



October 7, 2016

Dr. Janice Deakin
Provost & Vice-President (Academic)
The University of Western Ontario
London, Ontario

Dear Dr. Deakin:

Re: Step 2 Individual Grievance—Professor Morris Karmazyn

The Association grieves on its own behalf and on behalf of Professor Morris Karmazyn of the Department of Physiology and Pharmacology in the Schulich School of Medicine and Dentistry, that, in terminating Professor Karmazyn effective October 6, 2016, the Employer has violated, inter alia, the *Discipline* and *Academic Fraud and Misconduct* Articles in the 2014-2018 Collective Agreement and the *Manual of Administrative Policies and Procedures* (“MAPP”), *Policy 7.0 – Academic Integrity in Research Activities* and any other relevant articles and Legislation.

Specifically, the Employer has terminated Professor Karmazyn’s employment contrary to the terms of the Collective Agreement. The Collective Agreement and the relevant provisions of MAPP are clear that in order for a finding of scientific misconduct to be made, there must be a finding of dishonest purpose and an intent to mislead or reckless disregard for the intent to mislead. No such findings were made by the Investigation Panel in its report. Without such a finding, the termination of Professor Karmazyn’s employment (or any discipline) constitutes a breach of the Collective Agreement. Additionally, the termination of Professor Karmazyn’s employment, a Member with no disciplinary history, constitutes a breach of the Collective Agreement related to progressive discipline.

The Employer has also breached principles of natural justice and procedural fairness by virtue of the manner in which it carried out its investigation into Professor Karmazyn’s conduct.

As remedies, the Association seeks:

1. A declaration that the Employer has violated the Collective Agreement;
2. That Professor Karmazyn's termination be overturned and his employment reinstated immediately;
3. That any steps taken to disassemble Professor Karmazyn's research lab be reversed; and,
4. Any other appropriate remedy.

Yours sincerely,



Ann Bigelow
President, UWOFA

cc.: Prof. Morris Karmazyn
Ms. M. Parkin, Director, Office Faculty Relations
Professor Kathleen Fraser, Chair, Grievance Committee, UWOFA
Members of the UWOFA Grievance Committee
Ms. Cindy Cossar-Jones, Professional Officer, UWOFA