

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

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

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

TO: MOHIT SHAH

TAKE NOTICE THAT on **August 18 and 19, 2026** 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 while employed at a physiotherapy clinic, Revital Health Physio & Massage - Legacy, in Calgary, Alberta (the “Clinic”) in that:

1. On or about December 28, 2024, you failed to obtain adequate informed consent from Patient E.H. before performing physiotherapy treatment on Patient E.H.’s buttocks and/or lower back.
2. On or about December 28, 2024, you improperly draped Patient E.H.:
 - a. while Patient E.H. was laying prone and prior to performing physiotherapy treatment on her buttocks and/or lower back.
 - b. while Patient E.H. was laying supine and prior to performing physiotherapy interventions.
3. On or about December 28, 2024, while performing physiotherapy treatment on Patient E.H., you digitally penetrated Patient E.H.’s vagina.

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 in Allegations 1, 2, and 3 breaches one or more of the following:
 - (a) Code of Ethical Conduct for Alberta Physiotherapists: Responsibilities to the Client (A1, A4, A5, A6, A12, and A18); Responsibilities to the Public (B1); and Responsibilities to Self and the Profession (C1); and
 - (b) Standards of Practices for Physiotherapists in Alberta (March 2023): Client Assessment, Diagnosis, Interventions; Client-Centered Care; Consent; Evidence-Informed Practice and Professional Boundaries.
2. Your conduct in Allegation 3 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 (Mach 2023): 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, this 10th day of June, 2026.

A handwritten signature in black ink, appearing to read 'Haylee O'Reilly', is written over a faint, light blue circular stamp. The stamp contains the text 'LEGISLATION' and 'COLLEGE OF PHYSIOTHERAPISTS OF ALBERTA'.

Haylee O'Reilly, Hearings Director
College of Physiotherapists of Alberta