

**IN THE MATTER OF A HEARING BEFORE THE HEARING TRIBUNAL
OF THE COLLEGE OF PHYSIOTHERAPISTS OF ALBERTA**

into the conduct of Liaqat Ali Khan, Registration No. 8260
pursuant to the
Health Professions Act, RSA 2000, c H-7

**NOTICE OF HEARING
AND
NOTICE TO ATTEND AS WITNESS**

TO: LIAQAT ALI KHAN

TAKE NOTICE THAT on **June 25th, 26th, 27th, and 28th, 2024** in the City of Edmonton, in the Province of Alberta, commencing at 9:00 a.m. by Zoom Video Conference, a Hearing Tribunal of the College of Physiotherapists of Alberta (the “College”) will conduct a hearing into allegations that you engaged in unprofessional conduct in that:

1. On or between June 27, 2022 – October 6, 2022, while providing physiotherapy treatment to Patient S.B., you engaged in inappropriate discussions with Patient S.B. including one or more of the following:
 - a. You asked about women’s “erogenous zones”, or words to that effect;
 - b. You asked, “do women get aroused by touch”, or words to that effect;
 - c. You discussed and/or asked about sexual activity and “rape”;
 - d. You discussed vibrators and a sex toy website, PinkCherry;
 - e. You told a story to Patient S.B. about watching pornography;
 - f. You told Patient S.B. that “sex is more primal than intimate”, or words to that effect;
 - g. You discussed wanting to “curl up” with Patient S.B., or words to that effect.

2. Further, or in the alternative to Allegation 1, on or between June 27, 2022 – October 6, 2022, you were present when receptionist M.B. engaged in communications with your patient S.B. regarding topics of a personal and/or sexual nature, and failed to take steps to address the inappropriate nature of the communications or to enforce appropriate boundaries, including one or more of the following topics:
 - a. Sexual preferences and/or sexual orientation, including:

- i. discussing “jumping into a girls’ train”, or words to that effect;
 - ii. Being in an open relationship.
 - b. Pornographic movies;
 - c. Sexual activity and “rape”;
 - d. A party with male dancers, including that you viewed a photo of a naked man;
 - e. Being naked at home and/or in front of other people;
 - f. Vibrators and a sex toy website, PinkCherry.
- 3. In October 2022, while providing physiotherapy treatment to Patient S.B., you:
 - a. touched and/or attempted to rub the front of Patient S.B.’s hip in manner that was inappropriate;
 - b. told Patient S.B. “sorry for arousing you” or words to that effect.

IT IS FURTHER ALLEGED THAT your conduct constitutes “unprofessional conduct” as defined in s. 1(1)(pp)(i), (ii), and (xii) of the *Health Professions Act*, R.S.A. 2000, c. H-7 (the “HPA”), in particular:

- 1. Your conduct constitutes “sexual misconduct” as defined in s. 1(1)(nn.2) of the HPA and contravenes the College’s Standard of Practice for Physiotherapists in Alberta: Sexual Abuse and Sexual Misconduct.
- 2. Further or in the alternative, your conduct breaches one or more of the following:
 - (a) Code of Ethical Conduct for Alberta Physiotherapists: Responsibilities to the Client (A4, A5, A18); Responsibilities to the Public (B1, B5); and Responsibilities to Self and the Profession (C1, C3); and
 - (b) Standards of Practice for Physiotherapists in Alberta: Client-Centered Care; Professional Boundaries; and Sexual Abuse and Sexual Misconduct.

AND FURTHER TAKE NOTICE that pursuant to section 72(1) of the HPA you are required to attend at the said time and place in person, and you are compelled to give evidence and produce models, charts, documents, papers, notes, records, and other material relevant to the Hearing Tribunal.

AND FURTHER TAKE NOTICE that in the event that you do not attend at the said time and place, the Hearing Tribunal may proceed in your absence pursuant to section 79(6) of the HPA and you will not be entitled to any further notice of the proceedings.

AND FURTHER TAKE NOTICE that in the event you do not attend at the said time and place, your failure to comply with the Notice to Attend may result in a further complaint and may constitute unprofessional conduct.

DATED at the City of Edmonton, in the Province of Alberta, 21th day of February, 2024.

Haylee O'Reilly
Hearings Director
Signed by: Haylee O'Reilly