Tribunal File No. 26-004-PT
CPO File No. 2024-0199

NOTICE OF HEARING

ONTARIO PHYSIOTHERAPISTS DISCIPLINE TRIBUNAL

College of Physiotherapists of Ontario

College

- and -

Mohammadreza Shahrokh

Registrant

NOTICE OF HEARING

On October 29, 2026 a panel of the Inquiries, Complaints and Reports Committee of the College referred specified allegations of the registrant's professional misconduct and/or incompetence to the Tribunal.

In this proceeding, Registrant means "member" as set out in the *Regulated Health Professions Act, 1991*, the Health Professions Procedural Code (Code), the applicable health profession Act, and the regulations thereto.

The allegation(s) are that the registrant:

1. Has committed an act of professional misconduct under:

    a. Subsection 51(1)(c) of the Code, as set out in the following paragraphs of section 1 of Ontario Regulation 388/08, *Professional Misconduct Regulation*, made under the *Physiotherapy Act, 1991:*

        i. Paragraph 1: Failing to maintain the standards of practice of the profession.

        ii. 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.

        iii. Paragraph 28: Signing or issuing a document containing a statement that the member knows or ought to know contains a false or misleading statement.

iv. Paragraph 32: Submitting an account or charge for services that the member knows or ought to know is false or misleading.

v. Paragraph 33: Failing to take reasonable steps to ensure that any accounts submitted in the member's name or billing number are fair and accurate.

Further information about these allegations is set out below:

1. At all material times, Mohammadreza Shahrorkh (the "Registrant") was a Registrant of the College, practicing physiotherapy at various clinics in the Toronto area.

2. The Registrant listed the practice location, LifeMed Therapy, in Richmond Hill, Ontario (the "Clinic"), as being a practice location for the Registrant during the period June 1 – June 28, 2023.

3. In the period of June 1, 2023 – November 30, 2023, invoices for physiotherapy services were issued to patients or purported patients of the Clinic, under the Registrant's name and College Registration number, when no services were provided by the Registrant to these patients.

4. In the period of June 1, 2023 – November 30, 2023, invoices for physiotherapy services provided, or purportedly provided, by the Registrant to patients, or purported patients, were submitted to third party insurers for reimbursement, when the Registrant had not provided physiotherapy care to these patients.

5. During the period June 1, 2023 – November 30, 2023,the Clinic did not exist. The Tribunal will hold a hearing under sections 38 to 56 of the Code, the *Statutory Powers Procedure Act*, and the *Hearings in Tribunal Proceedings (Temporary Measures) Act, 2020*, on a date or dates to be set at a case management conference, to decide whether the registrant has committed an act or acts of professional misconduct and/or is incompetent.

The College will file this Notice with the Tribunal. The Tribunal will then set a date for the first case management conference and send it to the parties with more information about the Tribunal's process.

If the registrant or their representative does not attend the case management conference or the hearing, the Tribunal may proceed in the registrant's absence and the registrant is not entitled to any further notice in the proceeding.

If the Tribunal finds the registrant committed an act or acts of professional misconduct, it may make one or more of the following orders under subsections 51(2) of the Code.

- direct the Registrar to revoke the registrant's certificate of registration.

- direct the Registrar to suspend the registrant's certificate of registration for a specified period of time.

- direct the Registrar to impose specified terms, conditions and limitations on the registrant's certificate of registration for a specified or indefinite period of time.

- require the registrant to appear before the Tribunal to be reprimanded.

- require the registrant to pay a fine of not more than $35,000 to the Minister of Finance.

- if the act of professional misconduct was the sexual abuse of a patient, require the registrant to reimburse the College for funding provided for that patient under the program and/or require the registrant to post security acceptable to the College to guarantee this payment.

The Tribunal may, under subsection 53.1 of the Code, require the registrant to pay all or part of the College's costs and expenses.

The Tribunal's website includes the Tribunal's Rules of Procedure, Practice Directions and guides to the process.

Date: October 29, 2026

Joanna Birenbaum

Birenbaum Law Office

555 Richmond Street, Ste 1200

Toronto, ON M5V 3B1

647-500-3005

joanna@birenbaumlaw.ca

TO:

Elham Moaveni

Moaveni Law Professional Corporation

10087 Yonge Street, Suite 100

Richmond Hill, ON L4C 1T7

905-918-9606

moaveni@moavenilaw.com