

WRESTLING CANADA LUTTE

IN THE MATTER OF DISCIPLINE POLICY COMPLAINTS

BETWEEN

Lúcás Ó’Ceallacháin (the “**First Complainant**”)

Ed Zinger (the “**Second Complainant**”)

and

David Spinney (the “**Respondent**”)

DECISION

Daniel Ratushny

(the “**Panel**”)

I. PARTIES

1. Lúcas Ó'Ceallacháin ("Mr. Ó'Ceallacháin" or the "First Complainant") served as the High Performance Director of Wrestling Canada Lutte ("WCL") from July 2018 to February 2021.
2. Ed Zinger ("Mr. Zinger" or the "Second Complainant") is an Olympic-level referee and a wrestling coach.
3. David Spinney ("Mr. Spinney" or the "Respondent") is a wrestling coach and former athlete.

II. FACTUAL BACKGROUND

Regarding the First Complainant and the Respondent:

4. On July 2, 2019, the Respondent sent an email ("Email 1", a copy of which is set out at Appendix 1 attached hereto) to WCL Executive Director Tamara Medwidsky ("Ms. Medwidsky"). The Respondent's communications in Email 1 include:

"[...] Eamonn has advised me about what happened to [Athlete A] last night. I am astounded at the behaviour of WCL, but not surprised. I have instructed Eamonn to immediately move [Athlete A] out of the accommodations that WCL has provided [Athlete A]. I have also told Eamonn not to leave [Athlete A] alone anymore on the remainder of this trip. [...] I am not sure who is responsible for this latest mistake involving [Athlete A], nor do I care [...]."

5. On October 2, 2019, the Respondent sent an email ("Email 2", a copy of which is set out at Appendix 2 attached hereto) to Ms. Medwidsky, Don Ryan ("Mr. Ryan" – WCL President of the Board at that time), the First Complainant and Adam Klevinas ("Mr. Klevinas" – WCL Discipline and Complaints Officer at that time). The Respondent's communications in Email 2 include instructions that the First Complainant is not permitted to speak to a certain female athlete ("Athlete A") unless it is an emergency and "[y]ou are only permitted to communicate with her generally if, and only if, it is part of a group of athletes being addressed simultaneously". The Respondent also states that he intends to discuss with Sport Canada his beliefs that the First Complainant has:

"1. been harmful to [Athlete A's] athletic career and has conducted himself in a manner that most would describe as shameful

2. demonstrated an unprofessional and callous disregard towards the abuse of athletes and the goal of helping making wrestling in Canada a safer place for ALL athletes (and this involves other athletes besides [Athlete A]

3. has compromised the integrity and legitimacy of the Safety First National Task Force (refer to points 1 & 2)"

Also in Email 2, the Respondent instructs the First Complainant to “*stop harassing*” Athlete A and informs the First Complainant that should he refuse to follow the Respondent’s instructions, the Respondent would take further action against him, including advocating for independent assessments of the First Complainant’s efficacy in his role as WCL High Performance Director and possibly supporting the removal of the First Complainant from that role.

6. On December 23, 2020, the Respondent sent an email (“Email 3”, a copy of which is set out at Appendix 3 attached hereto) to the First Complainant, copying Mr. Ryan, Ms. Medwidsky and WCL counsel Jordan Goldblatt (“Mr. Goldblatt”). The Respondent’s communications in Email 3 includes:

“[...]

I will be taking a much more assertive role in keeping athletes safe as we enter 2021. To that end, I have formally made Director-General of Sport Vicki Walker aware of allegations that have been made against you.

It is a fact that you have approached [Athlete A] after it was made clear to both you and WCL, that you were not to have direct communication with her. I am cautioning you that any further contact with [Athlete A] will result in a complaint of criminal harassment to the police against you.

[...]”

7. On June 28, 2021, Erin Durant issued a written report (the “Investigation Report”) in respect of the following:

“[...]

WCL’s Complaints Officer tasked me with a systemic investigation into the Respondent’s allegedly inappropriate communications with the Complainant, and WCL’s Chief Executive Officer, Members of the Board of Directors, WCL’s employees and other members of the Canadian wrestling community.

[...]

I was tasked with determining whether the Respondent’s conduct evidenced through his repeated communications with the Complainant and the above-mentioned parties were harassing, disrespectful, or demeaning contrary to WCL’s Code of Conduct.

[...]

[M]y mandate is only to investigate whether a few email communications received during a lengthy and protracted underlying dispute amount to violating the WCL Code of Conduct.

[...].”

8. On October 2, 2021, the Respondent sent an email (“Email 4”, a copy of which is set out at Appendix 4A attached hereto) to multiple recipients and addressed to “*Dear Ontario Wrestling Association (OAWA), the Canadian Association of Wrestling Officials (CAWO) and Members of the Wrestling Community*”. The Respondent’s communications in Email 4 includes:

“[...]

I ask that the OAWA read the attached letter if your organization desires to achieve a resolution focussed on reconciliation and healing. The CAWO is also encouraged to read this letter if you are interested in addressing abuse within your organization.

[...].”

9. The letter attached to Email 4 (the “Email 4 Letter”, a copy of which is set out at Appendix 4B attached hereto) includes the following communications:

“[...]

Wrestling leadership, on the other hand, has continued to support, promote and endorse abusive men. This continued support only serves to embolden abusers/predators, which deepens a culture of fear and silence, and inevitably leads to further/increased victimization.

As an example of my continued efforts, I sent WCL a proposal on December 24, 2020, to address the abuse of female athletes at the hands of top male leadership (this is the day I sent the WCL High-Performance Director Lucas Ó'Ceallachán a written warning that if he continued to engage in harassment, a criminal complaint would be made to the police).

[...]

Further, I also helped expose Lucas Ó'Ceallachán in his abuse of a young Indigenous female wrestler in Ontario. If you are wondering why Lucas Ó'Ceallachán would leave WCL in the months leading up to the Olympics, now you know. (Lucas Ó'Ceallachán was unrelenting and this athlete has already filed her lawsuit against him in the courts). As we return from the National Day for Truth and Reconciliation that recognizes the experience of Indigenous people in Canada, I say good riddance to men like Mr. Ó'Ceallachán who engaged in years long harassment of one of Canada foremost Indigenous wrestlers

[...].”

