

THE UNIVERSITY TRIBUNAL
THE UNIVERSITY OF TORONTO

IN THE MATTER OF charges of academic dishonesty filed on November 25, 2014,

AND IN THE MATTER OF the University of Toronto *Code of Behaviour on Academic Matters, 1995*,

AND IN THE MATTER OF the *University of Toronto Act, 1971*, S.O. 1971, c.56 as amended S.O. 1978, c. 88

BETWEEN:

THE UNIVERSITY OF TORONTO

– AND –

J [REDACTED] P [REDACTED]

Hearing Date: November 10, 2016

Members of the Panel:

Ms. Sana Halwani, Barrister and Solicitor, Gilbert's LLP, Chair

Professor Katherine Larson, Department of English, Faculty Panel Member

Ms. Alanis Ortiz Espinoza, Student Panel Member

Appearances:

Ms. Lily Harmer, Assistant Discipline Counsel for the University, Paliare Roland Barristers

Mr. J [REDACTED] P [REDACTED], the Student

In Attendance:

Professor Luc de Nil, Vice Dean, Students, School of Graduate Studies

Ms. Krista Osbourne, Administrative Assistant, Office of the Appeals, Discipline and Faculty Grievances

Mr. Sean Lourim, Technology Assistant, Office of the Governing Council

Ms. Andrea Rico Wolf, Barrister and Solicitor, Gilbert's LLP (notetaker)

Mr. Seumas Woods, (Observer, New University Tribunal Chair)

A. CHARGES AND HEARING

[1] The Trial Division of the University Tribunal convened on November 10, 2016 to consider charges of academic dishonesty brought by the University of Toronto (the “University”) against Mr. J█████ P████ (the “Student”) under the *Code of Behaviour on Academic Matters, 1995* (the “Code”) by letter dated November 25, 2014 from the Interim Vice-Provost, Faculty & Academic Life, Professor Sioban Nelson.

[2] The Student was charged with the following:

Charge #1 – Concoction Charge

(a) In or about Winter and/or Spring 2013, you knowingly submitted academic work containing a purported statement of fact which had been concocted, contrary to section B.I.1(f) of the *Code*.

Charge #2 – Alternative Charge

(b) In the alternative, in or about Winter and Spring 2013, you knowingly engaged in a form of cheating, academic dishonesty or misconduct, fraud or misrepresentation in order to obtain academic credit or other academic advantage of any kind, contrary to section B.I.3(b) of the *Code*.

[3] The Student attended the hearing via Skye, was not represented by counsel, and pled guilty to all the above charges.

[4] Counsel for the University indicated that if the plea of guilty to the charge of concoction was accepted by the Panel, the second charge would be withdrawn as it was in the alternative.

B. AGREED STATEMENT OF FACTS AND FINDING OF GUILT

[5] At the outset of the hearing, the Panel was advised that the Student and the University had entered into an Agreed Statement of Facts. That Agreed Statement of Facts was introduced as Exhibit 1 at the hearing and is attached as Appendix “A” to this decision. In the Agreed Statement of Facts, the Student stated, *inter alia*, that:

(a) he received a copy of the charges filed;

- (b) he received reasonable notice of the hearing;
- (c) he waives the reading of the charges filed against him, and pleads guilty to all charges;
- (d) the Provost of the University advised him of his right to obtain legal counsel and he has not done so; and
- (e) he signs the Agreed Statement of Facts freely and voluntarily, knowing of the potential consequences, and does so with the advice of counsel.

[6] In addition, the Panel received into evidence, on consent, a Joint Book of Documents containing the documents referred to in the Agreed Statement of Facts, introduced as Exhibit 2 at the hearing. The Student and the University agreed that each document contained in the Joint Book of Documents could be admitted into evidence for all purposes, including for the truth of their contents, without further proof.

[7] At the hearing, counsel for the University provided detailed submissions regarding the evidence supporting the charges, during which she led the Panel through the Agreed Statement of Facts and, in particular, the impugned work which the Student was charged with concocting.

