

CLEA F. PARFITT LAWYER \*

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February 23, 2018

**BY EMAIL**

B.C. Human Rights Tribunal  
1170 - 605 Robson Street  
Vancouver, B.C.  
V6B 5J3

**Attention: Daniel Varnals, Case Manager**

Dear Mesdames/Sirs:

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**RE: Glynnis Kirchmeier - and - Glynnis Kirchmeier obo others v.  
University of British Columbia  
Case Number: 14965**

Please find enclosed the Complainant's Second List of Documents.

Yours truly,

CLEA F. PARFITT, LAWYER



Clea Parfitt

cc. Client

Roper Greyell, Attn: Michael Wagner/Jennifer Devins

**IN THE MATTER OF THE *HUMAN RIGHTS CODE*  
R.S.B.C. 1996, c. 210 (as amended)**

**AND IN THE MATTER of a complaint before the  
British Columbia Human Rights Tribunal**

**BETWEEN:**

**COMPLAINANT**

**AND:**

**RESPONDENT**

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**COMPLAINT'S SECOND LIST OF DOCUMENTS**

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**PART I: DOCUMENTS TO WHICH THERE IS NO OBJECTION TO  
PRODUCTION**

No.	Date	Description
a.	Various	All pleadings and submissions filed by the parties with the Tribunal in these proceedings
b.	Various	All correspondence exchanged in these proceedings between the parties and the Tribunal
c.	Various	All documents disclosed to us to date by the Respondent, whether or not listed
37.	January 2017	Emails to and from G. Kirchmeier
38.	February 2017	Emails to and from G. Kirchmeier
39.	March 2017	Emails to and from G. Kirchmeier
40.	April 2017	Emails to and from G. Kirchmeier
41.	May 2017	Emails to and from G. Kirchmeier
42.	June 2017	Emails to and from G. Kirchmeier
43.	August 2017	Emails to and from G. Kirchmeier
44.	September 2017	Emails to and from G. Kirchmeier
45.	October 2017	Emails to and from G. Kirchmeier
46.	November 2017	Emails to and from G. Kirchmeier
47.	January 2012	Email from C. Lundeen to S. Hay re hurt student

# Miscellaneous

48.	Undated	Kirchmeier timeline
49.	Undated	Monica Kay timeline
50.	Undated	Timeline – author unknown
51.	Sept. 16, 2014	History of issues re D. Mordvinov, author unknown
52.	Undated	Tina Loo timeline
53.	2012 – 2013	History Department Graduate Student Directory
54.	2012 winter	Dept. of History Working Groups
55.	July 24-28, 2012	ReSET Challenges Project “Towards a New Cultural History of Eastern and Central Europe. Critical Issues and Reappraisals” faculty and participant contact information
56.	June 1-3, 2013	Canadian Association of Slavists Annual Conference, Final Program
57.	June 2-3, 2013	Canadian Historical Association Annual Meeting Victoria, participants and details
58.	Jan. 31, 2014	Qualicum History Conference program
59.	Mar. 8, 2014	University of Alberta History & Classics Graduate Student Association Annual Conference program
60.	May 2014	ICASS VII: Sessions Program
61.	May 24-26, 2014	Canadian Association of Slavists Annual Conference Program
62.	Jan. 10, 2016	AHA Session 238. Race, Nation, Democracy, and State in and after the Russian Empire
63.	April 25, 2015	Panel R9 – Identity in Late Imperial Russian and Ukraine
64.	May 30 – June 1, 2015	CSHPS 2015 Congress, Preliminary Program
65.	July 8-10, 2015	Contradictions: Envisioning European Futures. Preliminary Program
66.	August 2015	UBC job description for Residence Coordinator Student Leadership 2015-2016
67.	August 2015	UBC job description for Residence Advisor 2015-2016
68.	August 2015	UBC Sexual Assault Intervention and Prevention Education Plan, draft
69.	2015	UBC Equity and Inclusion Office Annual Report 2014-2015
70.	Undated	Account of Experience with UBC re Sexual Assault Complaint from Caitlin Cunningham
71.	Nov. 12, 2015	Letter from UBC (C. Hyson) to C. Cunningham re discipline process complete
72.	Dec. 3, 2015	Report to the Board of Governors re Equity and Inclusion Office: 2014-2015 Annual Report
73.	2015	“The Enduring Silence of UBC’s ‘Hunting Ground’”, by Paul Krause (The Talon)
74.	Oct. 1 – Dec. 31,	Access Requests