Regarding the Second Complainant and the Respondent:

10. On February 6, 2021, the Respondent sent an email (“Email 5”, a copy of which is set out at Appendix 5 attached hereto) to the Second Complainant, officials@oawa.ca, Director General of Sport Vicki Walker, Ms. Medwidsky, former investigator Daniele Sauvageau and wrestling official Gary Bird (“Mr. Bird”). In Email 5, the Respondent offers on behalf of an athlete (“Athlete B”) “*not to escalate these concerns in any manner that seeks to address your harassment of her*” if the Second Complainant voluntarily departs from wrestling until Athlete B retires. The Respondent also states in Email 5:

“Dear Mr. Ed Zinger,

For several years you have engaged in demeaning, misogynistic, and harassing behaviour directed at multiple women in wrestling.

[...]

Thankfully the world of Canadian wrestling officials has proven to be filled with those who are willing to share evidence confidentially. I am grateful that others had the courage to audio record a powerful wrestling official like yourself engaging in this shameful behaviour.

[...]

Unfortunately, Mr. Zinger failed to appreciate or care about how important officials are to wrestling in Canada. He failed to see how his reckless and hurtful conduct could so quickly bring the reputation of Canadian wrestling officials into disrepute. This horribly demeaning behaviour did not come from a low-level provincial official, rather it came from a man who chose to place himself at the very pinnacle of Canadian and Olympic sport. This was not a one-time mistake and Mr. Zinger should have known better.

[...].”

11. On February 16, 2021, the Respondent sent an email (“Email 6”, a copy of which is set out at Appendix 6 attached hereto) to the Second Complainant informing him that he would be sued in the Ontario courts by Athlete B and the Respondent. The Respondent also states in Email 6: “*We would kindly ask that you cease all demeaning and defamatory comments about women in wrestling, and about me as well.*”
12. On February 17, 2021, the Respondent sent an email (“Email 7”, a copy of which is set out at Appendix 7 attached hereto) to Ms. Medwidsky, wrestling official Michelle Flinders, Mr. Bird and admin@oawa.ca and addressed “*Dear Wrestling Canada Lutte, Ontario Amateur Wrestling Association, and Delegates of the Canadian Association of Wrestling Officials*”. The Respondent’s communications in Email 7 include “*I am forwarding you the email that I sent to Mr. Ed Zinger yesterday*”, that the Respondent is taking steps to share an audio recording with WCL and that “*WCL will be will be free to do whatever it thinks best with the evidence/information that I will provide.*” The Respondent also states in Email 7:

“[...]

I want to let all of you know how disappointed [Athlete B] is that Mr. Zinger didn't just agree to take a time-out from wrestling so that she could finish her athletic career knowing that she would not have to cross paths with him at competitions again. She is greatly distressed at the idea of now having to be in the same room as Mr. Zinger at upcoming sporting events or at a trial to testify against him. [Athlete B] feels horrible that other witnesses are going to have to come forward to bring evidence of what Mr. Zinger has done.

[...].”

13. On June 28, 2021, Ms. Durant issued the Investigation Report.
14. On October 2, 2021, the Respondent sent an email (“Email 8”, a copy of which is set out at Appendix 8 attached hereto) to multiple recipients within the wrestling community and addressed “*Dear Ed Zinger*”. In Email 8, the Respondent states that while Athlete B will pursue her lawsuit against the Second Complainant, the Respondent was willing to settle his defamation lawsuit against the Second Complainant as follows:

“[...]

I agree to sign a legal release if you make a \$10,000 donation to a charitable organization who will advance those funds to furthering the Truth and Reconciliation Commission: Calls to Action #88 and #90. I won't even ask you to admit you did anything wrong or write a letter of apology.

In the event that these funds are not available to you. I would be happy to immediately pay that amount on your behalf, and we can set up a repayment plan that is manageable for you. I will even ensure that you get the tax receipt.

[...].”

15. Also on October 2, 2021, the Respondent sent Email 4 with subject “*Ed Zinger*” and the Email 4 Letter (copies of which are set out, respectively, at Appendix 4A and Appendix 4B attached hereto), to multiple recipients and addressed to “*Dear Ontario Wrestling Association (OAWA), the Canadian Association of Wrestling Officials (CAWO) and Members of the Wrestling Community*”. The Email 4 Letter includes the following:

“The facts and evidence are clear, OAWA Director and CAWO Delegate Ed Zinger has harassed, demeaned, and defamed women in the wrestling community in brutally misogynistic ways. The Government of Canada has evidence of this (audio recording and statutory declarations). All of you should know, however, that Ed Zinger is not the only man in wrestling leadership who we have exposed engaging in abuse of athletes.

[...]

As is typical for male leadership in WCL, the OAWA, and the CAWO, Ed Zinger suffers from an illusion of invulnerability in which he believes that despite his misogynistic abuse of multiple women in the wrestling community, he should be allowed to carry on with business as usual.

[...]

Sadly, this young victim of Ed Zinger's harassment decided to do what so many victims do when faced with such grotesque corruption - she withdrew from the complaint and continued to suffer in silence.

You would think that Ed Zinger would have realized that he dodged a bullet with the help of powerful corruption within WCL/CAWO. You would think that Ed Zinger would be careful to tread very lightly moving forward. But of course, he didn't tread lightly - the culture within wrestling leadership is so deep with abusive misogyny that Zinger felt that he could continue to demean and defame women in the wrestling community without any fear of repercussions - as I said, the wrestling culture in Canada has created an illusion of invulnerability amongst many powerful men.

[...]

Ed Zinger is not the only OAWA board member to engage in reprehensibly dangerous behaviour.

[...].”

III. PROCEDURAL HISTORY

Pre- Hearing Issues:

16. On January 5, 2021, the First Complainant made the following complaint (“Complaint 1”) against the Respondent:

“I have received multiple emails of a harassing or threatening nature from the [Respondent] and continued communication in relation to unsubstantiated claims. I have raised the issue with the management team of WCL and had no firm action in relation to this. I now feel that the communication of allegations to significant stakeholder groups (OTP, COC, Sport Canada) in Canadian sport can be damaging to my professional reputation. Most of all the behaviour is undermining my ability to effectively deliver my role. We have made efforts to direct communication to the athlete and her coaches via other staff members (again there is no evidence as to why this is required) but it can be operationally challenging. I also believe it is affecting other members of staff who have also received similar emails which can be provided upon request or from the management team. The [Respondent] is not [Athlete A]'s Coach - she is not a member of his club. However he has inserted himself as an intermediary. [Athlete A]'s coach, Eamonn Dorgan,

followed a similar behaviour pattern which resulted in having to pursue a complaint which was also proven to be unfounded. Throughout my time at WCL multiple efforts were made to address any complaints/concerns the coach or athlete had. These proved to be unsubstantiated claims and no evidence was presented to support the accusations. I believe that the communication received reflects a violation of the Code of Conduct and can be considered harassing in nature. I am acting to bring this behaviour to a close and to ensure that others will not be subjected to similar treatment.”

