

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

B E T W E E N :

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

DR. COREY LAPP, ND

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 “**Code**”). The statement of specified allegations is attached to this Notice of Hearing. A discipline panel (the “**Panel**”) will hold a hearing under the authority of sections 38 to 56 of the Code, 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. The panel will convene by secure video connection at **9:30 a.m. on a date to be set by the Chief Executive Officer (CEO)**¹, 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 PANEL MAY PROCEED IN YOUR ABSENCE AND YOU WILL NOT BE ENTITLED TO ANY FURTHER NOTICE IN THE PROCEEDINGS.

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

1. Direct the CEO to revoke your certificate of registration.
2. Direct the CEO to suspend your certificate of registration for a specified period of time.

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).

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 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 Code.

You are entitled to disclosure of the evidence against you in accordance with section 42(1) of the Code, and Rules 1.4, 6.4 and 6.5 of the *Rules of Procedure of the Discipline Committee of the College of Naturopaths of Ontario*.

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

Steinecke Maciura LeBlanc
Barristers & Solicitors
401 Bay Street
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Toronto, ON M5H 2Y4

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Note that, Rules 6.4 and 6.5 of the *Rules of Procedure of the Discipline Committee of the College of Naturopaths of Ontario* also apply to you. Rules 6.4 and 6.5 state as follows:

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.

RULE 6.4 Documents and Witnesses

- (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.
- (2) Each Party to a Proceeding shall deliver to every other Party a list containing the identity of any witnesses the Party intends to call and the subject of each witness's anticipated evidence.
- (3) The College must produce the information set out in (1) and (2) above as soon as is reasonably practicable after the Notice of Hearing is served but in any case, not less than fifteen (15) days before the commencement of the Hearing.
- (4) Any other Party must produce the information set out in (1) and (2) above as soon as is reasonably practicable after disclosure by the College under this Rule but in any case, not less than ten (10) days before the commencement of the Hearing.
- (5) In the event that the College produces any information set out in (1) and (2) above less than 15 days before the Hearing, any Party who wishes to produce information set out in (1) and (2) above in response thereto may produce the information as soon as is reasonably practicable after disclosure by the College under this Rule but in any case, not less than five (5) days after disclosure by the College and prior to the commencement of the Hearing.
- (6) A Party who does not disclose a document or thing in compliance with this Rule 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.
- (7) A Party who does not include a witness in the witness list or provide the subject matter 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.

RULE 6.5 Expert Opinion Disclosure

- (1) A Party who intends to call an expert to give 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, a witness summary; and
 - (d) file and "Acknowledgement Form – Expert's Duty" signed by the expert, in the form appended to these rules.
- (2) The College shall deliver any expert report or witness summary upon which the College intends to rely at the Hearing to the Registrant at least sixty (60) days before the commencement of the Hearing.

- (3) The Registrant shall deliver any expert report upon which they intend to rely to the College at least thirty (30) days before the commencement of the hearing.
- (4) The College may deliver a reply expert report at least fifteen (15) days before the commencement of the Hearing.
- (5) Where an expert report is filed, it shall 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.
- (6) A party who fails to comply with this Rule may not call the expert as a witness or file the expert's report without leave of the Panel, which may be on any conditions that the Panel considers just.

Date: December 22, 2025



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

TO: **Dr. Corey Lapp, ND**

STATEMENT OF SPECIFIED ALLEGATIONS

File 24-024

1. Corey Lapp (the “**Registrant**”) initially registered with the Board of Directors of Drugless Therapy – Naturopathy in or about 2014. The Registrant became a Registrant with the College of Naturopaths of Ontario (the “**College**”) in the General class of registration on or about July 1, 2015 as a result of the proclamation of the *Naturopathy Act, 2007*.
2. The Registrant practises at O Wellness in Chatham, Ontario (the “**Clinic**”).

