

**UNIVERSITY TRIBUNAL
UNIVERSITY OF TORONTO**

IN THE MATTER of charges of academic dishonesty made on October 30, 2012

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*

B E T W E E N:

UNIVERSITY OF TORONTO (the "University")

- and -

S [REDACTED] F [REDACTED] (the "Student")

Hearing Date: August 6, 2013

Panel Members:

Ms. Roslyn M. Tsao, Barrister and Solicitor, Chair

Professor Ato Quayson, Director of the Centre for Diaspora and Transnational Studies, Faculty
Panel Member

Mr. Jonathan Hsu, Student Panel Member

Appearances:

Mr. Robert Centa, Assistant Discipline Counsel for University, Paliare Roland Barristers

No one appearing for the Student

In Attendance:

Dr. Kristi Gourlay, Manager of Office of Academic Integrity, Faculty of Arts and Science

Ms. Natalie Ramtahal, Coordinator, Appeals, Discipline and Faculty Grievances

Reasons for Decision

Delivered by Ms. Roslyn M. Tsao

1. The Trial division of the Tribunal heard this matter on August 6, 2013. The Student was charged on October 30, 2012 of 22 charges relating to the forging, altering or falsifying of documents or evidence on 7 or 8 separate submissions to the Committee on Standing

("Committee") in support of petitions for late withdrawal from courses in two separate academic years.

2. The Hearing proceeded by way of an Agreed Statement of Facts ("ASF") (attached as Appendix 1) and with the University withdrawing 4 of the 22 charges.¹
3. The Student did not attend at the Hearing.

Facts of the Case

4. A summary of the agreed facts set out in the ASF are:
 - (a) In July 2008, the Student submitted a petition to the Committee on Standing, Faculty of Arts and Science, seeking late withdrawal without academic penalty from 10 courses in which he had enrolled in academic year 2007-2008 ("Petition 1"). The Committee granted his request based on the reasons given by the Student, namely, that his grandfather in Sri Lanka was ill and eventually passed away and that he had to spend a significant portion of his first term in Sri Lanka and when he returned to Canada, he had to take additional part-time work because his parents remained abroad to look after his grandmother.
 - (b) The University accepted the documents provided by the Student in support of Petition 1 without confirming their authenticity. The Student has now acknowledged that he knowingly forged and falsified the application for extended leave of absence, a letter requesting a leave of absence from work and a document titled Human Resources Recommendations.
 - (c) The following year in May, 2009, the Student submitted another petition to the Committee seeking late withdrawal without academic penalty from 7 courses in which he had enrolled in academic year 2008-2009 ("Petition 2").
 - (d) The reasons and documentation provided by the Student in support of Petition 2 were that he was "neglectful and self-destructive"...."pretty spaced out" ...

¹ Charges 11, 12, 13 and 22 were withdrawn.

"mostly stayed home and (sic) video games all day". The Student submitted a medical certificate which he now admits was knowingly forged.

- (e) Petition 2 was denied by the Committee, finding:

You have not presented compelling reasons for not withdrawing before the deadline for withdrawal without academic penalty. You have already been granted late withdrawal without academic penalty from all the courses from your previous year of study and you were clearly warned of your responsibility to assess your progress in courses and to drop them to avoid further academic penalty.

- (f) The Student submitted a further petition in September, 2009 seeking the same relief as was sought in Petition 2 ("Petition 3"). The personal statement submitted in Petition 3 was wholly different and inconsistent from that submitted with Petition 2. In particular, the Student claimed that his grandmother passed away in August, 2009 and, in support of this, submitted a Certificate of Death and application for translation of a death certificate. The Student now admits that these two documents were forged, altered and/or falsified.
- (g) In October, 2009, the Student submitted another personal statement in support of his Petitions 2 and 3, accompanied by a newspaper death notice for his grandmother. The Student now admits that the newspaper death notice which he proffered as evidence of his grandmother's death related to another unrelated third party.
- (h) The Student submitted another personal statement in April 2012 in further support of Petition 3. The Student wanted to follow up on the status of his "long outstanding petition".
- (i) The Student now admits that his Petition 1, Petition 2 and Petition 3 forms and personal statements contained false and misleading information and statements in an attempt to obtain academic advantage.
- (j) Finally, on May 31, 2012, the Student emailed a Petitions Officer at the University in response to her question regarding the newspaper death notice, with further false statements designed to mislead the university.