17. On February 11, 2021, the Second Complainant informed the WCL Complaints and Appeals Officer that he wished to have an email from the Respondent included in the Investigation Report.
18. On July 26, 2021, the Parties were informed that Daniel Ratushny had been appointed as the Panel in respect of this proceeding.
19. On August 6, 2021, WCL counsel Mr. Goldblatt informed the Panel that it was seeking “*leave to intervene in the proceeding, and to make submissions on an urgent basis concerning the proceeding*”.
20. On August 10, 2021, WCL filed submissions in respect of its request to intervene in this proceeding.
21. On August 12, 2021, the Respondent filed a response in respect of WCL’s request to intervene in this proceeding.
22. On August 15, 2021, the Panel informed the First Complainant of his deadline should he wish to respond to WCL’s request to intervene in this proceeding.
23. On August 16, 2021, the Respondent filed further submissions in relation to WCL’s request to intervene in this proceeding.
24. On August 17, 2021, the Respondent filed further submissions in relation to WCL’s request to intervene in this proceeding.
25. On August 18, 2021, the Panel issued rulings (the “August 18, 2021 Rulings”) in respect of (i) WCL’s request to intervene in this proceeding, (ii) Mr. Zinger’s status in relation to this proceeding at that time, and (iii) the order of proceedings going forward. On that same date, the Panel invited the Respondent to file submissions in respect of his allegations of bias or apprehension of bias by the Panel and the Respondent’s application that the Panel recuse itself from this hearing. A copy of this communication by the Panel is set out at Appendix 9 attached hereto.
26. On August 25, 2021, WCL filed submissions in respect of the following application (the “WCL Application”):

“[...]

2. *WCL submits that the manner by which this complaint has proceeded gives rise to a reasonable apprehension of bias on the part of the Complaints and Appeals Officer (the "Officer").*

3. *WCL submits that the conduct of the Officer has tainted the proceeding, and as such a remedy from the Panel is necessary.*

[...]

62. *Accordingly, WCL submits that the herein proceeding should be set aside as a result of procedural unfairness."*

27. On August 31, 2021, the Panel (i) issued its ruling in respect of the Respondent's deemed application for recusal, (ii) gave directions to WCL in relation to the WCL Application, and (iii) notified the parties in respect of the notice of complaint filed by Mr. Zinger and the possibility of including Mr. Zinger as a second complainant in this proceeding. A copy of this communication by the Panel is set out at Appendix 10 attached hereto.

28. On September 13, 2021, the Panel issued its ruling in respect of the WCL Application. A copy of this ruling by the Panel is set out at Appendix 11 attached hereto.

29. On October 5, 2021, the Panel informed the parties (i) that Mr. Zinger was admitted as a second complainant in this proceeding, and (ii) of a proposed procedural format and timeline for this proceeding. A copy of this communication is set out at Appendix 12 attached hereto.

30. On October 14, 2021, the Panel informed the parties in respect of the procedural timeline for this proceeding. A copy of this communication is set out at Appendix 13 attached hereto.

31. On October 28, 2021, the Second Complainant filed his written submissions.

32. On October 28, 2021 and October 30, 2021, the First Complainant filed his written submissions.

33. On November 4, 2021, the Respondent made the following request for production (the "First Request for Production"):

"I make a motion that the Panel order Mr. O'Ceallachain to provide me all information he provided WCL Complaints Officer Frank Fowlie in both of his complaints. This information should include all communication he had with Officer Fowlie related to his complaints, including any evidence he provided Officer Fowlie, as well as any official complaint forms that Officer Fowlie may have required Mr. O'Ceallachain to fill out [...]"

34. On November 5, 2021, the Respondent made the following request for production (the "Second Request for Production"):

“I ask the Panel to order the WCL Complaints Officer to provide me complete and full disclosure on all matters concerning his involvement with me in his role as WCL Complaints Officer, as well as providing a 'will say' statement.”

35. On November 7, 2021, Mr. O'Ceallachain informed the Panel of his objection to the First Request for Production on grounds that included the following:

“To disclose any and all correspondence with the complaints officer breaches the imputed confidentiality of the Office [...] Athletes and participants must have the ability to have candid discussions with the safe sport officer, and these conversations are not part of the record [...].”

36. On November 14, 2021, the Panel issued its ruling in respect of the First Request for Production and the Second Request for Production. A copy of these rulings are set out at Appendix 14 attached hereto.

37. On November 24, 2021, the Respondent made the following request (the “Third Request for Production”):

“The Panel should order Mr. Ó'Ceallacháin to provide all parties with an account of his communication between Alex Davidson and Mr. Ó'Ceallacháin involving anything to do with this hearing as it relates to agreeing to be a witness and/or withdrawing his agreement to being a witness.”

38. On November 26, 2021, the Panel denied the Third Request for Production for the reasons set out at Appendix 15 attached hereto.

39. On January 11, 2022, the Respondent brought a motion requesting that the Panel recuse itself from this proceeding.

40. On January 20, 2022, the Panel denied the Respondent’s motion for recusal for the reasons set out at Appendix 16 attached hereto.

41. On January 21, 2022, the Respondent made a request that this proceeding be adjourned.

42. On January 30, 2022, the Panel denied the Respondent’s request to adjourn this proceeding for the reasons set out at Appendix 17 attached hereto.

43. On February 7, 2022, the Respondent filed his written submissions.

44. On March 20, 2022, a tentative hearing schedule was sent to the parties for their comments and questions.

45. On April 4, 2022, the Respondent requested that the Panel take investigatory action in relation to the witness Tim Nanassy (“Mr. Nanassy”).