[8] As set out in detail in the Agreed Statement of Facts, the circumstances giving rise to the charges involved the deliberate concoction, by the Student, of the results of research undertaken as part of his Master's thesis. In particular, the Student admitted that:

- (a) he provided research data to his thesis supervisor, Dr. Andrew Wilde, in support of work the Student was doing in respect of his Master's program, which data he knew was to be included in the submission of an article to the *Journal of Cell Biology*;
- (b) he knowingly manipulated, altered and falsified the research data that he presented, which was ultimately included in the article submitted to the *Journal of Cell Biology* in Supplementary Figure 3 of the article;
- (c) he did not provide lab notebooks or data files to verify some or all of the data he reported;

- (d) he provided false explanations to Dr. Wilde when asked to explain anomalies identified in the data contained in Supplementary Figure 3 of the article; and
- (e) he committed the academic offence of knowingly submitting an academic work containing a purported statement of fact that had been concocted, contrary to section B.I.1(f) of the *Code*.

[9] Following deliberation and based on the submissions of counsel for the University, the facts set out in the Agreed Statement of Facts and Joint Book of Documents, and the Student's confirmation of his agreement with the University's review of the facts at the hearing, the Panel found that the first charge was proven with clear and convincing evidence on a balance of probabilities and accepted the Student's guilty plea in respect of that charge. Given that finding of guilt, the University withdrew the alternative charge. The Panel therefore makes no finding with respect to that alternative charge.

C. **PENALTY**

[10] Following the Panel's finding of guilt, the University and the Student submitted a Joint Submission on Penalty, introduced as Exhibit 3 and attached as Appendix "B" to this decision.

[11] The Joint Submission on Penalty proposed the following:

- (a) a final grade of zero in the course which was the subject matter of the offence (RST9999Y – Research/Thesis);
- (b) an immediate suspension of the Student from the University, to commence on the day the Tribunal makes its order for a period of up to five years;
- (c) a permanent notation of the sanction on the Student's academic record and transcript; and
- (d) a recommendation by the Tribunal that the Student be expelled from the University.

[12] In addition, the University and the Student submitted that the Tribunal should report its decision and the sanction(s) imposed to the Provost for publication in the University newspapers, with the name of the Student withheld.

[13] Counsel for the University submitted that a five year suspension and recommended expulsion in this case was within the range of appropriate sanctions. In support of this submission, counsel for the University reviewed a Book of Authorities setting out the sentencing guidelines and sentences that have been adopted by other panels of the University Tribunal in similar cases. According to these guidelines, the Panel should consider the following six criteria when deciding on an appropriate sanction:

- (a) the character of the person charged;
- (b) the likelihood of a repetition of the offence;
- (c) the nature of the offence committed;
- (d) any extenuating circumstances surrounding the commission of the offence;
- (e) the detriment to the University occasioned by the offence; and
- (f) the need to deter others from committing a similar offence.

[14] On the basis of the above factors and in light of the Joint Submission on Penalty, as confirmed by the Student at the hearing, the Panel concluded that there was no evidence of any extenuating circumstances and that the sanction agreed to by the parties was appropriate in the circumstances.

[15] In support of its decision, the Panel took into account the following factors:

- (a) the offence involved dishonesty and called into question the Student's character;
- (b) the Student was enrolled in a research intensive program, where maintaining the integrity of research was of utmost importance;
- (c) the Student deliberately manipulated and falsified research data, which he knew would be counted towards his academic work and used for further publication;
- (d) the Student took additional steps to misrepresent the authenticity of the impugned data when questioned by his thesis supervisor;

- (e) the Student was aware that the concocted research data was to be included in an article to be submitted for publication in a peer-reviewed journal. In doing so, the Student not only undermined the integrity of his academic work, but knowingly risked the reputation of his thesis supervisor and the University. As a result of the Student's academic misconduct, the *Journal of Cell Biology* revoked its acceptance of the article and Dr. Wilde had to withdraw an application for a government-funded research grant;
- (f) the Student did not admit his wrongdoing when he met with the Dean's Designate to discuss the allegation that he had concocted research; and
- (g) the Student pleaded guilty at the hearing and cooperated with the University with respect to the Agreed Statement of Facts and Joint Submission on Penalty.

[16] We note that the Panel had no basis to consider any relevant mitigating factors beyond the Student's cooperation with the University in the Agreed Statement of Facts and Joint Submission. In particular, there was no evidence from the Student of any extenuating relevant circumstances regarding his commission of the offence, his appreciation of the significance and gravity of his actions, or any reason to suspect that there would not be a repetition of the offence if the Student were to return to the University.