	2015	
75.	Nov. 20, 2015	ASEEES 2015 Convention Preliminary Program
76.	Nov. 19 – 22, 2015	History of Science Society Annual Meeting Program
77.	Undated	Letter from D. Eby and K. Corrigan to Interim President M. Piper re UBC administration's handling of sexual assault and harassment allegations at UBC
78.	Nov. 26, 2015	Open letter from Simon Fraser University History Graduate Student Association
79.	2015	Letter from UBC's Equity and Inclusion office (Sara-Jane Finlay) re next steps in initiatives related to sexual assault response and prevention
80.	2016	Sexual Assault Awareness Month information
81.	Dec. 16, 2015	Dmitry Mordvinov information
82.	January 2016	UBC Sexual Assault resource for faculty and staff
83.	2016	UBC guide re Mental Health and Wellbeing, Assisting Students in Distress
84.	Jan. 7, 2016	Open letter from UBC faculty members re UBC's sexual assault policies and procedures
85.	Undated	Letter from G. Kirchmeier to Ms. Butler
86.	February 2016	UBC Vancouver Sexual Assault Response and Support Protocol
87.	Feb. 15, 2016	Butler Workplace Solutions University of British Columbia Process Review
88.	2016	UBC statement re: Release of the Paula Butler Review Executive Summary
89.	Feb. 15-16, 2016	Sexual Assault: Discourse & Dialogue 2016
90.	February 2016	Strengthening Accountability Surrounding Issues of Sexual Violence: How UBC Process is Failing to Protect Graduate Students
91.	Feb. 18, 2016	"GSS attempts to bury own report on campus sexual violence", by M. Kreitzman
92.	Mar. 22, 2016	Student Services – Faculty and Staff Resources: Sexual assault response and education
93.	Mar. 23, 2016	UBC Sexual Assault Policy & Process Development
94.	Mar. 26, 2016	UBC – Questions: "More Problems of Silencing and 'Privacy' – and of What Universities Are Supposed to Do", by P. Krause
95.	Mar. 30, 2016	The Ubyyssey: "More problems of silencing and 'privacy' – and of what universities are supposed to do", by P. Krause
96.	Mar. 31, 2016	Media Release. "Patterns of Behaviour: Human Rights Tribunal Complaint File Against The University of British Columbia by Glynnis Kirchmeier"
97.	April 6, 2016	Letter from J. Benedet (Chair, University Panel on

		Sexual Assault) to "Concerned Faculty, Students, Staff and Community Members"
98.	May 2016	Ending Violence Association of BC – "Campus Sexual Violence: Guidelines for a Comprehensive Response"
99.	May 19, 2016	Progress of Bills. 5 <sup>th</sup> Session, 40 <sup>th</sup> Parliament (2016)
100.	June 2016	Sexual Assault at the University of British Columbia: Prevention, Response, and Accountability. Prepared by UBC Sexual Assault Panel
101.	May 21, 2016	Report to the Board of Governors. New Policy #131 – Sexual Assault
102.	June 7, 2016	Board of Governors. People, Community & International Committee Agenda
103.	June 15, 2016	Sexual Assault on Trial: Ghomeshi, Survivors, Media & the Law
104.	Aug. 5, 2016	Handwritten notes of G. Kirchmeier
105.	Aug. 8, 2016	Twitter feed of G. Kirchmeier
106.	Aug. 10, 2016	UBC Sexual Assault Policy & Process Development (Equity and Inclusion Office)
107.	Aug. 23, 2016	Media Release: OCRCC responds to R. v. Ururyar
108.	Aug. 29, 2016	Handwritten notes of G. Kirchmeier
109.	Sept. 9, 2016	Sexual Assault Policy Consultation (Equity and Inclusion Office)
110.	Sept. 26, 2016	Letter from M. Thien to S. Ono, G. Verill, A. Lyon, L. Svendsen and S. Galloway
111.	Sept. 29, 2016	Job Posting: Director, Conflict Management
112.	Sept. 30, 2016	The Power of Our Collective Voices: Changing the Conversation on Sexual Violence at Post-Secondary Institutions program
113.	Oct. 1, 2016	Handwritten notes of G. Kirchmeier
114.	Undated	Question sheets: "Reporting & Responding", "Policy Development", "Research and Data".
115.	Undated	Campus Sexual Violence Guidelines for a Comprehensive Response (Ending Violence Association of BC)
116.	Oct. 1, 2016	Handwritten notes of G. Kirchmeier
117.	Oct. 4, 2016	UBC Broadcast Email: Sexual Assault Policy Information Sessions
118.	Oct. 5, 2016	UBC Broadcast Email: Message from Professor Santa Ono – Vancouver campus incident
119.	Oct. 24, 2016	Recommended UBC Structures Re Sexual Violence, Harassment and Discrimination Complaints (Kirchmeier/ Parfitt)
120.	Oct. 26, 2016	UBC Steering Committee on Sexual Assault application form
121.	Oct. 26, 2016	Student Services – Faculty & Staff Resources.