46. On April 8, 2022, an updated tentative hearing schedule was sent to the parties for their comments and questions. On that same date, the Panel denied the Respondent's April 4, 2022 request to take investigatory action, for the reasons set forth at Appendix 18 attached hereto.
47. On April 18, 2022, the Respondent requested that the hearing be delayed for medical reasons.
48. On April 19, 2022, the Panel granted the Respondent's request to delay the hearing for the reasons set out at Appendix 19 attached hereto.
49. On April 20, 2022, a new tentative hearing schedule was sent to the parties for their comments and questions.
50. On April 25, 2022, the Respondent sent and forwarded several emails to the Panel, which included a statutory declaration already filed by the Respondent with his written submissions on February 7, 2022.

The Hearing:

51. The evidentiary portion of the hearing was held by videoconference on April 26, 27 and 28, 2022. In addition to the Panel, the following persons attended the hearing, or portions thereof:

(i) For the First Complainant:

- Mr. Ó'Ceallacháin (First Complainant)
- Bill Bain (Witness)
- Kimin Kim (Witness)
- Laura Steffler (Witness)
- Marcia Chiasson (Witness)
- Dr. Frank Fowlie (Witness)
- Jennifer Stairs (Witness)
- André Marin (Counsel)

(ii) For the Second Complainant

- Mr. Zinger (Second Complainant)
- Jenette Howe (Witness)

- Marcia Chiasson (Witness)
- Gary Bird (Witness)
- André Marin (Counsel)

(iii) For the Respondent:

- Mr. Spinney (Respondent)
- Tim Nanassy (Witness)
- David Zilberman (Witness)
- Eamonn Dorgan (Witness)
- Athlete A (Witness)
- Athlete B (Witness)
- Ahmed Shamiya
- John Smith (Counsel)

52. By way of summary, the witnesses for the First Complainant and the Second Complainant essentially gave good character evidence. A brief summary of the Respondent's witnesses' evidence is provided at Appendix 20

IV. SUBMISSIONS OF THE PARTIES

53. While the Panel has considered the entirety of the parties' submissions in this proceeding – including all of the facts, allegations, arguments, documentary and testimonial evidence presented by them both in writing and orally – it refers in its Decision only to the submissions and evidence it considers necessary to explain its reasoning.

54. This section summarizes the substance of the parties' main allegations and arguments as set out in their written and oral submissions, pleadings and evidence. Additional elements of the parties' submissions, pleadings and evidence may be set out, where relevant, in connection with the legal discussion that follows.

A. The Complainants' Submissions

55. The First Complainant's submissions, in essence, may be summarized as follows:

- While employed as WCL High-Performance Director, the Complainant was subjected to several email communications by the Respondent which were aggressive, harassing or threatening in nature and violated the applicable codes of

conduct. These communications included unsubstantiated allegations about the First Complainant which constituted serious professional and personal attacks on the First Complainant's competence and character.

- The Respondent's repeated false allegations against the First Complainant were widely circulated not only in the wrestling community but also to organizations in Australia where he now lives, such as Sport Integrity Australia.
- The First Complainant has built a solid reputation in the sport of wrestling as a promoter of gender equity and the growth and development of women's wrestling around the world. The Respondent's harassing communications affected the First Complainant's ability to do his job and to interact with stakeholders within the sport of wrestling. These communications also negatively impacted upon the First Complainant's professional reputation and career.
- The Respondent's false allegations made against the First Complainant are the most horrific things you can call someone, and "*if you throw enough mud some of it will stick*". In today's climate, being called a misogynist, racist or homophobe – "*that's the end basically*".
- The bottom line in this case is that the Respondent's email communications in relation to the First Complainant are, on a balance of probability and even beyond a reasonable doubt, threatening and harassing in nature and constitute violations of the WCL code of conduct.
- The First Complainant requests a formal reprimand of the Respondent to discourage such behaviour from continuing, a temporary suspension to show denouncement of the Respondent's misconduct, publication of the Panel's decision on the WCL website, an apology to the First Complainant and legal costs.

56. The Second Complainant's submissions, in essence, may be summarized as follows:

- The Respondent has engaged in a "*smear campaign*" in relation to the Second Complainant by authoring and circulating speculative and potentially slanderous material, defaming false claims, taunts, threats and outbursts to numerous members of the wrestling and sport community in attempts to discredit and embarrass the Second Complainant. The Respondent's communications violate both the principles and specific sections of the applicable codes of conduct.
- The Respondent is not the victim supporter that he claims to be. In fact, he is the orchestrator of a smear campaign to bolster his own interests. The Respondent has made numerous accusations, defaming claims, taunts, threats and outbursts which led to the Second Complainant's submission of a harassment claim against the Respondent. The Respondent's harassment has created a negative work environment for the Second Complainant and has caused him mental anguish, which is in violation of the WCL code of conduct.

- The Respondent's false allegations made against the Second Complainant are the most horrific things you can call someone and "*if you throw enough mud some of it will stick*". In today's climate, being called a misogynist, racist or homophobe – "*that's the end basically*". The Respondent's email communications have tarnished the Second Complainant's reputation with serious allegations and no proof.
- The bottom line in this case is that the Respondent's email communications in relation to the Second Complainant are, on a balance of probability and even beyond a reasonable doubt, threatening and harassing in nature and constitute violations of the WCL code of conduct.
- The Second Complainant requests a formal reprimand of the Respondent to discourage such behaviour from continuing, a temporary suspension to show denouncement of the Respondent's misconduct, publication of the Panel's decision on the WCL website, an apology to the Second Complainant and legal costs.

B. The Respondent's Submissions

57. The Respondent's submissions, in essence, may be summarized as follows:

- The Respondent's email communications, which are at the heart of this proceeding, were sent as a direct result of harassing behaviour by the First Complainant and the Second Complainant directed at two young athletes who the Respondent supports.
- The Respondent is simply trying to make the sport of wrestling safer by protecting athletes because the First Complainant and the Second Complainant refuse to follow instructions. "*When a woman tells a man to leave them alone, they just must do so. I, I don't understand how what I'm doing would be considered harassment if what they're doing is not committed, considered harassment to the tenth power.*"
- The issue in this case is whether the Respondent committed harassment against the First Complainant or the Second Complainant. However, "*it's all about context*" and "*what was reasonable in the circumstances*". Each of the First Complainant and the Second Complainant do not come to this proceeding with clean hands – "*Did [the Respondent] ever accuse [the Second Complainant] of being a pedophile? Did he ever speak about the sex life of [the First Complainant]?*" However you describe the Respondent's email communications in respect of the First Complainant and the Second Complainant, there is a direct nexus to the depravity and dirt committed upon these women by the First Complainant and the Second Complainant.
- As established in *Hongkong Bank of Canada v. Wheeler Holdings Ltd.*, [1993] 1 S.C.R. 167, equitable principles such as the conduct of the party seeking the relief can play a role in the court's exercise of discretion in respect of granting the remedy. The First Complainant and the Second Complainant, men in positions of power within wrestling leadership, believe they can repeatedly violate the confidentiality

of Athlete A and Athlete B with “*some of the worst and most salacious false allegations*” and then they are here seeking relief from the Panel.