[17] In determining the appropriateness of the penalty sought, the Panel took into account the University's submission on the significant weight to be accorded to the Joint Submission on Penalty. While a panel is neither required nor obliged to accept a joint submission on penalty, the Panel was cognizant that such submissions should only be rejected in limited circumstances, where the proposed penalty is unreasonable, unconscionable, or would bring the administration of justice into disrepute. (*The University of Toronto v. S.M.*, September 12 2013, Case No. 696, at para. 24; *University of Toronto and S. F.*, October 20 2014, Case No. 690 at para. 22)

[18] The Panel was of the view that accepting the Joint Submission would not bring the administration of justice into disrepute. The deliberate fabrication of research results in the academic setting is an extremely serious offence and warrants an equally serious sanction. As commented by this Tribunal on numerous occasions, this offence goes to the heart of the academic integrity and reputation of the University and is inconsistent with the standards of

ethical research espoused by the University. As noted in the October 5, 2012 appeal decision *M.K. and the University of Toronto*, Case No. 634:

Academic integrity is essential to the University community and to the pursuit and transmission of knowledge in the University. Falsification of academic endeavour undermines the role and reputation of the University in a fundamental way. This is particularly the case when the dishonesty in question is, as it was here, at the highest level of research in a research intensive department.

[19] Similarly, in the 2007 decision on fabrication of research data in *University of Toronto and J.D.*, Case No. 456 the Tribunal noted:

Actions of this kind undermine the integrity, reputation and credibility of the University, its academic staff and students, and its academic mission, as well as the public need to presume that a degree from the University is honestly earned. A serious penalty is warranted in order to vindicate the interest of both specific and general deterrence.

[20] In light of the foregoing, the Panel found that the sanctions requested by the University and the Student represent a reasonable recognition of the factors of specific and general deterrence in the context of a research intensive program, and are consistent with the principles expressed in prior cases and the evidence before the Panel. The Panel therefore accepted the Joint Submission on Penalty.

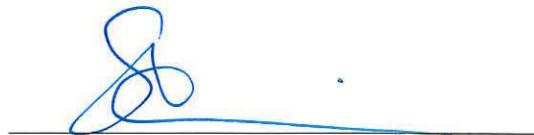
D. DECISION OF THE PANEL

[21] At the conclusion of the hearing, the Panel ordered that:

- (a) the Student is guilty of the academic offence of knowingly submitting an academic work containing a purported statement of fact that had been concocted, contrary to section B.I.1(f) of the *Code*;
- (b) the Student shall receive a final grade of zero in RST9999Y;
- (c) the Student be immediately suspended from the University for a period of up to five years;
- (d) the Tribunal recommends to the President of the University that he recommend to the Governing Council that the Student be expelled from the University;

- (e) the sanction shall be permanently recorded on the Student's academic record and transcript; and
- (f) this case shall be reported to the Provost for publication of a notice of the decision of the Tribunal and the sanction or sanctions imposed, with the name of the Student withheld.

DATED at Toronto, January 26, 2017

A handwritten signature in blue ink, appearing to read "Sana Halwani". It is written in a cursive style with a long horizontal line extending from the end of the signature.

Sana Halwani, Co-Chair

**THE UNIVERSITY TRIBUNAL
THE UNIVERSITY OF TORONTO**

IN THE MATTER OF charges of academic dishonesty filed on November 25, 2014,

AND IN THE MATTER OF the University of Toronto Code of Behaviour on Academic Matters, 1995,

AND IN THE MATTER OF the University of Toronto Act, 1971, S.O. 1971, c. 56 as am. S.O. 1978, c. 88

B E T W E E N:

THE UNIVERSITY OF TORONTO

- and -

J [REDACTED] P [REDACTED] ([REDACTED])

AGREED STATEMENT OF FACTS

1. This hearing arises out of charges of academic misconduct filed by the Provost of the University of Toronto (the "Provost") under the *Code of Behaviour on Academic Matters* ("Code"). For the purpose of this hearing, the Provost and J [REDACTED] P [REDACTED] ("Mr. P [REDACTED]") have prepared this Agreed Statement of Facts ("ASF") and a joint book of documents ("JBD"). The Provost and Mr. P [REDACTED] agree that:

(a) each document contained in the JBD may be admitted into evidence at the Tribunal for all purposes, including for the truth of the document's contents, without further need to prove the document; and

(b) if a document indicates that it was sent or received by someone, that is *prima facie* proof that the document was sent and received as indicated.

2. Mr. P [REDACTED] admits that he received a copy of the charges filed by the Provost. The charges are included in the JBD at Tab 1.

3. Mr. P [REDACTED] admits that he received reasonable notice of the hearing. The notice of hearing in this matter is included in the JBD at Tab 2.