Decision of the Tribunal

5. Based on the foregoing admitted facts, the Tribunal finds the Student guilty of the charges (except those withdrawn by the University).

Penalty

6. The Student and University submitted the following joint submission regarding penalty:
 - (a) The Student will receive final grade of zero in the 17 courses which were the subject matter of Petitions 1 and 2;
 - (b) The Student will be immediately suspended from the University for a period of up to five years from the date of the order, and that a corresponding permanent notation be placed on his academic record and transcript; and
 - (c) The Tribunal should report the decision to the Provost for publication.
7. The University stressed that because the Student admitted the facts and his guilt to all 22 charges, as set out in the ASF, the requirement of putting the University to the task of proving the allegations was avoided and that significant time and effort was saved.
8. There was an Agreed Statement of Facts and Joint Submission on Penalty ("ASF/JSP") (attached as Appendix 2).
9. The Student has been sanctioned for academic misconduct on two prior occasions:
 - (a) In the summer of 2009, the Student admitted that he committed plagiarism in an assignment worth 10% of his final grade. This matter (which predated the within charges) was addressed at the department level and the Student received a zero on the assignment; and
 - (b) In the summer of 2012, the Student again admitted that he committed plagiarism in an assignment and attempted to withdraw from the course. The matter was addressed by the Dean's Designate on July 2, 2012 with a zero on the assignment and a final grade reduction by 7 marks.

10. It was in or about the time of the second plagiarism charge that the University investigated the previous Petitions submitted by the Student.
11. The Student did not attend at the hearing to provide any other submissions regarding mitigation.
12. The Panel considered some of the documentation included in the Joint Book of Documents (Exhibit 3) in the context of penalty:
 - (a) In May, 2009, the Student had been accepted to Ross University, a Caribbean medical school, which the Student states, accepts students with grade averages of 50% with a sufficiently high MCAT score.²
 - (b) His stated reason for the requested late withdrawal was "to get a min GPA of 1.85 to get off probations because I need to get a course overload for the summer and/or for the fall ... because I got accept (sic) to Ross University Medical School.."
 - (c) As recently as May 31, 2012, after being sanctioned for plagiarism in May 2009, the Student continued to make (elaborate) false and misleading statements to the Petitions Officer for academic advantage (e.g. explaining why the newspaper death notice of his "grandmother" does not refer to him by name because his name in Sri Lankan is different than what he uses here).
 - (d) The Student's email of May 31, 2012 to the Petitions Officer also indicates that he will be starting "clinicals" after August 18th and will be unavailable until the summer of next year, which leads the panel to suspect that he has likely completed a medical program at Ross University given the 4 academic years that have elapsed from his acceptance in May 2009.

² See Personal Statement of Student submitted with Petition 2 filed May 22, 2009.

13. The Student has demonstrated a cavalier disdain for the ethics of this **or any** academic institution and his false statements, misrepresentations and fabrications are not isolated to one incident or a brief period of time but span years.
14. After being allowed to late withdraw from 10 courses (Petition 1) in one year, the Student looked "a gift horse in the mouth" and doubled down the following year by seeking to late withdraw again from his entire course load --- solely on the basis of false and misleading statements to the Committee. Even after the Student committed plagiarism on an assignment and was sanctioned in 2009, he continued to submit false and misleading statements and documents and committed a second instance of plagiarism.
15. There are too many examples of the Student's disregard for integrity and responsibility and it shocks the conscience of the Panel that such behaviour could warrant anything less than a recommendation for expulsion.
16. The Panel is very reluctant, in most circumstances, to reject a joint submission on penalty. However, the Panel is of the view that the penalty proposed in this matter would bring the administration of justice into disrepute and would condone the Student's misconduct.
17. University counsel provided 2 decisions in support of the Joint Submission on Penalty. The decision in *P* [REDACTED] is distinguishable as the Student had no prior academic offences, admitted guilt at the Dean's meeting and suffered from depression. The decision in *W* [REDACTED] is also distinguishable in that the Student had no prior discipline history and attended at the hearing to offer mitigating submissions.