- The First Complainant and the Second Complainant have been proven on a balance of probabilities to have “*grotesquely violated the privacy of [Athlete A] and [Athlete B] and that is what the Respondent was addressing. There’s no other victims of harassment around here, there’s nobody here except these men.*”
- The Respondent “*would be happy to be given the title of harasser, but surely you will, in your judgement you will give the title of the harasser times ten to these men in positions of power with respect to the way they treated women*”.

V. ANALYSIS

(A) Jurisdiction

58. As registered participants of WCL, the parties submitted to the jurisdiction of the Panel in this proceeding, which powers arise pursuant to Section 16 *et seq.* of the *Discipline Policy*.
59. In accordance with the *Discipline Policy*, a Discipline Panel was appointed by the WCL Complaints and Appeals Officer, as confirmed to the Parties on July 26, 2021.
60. The Panel accepted the complaints and reviewed the allegations in accordance with the *Discipline Policy*.

(B) Regulatory Framework

Organizational Policies

61. WCL and its members and affiliated organizations have, and historically have had, various organizational policies, codes, or rules regulating the conduct of participants to assist in delivering a safe and positive environment to everyone involved in the sport and to protect the health and well-being of the organization and its participants.
62. The *Discipline Policy* provides procedures for addressing alleged infractions of WCL’s values and integrity as set out in WCL’s rules regulating conduct, including the *Code of Conduct June 2017* (the “*2017 Code of Conduct*”), and *WCL’s Safe Sport Policy Manual June 2021*, which includes a *Code of Conduct & Ethics* (the “*2021 Code of Conduct*”)
63. The *2017 Code of Conduct* includes the following:

“[...]

ALL PARTICIPANTS are expected to:

- ***Demonstrate the greatest levels of respect, protecting the rights, dignity and worth of every person*** [...]

- *Participants are to refrain from any behaviour that constitutes harassment, where harassment is defined as improper conduct by an individual during a Wrestling Canada Lutte sanctioned or sponsored event or business activity and that the individual knew or ought reasonably to have known would cause offence or harm. It comprises objectionable act(s), comment(s), or display(s) that demean, belittle or cause personal humiliation or embarrassment, and any act of intimidation or threat.”*

64. The following definitions are included in WCL’s *Safe Sport Policy Manual June 2021*:

“17. “Harassment” – A course of vexatious comment or conduct against a Participant or group, which is known or ought to reasonably be known to be unwelcome. Types of behaviour that constitute Harassment include, but are not limited to:

a) Written or verbal abuse, threats, or outbursts;

b) Persistent unwelcome remarks, jokes, comments, innuendo or taunts;

[...]

e) Condescending or patronizing behaviour which is intended to undermine self-esteem, diminish performance or adversely affect working conditions;

[...]

m) Retaliation or threats of retaliation against a person who reports harassment to WCL.”

[...]

*22. *“Maltreatment” – a volitional act (or acts) by a Participant that results in harm or the potential for physical or psychological harm to another Participant, and includes any of the following behaviours or conduct:*

a) Psychological Maltreatment: any serious incident (or incidents) of deliberate conduct that has the potential to be harmful to the psychological well-being of a Participant. Psychological Maltreatment is determined by the objective behaviour, and not whether harm is intended or results from the behaviour. It includes:

(i) Verbal Acts: verbally assaulting or attacking a Participant, including but not limited to unwarranted personal criticisms, [...] comments that are demeaning, humiliating, belittling, intimidating, insulting or threatening; the use of rumours or false allegations about an individual to diminish their reputation; using confidential sport and non-sport information inappropriately. Verbal Maltreatment may also occur in online forms.”

65. The 2021 Code of Conduct includes the following:

“Responsibilities

10. Participants have a responsibility to:

a) Maintain and enhance the dignity and self-esteem of members and other individuals by:

i. Treating each other with the highest standards of respect and integrity;

ii. Focusing comments or criticism appropriately and avoiding public criticism of athletes, coaches, officials, organizers, volunteers, employees or members;

iii. Consistently demonstrating the spirit of sportsmanship, sport leadership, and ethical conduct;

iv. Acting, when appropriate, to correct or prevent practices that are unjustly discriminatory;

v. Consistently treating individuals fairly and reasonably; and

[...]

b) Refrain from any behaviour that constitutes Abuse, Harassment, Workplace Harassment, Sexual Harassment, Workplace Violence, Discrimination or any form of Maltreatment.

[...].

66. Email 1, Email 2, Email 3, Email 5, Email 6 and Email 7 were sent prior to the 2021 Code of Conduct coming into effect in June 2021 and therefore, the 2017 Code of Conduct is applicable to these communications. The 2021 Code of Conduct is applicable in respect of the communications in Email 4, the Email 4 Letter, and Email 8, which were sent in October 2021. In the Panel’s view, this is consistent with the general principle of non-retroactivity as explained in CAS 2017/A/5003: “(i) Any determination of what constitutes a sanctionable rule violation and what sanctions can be imposed in consequence must be determined in accordance with the law in effect at the time of the allegedly sanctionable conduct”, (ii) new rules and regulations do not apply retrospectively to facts occurring before their entry into force [...].”As a fundamental matter of fairness, the Panel does not find that allegations of misconduct should be analysed in relation to a code of conduct not in effect at the date of such conduct.

(C) Standard of Proof

67. It was submitted by the First Complainant and the Second Complainant, and it was not disputed by the Respondent, that the standard of proof in this matter is proof on a balance of probabilities. As instructed by the Supreme Court of Canada in *F.H. v. McDougall* at paragraph 49, the Panel "*must scrutinize the relevant evidence with care to determine whether it is more likely than not that an alleged event occurred*".