		Sexual assault response and education, unchanged online since March 2016.
122.	Nov. 15, 2016	UBC statement from Philip Steenkamp, VP External Relations
123.	Nov. 23, 2016	Guidelines for University Investigations and Hearings
124.	Jan. 25, 2017	Report to the Board of Governors. New Policy #131 – Sexual Assault and Other Sexual Misconduct
125.	April 13, 2017	UBC Broadcast Email: UBC's Sexual Assault Policy approved by the Board of Governors
126.	April 13, 2017	Reddit post: UBC's new sexual assault policy, broken down piece-by-piece in plain language
127.	Mar. 30 – April 13, 2017	Reddit post: Policy 131 AMA, with comments
128.	Mar. 30 – May 4, 2017	Reddit post: Policy 131 AMA, with comments
129.	Sept. 14, 2017	UBC Broadcast Email: Creating a community free from sexual misconduct
130.	2017	Executive Profile, Director of Investigations, the University of British Columbia
131.	Dec. 5, 2017	The Canadian Bar Association of B.C. job posting re UBC legal counsel

#### John Furlong Issue

132.	Dec. 15, 2016	2017 ZLC Millennium Scholarship Breakfast info
133.	Undated	2017 ZLC Millennium Scholarship Breakfast info
134.	Dec. 19, 2016	Letter from G. Kirchmeier to S. Ono re 2017 ZLC Millennium Scholarship Breakfast and J. Furlong, with attachments
135.	Jan. 3, 2017	UBC News: Statement on decision regarding John Furlong speaking engagement, 2 copies
136.	Jan. 3, 2017	Statement from John Furlong on UBC Apology for Cancellation of Speech
137.	Jan. 3, 2017	"John Furlong has won the right to get on with his life", by G. Mason (The Globe and Mail)
138.	Dec. 31, 2016	"John Furlong's sex-abuse trial by social media", by C. Blatchford (National Post)
139.	Dec. 31, 2016	"Correcting Christie Blatchford", Canadaland news brief
140.	Jan. 19, 2009	Office of the Premier Senior Public Service Executive List

#### Media

141.	Jan. 27, 2014	"Part One: Women's Stories from a Graduate Residence". GUTS Canadian Feminist Magazine.
142.	Feb. 6, 2015	"Sex assault reporting on Canadian campuses worryingly low, say experts". CBC News.

