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01 Feb. 94.

To: Prime Minister Jean Chretien Premier Bob Rae Mr. Edward L. Greenspan Q.C.

### Special Cover Letter for OHRC (01 Feb. 94) Letter

#### Dear Esteemed Gentlemen:

Enclosed are your copies of my "deposition" to the OHRC. There are a few pertinent points that I wish to draw to your collective attentions. Please find the photocopies of correspondence to Mr. Alan Borovoy (Cdn. Civil Lib. Assoc., & Ms. Gilbert's late reply). Ms. Gilbert's main concerns are issues to society, and therefore a reason any "Centres of Excellence" must be tested to prevent financial and medical disasters; as I believe my case would do. The excuses will be, "we weren't ready", or "no one was double-checking the guidelines" or "we didn't want to speak up for fear of reprisal". Society requires protection and a simple model is available. The only reason not to is that the participants know that they would be found unfit.

The "deposition" to OHRC was absolutely necessary since so many have shirked their duty, and I can not realistically continue without positive intervention. Douglas Wright doesn't care if "little people" are hurt or not (registered letter to, May 93). Rather, he would lecture society on the shortcomings of an education system that he is partially responsible for. I am claiming hatred by the Corporation of the University of Waterloo. My one solicitor once wrote the University that I could be a credit to them if they helped. What does it say about our higher education system if they'd rather hate than help? Is this good for Canada?

Help, fairness and equity. I am not sure if these are nothing but words to you.Let me explain. My example will be quite blunt, but please do not take personal offense (as you are all probably very fine people). Let us compare Mr. Edward A. Greenhalgh to Premier Bob Rae (Mssrs. Chretien and Greenspan, you may compare your own histories too).

Mr. Greenhalgh is 40 yrs. old, and Mr. Rae is 45; therefore fairly comparable. Mr. Greenhalgh's father was a CNR foreman (quite proud of the CNR) while Mr. Rae has a wealthy background (Power Corp.?). Mr. Rae was a Rhodes scholar while Mr. Greenhalgh worked in a factory to pay his own way. The <u>bluntness</u>: had you not come from a wealthy family, you may not have been a Rhodes scholar!

What? What about ability? No doubt you are talented, but Mr. Greenhalgh only has 22 teeth. Huh? And not one without a filling. So what does that have to do with anything? <u>Poverty!</u> The human toll that poverty takes: the luxury of sleeping in; lack of peer pressure because your clothes aren't hand-me-downs; not having to work after school at home; on weekends for "spending money"; not being able to do homework until 8:00 p.m. and then going to bed at 1:00 a.m. to get up at 5:00 a.m. for a 1 hour bus ride; and low-grade infections draining your health.

The teeth. At age 9 a back molar was so decayed that to stop the pain I smashed it out on a car door handle. There was no money for a dentist until at 16 I got my own spending money working after school/weekends. The dentist removed 4 roots and 5 large abscesses. Do you believe that you could have kept your grade average up? The wealthy (include middle class) do not appreciate their tremendous advantages. Do you appreciate my story now? By the way, I am the first of my family to go to university. Do you appreciate the meanness of Douglas Wright, Trevor Eyton and the other senators?

Please note, when I asked Mr. Kevin Coe (Canada Manpower, 20 Oct. 93) what work I should apply for he said, "factory work". With everything I've been through, is this proof that our universities are only for the wealthy and politically connected: the elite and privileged? Is this fair? And just because I'm a white male, does this mean that the law and equity aren't there for my protection also?

Mr. Greenspan, you are listed as a Vice-President of the Cdn. Civil Lib. Assoc. What do you think? Mr. Borovoy on CBC radio said he was inspired by the Canadian Expedition to the Spanish Civil War. I did not ask him (nor Mr. Trudeau, nor others) to stop a bullet for me, but help. Is that fair?

Mr. Chretien, our society is producing Fabrikants and students like the co-op student of U. of W. 1 Jan. 93 (he killed another person) and Jag Bhaduria-type people. I believe, if nothing else, I have remained a positive person under the most dreadful of circumstances. Don't you believe such a person would prove beneficial to Canada and deserves more fairness than received so far?