Breaching Agreement of Services

3. It is alleged that in or around December 2023, the Registrant entered into an agreement with Patient 1, and other patients, to provide a group program for hormone and metabolic support (the “**Program**”). It is alleged that the terms of the Program included the following:
 - a. Twice monthly 30-minute group Zoom calls, for a period of four months;
 - b. 1:1 personal support from the Registrant as needed, for a period of four months;
 - c. Group support through Whatsapp group chat, for a period of four months;
 - d. Education and information on hormones, nervous system, inflammation and metabolism, for a period of four months;
 - e. An evening event and/or retreat designed for group connection, education and support; and
 - f. An evening of hormone wellness with special guests.
4. It is alleged that the Program was scheduled to commence on or about January 8, 2024 and conclude on or about May 8, 2024.
5. It is alleged that shortly after the Program commenced, the Registrant failed to comply with the terms of the Program and/or discontinued the Program.
6. It is alleged that Patient 1 followed up with the Registrant to inquire about the Program and/or why the terms of the Program were not being provided.
7. It is alleged that Patient 1 asked the Registrant if she would provide a refund as a result of the Registrant failing to comply with the terms of the Program.
8. It is alleged that despite numerous attempts by Patient 1 to contact the Registrant, the Registrant failed to respond until the Registrant was advised that Patient 1 had filed a complaint with the College.
9. It is alleged that despite the request of Patient 1 for a refund and the failure of the Registrant to comply with the terms of the Program, the Registrant did not agree to offer a refund to Patient 1.

Fees and Billing

10. It is alleged that that the Registrant did one or more of the following in respect of Patient 1 and the Program:
- a. Charged fees that were not an accurate reflection of the services provided;
 - b. Issued or permitted the issuance of an invoice and/or receipt that:
 - i. Was inaccurate and/or misleading;
 - ii. Did not record and/or did not accurately record: the Registrant's registration number; Patient 1's address and phone number; the date of service; and/or the services billed;
 - iii. Was not clearly itemized; and/or
 - iv. Did not separate the fees for naturopathic consultation from other fees;
 - c. Failed to provide clear information about the basis upon which the bill for services was calculated;
 - d. Failed to ensure that a process existed for the timely provision of applicable refunds;
 - e. Charged a block fee for the Program; and/or
 - f. Offered and/or gave a reduction in fees for paying upfront to join the Program.

Record Keeping

11. It is alleged that the Registrant failed to maintain financial records in accordance with the standards of the profession and/or failed to maintain financial records that were accurate, legible and comprehensive, in one or more of the following ways:
- a. Issued or permitted the issuance of an invoice and/or receipt to Patient 1 that:
 - i. Did not record and/or accurately record: the patients address and phone number; the method of payment; the date of service; and/or the services billed;
 - ii. Was not clearly itemized; and/or
 - iii. Did not separate the fees for naturopathic consultation from other fees.

Allegations of Professional Misconduct

12. It is alleged that the above noted conduct constitutes professional misconduct pursuant to subsection 51(1)(c) of the *Health Professions Procedural Code* (the "**Code**"), being Schedule 2 to the *Regulated Health Professions Act, 1991*, 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 Standards of Practice on Fees and Billing and/or Record Keeping;
- b. **Paragraph 6:** Discontinuing professional services that are needed unless the discontinuation would reasonably be regarded by members as appropriate having considered:
 - i. the member's reasons for discontinuing the services,
 - ii. the condition of the patient,
 - iii. the availability of alternate services, and
 - iv. the opportunity given to the patient to arrange alternate services before the discontinuation.
- c. **Paragraph 18:** Issuing an invoice, bill or receipt that the member knows or ought to know is false or misleading;
- d. **Paragraph 21:** Failing to provide an account or failing to itemize the account in a way that sets out each item charged, including, but not limited to, professional fees, products, services and applicable taxes;
- e. **Paragraph 22:** Breaching, without reasonable cause, an agreement with a patient or a patient's authorized representative relating to professional products or services for the patient or fees for such products or services;
- f. **Paragraph 23:** Failing to keep records in accordance with the standards of the profession; and/or
- g. **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.