³ *University of Toronto v. P* [REDACTED] *P* [REDACTED] [April 5, 2011] (University of Toronto University Tribunal, Trial Division)

⁴ *University of Toronto v. Q* [REDACTED] *W* [REDACTED] [March 22, 2012] (University of Toronto University Tribunal, Trial Division)

18. The Tribunal, therefore, makes the following Order regarding penalty:
- (a) The Student will receive final grades of zero in ANT333Y1Y, CSB349H1S, CSB460H1S, HMB311H1S, HMB434H1F, HMB443H1S, HMB444H1F, JFG 475H1F, MGY378H1S, and NFS284H1F (Petition 1) and ANT 200Y1Y, ANT 204Y1Y, ANT 333Y1Y, BIO 251Y1Y, HPS 390H1F, MAT 334H1S, and PSL 302Y1Y (Petition 2);
 - (b) The Student will be immediately suspended from the University for a period of five years from the date of this order;
 - (c) The Tribunal recommends to the President of the University that Governing Counsel be requested to expel the Student from the University; and
 - (d) The sanctions imposed herein be recorded on the Student's academic record and transcript for a period of 7 years.
19. The Tribunal shall report this decision to the Provost for publication of a Notice of this decision and the sanction in the University newspaper, with the Student's name withheld.

Dated at Toronto, this 5th day of
September, 2013.



ROSLYN M. TSAO
Co-Chair

APPENDIX 1

**THE UNIVERSITY TRIBUNAL
THE UNIVERSITY OF TORONTO**

IN THE MATTER OF charges of academic dishonesty made on October 30, 2012,

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 -

S [REDACTED] F [REDACTED] (993 097 830)

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 purposes of this hearing, the Provost and S [REDACTED] F [REDACTED] ("Mr. F [REDACTED]") have prepared this Agreed Statement of Facts ("ASF") and a joint book of documents ("JBD"). The Provost and Mr. F [REDACTED] agree that:

- (a) each document contained in the JBD may be admitted into evidence at the Tribunal for all purposes, including to prove 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.

A. Notice of hearing

2. Mr. F [REDACTED] admits that he received a notice of hearing for August 6, 2013, and that he received reasonable notice of the hearing. The notice of hearing is included in the JBD at Tab 1.

B. Charges and guilty plea

3. Mr. F [REDACTED] admits that he received a copy of the charges filed by the Provost on October 30, 2012. A copy of the charges is included in the JBD at Tab 2.

4. Mr. F [REDACTED] waives the reading of the charges filed against him, and pleads guilty to all 22 charges filed by the Provost.

5. A copy of Mr. F [REDACTED]'s academic record, dated February 15, 2013, is found in the JBD at Tab 3.

6. At all material times, Mr. F [REDACTED] was a student member of the University of Toronto, within the meaning of the *Code of Behaviour on Academic Matters*. Mr. F [REDACTED] admits that the University Tribunal has jurisdiction over him and that the *Code of Behaviour on Academic Matters* applies to his conduct.

C. Petition filed in July 2008

7. On July 14, 2008, Mr. F [REDACTED] filed a petition to the Committee on Standing at the University of Toronto Faculty of Arts and Science ("Committee" and "2008 Petition"). Mr. F [REDACTED] requested late withdrawal without academic penalty from the courses ANT333Y1Y, CSB349H1S, CSB460H1S, HMB311H1S, HMB434H1F, HMB443H1S, HMB444H1F, JFG 475H1F, MGY378H1S, and NFS284H1F, all of which he took in academic year 2007-2008.

8. Mr. F [REDACTED]'s 2008 Petition consisted of the petition form, a personal statement, an application for an extended leave of absence, a letter requesting a leave of absence from work, and a document titled Human resources Recommendations. A copy of the 2008 Petition is included in the JBD at Tab 4.