(D) Scope of this Proceeding

68. As communicated to the Parties on November 14, 2021 in the Panel's "*Rulings on Requests for Production; Other Matters*", the scope of this proceeding in accordance with the *Discipline Policy* is as follows:
- (i) The Panel must first determine if the conduct alleged by each of the First Complainant and the Second Complainant is proven to the required standard;
 - (ii) if (i) is answered in the affirmative, the Panel's second step is to determine if such conduct constitutes a violation of an applicable code of conduct; and
 - (iii) if the Panel finds that one or more code violations have occurred, it must determine the appropriate sanction to be applied, if any.
69. The Respondent urges the Panel to consider in this case contextual factors; "*what was reasonable in the circumstances*" and more specifically, that each of the First Complainant and the Second Complainant "*do not come to this proceeding with clean hands*", according to the Respondent.
70. The Respondent has not identified anything in the *Discipline Policy*, the *2017 Code of Conduct* or the *2021 Code of Conduct* which instructs or permits the Panel, in its "second step" analysis of whether or not a code of conduct rule has been broken, to consider possible justifications for impugned conduct.
71. However, in the Panel's view, the discretion afforded by the *Discipline Policy* to the Panel in its final step; that is, its determination of an appropriate sanction, if any, does not preclude the Panel from taking into account such factors that are relevant to the sanction and fair to the parties.
72. The Respondent has essentially conceded that his conduct, as alleged by the First Complainant and the Second Complainant, has been proven. The relevant evidence is contained in the email communications composed by the Respondent and he has not disputed their authenticity. The Panel finds, therefore, that the conduct alleged by each of the First Complainant and the Second Complainant is proven to the required standard.
73. The Panel therefore shall analyse and determine if any applicable rule(s), as set out in the applicable codes of conduct, have been violated.

(E) Panel Findings in relation to the First Complainant and the Respondent:

Email 1

74. It is undisputed that the Respondent sent Email 1 to Ms. Medwidsky on July 2, 2019.
75. In Email 1, the Respondent is critical of WCL but makes no mention of the First Complainant. On that basis alone, the Panel finds it unnecessary to consider whether the Respondent's communications in Email 1 constitute a violation of the *2017 Code of Conduct*.
76. The Panel, therefore, dismisses the allegation made against the Respondent in respect of Email 1.

Email 2

77. It is undisputed that on October 2, 2019, the Respondent sent Email 2 to Ms. Medwidsky (to whom the First Respondent in his role as High Performance Director reported and was accountable), WCL President Mr. Ryan, Mr. Klevinas and the First Complainant.
78. In Email 2, the Respondent:
 - Instructs the First Complainant to not speak with Athlete A unless certain conditions are met;
 - Describes the First Complainant's conduct as "*harmful to [Athlete A]'s athletic career*", "*shameful*" and "*unprofessional*";
 - Claims that the First Complainant has "*demonstrated an unprofessional and callous disregard towards the abuse of athletes and the goal of helping making wrestling in Canada a safer place for ALL athletes*";
 - Claims that the First Complainant "*has compromised the integrity and legitimacy of the Safety First National Task Force*";
 - Warns the First Complainant regarding actions that the Respondent may take against the First Complainant should he not comply with the Respondent's instructions in relation to Athlete A.
79. In the Panel's view, the Respondent knew or ought reasonably to have known that his comments in Email 2 in respect of the First Complainant, which he sent directly to those responsible for the First Complainant's employment, would cause offense, harm, personal humiliation or embarrassment to the First Complainant.
80. The Panel also notes that the *2017 Code of Conduct* expects all WCL participants including the Respondent to "[d]emonstrate the greatest levels of respect, protecting the rights, dignity and worth of every person [...]" and further, that the *Discipline Policy* provides

WCL participants, including the Respondent and Athlete A, with a procedure for alleging code of conduct infractions against other participants, including the First Complainant.

81. For these reasons, the Panel finds that the Respondent's communications in Email 2 were improper, constituted harassment and violated the *2017 Code of Conduct*.
82. Whether or not, as alleged by the Respondent, there existed a "*wide array of corruption within WCL*" including valid complaints properly made but never pursued, which discouraged the Respondent or Athlete A from pursuing their complaints under the WCL dispute resolution process, is beyond the scope of this proceeding as set out above.

Email 3

83. It is undisputed that on December 23, 2020, the Respondent sent Email 3 to the First Complainant, Ms. Medwidsky (to whom the First Respondent in his role as High Performance Director reported and was accountable), WCL President Mr. Ryan and the Mr. Goldblatt.
84. In Email 3, the Respondent informs the First Complainant that he has "*made Director-General of Sport Vicki Walker aware of allegations that have been made against you*". The Respondent instructs the First Complainant to not have direct communication with Athlete A and warns the First Complainant that "*any further contact with [Athlete A] will result in a complaint of criminal harassment to the police against you*".
85. The *2017 Code of Conduct* states that harassment comprises "*any act of intimidation or threat*". In the Panel's view, the Respondent's communications issued to the First Complainant in Email 3 are adversarial in nature and from the First Complainant's perspective, are understandably unwelcome. However, such communications do not, in the Panel's view, rise to the level of "*intimidation or threat*" and more broadly fall short of "*harassment*" as it is defined in the *2017 Code of Conduct*.
86. The Panel, therefore, dismisses the allegation made against the Respondent in respect of Email 3.

Email 4 and the Email 4 Letter

87. It is undisputed that on October 2, 2021, the Respondent sent (i) Email 4 with subject "*Ed Zinger*" to multiple recipients and addressed to "*Dear Ontario Wrestling Association (OAWA), the Canadian Association of Wrestling Officials (CAWO) and Members of the Wrestling Community*" and (ii) the Email 4 Letter.
88. The Email 4 Letter includes:

[...]

Further, I also helped expose Lucas Ó'Ceallachán in his abuse of a young Indigenous female wrestler in Ontario. If you are wondering why Lucas

Ó'Ceallachán would leave WCL in the months leading up to the Olympics, now you know. (Lucas Ó'Ceallachán was unrelenting and this athlete has already filed her lawsuit against him in the courts). As we return from the National Day for Truth and Reconciliation that recognizes the experience of Indigenous people in Canada, I say good riddance to men like Mr. Ó'Ceallachán who engaged in years long harassment of one of Canada foremost Indigenous wrestlers

[...].

