## IN THE MATTER OF A SECTION 70 HEARING BEFORE THE HEARING TRIBUNAL OF THE COLLEGE OF PHYSIOTHERAPISTS OF ALBERTA

into the conduct of ELLIOTT GOLDMAN pursuant to the Health Professions Act, RSA 2000 C H-7

## NOTICE OF HEARING AND NOTICE TO ATTEND AS WITNESS

TO: ELLIOTT GOLDMAN

**TAKE NOTICE THAT** on **Sept 18, 2025** 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 your written admission pursuant to section 70 of the *Health Professions Act*, RSA 2000 C H-7 and to determine whether the Hearing Tribunal will accept the admissions and to determine whether you engaged in unprofessional conduct in that:

- 1. Between March 27, 2023 April 13, 2023, the Regulated Member made inappropriate verbal and written communications of a sexual nature to Patient A, specifically:
  - a. Suggested to engage in sexual activity with Patient A;
  - b. Offered to perform a "home visit" with Patient A;
  - c. Suggested to meet outside of the physiotherapy clinic at Patient A's home;
  - d. Discussed sexual activity that had occurred in the physiotherapy clinic between the Regulated Member and Patient A;
  - e. Provided a picture of his genitalia.
- 2. Between March 27, 2023-April 11, 2023, the Regulated Member engaged in inappropriate physical contact and behavior of a sexual nature with Patient A during her physiotherapy sessions, including:
  - a. Kissed Patient A on multiple occasions;
  - b. Touched Patient A's vagina over her clothing and under her clothing;
  - c. Masturbated Patient A by inserting his fingers into Patient A's vagina;
  - d. Pressed his erect penis against Patient A's body and invited Patient A to touch his penis over his clothing;
  - e. Exposed his penis to Patient A;

f. Received oral sex from Patient A;

g. Performed oral sex on Patient A;

h. Engaged in sexual intercourse with Patient A.

**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*, RSA 2000, c H-7 (the "HPA"), in particular:

1. Your conduct constitutes "sexual abuse" as defined in s. 1(1)(nn.1) of the HPA and contravenes the College's Standard of Practice for Physiotherapists in Alberta: Sexual Abuse and Sexual Misconduct.

2. 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.

3. Your conduct breaches the Code of Ethical Conduct for Alberta Physiotherapists and the Standards of Practices for Physiotherapists in Alberta.

**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, this 29<sup>th</sup> day of July 2025.

Haylee O'Reilly Hearings Director

Signed by: Haylee O'Reilly