



July 17, 2019

Personal and Confidential

**Balwinder Badhan**

REDACTED

Re: Formal Complaint of Unprofessional Conduct by Dr. Badhan  
File number: CR 2019 – 007

Dear Dr. Badhan:

REDACTED

Given your obvious failure to comply with CNDA obligations, and given that the matters herein are significant enough to amount to reasonable grounds that your conduct constitutes unprofessional conduct, I am prepared to resolve this complaint with you by way of an undertaking which will include the following terms:

1. You will change all your advertising and social media to remove references of any kind to a service offering of manipulation or osteopathy before 4pm July 19, 2019;
2. You will change all your advertising and social media to remove any reference to “osteopath”, “medical doctor” or other variations thereof before 4pm July 19, 2019;
3. You will communicate completion of #1 and #2 above by 4pm July 19, 2019;

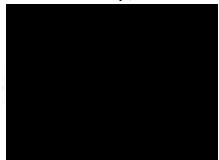
4. You will pay a fine of \$1,000 on or before August 30, 2019;
5. You will pay the costs of the CNDA investigation in the amount of \$750 on or before September 30, 2019;
6. You acknowledge that any future failure to comply with the terms herein will result in immediate suspension of your practice permit and referral to the complaints process;
7. You acknowledge that the terms of this agreement will be used in any future discipline proceedings with the CNDA; and,
8. You agree to publication of this matter, including your name.

Should I not receive this signed undertaking by 4pm on July 19, 2019 I will refer this matter to a hearing without further delay. If you accept these terms, please sign below in front of a witness and return the original of this letter to me by the deadline above.

You are entitled to seek legal advice before agreeing to the terms of this undertaking.

Please communicate any questions or concerns to me at [registrar@cnda.net](mailto:registrar@cnda.net).

Yours truly,



Cherie Baruss

Complaints Director and Investigator for File Number 2019 – 007

I, Balwinder Badhan, have sought legal advice with respect to the terms of the above-referenced undertaking or have explicitly waived my right to legal advice and I agree to be bound by the terms of this undertaking. Failure to comply with the terms of the undertaking will be deemed unprofessional conduct and result in the immediate cancellation of my practice permit.

DATE: July \_\_\_\_, 2019

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Witness:

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Member: Balwinder Badhan