Gentlemen, Canada needs positive people. I need help. By protecting negative institutions that bend the rules you aren't making Canada more competitive, nor a fairer place. A winning attitude isn't built upon cheating. I look forward to your replies.

Yours truly

Edward A. Greenhalgh

The Le Premier Premier of ministre de Ontario l'Ontario

LegisLative Building Queens Park Toronto, Ontario M7A 1A1 Hotel du gouvernemer Queen's Park Toronto Ontario) M7A 1A1

February 24, 1994

Mr. Edward A. Greenhalgh 265-7 Regina Street North Waterloo, Ontario N23 389

Dear Mr. Greenhalgh:

Thank you for your letter informing me about your Ontario Human Rights Commission (OHRC) case. I have noted your comments.

The OHRC operates at arm's length from the government so that it may consider cases free from political interference. Therefore, I hope you will understand that it would be inappropriate for me, as Premier, to comment on the matters you have raised in this letter.

I appreciate your writing.

Yours sincerely,

Bob Rae

# A Formal Complaint to the Ontario Human Rights Commission

## to Initiate an Investigation 02 February 1994

by

E. A. Greenhalgh (519) 884-3318 265-7 Regina St. N. Waterloo, Ontario N2J 3B9

Mr. E. A. Greenhalgh Outlines How Discriminatory Practices Condoned/Sanctioned by the Corporation of the University of Waterloo While Promoting a "Special Student/Research Program" Violated his Access to Education and Related Employment and Benefits (this material augments that sent to the Federal-Provincial Governments requesting a Civil Rights Fraud Investigation).

# Copies forwarded to:

Ms. Lillian Davis: Toronto Office of the Ontario Human Rights Commission

#### Federal Government

**Provincial Government** 

Prime Minister, Jean Chretien Deputy
P.M., Sheila Copps
\*Minister of Human Resources,
Lloyd Axworthy
\*Minister of Health, Diane Marleau
\*Attorney General of Canada, Allan
Rock
\*Secretaiy of State (Science,
Research and Development), Jon
Gerrard

Premier, Bob Rae
Attorney General, Marion Boyd
Minister of Education, David Cook
The Law Society of Upper Canada,
J. Scott Kerr, Asst. Secretary A
Vice-Pres. of the Canadian Civil
Liberties Association,
Edward L. Greenspan Q.C.

<sup>\*</sup>Ask the offices of P.M. Chretien, Deputy P.M. S. Copps (J. Boutet) and M.P. Telegdi for additional material (re: fraud and safety concerns)

This correspondence, plus that of the 18 Nov. 93, represents a formal complaint to be recorded as such by Mr. E. A. Greenhalgh (Greenhalgh) against the Senior Administrators/Senate of the Corporation of the University of Waterloo (henceforth, "Corporation"). Any interviewing officer with the Ontario Human Rights Commission (OHRC) may "augment" to the formal complaint. This formal complaint represents Greenhalgh's sincere and honest beliefs to be accepted as such. Copies will have been sent (registered) to the afore-listed as Greenhalgh has informed Ms. Davis of his fear that a local office may be biased to protect local reputations and only record minimal incriminating material so no complaint would be apparent. Mr. Greenhalgh's concerns have been raised by P.M. Chretien who has spoken on the public's general lack of trust and confidence in government and public institutions. Greenhalgh's precautions are, therefore, reasonable.

To request an investigation for Human Rights Abuse (access to education and related subsequent employment) by the President, Chancellor and Senate (specifically members thereof between 1984 and 1993) to conceal unethical and criminal conduct with INTENT to harm Greenhalgh's career to the benefit of, directly or indirectly, the Corporation individual agents/employees) financially and personally (including any forms of prestige and family/friend relationships). Corporation's actions establishes an ATTITUDE that allows the compromising of public trust and standards (safety, ethical and financial) for the Corporation's gain. The 18th Nov. 93 letter clearly responsibility as being totally the Corporation's defines the (opposed to individual agents/professors). The Senior Administrators, as a Board of Directors of any Corporation are ultimately responsible for the character, conduct and ethics of the corporation: ensuring all laws are obeyed. Therefore, the Senior Administrators are totally responsible to ensure that human rights abuses do not occur, and especially not to initiate abuses (because higher education is meant to set and demonstrate high ethical standards f excellence]; not to develop techniques to circumvent laws--including EQUITY and fair hiring practices).

