

**DISCIPLINE COMMITTEE OF  
THE COLLEGE OF PHYSIOTHERAPISTS OF ONTARIO**

B E T W E E N :

COLLEGE OF PHYSIOTHERAPISTS OF ONTARIO

- and -

MATTHEW AGGERHOLM, Registration Number 10493

**NOTICE OF HEARING**

The Inquiries, Complaints and Reports Committee of the College of Physiotherapists of Ontario has referred specified allegations against Matthew Aggerholm to the Discipline Committee of the College. The allegations were referred in accordance with paragraph 26(1)1 of the *Health Professions Procedural Code*. The statement of allegations is attached to this notice of hearing. A discipline panel will hold a hearing under the authority of sections 38 to 56 of the *Health Professions Procedural Code*, as amended, for the purposes of deciding whether the allegations are true. A **pre-hearing conference** may be held at a date and time to be fixed by the Registrar. A discipline panel will subsequently convene for the purposes of conducting the **hearing**.

**IF YOU DO NOT ATTEND AT THE HEARING IN ACCORDANCE WITH THE PRECEDING PARAGRAPH, THE DISCIPLINE PANEL MAY PROCEED IN YOUR ABSENCE AND YOU WILL NOT BE ENTITLED TO ANY FURTHER NOTICE IN THE PROCEEDINGS.**

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

1. Direct the Registrar to revoke the member's certificate of registration.
2. Direct the Registrar to suspend the member's certificate of registration for a specified period of time.
3. Direct the Registrar to impose specified terms, conditions and limitations on the member's certificate of registration for a specified or indefinite period of time.
4. Require the member to appear before the panel to be reprimanded.
5. Require the member to pay a fine of not more than \$35,000 to the Minister of Finance.

The discipline 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 *Health Professions Procedural Code*.

You are entitled to disclosure of the evidence against you in accordance with section 42(1) of the *Health Professions Procedural Code*, as amended. You, or your representative, may contact the solicitor for the College, Joanna Birenbaum, in this matter at:

Ursel Phillips Fellows Hopkinson LLP  
555 Richmond St. West, Suite 1200  
Toronto, ON M5V 3B1

Telephone: (416) 968-3333  
Facsimile: (416) 968-0325  
Email: [jbirenbaum@upfhlaw.ca](mailto:jbirenbaum@upfhlaw.ca)

You must also make disclosure in accordance with section 42.1 of the *Health Professions Procedural Code*, which states as follows:

Evidence of an expert led by a person other than the College is not admissible unless the person gives the College, at least ten days before the hearing, the identity of the expert and a copy of the expert's written report or, if there is no written report, a written summary of the evidence.

Date: May 21, 2025



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Craig Roxborough, PhD  
Registrar and CEO  
College of Physiotherapists of Ontario

TO: Rohit Kumar  
Miller Thompson LLP  
Scotia Plaza  
40 King Street West, Suite 5800  
P.O. Box 1011  
Toronto, Ontario M5H 3S1

Counsel for the Registrant,  
Matthew Aggerholm

### **Statement of Allegations**

1. At all material times Matthew Aggerholm (the “Registrant”) was a registrant of the College of Physiotherapists of Ontario holding an Independent Practice certificate of registration and was the owner or co-owner of Vestibular and Orthopaedic Rehabilitation (the “Clinic”) in Waterloo, Ontario, where the Registrant practiced physiotherapy.
2. In the period May 15, 2024 to July 15, 2024, the Registrant engaged in professional misconduct within the meaning of the following paragraphs of section 1 of the *Professional Misconduct Regulation*, O. Reg. 388/08:
  - a. paragraph 1 (failing to maintain the standards of practice of the profession);
  - b. paragraph 7 (performing a professional service for which consent is required by law without such consent);
  - c. paragraph 10 (sexual abuse of a patient);
  - d. paragraph 18 (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); and
  - e. paragraph 21 (representing qualifications in a manner that is false, misleading or deceptive).
3. In or about May 15, 2024 to July 15, 2024, the Registrant committed an act or acts of professional misconduct under ss. 1(3), 1(4) and s.51(1)(b.1) of the Health Professions Procedural Code, which is Schedule 2 to the *Regulated Health Professions Act, 1991*, S.O. 1991, c.18 (the “Code”), in that he engaged in sexual abuse of a patient.

## **PARTICULARS OF THE ALLEGATIONS**

1. At all material times Matthew Aggerholm (the “Registrant”) was a registrant of the College of Physiotherapists of Ontario holding an Independent Practice certificate of registration, and was the owner or co-owner of Vestibular and Orthopaedic Rehabilitation (the “Clinic”) in Waterloo, Ontario, where the Registrant practiced physiotherapy.
2. In or about May 15, 2024, the Registrant confirmed to Patient A that the Registrant was an osteopath and/or was practicing osteopathy, when the Registrant had not yet received his diploma in osteopathic manual practice nor was he a member of the Ontario Association of Osteopathic Manual Practitioners.
3. In or about May 15, 2024 and July 12, 2024, Patient A attended at the Clinic for a physiotherapy assessment and/or treatment with the Registrant. During these appointments, the Registrant made sexualized and/or inappropriate comments, including by stating words to the effect that the Registrant hopes Patient A’s husband doesn’t notice the hand marks on Patient A’s body caused by the physiotherapy treatment, and about not looking at Patient A’s breasts, when the Registrant’s gaze was on Patient A’s breasts.
4. In or about July 12, 2024, Patient A attended a follow up appointment with the Registrant. In this second appointment, the Registrant touched and/or put both hands on and/or rubbed, Patient A’s breasts over Patient A’s clothing. The Registrant also made an inappropriate and sexual remark when touching or in relation to touching Patient A’s breasts. The touching of Patient A’s breasts and the comment were not clinically indicated, were sexual in nature, were unwelcome to Patient A and were experienced by Patient A as a violation of Patient A’s sexual integrity.

5. In or about July 12, 2024, the Registrant performed a thoracic manipulation on Patient A, without Patient A's informed consent and in spite of Patient A's express direction to the Registrant that Patient A did not consent to any "cracking," including cracking of their spine.
6. In or about July 12, 2024, the Registrant performed treatments on Patient A which involved close contact with Patient A, without Patient A's informed consent.
7. In the physiotherapy appointments on May 15, 2024 and July 12, 2024, the Registrant engaged in an assessment and treatment of Patient A, and made clinical findings in respect of Patient A, that were outside of the scope of practice of physiotherapy.
8. The Registrant's conduct as set out at paragraphs 3-6 above, failed to respect Patient A's personal boundaries, fell below the standards of practice of the profession with respect to physiotherapists maintaining professional boundaries, were undertaken without Patient A's informed consent, failed to respect the standards of practice in respect of communication with patients and patient-centred care, and otherwise constitute conduct that, having regard to all the circumstances, would reasonably be regarded by members of the profession as disgraceful, dishonourable and/or unprofessional.

## **APPENDIX**

1. Take notice that the documents that have been and will later be disclosed to you will be tendered as business documents pursuant to the *Evidence Act* of Ontario.
2. 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.