File 25-007R

Breaching Agreement for Services

13. It is alleged that in or around December 2023, the Registrant entered into agreements with seven patients, Patient A, Patient B, Patient C, Patient D, Patient E, Patient F and Patient G (the "**Program Participants**"), to provide a group program for hormone and metabolic support (the "**Program**"). It is alleged that the terms of the Program included the following:
- a. Twice monthly 30-minute group Zoom calls, for a period of four months;
 - b. 1:1 personal support from the Registrant for each Program Participant as needed, for a period of four months;
 - c. Group support through Whatsapp group chat, for a period of four months;

- d. Education and information on hormones, nervous system, inflammation and metabolism, for a period of four months;
 - e. An evening event and/or retreat designed for group connection, education and support; and
 - f. An evening of hormone wellness with special guests.
14. It is alleged that the Program was scheduled to commence on or about January 8, 2024 and conclude on or about May 8, 2024.
15. It is alleged that shortly after the Program commenced, the Registrant failed to comply with the terms of the Program and/or discontinued the Program.
16. It is alleged that the Registrant did not offer and/or provide a refund to Program Participants.

Fees and Billing

17. It is alleged that that the Registrant did one or more of the following in respect of the Program Participants and the Program:
- a. Charged fees that were not an accurate reflection of the services provided;
 - b. Issued or permitted the issuance of invoices and/or receipts that:
 - i. Were inaccurate and/or misleading;
 - ii. Did not record and/or did not accurately record: the Registrant's registration number, the address and phone number of the Program Participant; the date of service; and/or the services billed;
 - iii. Were not clearly itemized; and/or
 - iv. Did not separate fees for naturopathic consultation from other fees;
 - c. Failed to provide clear information to Program Participants about the basis upon which the bills for services were calculated;
 - d. Failed to ensure that a process existed for the timely provision of applicable refunds;
 - e. Charged a block fee for the Program;
 - f. Offered and/or gave a reduction in fees to Program Participants for paying upfront to join the Program; and/or
 - g. Charged a mark-up on the cost of a laboratory test and failed to obtain the patient's consent for the mark-up and/or failed to document the mark-up in the patient record.

Record Keeping

18. It is alleged that the Registrant failed to keep records as required and/or failed to maintain patient records that are accurate, legible and comprehensive by failing to ensure that the patient records contained the elements as required by the Standard of Practice: Record Keeping.

Consent

19. It is alleged that the Registrant did not discuss and/or obtain and/or document informed consent from the Program Participants before providing treatment.

Conflict of Interest

20. It is alleged that the Registrant offered Program Participants a lifetime 25% discount for an online digital dispensary for nutritional supplements and wellness products.
21. It is alleged that the Registrant recommended nutritional supplements and/or wellness products to patients and suggested that patients order through the online digital dispensary.
22. It is alleged that the Registrant received a financial benefit from the online digital dispensary (the "**Financial Benefit**") for nutritional supplements and/or wellness products purchased by her patients.
23. It is alleged that the Registrant did not disclose the Financial Benefit to Program Participants.
24. It is alleged that the Registrant offered Program Participants a discounted rate of \$500 for a hormone test performed by a laboratory.
25. It is alleged that the Registrant recommended and/or suggested to and/or convinced Program Participants that they should undergo the hormone test.
26. It is alleged that the Registrant marked-up the cost of the hormone test from \$365 to \$500 for Program Participants (the "**Testing Financial Benefit**").
27. It is alleged that the Registrant did not disclose the Testing Financial Benefit to Program Participants.