CODE violations were absolutely necessary to hide unethical/criminal activities (premeditation ensuring the continuation of RESEARCH FUNDING and consequently a future academic position for J. C. M. Riley). Whether or not OHRC continues a criminal investigation (federally and provincially) or requests a public inquiry, OHRC is morally/ethically required to: 1. begin an investigation; then, 2. inform the proper authorities.

How was the CODE violated in Greenhalgh vs. Corporation?

p. 2 CODE booklet: "The Ontario Human Rights Code states that every person has a right to freedom from discrimination in the area of:

- -contracts (oral or written agreements)
- -employment (including advertisements, applications forms and job interviews)"
- p. 3 "on the grounds of:
  - -creed (religion)
  - -family status (being in a parent-child relationship)".

<u>Point One</u>: Contracts, written or oral - an understanding. <u>My</u> understanding of <u>my</u> contract/agreement with the Corporation as an MSc. Biology graduate student was to fulfill the following:

- A. to have the required proper background for my program
- B. to complete the required course load in the required time
- C. to receive fair and proper guidance from my supervisors and the Corporation
- D. to produce repeatable scientific work of merit/excellence and report same honestly without bias
- E. Not to have my work suppressed because of special interests outside of my MSc. program
- F. to be treated with honesty, respect and fairness regardless of my publicly declared creed, any friendship requirements, or my not being related to faculty/administration; or not having done my undergraduate degree at U of W
- G. receive all normal benefits associated with the successful completion of an MSc. program; i.e., help towards a Ph.D. program, necessary references, and assistance in dealing with funding agencies (NSERC, NRC, MRC, etc.).

<u>Point A</u>: Greenhalgh had the necessary background: Hons. BSc. in Biology (chem. minor one credit short gen. chem. BSc. phys. chem.). In direct contrast (i.e., OHRC, 18 Nov. 93), J. C. M. Riley had a gen. BSc. (Phys. C- avg.) without any undergrad degrees in Biology or chemistry, so J. C. M. Riley would never qualify, but he went on to a graduate degree in Biology. How was this possible that he could receive such a special discriminatory contract from the Corporation <u>NOT</u> allowed Greenhalgh (nor other Biology students, for that matter)?

It has come to my attention that J. C. M. Riley may have had a relative with influence to the faculty/administration. This relative factor ("family status": CODE) must be investigated by OHRC. A definite grounds of discrimination by the Corporation violating their own "Standards of Excellence" (over academic ability).

Further, Greenhalgh comes from a working class background possessing neither wealth nor political influence, and as a Canadian citizen never dreamed of being a victim of <u>ELITISM</u> (N.B. the close political ties of Brian Mulroney, Douglas Wright and Kim Campbell and their media announced stands on elitism). Therefore, the discrimination has basis in <u>family</u> relationships and class for CODE yiolations

\* \* \*

<u>Point B</u>: To complete courses in required time. As outlined to OHRC (18 Nov. 93) any student is considered substandard if they can not. Greenhalgh completed the required courses, yet Dr. Carlson would not let him write his thesis nor set a defense date. Dr. Carlson spent all his time helping J. C. M. Riley complete his Ph.D. before a deadline. Numerous registered letters were sent to the Corporation (student advisor, Asst. Deans and Dean of Science) for help. Finally, legal advice was sought.

Circa 1986, Mr. J. B. (David) Stock, Q.C. of Woodstock, Ont. was consulted. He advised that since I had a <u>verbal</u> offer to do Ph.D. studies at Sick Children's in Toronto with Dr. Pace-Asciak ("could be of clinical value" see photocopy), to write and submit my thesis. Mr. Stock felt the Corporation would see it as a personality conflict of my supervisor and help me leave to a position that would reflect positively on them. Unfortunately, the Corporation responded negatively (see photocopies 27/29 Apr. 1987) Dr. Kendrick's "warning"). Because of this negativity, Greenhalgh would lose the offer (Pace-Asciak 1988). Please note:

- 1. Greenhalgh had a positive situation to go to;
- 2. Greenhalgh wasn't demanding anything except to be allowed to leave, having fulfilled his part of the MSc. contract.

