



---

**Department of Mechanical and Materials Engineering**

**Nicol Hall**  
Kingston, Ontario Canada  
K7L 3N6

Tel 613-533-2748

Fax 613-533-6610

<http://me.queensu.ca/>

Deputy Provost Shearer  
Office of the Provost  
Richardson Hall, Suite 353  
Queen's University  
Kingston ON Canada K7L 3N6

Dear Dr. Shearer,

August 15, 2016

**Re: Investigation under Article 20.3.1**

Thank you for your letter dated August 11, 2016.

According to Article 20.3.1 of the Queen's- QUFA Collective Agreement, the person leading the investigation must have had no previous decision-making authority respecting the allegation.

You should not be leading the investigation because you initiated the previous investigation into allegations of insubordination, decided to delegate the investigation to Andrew Zabrovsky of Hicks Morley LLP, set the mandate for the investigation, and disciplined me for insubordination (one month suspension without pay) on June 29, 2016.

It is clear that you have had significant decision-making authority in this case and are unable therefore to impartially assess any argument against discipline. Procedural fairness dictates assigning a neutral investigator and decision maker in this matter. This is particularly important given that serious problems have been identified with the previous investigation, and QUFA has already filed a grievance (July 5, 2016) arguing that Articles 20 and 8 of the Collective Agreement were abrogated.

Sincerely,

M. Shirkhanzadeh  
Associate Professor  
Department of Mechanical and Materials Engineering  
Nicol Hall, Room 328A  
60 Union Street  
Kingston, Ontario, K7L 3N6