4. Mr. P█ waives the reading of the charges filed against him, and pleads guilty to all charges. The Provost agrees that if the Tribunal convicts Mr. P█ on charge 1 the Provost will withdraw charge 2.

5. At all material times, Mr. P█ was a registered student at the University of Toronto enrolled in a Master of Science program in the Department of Biochemistry. A copy of Mr. P█'s academic record is included in the JBD at Tab 3. A copy of the Program Outline is included in the JBD at Tab 4.

6. Dr. Andrew Wilde was Mr. P█'s Master's thesis supervisor.

7. In working on his Master's thesis under Dr. Wilde's direction, Mr. P█ was required to perform research and contribute lab results to a joint project involving Septin-Anillin filaments and their role in cytokinesis ("P█ Research"). The first stage of Mr. P█'s analysis included separating proteins so that they could be detected individually. This stage was to be done using a process called SDS gel electrophoresis. The next stage included specifically detecting each of these proteins using a technique called Western Blotting. The presence of a protein would be denoted by dark bands.

8. The research work carried out by Mr. P█ was expected to be eventually incorporated into his Master thesis.

9. Mr. P█ contributed the results of his research to a manuscript entitled "Septin-Anillin filaments drive midbody maturation and the positioning of the ESCRT III abscission machinery during cytokinesis", which was submitted by Dr. Wilde to the *Journal of Cell Biology* in May, 2013 ("Manuscript"). A copy of the Manuscript is included in the JBD at Tab 5.

10. Mr. P█'s contribution to the Manuscript was panel B of Supplementary Figure S3 (found on the third last page of the Manuscript at Tab 5).

11. In the spring of 2013, Mr. P█ took a reclassification exam to move from the MSc program to the PhD program. The report he submitted in that process was of such concern that the examination committee required that it be completely re-written before he would be permitted to take the oral exam. Mr. P█ then stopped attending Dr. Wilde's lab. On June 3, 2013 he provided Dr. Wilde with a doctor's note dated June 1, 2013 which indicated that Mr. P█ was seen on June 1, 2013 for medical reasons, and that he had been advised to stay off school from May 29, 2013 to June 3, 2013. A copy of the medical note is included in the JBD at Tab 6.

12. Mr. P█ returned to the lab on June 5, 2013 to advise Dr. Wilde that the stress of the MSc program was affecting his health and that he was not going to proceed with reclassifying into the PhD program, but would instead write up and finish the MSc program. During that discussion Dr. Wilde asked Mr. P█ to organize his reagents and his data that day. Mr. P█ never returned to the lab after that meeting.

13. The Manuscript was accepted by the *Journal of Cell Biology* for publication on October 4, 2013.

14. On October 8, 2013 the Executive Editor of the *Journal of Cell Biology*, Liz Williams, invited Dr. Wilde to upload some or all of the original data so that it could be made available to readers in a browser-based viewer tool for presenting original image data as a supplement to the Manuscript. A copy of Dr. William's email to Dr. Wilde of October 8, 2013, is included in the JBD at Tab 7.

15. When efforts were made by Dr. Wilde and his colleague Dr. Renshaw to upload high resolution images to the *Journal of Cell Biology* in response to Ms. William's invitation to do so, they could not find Mr. P█'s original data or any folders on the various lab computers belonging to Mr. P█ which corresponded to the images Mr. P█ had provided for the Manuscript. They did find an image with similar background markings, but it did not have the same pattern of bands

as had been submitted. A copy of the image obtained by Dr. Wilde from the BioRad scanner with similar background markings is included in the JBD at Tab 8.

16. Dr. Wilde also could not find any of Mr. P█'s lab notebooks, which researchers are required to maintain in the lab.

17. Dr. Wilde requested that all contributing authors of the Manuscript, including Mr. P█, submit a *Manuscript content verification and provisional license to publish* form to the *Journal of Cell Biology* ("Verification Form"). Mr. P█ signed the Verification Form and sent it directly to the *Journal of Cell Biology*. A copy of the Verification Form signed by Mr. P█ is included in the JBD at Tab 9.

18. Dr. Wilde also asked Mr. P█ to provide him with his research data. In addition, Dr. Wilde instructed Mr. P█ that he needed to inform the University if he was withdrawing or taking a medical leave of absence. An email from Dr. Wilde to Mr. P█ on October 9, 2013 is included in the JBD at Tab 10.