9. By submitting the petition form, Mr. F [REDACTED] affirmed that he had provided accurate and complete information with the 2008 Petition.

10. In his personal statement in support of the petition, Mr. F [REDACTED] wrote:

The reasons for this is that mid October my dad heard his father had become ill and become hospitalized. As an only child he and the rest of us left to Sri Lanka to see him, being he had pneumonia and his age. He was pretty sick. After arriving in Sri Lanka I believe it was on the 24th, we did the customary meet and greet with the relatives and their best wishes. My grandfather was hospitalized till early December, getting better he was released. His health better, we decided to leave before the end of December, but shortly after his release. He fell ill, and was readmitted. He stayed under observation at the Colombo General Hospital. On Jan. 24th he died in his sleep. My father decided to stay in Sri Lanka with my grandmother because she isn't doing well after her husband's death. As a result my parents are currently living in Sri Lanka, since putting her in a home is both very expensive and not good because the quality of elderly homes in Sri Lanka is not very good. I arrived in Canada on February 9th.

You might ask why didn't you cancel your courses in October, in all honesty I only expected to stay for 2 weeks max, and there weren't any tests coming up so I thought I'd come back in time. But his health was worse than expected and it turned into an extended stay. Between the hospital visits and paying the hospital fee's and tracking down doctors who disappear, I totally forgot about school. Again you might ask why didn't you cancel your second term courses, when I got back I didn't even remember school, we had gone to Sri Lanka in peak season with a loan, and since my dad is retired and my mom left her job in Canada went back to teaching in Sri Lanka. I had to get a part-time job on top of my current part-time job as a security guard. As a result I am busy 5 nights a week and I am busy 4 days out of the working week. I get a letter from Woods worth saying I've been put on academic probation.

11. The University accepted the documents provided by Mr. F [REDACTED] without confirming their authenticity. On November 24, 2009, the Committee granted the 2008 Petition and granted him late withdrawal without academic penalty in the 10 courses. A copy of the petition decision is included in the JBD at Tab 5.

12. Mr. F [REDACTED] admits that he filed the 2008 Petition knowing that it contained some false information, including, but not limited to the asserted explanation for needing to drop the courses after the drop date.

13. Mr. F [REDACTED] admits that he knowingly forged and falsified the application for an extended leave of absence, the letter requesting a leave of absence from work, and the

document titled Human Resources Recommendations documents and that he circulated them knowing that they were forged and falsified and did so to obtain an academic advantage.

D. Petition filed in May 2009

14. On May 21, 2009, Mr. F [REDACTED] submitted a petition to the Committee ("May 2009 Petition"). He requested late withdrawal without academic penalty in ANT 200Y1Y, ANT 204Y1Y, ANT 333Y1Y, BIO 251Y1Y, HPS 390H1F, MAT 334H1S, and PSL 302Y1Y, which he had taken in academic year 2008-2009.

15. Mr. F [REDACTED]'s May 2009 Petition consisted of the petition form, a personal statement, a letter from the Office of the Registrar at Ross University, an AAMC MCAT Report of Scores, and a University of Toronto Medical School Certificate, which was dated June 11, 2009. A copy of the 2008 Petition is included in the JBD at Tab 6.

16. The University accepted the documents provided by Mr. F [REDACTED] without confirming their authenticity. On May 22, 2009, the Committee denied Mr. F [REDACTED]'s request. A copy of the petition decision is included in the JDB at Tab 7. The decision read as follows:

You have not presented compelling reasons for not withdrawing before the deadline for withdrawal without academic penalty. You have already been granted late withdrawal without academic penalty from all the courses from your previous year of study and you were clearly warned of your responsibility to assess your progress in courses and to drop them to avoid further academic penalty.

17. Mr. F [REDACTED] admits that he filed his petition knowing that it contained false information, and that he knowingly forged and falsified the medical certificate, and circulated that document to obtain an academic advantage.