\* \* \*

A direct comparison of J. C. M. Riley is required. He was approved by the Senate for an MSc. program but was unable to complete in the required time (hence would be substandard: loss of future in academia). The Senate then approved his MSc. to a Ph.D. without the required necessary courses. Therefore, he now had more time and would be seen as "standard", and eligible for funding and <u>future academic positions</u>.

You must realize that if an experienced friend/relative was watching out for J. C. M. Riley's future, they knew that positions would be available in a few years. They just had to ensure that he would match any written requirements. Therefore, J. C. M. Riley would be receiving special (outside, and beyond, the normal "contract") help (discriminatory to ALL other students) to ensure future employment and life benefits (a position and associated prestige, etc.). However, this suggests that the Corporation was willing to use UNFAIR HIRING PRACTISES, and totally ignore EQUITY. Any future job competitions/postdoctorate equivalent can not be viewed as being completely fair.

Mr. Kerr of the Law Society of Upper Canada (LSUC), Mr. Haney would be aware of this situation. Dr. J. C. M. Riley has a post-doctorate situation (1994) at U. of W., so doesn't this constitute a <u>pre-ordained</u> situation? Considering that Greenhalgh's thesis challenged Riley's Ph.D.'s very theoretical basis, and since shown flawed, can Riley truly be viewed as the best candidate; or are postdoctorate situations awarded on the merit of friendship/family? Is such a practice valid? Safe? Would any other institution be allowed such hiring practices? Are universities above the law?

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<u>Point C</u>: To receive proper and fair guidance. Greenhalgh did not. Indeed, when the Senior Administrators asked for one competent expert, that very comment was made. N.B. Mr. Kerr (LSUC) Mr. Haney is quite aware of the Corporation's conduct to support continued financial gain (funding) and to preserve their reputations. Mr. Haney is an <u>active</u> participant, cognizant of his actions! He is also a bright man, aware of the future ramifications. As an officer of the court, when was he ethically and duty bound to report the Corporation's actions?

More to the point, Greenhalgh had completed the required courses in the required time, but Dr. Carlson would <u>not let</u> him, nor help him write his thesis. He only helped J. C. M. Riley, taking him to conferences and writing his thesis: actively promoting the Riley career/and Research Program that was bringing funding/prestige to the Corporation. If Greenhalgh had <u>published</u> the <u>original</u> thesis, the Riley Ph.D./thesis theory would be exposed as flawed. The career ended and funding open to review. N.B. the theory of the Riley Ph.D. is not used today. Greenhalgh was punished/discriminated for presenting superior and advanced work (confirmed by Mr. Haney 22 Apr. 1991). This is discriminatory and a breach of the student-Corporation contract.

<u>Point D</u>: To produce repeatable scientific work of excellence and report data honestly without bias.

My lawyer, Mr. Besant, finally persuaded the Senate to have Dr. Carlson step aside (though he retained veto), and a special Ph.D. style defense, with a Dr. Plumtree as chair, was held. No serious flaws could be raised and Dr. Plumtree, in front of witnesses, congratulated Greenhalgh on his successful Ph.D. defense. This is important: two outside observers recognized the work of Ph.D. calibre -1. Dr. Plumtree, and 2. Dr. Nicolson. However, the Corporation refused to let Greenhalgh graduate unless he entered into another <u>special</u> contract to <u>change</u> his (already defended) thesis: suppressing his work and violating academic freedom (active discrimination). Greenhalgh would work with Dr. Bols in exchange for graduation and a reference (<u>CRITICAL</u> to continued education = ACCESS). N.B. Mr. Kerr (LSUC), Mr. Haney were aware.

But, there are TWO MAJOR considerations: precedence and discrimination to this <u>special</u> contract. The Corporation was applying prejudicial measures against Greenhalgh not expected of his <u>contemporary</u> students. Two examples: Lucy Lee and Suzanne E. Cziraki (N.B. both were U. of W. undergraduates).

