

**DISCIPLINE COMMITTEE OF  
THE COLLEGE OF CHIROPODISTS OF ONTARIO**

**B E T W E E N:**

**COLLEGE OF CHIROPODISTS OF ONTARIO**

(the “College”)

-and-

**PATRICIA GLORIA WILSON**

(the “Registrant”)

**NOTICE OF HEARING**

**THE INQUIRIES, COMPLAINTS AND REPORTS COMMITTEE (ICRC)** of the College of Chiropractors of Ontario has referred specified allegations against **PATRICIA GLORIA WILSON** (Registration #130042) to the Discipline Committee. The allegations were referred in accordance with paragraph 26(1)1 of the *Health Professions Procedural Code*, which is Schedule 2 to the *Regulated Health Professions Act, 1991* (the “Code”).

Further information about the allegations is contained in the Statement of Allegations attached to this Notice of Hearing. A discipline panel will hold a hearing, on a date to be fixed by the Chair of the Discipline Committee, at the offices of the College of Chiropractors of Ontario at 180 Dundas Street West, Suite 1901, Toronto, ON M5G 1Z8 or electronically via Zoom or other electronic means, under the authority of sections 38 to 56 of the *Health Professions Procedural Code* for the purposes of deciding whether the allegations are true.

**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 your certificate of registration.
2. Direct the Registrar to suspend your certificate of registration for a specified period of time.
3. Direct the Registrar to impose specified terms, conditions and limitations on your certificate of registration for a specified or indefinite period of time.
4. Require you to appear before the panel to be reprimanded.
5. Require you to pay a fine of not more than \$35,000.00 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 in this matter:

Debra McKenna  
**WEIRFOULDS LLP**  
4100-66 Wellington Street West  
P.O. Box 35, TD Bank Tower  
Toronto, ON M5K 1B7  
t. (416) 947-5080  
e. [dmckenna@weirfoulds.com](mailto:dmckenna@weirfoulds.com)

At the hearing, the College intends to introduce as business records, under section 35 and/or 52 of the *Evidence Act*, any writings or records that were made in the usual and ordinary course of business. Without limiting the generality of the foregoing, the College intends to introduce as business records the patient records, financial records, or other records that relate to the subject matter of the allegations.

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 30, 2024



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Nicole Zwiers  
Registrar and Chief Executive Officer  
**College of Chiropodists of Ontario**  
180 Dundas Street West, Suite 2102  
Toronto, Ontario M5G 1Z8

**TO: PATRICIA GLORIA WILSON**

**STATEMENT OF ALLEGATIONS**

1. Patricia Gloria Wilson (“**Registrant**”) was at all material times a registered member of the College.
  
2. It is alleged that during the period from approximately December 2022 to November 2023 (the “**Relevant Period**”), the Registrant engaged in conduct that constitutes professional misconduct pursuant to the following:
  - (a) Clause 51(1)(c) of the *Health Professions Procedural Code*, being *Schedule 2 to the Regulated Health Professions Act, 1991* and as defined in one or more of the following paragraphs of section 1 of the *Professional Misconduct Regulation* (O. Reg. 750/93) under the *Chiropody Act, 1991*:
    - (i) paragraph 2 – failing to meet or contravening a standard of practice of the profession) and, in particular, the College’s standards pertaining to:
      - a. Assessment and Management;
      - b. Patient Relations;
      - c. Records;
      - d. Prescription Custom Foot Orthoses; and/or
      - e. Prescription Footwear.
    - (ii) paragraph 10 – practising the profession while the member is in a conflict of interest;

- (iii) paragraph 17 – failing to keep records as required by the regulations;
- (iv) paragraph 20 – signing or issuing, in the member’s professional capacity, a document that contains a false or misleading statement;
- (v) paragraph 21 – submitting an account or charge for services that the member knows is false or misleading;
- (vi) paragraph 30 – contravening the *Chiropody Act, 1991*, the *Regulated Health Professions Act, 1991*, or the regulations under either of those Acts, including, but not limited to, Ontario Regulation 203/94, Part III (Records);
- (vii) paragraph 33 – engaging in conduct or performing an act, in the course of practising the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable, or unprofessional.

## **PARTICULARS OF THE ALLEGATIONS**

### **A. Background**

1. At all material times, the Registrant was registered with the College in the chiropodist classification to practise chiropody in Ontario. The Registrant was first registered with the College on or about July 4, 2013.
2. During the Relevant Period, the Registrant's primary practice location was reported to the College as being Wilson Health Services (the "**Clinic**"), which operated four clinics in Ontario located at the following locations:
  - Cambridge – 210 Pinebush Road, Unit #6;
  - Guelph – 30 Clair Road West, Unit #5;
  - Paris - A3.1 – 1070 Rest Acres Road
  - Kitchener - 123 Pioneer Drive, Building J., Unit #2

### **B. The Complaint**

3. During the Relevant Period, the Clinic and the Registrant had agreed to provide clinical placement opportunities for students who were registered in the chiropody program at the Michener Institute.
4. On or about November 9, 2023, the College received a complaint from Sun Life Assurance Company of Canada ("**Sun Life**") with respect to the Registrant (the "**Complaint**"). As outlined in the Complaint, Sun Life had recently conducted an investigation concerning the Registrant's business practices.

5. In particular, Sun Life's investigation revealed that the Registrant had permitted individuals who were not registered with the College (specifically students doing a clinical placement at the Clinic) to see, assess and/or provide treatment to patients without proper supervision and/or in a manner contrary to the College's standards, including during times when the Registrant was not present and/or out of the country.
6. Among other concerns, the Registrant allowed and/or required chiropody students to assess patients and/or to dispense orthotics and/or footwear prescribed by the Registrant contrary to the College's standards.
7. In addition, the Registrant's patient records and other information submitted to Sun Life to support benefit claims for patients contained false or misleading information that indicated the Registrant had assessed the patients and/or dispensed orthotics or footwear, including with respect to the following patients:
  - A.A.
  - A.K.
  - B.S.
  - C.S.
  - D.G.
  - D.K.
  - J.G.
  - K.F. (1)
  - K.F. (2)

- M.B.
- M.K.
- N.D.
- S.V.
- T.M.
- V.D.
- W.M.

### **C. Summary of the Investigation**

8. The Registrant failed to maintain patient records, including financial records, in accordance with the regulations and the College's standards.
9. In providing chiropody treatments to patients at the Clinic, the Registrant signed, issued, and/or submitted documents that were false and/or misleading.
10. In providing chiropody treatment to patients at the Clinic, the Registrant failed to adequately supervise students.
11. In providing chiropody services to patients at the Clinic, the Registrant breached the College's standards to ensure that treatments were medically necessary and/or required for the prevention, treatment or management of a disease, disorder, or dysfunction of the foot.



12. In the course of practising the profession and engaging as a clinical instructor for chiropody students, the Registrant engaged in behaviour that was contrary to the College's standards and was disgraceful, dishonourable, or unprofessional.
13. Additional information and disclosure about the allegations against the Registrant will be provided in advance of the hearing.

**COLLEGE OF CHIROPODISTS OF ONTARIO**  
(the “College”)

- and -

**PATRICIA GLORIA WILSON**  
(the “Registrant”)

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Lawyers for the College of  
Chiropractors of Ontario