19. On October 17, 2013 Dr. Wilde received an email from Liz Williams advising him that the Journal's review of high-resolution TIFF versions of the images shown in Figure S3B of the Manuscript revealed a number of anomalies visible in the images. These included sharp, irregular outlines around some of the bands, an area of smoothed pixels, and what appeared to be an area of duplicated pixels. She attached two files showing some of these features. Dr. Williams asked Dr. Wilde to explain the origin of these image features. A copy of Dr. William's email to Dr. Wilde dated October 17, 2013, together with the attachments, is included in the JBD at Tab 11.

20. Dr. Wilde was very concerned about the information relayed to him about Dr. William's concerns with Figure S3B of the Manuscript. In an email response to Dr. Williams on October 17, 2013, he explained that he had independent data

that corroborated the findings so that the conclusions did not change, and offered to replace Fig S3B with new data and to remove Mr. P [REDACTED] from the list of authors on the Manuscript. He confirmed that he could not find the original data, but had found a blot that bore resemblance in some lanes to the septin 9 panel. He pointed out anomalies which led him to conclude that he had no confidence in panel B of Fig S3, the only contribution Mr. P [REDACTED] made to the Manuscript. Dr. Wilde told Dr. Williams that he was ashamed for not having discovered the anomalies himself. A copy of Dr. Wilde's October 17, 2018 email is included in the JBD at Tab 12.

21. Also on October 18, 2013, Lori Ferris, Associate Vice-Provost, Health Sciences Policy and Strategy and Special Advisor to the Vice-President, Research and Innovation, wrote to Dr. Williams on behalf of the University. She confirmed that the University would undertake a review of the matter, and indicated that "We sincerely hope this will be acceptable to the JCB and will allow the journal to move forward with its original editorial decision". A copy of the October 18, 2013 email from Dr. Ferris is included in the JBD at Tab 13.

22. On October 18, 2013, Liz Williams advised that the image manipulation evident in Figure S3B of the Manuscript was in direct violation of the Journal of Cell Biology's editorial policies and was unacceptable. The Journal's editors thus revoked their previous acceptance of the Manuscript, making it clear that "we take the integrity of primary data very seriously and know of no better way to convey the importance we attach to this principle". A copy of the email from Dr. Williams on October 18, 2013 is included in the JBD at Tab 14.

23. As a result Dr. Wilde withdrew an application for a Canadian Institute of Health Research government funded grant that he had submitted in the Fall of 2013 because Mr. P [REDACTED] had contributed data to that grant application, and Dr. Wilde could not be 100% certain of the data that Mr. P [REDACTED] had provided to him.

24. On January 29, 2014, Dr. Wilde emailed Mr. P█ with his concerns about the data Mr. P█ had provided to Dr. Wilde for the Manuscript, and asked Mr. P█ to address those concerns.

25. Mr. P█ replied to Dr. Wilde that same day indicating that "these are the images I have". Dr. Wilde was unable to open Mr. P█'s file, and so sent a follow-up email, this time attaching the electronic files Dr. Wilde had received from the Journal in October 2013 indicating their concerns (described in paragraph 18 above and included in the JBD at Tab 11). Mr. P█ responded by attaching three .tif files "TIF Files"). He explained that the round spotty regions could be explained because he grabbed the blot too hard, and the sharpness could be because of the gamma adjustment to sharpen the image to get rid of the background noise. Later that day Mr. P█ provided a further image file to Dr. Wilde, claiming to have overexposed gamma adjustment. He included explanations for the anomalies directly on the image file. The email exchange between Dr. Wilde and Mr. P█ on January 29, 2014, together with the related attached image files, is included in the JBD at Tabs 15, 16 and 17 respectively.

26. The data that Mr. P█ provided to Dr. Wilde was in the form of .tif image files which were generated in the Adobe Photoshop CS4 program, and not on the BioRad image scanner that was the piece of lab equipment used to generate the original research data.

27. Dr. Wilde could not find a .scn file generated by the BioRad image scanner that corresponded to the .tif images in the TIF Files and data provided by Mr. P█ in his responses to Dr. Wilde.

28. Dr. Wilde did find a .scn file with the same file acquisition time and exposure length as one of the images sent by Mr. P█, and a .scn file with the same name as the .tif file sent by Mr. P█, but the pattern of protein bands in these two images differs dramatically. At the same time, there were many markings on the image in the .scn file that were identical to the TIF Files that Mr.

P█ provided, suggesting that it was this .scn file that was manipulated by Mr. P█ to form the basis of the TIF Files Mr. Patel provided to Dr. Wilde.