89. In the Panel's view, the Respondent knew or ought reasonably to have known that his written outburst, which included a serious personal attack against the First Complainant, would be unwelcome. The Panel also notes that Section 10 a) ii. of the *2021 Code of Conduct* places a responsibility on WCL participants to focus comments or criticism appropriately and to avoid public criticism of employees. This responsibility was not upheld by the Respondent in relation to the Email 4 Letter. The Panel finds, therefore, that the Respondent's communications in the Email 4 Letter constitute harassment and psychological maltreatment as defined in the *2021 Code of Conduct*.
90. The *Discipline Policy* provides WCL participants including the Respondent and Athlete A with a procedure for alleging a code of conduct infraction against other participants, including the First Complainant.
91. Whether or not, as alleged by the Respondent there existed a "wide array of corruption within WCL" which justifiably discouraged the Respondent or Athlete A from pursuing their complaints under the WCL dispute resolution process, is beyond the scope of this proceeding as set out above.

(F) Panel Findings in relation to the Second Complainant and the Respondent:

Email 5

92. It is undisputed that on February 6, 2021, the Respondent sent Email 5 to Mr. Zinger, officials@oawa.ca, Director General of Sport Vicki Walker, Ms. Medwidsky, former investigator Daniele Sauvageau and wrestling official Mr. Bird.
93. The Respondent states in Email 5:

"Dear Mr. Ed Zinger,

For several years you have engaged in demeaning, misogynistic, and harassing behaviour directed at multiple women in wrestling.

[...]

Thankfully the world of Canadian wrestling officials has proven to be filled with those who are willing to share evidence confidentially. I am grateful that others

had the courage to audio record a powerful wrestling official like yourself engaging in this shameful behaviour.

[...]

Unfortunately, Mr. Zinger failed to appreciate or care about how important officials are to wrestling in Canada. He failed to see how his reckless and hurtful conduct could so quickly bring the reputation of Canadian wrestling officials into disrepute. This horribly demeaning behaviour did not come from a low-level provincial official, rather it came from a man who chose to place himself at the very pinnacle of Canadian and Olympic sport. This was not a one-time mistake and Mr. Zinger should have known better.

[...].”

94. In the Panel’s view, the Respondent knew or ought reasonably to have known that his comments in Email 5 in respect of the Second Complainant would cause offense, harm, personal humiliation or embarrassment to the Second Complainant.
95. The Panel also notes that the *2017 Code of Conduct* expects all WCL participants including the Respondent to “[d]emonstrate the greatest levels of respect, protecting the rights, dignity and worth of every person [...]” and further, that the *Discipline Policy* provides WCL participants including the Respondent and athletes with a procedure for alleging a code of conduct infraction against other participants including the Second Complainant.
96. For these reasons, the Panel finds that the Respondent’s communications in Email 5 were improper, constituted harassment and violated the *2017 Code of Conduct*.
97. Whether or not, as alleged by the Respondent, there existed a “*wide array of corruption within WCL*” including valid complaints properly made but never pursued, which discouraged the Respondent or other WCL participants from pursuing their complaints under the WCL dispute resolution process, is beyond the scope of this proceeding as set out above.

Email 6

98. It is undisputed that on February 16, 2021, the Respondent sent Email 6 to Mr. Zinger, informing him that he would be sued in the Ontario courts by Athlete B and the Respondent. The Respondent also states in Email 6: “*We would kindly ask that you cease all demeaning and defamatory comments about women in wrestling, and about me as well.*”
99. The *2017 Code of Conduct* states that harassment comprises “*any act of intimidation or threat*”. In the Panel’s view, the Respondent’s communications issued to the First Complainant in Email 6 are adversarial in nature and from the Second Complainant’s perspective, are understandably unwelcome. However, such communications do not, in the Panel’s view, rise to the level of “*intimidation or threat*” and more broadly fall short of “*harassment*” as it is defined in the *2017 Code of Conduct*.

100. The Panel, therefore, dismisses the allegation made against the Respondent in respect of Email 6.

Email 7

101. It is undisputed that on February 17, 2021, the Respondent sent Email 7 to Ms. Medwidsky, wrestling official Michelle Flinders, Mr. Bird and admin@oawa.ca, addressed “*Dear Wrestling Canada Lutte, Ontario Amateur Wrestling Association, and Delegates of the Canadian Association of Wrestling Officials*”.

102. The Respondent states in Email 7:

“[...]

I want to let all of you know how disappointed [Athlete B] is that Mr. Zinger didn't just agree to take a time-out from wrestling so that she could finish her athletic career knowing that she would not have to cross paths with him at competitions again. She is greatly distressed at the idea of now having to be in the same room as Mr. Zinger at upcoming sporting events or at a trial to testify against him. [Athlete B] feels horrible that other witnesses are going to have to come forward to bring evidence of what Mr. Zinger has done.

[...]”

103. The *2017 Code of Conduct* states that harassment comprises “*any act of intimidation or threat*”. In the Panel’s view, the Respondent’s communications issued to the First Complainant in Email 6 are adversarial in nature and from the Second Complainant’s perspective, are understandably unwelcome. However, such communications do not, in the Panel’s view, rise to the level of “*intimidation or threat*” and more broadly fall short of “*harassment*” as it is defined in the *2017 Code of Conduct*.

104. The Panel, therefore, dismisses the allegation made against the Respondent in respect of Email 7.

Email 8

105. It is undisputed that on October 2, 2021, the Respondent sent Email 8 to multiple recipients within the wrestling community and addressed “*Dear Ed Zinger*”.

106. In Email 8, the Respondent states that while Athlete B will pursue her lawsuit against Mr. Zinger, the Respondent was willing to settle his defamation lawsuit against Mr. Zinger as follows:

“[...]

But unlike you who seems to continually operate from a position of bitterness and malice, I have decided that in the spirit of Canada's first ever National Day for

Truth and Reconciliation I am willing to settle my defamation lawsuit against you as follows:

I agree to sign a legal release if you make a \$10,000 donation to a charitable organization who will advance those funds to furthering the Truth and Reconciliation Commission: Calls to Action #88 and #90. I won't even ask you to admit you did anything wrong or write a letter of apology.

In the event that these funds are not available to you. I would be happy to immediately pay that amount on your behalf, and we can set up a repayment plan that is manageable for you. I will even ensure that you get the tax receipt.

[...].”

107. The Panel finds that the Respondent's communications in Email 8 amounts to an obvious violation of Section 10 a) ii. of the *2021 Code of Conduct*, which places a responsibility on WCL participants to focus comments or criticism appropriately and to avoid public criticism of other WCL participants which includes the Second Complainant.