Advertising

28. It is alleged that the Registrant communicated and/or permitted the communication of information that is not verifiable and/or included a guarantee of success of the services provided and/or is misleading, including but not limited to one or more of the following:
 - a. "Balance your hormones for good";
 - b. "Finally initiate the lasting change you need";
 - c. "A way to initiate and see REAL change in 2024";

- d. "Make lifestyle changes that WILL support your health and happiness and the health and happiness of your family and children";
- e. "You can be held accountable to initiate REAL change";
- f. "I take women from over extended and exhausted to energized and balanced";
- g. "Giving women the energy and motivation to thrive by leading them from isolation and overwhelm towards a life of renewed energy and balance";
- h. "Imagine finally having the answers and finally having a plan for getting you on track with your goals";
- i. "Let's work together to get your life back – you can have it all and more";
- j. "Align your hormones to work for you to prevent exhaustion and help you feel energized and balanced";
- k. "YOU CAN HAVE IT ALL"; and/or
- l. "It's time to align your hormones to work for you, you have one life – you can have it all".

29. 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's Facebook page and/or the Registrant's Facebook page.

Requisitioning Laboratory Tests

30. It is alleged that the Registrant requisitioned the hormone test for Patient E and/or Patient F for a purpose other than diagnosing or treating the patients in the course of her naturopathic practice, and/or without obtaining the patient's health history, and/or without performing a clinical assessment of the patients, and/or taking into consideration a differential diagnosis of the patients.

Patient Privacy and Confidentiality

31. It is alleged that the Registrant failed to obtain consent from the Program Participants when collecting, using or disclosing personal health information in the WhatsApp group chat and in email correspondence.

32. It is alleged that the conduct outlined in paragraph 31 is a contravention of section 29 of the *Personal Health Information Protection Act, 2004*, S.O. 2004, c.3 Sch A.

33. It is alleged that the Registrant failed to maintain the confidentiality of the Program Participants in the course of collecting and transmitting personal health information in the WhatsApp group chat in email correspondence.

Recommending Non-scheduled Substances

34. It is alleged that the Registrant recommended non-scheduled substances for Patient E and/or Patient F without obtaining the patient's health history and/or without performing a clinical assessment of the patient.

35. It is alleged that after recommending non-scheduled substances, the Registrant did not monitor or document the patients' response to the therapy, adjust dosage or discontinue the therapy as appropriate.

Allegations of Professional Misconduct

36. It is alleged that the above noted conduct constitutes professional misconduct pursuant to subsection 51(1)(c) of 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 College Standards of Practice on: Fees and Billing; and/or Record Keeping; and/or Consent; and/or Conflict of Interest; and/or Advertising; and/or Requisitioning Laboratory Tests; and/or Recommending Non-Scheduled Substances;
 - b. **Paragraph 3:** Doing anything to a patient for a therapeutic, preventative, palliative, diagnostic or other health-related purpose except, i. with the informed consent of the patient or the patient's authorized representative, or ii. as required or authorized by law;
 - c. **Paragraph 5:** Giving information about a patient to a person other than the patient or the patient's authorized representative except with the consent of the patient or the patient's authorized representative or as required or authorized by law;
 - d. **Paragraph 6:** Discontinuing professional services that are needed unless the discontinuation would reasonably be regarded by members as appropriate having considered:
 - i. the member's reasons for discontinuing the services,
 - ii. the condition of the patient,
 - iii. the availability of alternate services, and
 - iv. the opportunity given to the patient to arrange alternate services before the discontinuation.
 - e. **Paragraph 17:** Acting in a conflict of interest when acting in a professional capacity;
 - f. **Paragraph 18:** Issuing an invoice, bill or receipt that the member knows or ought to know is false or misleading;
 - g. **Paragraph 21:** Failing to provide an account or failing to itemize the account in a way that sets out each item charged, including, but not limited to, professional fees, products, services and applicable taxes;
 - h. **Paragraph 23:** Failing to keep records in accordance with the standards of the profession;

- i. **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;
- j. **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;
- k. **Paragraph 37:** Contravening, by act or omission, a law if, i. the purpose of the law is to protect or promote public health, or ii. the contravention is relevant to the member's suitability to practise including but not limited to the Laboratory and Specimen Collection Centre Licensing Act; and/or
- l. **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.

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 of the College of Naturopaths of Ontario* 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.

DISCIPLINE COMMITTEE
OF THE COLLEGE OF
NATUROPATHS OF ONTARIO

NOTICE OF HEARING

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