1. Precedence: Dr. Bols was a graduate student advisor (N.B. recall experts' opinion that Greenhalgh had not received proper guidance). Dr. Bols was also Lucy Lee's MSc. supervisor. I liked Lucy and decided to attend her defense, since MSc.'s were poorly attended. Lucy had attempted a novel experiment: culturing fish cells with mammalian methods. Few questions were asked and, since I enjoy questions at my own presentations, I asked one. "What does it mean when your cells form that large fat vacoule you've shown?" Dead silence. Lucy looked funny. Bols upset. After a pause, Dr. Dixon (fish expert) said, "it means the cells are dead". Oh! So in fact, Lucy's thesis had failed to develop a viable method. Nevertheless, Lucy graduated without incidence. I have no qualms. Lucy had tried something difficult. At least she had honestly tried.

The point becomes, why was Greenhalgh discriminated against? His experiments succeed (later published and recognized internationally). Why did Greenhalgh require counsel to graduate? Lucy didn't. Did Lucy go on to further education/employment? This can be <u>investigated</u> and <u>verified</u>!

Suzanne E. Cziraki graduated with Greenhalgh (but had started later). Why? She completed her course load and Dr. Carlson <u>helped</u> her with her thesis, and took her to conferences. Dr. Carlson did none of this for Greenhalgh. By not presenting Greenhalgh at conferences he was deliberately separating Greenhalgh from peer recognition and "traditionally accepted remedies". This is discriminating and career damaging. The Corporation supported Dr. Carlson (the funding/gain), and, so <u>his actions are the Corporation's</u>.

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### 2. Second Breach of Contract/Discrimination

Greenhalgh was forced to work with Dr. Bols to <u>suppress his own work</u> (in direct contradiction to the Corporation's claims of ethics/academic freedom: re: Centre of Excellence) in return for graduation and a reference (from Dr. Bols). Greenhalgh did this, but Dr. Bols refused (see Besant letters 19 May 1988, 4 Nov. 1988): breach of contract. Therefore, the Corporation is openly discriminating (perhaps committing criminal acts re. Mr. Haney, Mr. Kerr, LSUC?) against Greenhalgh and consciously and deliberately blocking his access to related education and employment.

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Before continuing, the <u>issue of responsibility</u> must be clarified: the <u>Corporation</u> itself, and through its various agents, is committing the offences. Every action is negative with the intent of harming Greenhalgh's academic career/dreams. Therefore, although the Corporation may try to invoke 1988 for any statute's clause, continued negative/vindictive events directly related to their intent will move any such date much later (including 1993). N.B. Mr. Kerr (LSUC), Mr. Haney was/is involved in all events: when did he have an ethical duty as an officer of the court?

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<u>Point D</u>: To produce replicable scientific work of "excellence" and report data honestly without bias (since the life sciences can cause serious harm, i.e., DES, silicon implants, HIV-testing-blood -- a letter explaining thalidomide and harm was given to Dean Brodie). In short, to tell the truth (see Creed)!

To tell the truth required explaining serious flaws in J. C. M. Riley's work (and associated labs at U. of W., Cornell and Yale). Specifically, there are Dr. Carlson's handwritten comments on the suppressed thesis.

<u>Point of Interjection:</u> <u>Creed.</u> From the Oxford Universal Dictionary Creed (krid), sb. [OE> cred

Lillian Davis replied (OHRC, 8 Dec. 93) on pg. 1: "it must satisfy two requirements: 1. It must involve one of the social areas covered by the CODE, for example, employment or services and; 2. It must also involve one of the grounds set out in the CODE such as handicap, colour, age, sex, marital status, creed, race among others." As we have been examining how my education/related employment has been discriminated in the "Contract" violations, my "Creed" as a threat to the Corporation must be examined (as will my class, and my non-relative status).

Note the last sentence in my thesis acknowledgements: "My mother and father who formed within me an appreciation for God, honesty and hard work." God, honesty and hard work: a CREED declared in writing! The Corporation is aware of this declared creed. How would a belief in God requiring the practice of honesty threaten them? If they were engaged in unethical or immoral or illegal activities requiring everyone to be on side, then the creed would be a threat to them (i.e., grant fraud, unfair hiring practices, etc.). It would publicly question prestige and ego. But whose funding? Whose ego?

