths of Ontario (the "College") and Dr. Natasha Turner, ND (the "Registrant") agree and jointly submit that the following would be an appropriate order as to penalty:
 - a. Requiring the Registrant to appear before the Panel to be reprimanded immediately following the hearing of this matter;
 - b. Directing the Chief Executive Office to suspend the Registrant's certificate of registration for a period of twelve (12) months with six (6) months remitted, to commence on the date of the hearing in this matter; and
 - c. Requiring the Registrant to pay a fine in the amount of \$350.00 to the Minister of Finance within two (2) months of the date of the hearing of this matter.
2. The Registrant acknowledges that this Joint Submission on Penalty and Costs is not binding upon the Discipline Committee.
3. The Registrant acknowledges and understands that she is executing this document voluntarily, unequivocally, free of duress and free of bribe and that she has obtained legal advice.

(continues)

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Signed this 4 day of April, 2022

A handwritten signature in blue ink, appearing to read 'Natasha Turner', written over a horizontal line.

Dr. Natasha Turner, ND
Registrant

Signed this 4th day of April, 2022

A handwritten signature in blue ink, appearing to read 'Andrew Parr', written over a horizontal line.

Andrew Parr, CAE
Chief Executive Officer
College of Naturopaths of Ontario

DISCIPLINE COMMITTEE OF THE
COLLEGE OF NATUROPATHS
OF ONTARIO

JOINT SUBMISSION ON PENALTY AND COSTS

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Lawyers for the College of Naturopaths
of Ontario

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

**This is Exhibit # 4
In CONO vs. Natasha Turner
(DC21-02) Date: May 2, 2022**

B E T W E E N:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER
(FILE NO. 20-021R)

ACKNOWLEDGEMENT AND UNDERTAKING

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

B E T W E E N:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER
(FILE NO. 20-021R)

ACKNOWLEDGEMENT AND UNDERTAKING

I, DR. NATASHA TURNER, ND, hereby acknowledge and undertake as follows:

The Registrant

1. I registered with the Board of Directors of Drugless Therapy – Naturopathy on or about October 28, 1999. I then became registered with the College of Naturopaths of Ontario (the “College”) on July 1, 2015.
2. I have not successfully completed a course on prescribing approved by Council or an examination on prescribing administered or approved by Council and am therefore not authorized to prescribe drugs or substances.
3. I work at and own Clear Medicine in Toronto, Ontario (the “Clinic”).

Allegations of Professional Misconduct

4. I acknowledge that allegations of professional misconduct against me have been referred to the College's Discipline Committee in File No 20-021R (the "Discipline Matter"). A copy of the Notice of Hearing is attached as **Tab "A"**.

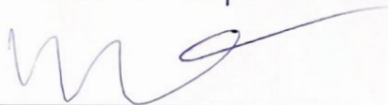
Resignation

5. I undertake to resign my certificate of registration with the College on the date of the Discipline Committee's order in the Discipline Matter and to never apply for registration with CONO in the future.

Other Acknowledgements

6. I acknowledge that if I breach this Acknowledgement and Undertaking, including but not limited to by engaging in clinical practice and/or failing to resign as indicate above, the College will be entitled to prosecute me for that breach and that such a prosecution may proceed (in accordance with section 14 of the Health Professions Procedural Code, being Schedule 2 of the *Regulated Health Professions Act, 1991*) even though I may have resigned my certificate of registration with the College.
7. I further understand, acknowledge and agree that:
- a. I fully understand the terms of this Acknowledgement and Undertaking;
 - b. I am signing this Acknowledgement and Undertaking voluntarily and without compulsion or duress; and
 - c. I have obtained legal advice.

Signed this 4 day of April, 2022



Dr. Natasha Turner, ND
Registrant

Signed this 4th day of April, 2022



Andrew Parr, CAE
Chief Executive Officer
College of Naturopaths of Ontario

DISCIPLINE COMMITTEE OF THE
COLLEGE OF NATUROPATHS
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ACKNOWLEDGEMENT AND UNDERTAKING

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