E. Petition filed in September 2009

18. On September 9, 2009, Mr. F [REDACTED] filed a petition to the Committee ("September 2009 Petition"). He requested late withdrawal without academic penalty from ANT 200Y1Y, ANT 204Y1Y, ANT 333Y1Y, BIO 251Y1Y, HPS 390H1F, MAT 334H1S, and PSL302Y, which he had

taken in academic year 2008-2009. This was the same relief he had requested in the May 2009 Petition.

19. Mr. F [REDACTED]'s September 2009 Petition consisted of the petition form, a personal statement, a paystub purportedly from the Scotiabank Group, an Application for Deposit Services, a Scotiabank bank statement, a Certificate of Death in the name of Elizabeth M. Perera, indicating a date of death of August 1, 2009, and an application for the translation of a death certificate. A copy of the September 2009 Petition is included in the JBD at Tab 8.

20. By filing his petition, Mr. F [REDACTED] affirmed that he had provided accurate and complete information on the form and with his petition.

21. Mr. F [REDACTED]'s personal statement submitted in the September 2009 Petition was totally different and inconsistent with the personal statement he submitted as part of the May 2009 Petition. Mr. F [REDACTED] admits that he knew that the September 2009 Personal Statement that he submitted contained false statements relating to his reasons for failing to withdraw from his courses within the required time.

22. Mr. F [REDACTED] admits that he forged or falsified:

- (a) the Certificate of Death in the name of [REDACTED] indicating a date of death of August 1, 2009; and
- (b) the application for the translation of a death certificate, both of which are found in the JBD at Tab 9.

23. Mr. F [REDACTED] admits that he knew that these two documents that he submitted had been forged, altered and/or falsified, and that they contained false statements relating to his reasons for failing to withdraw from his courses within the required time.

24. Mr. F [REDACTED] submitted another Personal Statement to the Committee on Standing on or about October 6, 2009 in support of his September 2009 Petition ("October 2009 Personal Statement"). A copy of this document is included in the JBD at Tab 10. . Mr. F [REDACTED] admits that he knew that the October 2009 Personal Statement that he submitted contained false

statements relating to his reasons for failing to withdraw from his courses within the required time.

25. Mr. F [REDACTED] included a printout from a newspaper in Sri Lanka, which he represented was a death notice for his grandmother. Mr. F [REDACTED] admits that the person referred to in this article was not his grandmother, or any relation to him, and that he knowingly circulated this document knowing that it contained false representations and did so in an attempt to obtain an academic advantage

26. Mr. F [REDACTED] submitted another Personal Statement to the committee on Standing on or about April 25, 2012 ("April 2012 Personal Statement") in support of his September 2009 Petition. A copy of this document is included in the JBD at Tab 11. . Mr. F [REDACTED] admits that he knew that the April 2012 Personal Statement that he submitted contained false statements relating to his reasons for failing to withdraw from his courses within the required time.

27. In May 2012, Mr. F [REDACTED] submitted a Registrar of Deaths to the Committee on Standing in support of his September 2009 Petition. A copy of this document is included in the JBD at Tab 12. . Mr. F [REDACTED] admits that he forged, altered and/or falsified that document, which contained false statements relating to his reasons for failing to withdraw from his courses within the required time.

28. On or about May 31, 2012, he again submitted a Personal Statement to the Committee on Standing which he knew contained false statements relating to his absence during the 2008/2009 school year and his reasons for failing to withdraw from his courses within the required time.

29. Mr. F [REDACTED] admits that he knowingly forged and falsified these documents and circulated that them.

F. General Admissions

30. With respect to all of the false information, forged or falsified documents that Mr. F [REDACTED] provided to the University, Mr. F [REDACTED] admits that he knowingly sent this false information:

- (a) in order to obtain an academic advantage;
- (b) to mislead the Committee and others at the University; and
- (c) expecting that the Committee would rely on this information to its detriment and would provide him with an academic advantage.

31. On July 26, 2012, Mr. F [REDACTED] met with Professor John Britton, Dean's Designate for Academic Integrity, to discuss the allegations that he had violated the *Code of Behaviour on Academic Matters*. During this meeting, Mr. F [REDACTED] admitted that he had committed some, but not all, of the academic offences described above.