One answer may be found on pg. 141 of the suppressed thesis in Dr. Carlson's handwritten comments. He told me not to include the BW755c or NaPB experiments (crucial to the scientific explanation, but contravening views) on the grounds of statistically insufficient numbers. Greenhalgh validated their inclusion by citing Carlson and others who in 1974 claimed ONE ewe was statistically significant! The BW755c (as an antioxidant reaction) + NaPB (cell death theory) work questions the very validity of Riley's thesis plus work at Cornell and Yale. Dr. Carlson's comments include, "this is not fair", and, "how can anyone trust you?" My "contract" and creed requires Greenhalgh to be truthful and unbiased. Note letter to Dean Brodie, and isn't this how the 1993 U.K. cancer hospital scandal occurred? No one would speak up in an unbiased fashion. Truth is absolutely necessary in science! Dr. Carlson, in essence, asked me to lie! By supporting Carlson/Riley, the Senate was asking me to lie (and, ultimately, endanger society). My creed put me in conflict with Douglas Wright, Trevor Eyton and the other Senators.

\* \* \*

<u>Point E</u>: Not to have my work suppressed because of special interests outside of my program.

What special interests would exist outside of the honest and unbiased reporting of data? Two are suggested:

- 1. Grant fraud (i.e., O'Toole vs. M.I.T.).
- 2. The reputation of the Corporation, international political connections, plus the personal vanity of people in power: ego.

How? Review Dr. Carlson's comments, plus p. 223 of the suppressed thesis: "As for the contention that membrane fluidity is important to receptor-binding (or lack of) or adenylate cyclase functioning (or hindrance thereof, or endocrine function) no support could be provided for such from the work presented in this thesis. What the thesis does conclude is that physical changes do occur in regressing luteal cell membranes, but they are just that: physical responses after the fact. They may be part of the mechanism providing arachidonic acid for PG biosynthesis; however, they are not the signaling mechanism. The literature still places the origin of that signal deeper in the cell and an investigation of genetic expression would provide greater insight than more polarization studies could hope to."

This one page clearly summarizes that the research at U. of W., associated with J. C. M. Riley, Drs. Carlson, Thompson, Bols and others, is flawed. Similarly, the work of Hansel (Cornell) and Behrman (Yale). Greenhalgh took a public stand in 1986. In 1990 Weight et al. won the Nobel prize for explaining why, in better detail. Therefore, the Corporation and friends would have cause to feel threatened (MOTIVE) and seek protection, even though they would be violating Greenhalgh's rights. The 1988 Toronto Star article concerning Pres. Wright vs. Prof. Guelke's concern for public trust vs. millionaires is an example of attitude. We can draw from the article Wright's concern for money, which would be reflected in the Corporation's policies.

The funding threat is obvious (grant fraud -worldwide concern). The other agenda is subtle, involving human vanity (ego). We must examine only students contemporary to the incident's time frame. We also must consider that in 1990 (see newspaper article), Douglas Wright was appointed P.M. Mulroney's <u>special</u> educational advisor (he is Pres. and chancellor). This is a man of prominence with connections, and it is fair to suggest that he believes in his own importance and power. It is also fair to suggest that he believes that U. of W. should be a "Centre of Excellence", and therefore U. of W. students are superior. It is also fair to suggest that these beliefs are shared by the Senate.

<u>Point</u>: J. C. M. Riley is a U. of W. product. What other contemporary students did their undergrad studies at U. of W.? Lucy Lee, Dr.Bols's grad student. Jackie Brown, Dr. Thompson's grad (was she also related to Jack Brown, the University Secretary?), Suzanne E. Cziraki, Dr. Carlson's other MSc. student. It should be apparent that an outsider (from

WLU) was questioning (unintentionally/honestly) their excellence. Is it fair to suggest that egos were rubbed the wrong way? Is it fair to suggest that the Corporation could have reacted with a mean and vindictive attitude (Mr. Haney's correspondence is a record of broken promises). Therefore, human jealousy is a valid explanation for the human rights violations (and isn't it a common cause?).

\* \* \*

<u>Point F</u>: To be treated with honesty, respect and fairness regardless of any Creed, Family Status (not related to faculty/administration/political party or business connections), nor the special prerequisite of having been a U. of W. undergrad.

The question that <u>MUST</u> be investigated is, Who was J. C. M. Riley related to, or befriended by? Why was Greenhalgh discriminated against while <u>special provisions</u> were made for J. C. M. Riley? Specific example, Mr. Haney (Davis 20 Mar. 91, Haney 22 Apr. 91) replies that the work may have been published and of superior quality but that is no substitute for having been enrolled in a Ph.D. program and fulfilling all of the requirements. The point is neither did J. C. M. Riley, except by "special escape clauses" from the Corporation. Greenhalgh was discriminated against.