29. A copy of a report prepared by Dr. Wilde to document the timeline of events and supporting documentation is included in the JBD at Tab 18.

30. Mr. P█ attended a meeting with the dean's designate to discuss the allegation that he had concocted research for the Manuscript on September 10, 2014. Mr. P█ did not admit at that meeting that he concocted the research submitted to Dr. Wilde to be included in the Manuscript submitted to the *Journal of Cell Biology*.

31. Mr. P█ now admits that he:

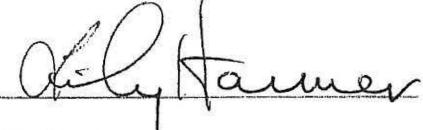
- (a) provided research data to Dr. Andrew Wilde in support of the work he was doing in respect of his Master's program, which data Mr. P█ knew was to be included in the submission of an article to the *Journal of Cell Biology*;
- (b) knowingly manipulated, altered and falsified the research data he presented which was ultimately included in the Manuscript submitted to the *Journal of Cell Biology*;
- (c) did not provide lab notebooks or data files to verify some or all of the data he reported;
- (d) provided false explanations to Dr. Wilde when asked to explain the anomalies in the data contained in Fig S3B of the Manuscript; and
- (e) committed the academic offence of knowingly submitting an academic work containing a purported statement of fact that had been concocted, contrary to section B.I.1(f) of the *Code*.

32. Mr. P [REDACTED] acknowledges that:
- (a) the Provost of the University of Toronto has advised Mr. P [REDACTED] of his right to obtain legal counsel and that Mr. P [REDACTED] has done so; and
 - (b) he is signing this ASF freely and voluntarily, knowing of the potential consequences he faces, and does so with the advice of counsel.

Signed on November 9, 2016.

[REDACTED]
J [REDACTED] P [REDACTED]

Signed on November 9, 2016



Lily Harmer
Assistant Discipline Counsel
University of Toronto

NO. []

THE UNIVERSITY TRIBUNAL
UNIVERSITY OF TORONTO

[REDACTED] AND [REDACTED]

This Exhibit is produced by
the University
this 10 day of November, 2016.
K. C. Brown

APPENDIX B

2/23

THE UNIVERSITY TRIBUNAL THE UNIVERSITY OF TORONTO

IN THE MATTER OF charges of academic dishonesty filed on November 25, 2014,

AND IN THE MATTER OF the University of Toronto Code of Behaviour on Academic Matters, 1995,

AND IN THE MATTER OF the University of Toronto Act, 1971. S.O. 1971, c 56 as am. S.O. 1978, c. 88

B E T W E E N:

THE UNIVERSITY OF TORONTO

- and -

([REDACTED] P [REDACTED])

JOINT SUBMISSION ON PENALTY

1. For the purposes of the sanction phase of this hearing under the *Code of Behaviour on Academic Matters* ("Code"), the University of Toronto (the "University") and [REDACTED] P [REDACTED] have prepared this Joint Submission on Penalty.
2. The Provost and Mr. P [REDACTED] submit that the appropriate penalty in all the circumstances of the case is that the University Tribunal impose the following sanctions on Mr. P [REDACTED]:

- (a) a final grade of zero (0) in RST9999Y;
- (b) an immediate suspension from the University to commence on the day the Tribunal makes its order for a period of up to five years;
- (c) a permanent notation of the sanction on his academic record and transcript; and
- (d) a recommendation that Mr. P [REDACTED] be expelled from the University.

3. The Parties further submit that it is appropriate for the Tribunal to report this case to the Provost for publication of a notice of the decision of the Tribunal and the sanction or sanctions imposed in the University newspapers, with the name of the student withheld.

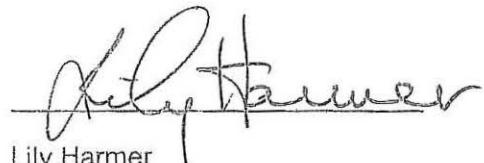
4. Mr. P [REDACTED] admits that he is signing this JSP freely and that he has been given the opportunity to obtain independent legal advice before signing this JSP, and has done so.

Signed on November 9, 2016.

[REDACTED]

J [REDACTED] P [REDACTED]

Signed on November 9, 2016.


Lily Harmer
Assistant Discipline Counsel
University of Toronto

NO. 3

THE UNIVERSITY TRIBUNAL
UNIVERSITY OF TORONTO

J. [REDACTED] AND R. [REDACTED]
This Exhibit is produced by
the University
this 10 day of November, 2016.

K. Osborne