32. Mr. F [REDACTED] acknowledges that he is signing this ASF freely and voluntarily, knowing of the potential consequences he faces. Mr. F [REDACTED] acknowledges that the Provost has provided him with no assurances regarding what sanction the Provost may request the Tribunal to impose in this case.

Signed on July 25, 2013.

S [REDACTED] F [REDACTED]

Signed on July 25, 2013.

NO. 2

THE UNIVERSITY TRIBUNAL
UNIVERSITY OF TORONTO

Robert A. Centa
Assistant Discipline Counsel
University of Toronto

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This Exhibit is produced by
the UNIVERSITY
this 6 day of AUGUST, 2013.

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APPENDIX 2

**THE UNIVERSITY TRIBUNAL
THE UNIVERSITY OF TORONTO**

IN THE MATTER OF charges of academic dishonesty made on October 30, 2012,

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* am.

BETWEEN:

THE UNIVERSITY OF TORONTO

- and -

S [REDACTED] F [REDACTED] ([REDACTED])

AGREED STATEMENT OF FACTS AND JOINT SUBMISSION ON PENALTY

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 the penalty phase of this hearing, the Provost and S [REDACTED] F [REDACTED] ("Mr. F [REDACTED]") have prepared this Agreed Statement of Facts and Joint Submission on Penalty ("JSP") and have attached several documents to this JSP. The Provost and Mr. F [REDACTED] agree that:
 - a. each document attached to the JSP 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. F [REDACTED] admits that he has been sanctioned for academic misconduct on two prior occasions.
3. First, in Summer 2009, he enrolled in ANT200Y, which was taught by Michael Gregg. Mr. F [REDACTED] admitted that he committed plagiarism in an assignment worth 10% of the final grade in ANT200Y. The Chair of the Department imposed a grade of zero on the assignment.
4. Second, in ^{a different course} ~~the same course~~, Mr. F [REDACTED] committed a separate act of plagiarism on a different assignment in the course, which was worth 7.5% of the final grade. The Dean's Designate for Academic Integrity imposed the following sanction: a grade of zero on the assignment in question and a further reduction of 7 marks on the final grade in the course. A copy of the decision letter from the Dean's Designate, dated July 2, 2012, is attached to this JSP as Exhibit A.
5. The University of Toronto and S [REDACTED] F [REDACTED] submit to the Tribunal that the appropriate penalty in all the circumstances of this case is that:
 - a. a final grade of zero be assigned for each of: ANT333Y1Y (20079), CSB349H1S (20081), CSB460H1S (20081), HMB311H1S (20081), HMB434H1F (20079), HMB443H1S (20081), HMB444H1F (20079), JFG475H1F (20079), MGY378H1S (20081), NFS284H1F (20079), ANT200Y1Y (20089), ANT204Y1Y (20089), ANT333Y1Y (20089), BIO215Y1Y (20089), HPS390H1F (20089), MAT334H1S (20091), PSL302Y1Y (20089);

- b. Mr. F [REDACTED] be immediately suspended from the University for a period of up to five years from the date of the order, and that a corresponding permanent notation be placed on his academic record and transcript; and
6. The University of Toronto and Mr. F [REDACTED] submit that the Tribunal should report this case to the Provost who may publish a notice of the decision of the Tribunal and the sanctions imposed, with the student's name withheld.
7. Mr. F [REDACTED] acknowledges that the University of Toronto has advised him to obtain independent legal advice before signing this Joint Submission on Penalty and that he has done so or that he has deliberately waived his right to do so.

Signed in Toronto on July 25, 2013.

[REDACTED]
S [REDACTED] F [REDACTED]

Signed in Toronto on July 25, 2013.



Robert A. Centa
Assistant Discipline Counsel
University of Toronto

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NO. 4

THE UNIVERSITY TRIBUNAL
UNIVERSITY OF TORONTO

[REDACTED]
This Exhibit is produced by
the UNIVERSITY
this 6 day of AUGUST, 2013