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<u>Point G</u>: To receive all benefits associated with the successful completion of the Program.

Blacklisting will be outlined and how the Corporation may be guilty of spreading hate about Greenhalgh to prevent his doing research (so U. of W.'s would not be examined by peers: MOTIVE). Only a few representative pieces will be presented in this FORMAL COMPLAINT. Please realize, that although verbal or electronic communications are not physically lasting, but the result is provable. The concept is similar to overriding habeas corpus a murder conviction may be obtained even though a body is never found. The effects of blacklisting are to "poison the waters" so that the individual loses all opportunities associated with the NORMAL pursuit of the goal. Any corporation that can't demonstrate a positive atmosphere of goodwill and open communication is deemed fully responsible for any and all of its agents' actions (especially if they do not show disdain or contrary actions, and may even benefit from said actions). Therefore, only one concrete example is necessary. More than one follows, and their associated dates give a real time frame for any statutes of limitations.

There must be a "Benchmark-Reference Point" relative to the period that Greenhalgh was competing in. The contemporary students were: Riley, Brown, Cziraki and Lee. Did they later: i) receive funding, ii) position/jobs and/or iii) further education? How do they compare to Greenhalgh who lost all opportunities and finally blocked by <u>protocol</u> (Dr. Slotin/MRC, 14 Apr. 1988 funding is only available if you have a position at a recognized facility). Discrimination and harm should be apparent.

For example: the correspondence with Dr. E. Vos of CIBA-GEIGY who first (7 May 1990) offered a scholarship, but later don't do research in Canada (19 Aug. 1992).

- : Dr. Pace-Asciak of Toronto's Sick Children's (26 May 1986) considers the work of potential clinical value, but later changes his research (27 June 1988).
- : Dr. Carl Laskin of Toronto General Hospital (25 Apr. 1989) who says he's unqualified to be my supervisor (of a female reproductive project). Yet, the next year he receives \$80,000 from MRC to study aspirin and pregnant women (same concept as BW755c see the Burroughs Wellcome correspondence).

Then there's the Dr. Huntley-Blair/Dalhousie correspondence (26 Jan. 1990) who acknowledges our telephone conversation wherein there was "no space" for Greenhalgh. As an MSc., Greenhalgh has 3 single author papers (most new Ph.D.s can't do this) an astounding academic feat. Therefore, for the Dalhousie students to be better qualified, they would have to, at least, match this ability. Therefore, no students should have been accepted into a related Ph.D. program if they were not. Subpoenas will quickly answer if any students entered such programs. if so, Dalhousie is guilty of discrimination (possible criminal violations). Why?

Then there's the correspondence with Dr. J. Dorrington of the University of Toronto (July-Aug. 1989). Dr. Dorrington turns down Greenhalgh after a verbal acceptance for a Ph.D. Why? A friend had a change of mind. Two points:

1. If this is true, then U. of T. is guilty of discrimination. 2. If there was no student, then Greenhalgh was not told the truth. Blacklisting. Subpoenas.

Then there is the very kind Dr. Nicolson (23 Jan. 1990). This very good man helped me more than any of my countrymen (save two). He states that I'm a victim of jealousy. I should change fields, be positive, put the past behind me and move on.

I tried. Review the kind offer from Dr. Peddie (9 July 1990, U.K.) who considers the work interesting and would I be interested in a position? This is acceptance! But the position disappeared (see letter to Dr. Peddie 27 Aug. 1990). Why? There is more to this issue, and subpoenas are required. But note -based only on the <u>quality</u> of <u>his work</u>, Greenhalgh is more than acceptable.

Please be fully aware that Greenhalgh was doing everything possible to leave the past behind -- it was following him! Someone was spreading hate. Note Mr. Davis to Mr. Haney (Davis, 12 Apr. 91) requesting a letter of reference from Mr. Wright, etc. because of the bitterness of the dispute (N.B. Bols's refusal earlier). Mr. Haney replies that he can't understand why Greenhalgh would need such a letter. The Corporation had the chance to be positive and prevent harm, but chose not to. The Corporation (as noted by Davis) is fully responsible.