Email 4 and the Email 4 Letter

108. It is undisputed that on October 2, 2021, the Respondent sent (i) Email 4 with subject “*Ed Zinger*” to multiple recipients and addressed to “*Dear Ontario Wrestling Association (OAWA), the Canadian Association of Wrestling Officials (CAWO) and Members of the Wrestling Community*” and (ii) the Email 4 Letter.

109. The Email 4 Letter includes:

“The facts and evidence are clear, OAWA Director and CAWO Delegate Ed Zinger has harassed, demeaned, and defamed women in the wrestling community in brutally misogynistic ways. The Government of Canada has evidence of this (audio recording and statutory declarations). All of you should know, however, that Ed Zinger is not the only man in wrestling leadership who we have exposed engaging in abuse of athletes.

[...]

As is typical for male leadership in WCL, the OAWA, and the CAWO, Ed Zinger suffers from an illusion of invulnerability in which he believes that despite his misogynistic abuse of multiple women in the wrestling community, he should be allowed to carry on with business as usual.

[...]

Sadly, this young victim of Ed Zinger's harassment decided to do what so many victims do when faced with such grotesque corruption - she withdrew from the complaint and continued to suffer in silence.

You would think that Ed Zinger would have realized that he dodged a bullet with the help of powerful corruption within WCL/CAWO. You would think that Ed Zinger would be careful to tread very lightly moving forward. But of course, he didn't tread lightly - the culture within wrestling leadership is so deep with abusive misogyny that Zinger felt that he could continue to demean and defame women in the wrestling community without any fear of repercussions - as I said, the wrestling culture in Canada has created an illusion of invulnerability amongst many powerful men.

[...]

Ed Zinger is not the only OAWA board member to engage in reprehensibly dangerous behaviour.

[...].

110. In the Panel's view, the Respondent knew or ought reasonably to have known that his written outburst, which included a serious personal attack against the Second Complainant, would be unwelcome. The Panel also notes that Section 10 a) ii. of the *2021 Code of Conduct* places a responsibility on WCL participants to focus comments or criticism appropriately and to avoid public criticism of other WCL participants. This responsibility was not upheld by the Respondent in relation to the Email 4 Letter. The Panel finds that the Respondent's communications in the Email 4 Letter constitute harassment and psychological maltreatment as defined in the *2021 Code of Conduct*.
111. The *Discipline Policy* provides WCL participants including the Respondent and athletes with a procedure for alleging a code of conduct infraction against other participants including the Second Complainant and OAWA board members.
112. Whether or not, as alleged by the Respondent there existed a "grotesque corruption" within WCL which justifiably discouraged the Respondent or athletes from pursuing their complaints under the WCL dispute resolution process, is beyond the scope of this proceeding as set out above.

VI. SANCTION AND CONCLUSIONS

113. The Panel finds that the Respondent has committed violations of the applicable codes of conduct as previously indicated. The only remaining issue before the Panel is what sanction, if any, should be imposed.
114. The Respondent takes the position that his violations were a direct result of repeated harassing behaviour by the First Complainant and the Second Complainant. The Respondent has, in effect, attempted to turn the complaints made against him into a trial against those who have complained. It is not within the mandate of this Panel to make findings of violations apart from the two complaints that are already before us. The Panel also notes that the Respondent and the athletes he supports have available to them the

complaint process under the codified dispute resolution process set out in the *WCL Safe Sport Policy Manual June 2021*.

115. Nevertheless, the Respondent was not denied the opportunity to present evidence regarding alleged misconduct by the First Complainant and the Second Complainant for its potential relevance as context in relation to the sanction, if any. A brief summary of that evidence is set out at Appendix 20.
116. In the Panel's view, based on the evidence before it, the Respondent's descriptions and characterizations about the behaviour of the First Complainant and the Second Complainant are without merit. The Respondent's case is largely based on witness testimony that when challenged on cross-examination was revealed to be inconsistent and unreliable, on an audio recording that was repeatedly referred to but was never produced, and on situations or events that were misrepresented, sometimes grossly, in the Respondent's portrayal of them in his harassing communications. In sum, the Panel finds that the Respondent's descriptions and characterizations of the First Complainant's behaviour and the Second Complainant's behaviour are not supported by credible evidence.
117. Based on the evidence before it in this proceeding, the Panel is satisfied that the Respondent has not established any justification for his code of conduct violations. Those violations amount to attacks that scorn the dispute resolution processes available in WCL's codes and have caused significant stress, mental anguish, and psychological and reputational harm to the First Complainant and the Second Complainant, on both a professional and personal level.
118. A variety of purposes may be served by sanctions imposed pursuant to WCL's *Discipline Policy*. In the Panel's view, denunciation and deterrence are important objectives in this case. Personal deterrence is a particularly important objective in view of the Respondent's repeated violations of WCL's existing regulatory framework through his serious and harmful personal attacks on other WCL participants.
119. In the Panel's view, denunciation has been served by its various findings and comments critical of the Respondents' actions. In relation to personal deterrence, the Panel is mindful of the need to balance the harm suffered by the First Complainant and the Second Complainant and the Respondent's ongoing contributions to athlete development in his role as a WCL volunteer. The Panel finds that the appropriate balance is achieved by the following:
120. The Panel imposes a two-year ban (the "Two-Year Ban"), suspended as indicated below, banning the Respondent from participation, in any capacity, in any program, practice, activity, event, or competition sponsored by, organized by, or under the jurisdiction of WCL.
121. The Two-Year Ban is suspended for a probationary period of three years (the "Probationary Period") beginning on the date of this Decision. During the Probationary Period, the

Respondent is not to commit, directly or indirectly, a further violation of a similar nature as those set out in this Decision. If the Respondent is found to have committed, directly or indirectly, during the Probationary Period, a further violation of a similar nature as those set out in this Decision, the competent disciplinary body shall order the Two-Year Ban to be enforced, starting on the date of the competent disciplinary body's new decision. The Two-Year Ban may be added to any disciplinary measure for the new violation. If at the end of the Probationary Period, the Respondent has not been found to have committed, directly or indirectly, a further violation of a similar nature as those set out in this Decision, the Two-Year Ban shall be deemed to be null and void.

122. In addition to the suspended Two-Year Ban, the Respondent shall within 60 days of the date of this Decision, pay by way of costs \$5,000 (CAD) to the First Complainant and \$5,000 (CAD) to the Second Complainant as contributions towards their legal fees and expenses.

JULY 31, 2022

DISCIPLINE PANEL



Daniel Ratushny
Discipline Panel