Dr. Nicolson is a good man who gave advice that Greenhalgh tried to follow. Greenhalgh developed AIDS-related experiments that pharmaceutical firms said were worthy of sponsorship (see example), but they don't do research in Canada. Note the letters to McMaster, who, unlike the Pharmaceutical <u>Presidents</u>, wouldn't even reply. McMaster <u>turned down</u> additional funding! Does that make sense if blacklisting isn't being applied (like the Hollywood writers under McCarthy)?

Then there's Dr. Poznansky's reply: because of <u>protocol</u> he can't even offer Greenhalgh a position in 1993. Greenhalgh is blocked from research. It would appear that the Corporation's hate has done its job. Greenhalgh's career is over and the statutes of limitations date is moved to 1993.

#### Nonetheless, the MAIN POINTS to consider are:

- 1. J. C. M. Riley's undergraduate record would never have qualified him at any other university for entrance into a Biology Ph.D. program. He required very special help. Who provided this help? Someone with a very special influence: a position of power at the university; lots of money; connections to a political party; or a combination thereof. Therefore, it becomes apparent that Greenhalgh's human rights were violated (discriminated against) because of <a href="Family Status">Family Status</a> (not being a relative/friend) and <a href="Class">Class</a> (from a workingclass family without influence in the above 3 categories). Riley's undergrad record is easily subpoenaed.
- 2. J. C. M. Riley has some type of position (1994) at U. of W. (easily investigated). Therefore, it can be strongly argued that any "competitions" for his position were invalid and represent a criminal activity (N.B. Mr. Kerr,LSUC, regarding Mr. Haney's client's future actions): i.e., they violate

FAIR HIRING PRACTISES and EQUITY. Equity because any female or minority candidate with an Honours B.Sc. background has better qualifications to begin with. This may represent a criminal violation <u>SANCTIONED</u> by the Corporation. This suggests that J. C. M. Riley was <u>pre-ordained</u> to be employed (in some capacity and move upward from there) at U. of W. Apparently someone loved him very, very much. So much so that university guidelines were meaningless and others' human rights could be discrimanated against.

Love may be admirable, but not when others are made to suffer. Such an unchallenged action strongly indicates that the Corporation would condone unsafe science/medicines at the public's expense (see Guelke). I do not believe that a thalidomide or DES victim, nor an HIV-infected hemophiliac would find such love admirable. However, it may explain why many failures concerning health safety were not properly investigated (i.e., MRC/Dr. Slotin doesn't investigate for guidelines violations). Is this the format for the "Centres of Excellence"? If so, will they be safe?

"Standard of Excellence" brings us back to the Corporation and Douglas Wright (both president and chancellor). By accepting two positions, he accepted double responsibility (in his 9 yr. term the accumulated salary would be in the millions, therefore, we <u>must</u> expect great responsibility from such a man). J. C. M. Riley represents <u>Douglas Wright's ideal</u>: his personal Standard of Excellence for all of Canada. Also the National Standard for Reproductive Science; Safety Testing, etc. Is it good enough? This is why an investigation is absolutely necessary.

The main points to OHRC are these. I met all of my contract obligations but was discriminated against because of creed, family status and class. Even when I tried to walk away from a negative situation, the Corporation, directly or indirectly, out of hatred and fear, continued the negativity until a career became impossible. Therefore, I have no choice but to file a claim and seek a full investigation.

What I believe has been clearly demonstrated was MOTIVE and INTENT. The Corporation, by delaying my graduation past accepted time constraints, had the definite INTENT to terminate my career (to protect their funding and J. C. M. Riley). Unfortunately for the Corporation, the work was of such superior quality as to be published and achieve international recognition and acceptance. The Corporation, by and through its agents, then was forced to apply extraordinary measures to achieve their original INTENT: to end a career. The Corporation's actions were pre-meditated and mean. Such meanness can only be

a negative force to Canada, and should not be tolerated by any progressive and fair-minded persons and governments. To do otherwise is to say that we have no safety standards, and the elite are above the law. The Canadian people deserve better. An investigation is required. Thank you.

Yours very truly,

Edward A. Greenhalgh