143.	Nov. 20, 2015	"Steven Galloway suspension shouldn't have been announced: UBC faculty association". The Canadian Press.
144.	Nov. 20, 2015	"UBC 'abandoned' women who reported sexual assaults". CBC News.
145.	Nov. 21, 2015	"School took more than a year to deal with sexual predator: CBC", and "Faculty group upset that UBC made probe of professor public". The Vancouver Sun.
146.	Nov. 23, 2015	"Reporting sex assault worse than the attack itself, UBC told". The Vancouver Sun.
147.	Jan. 16, 2016	"AMS approves sexual assault external policy". The Ubyyssey.
148.	Undated	"TED Fellow develops online reporting system to help sexual-assault victims". The Globe and Mail.
149.	Mar. 2, 2016	"UBC announces members of panel to develop sexual assault policy after complaints". 580 CFRA News Talk Radio.
150.	Mar. 24 – 27, 2016	"If Ghomeshi skates, a movement will be emboldened". Metro News.
151.	Mar. 29, 2016	"UBC students back in class as fears about sex predator linger". Global News.
152.	Mar. 31, 2016	"Human rights complaint filed against UBC for handling of sexual assault". The Ubyyssey
153.	Mar. 31, 2016	"UBC alumna files human rights complaint over response to sex assault reports". The Canadian Press.
154.	April 1, 2016	"Justice on campus". The Globe and Mail.
155.	May 31, 2016	"Campus Five-O: A look at safety and security at UBC". The Ubyyssey.
156.	June 22, 2016	"Author Steven Galloway fired from UBC after investigation of 'serious allegations'". The Globe and Mail.
157.	July 7, 2016	"What Happened When I Found Out I Was In The Same Class As My Rapist", by Paniz Khosroshahy (The Establishment)
158.	Sept. 14, 2016	"Whatever the star UBC prof may have done, the university made things worse", by K. Gold (The Walrus)
159.	Oct. 3, 2016	"We need a plan. Sexual assault on campus is a national issue." "Investigating the vacuum of accountability". (Metro News)
160.	Oct. 4, 2016	"Sexual Assault on Campus: A Metro Special Focus. A federal vacuum." (Metro News)
161.	Oct. 5, 2016	"Experts Sidelined: UBC sexual-assault panel members like Sarah Hunt say draft policy was tabled before recommendations." (Metro News)
162.	Oct. 6, 2016	"Sexual Assault on Campus: A Metro Special Focus. Dearth of data." (Metro News)

163.	Oct. 7-10, 2016	"Sexual Assault on Campus: A Metro Special Focus. The way ahead." (Metro News)
164.	Oct. 5, 2016	"Survivor serves on university's sex-assault panel." (Metro News)
165.	Oct. 28, 2016	"Under a cloud: How UBC's Steven Galloway affair has haunted a campus and changed lives." (The Globe and Mail)
166.	June 25, 2017	"Opinion: Monitoring sexual abuse helps prevent it", by C. Rooney and G. Kirchmeier
167.	Oct. 21, 2016	"UBC Equity and Inclusion to hire new director of conflict management". (The Ubyyssey)
168.	Undated	"UBC denies discrimination in its handling of sexual assault reports". (The Ubyyssey)

### Policies

169.	Sept. 2011	Policy No. 3 - Discrimination and Harassment
170.	February 1997	Policy No. 95 - Formal Investigations
171.	Undated	Guidelines for University Investigations and Hearings
172.	Undated	Policy No. 131 - Sexual Assault - Draft
173.	April 13, 2017	Policy No. 131 - Sexual Assault and Other Sexual Misconduct
174.	June 2015	University of Victoria Policy GV0205 - Discrimination and Harassment Policy

### UBC FOI Disclosure

175.	Undated	UBC Wide Policies
176.	May 2015	Privacy Fact Sheet: Disclosing Personal Information to Law Enforcement Agencies and Government Bodies
177.	May 2015	Privacy Fact Sheet: Disclosing Personal Information for Health and Safety Reasons
178.	Undated	Title page re Policies and Procedures Specific to Counselling Services
179.	Undated	Counselling Services Role in Supporting Students Regarding Reporting Sexual Assault
180.	Undated	Title page re Policies and Procedures Specific to Equity and Inclusion
181.	Undated	Equity.ubc.ca website information
182.	Undated	AHU responsibilities for UBC equity-related policies, quick guide
183.	Undated	Responding to Bullying in the Learning Environment Using Effective Conflict Management – An Introduction
184.	Aug. 2011	UBC Discrimination and Harassment Policy Complaint Procedure Guidelines
185.	Undated	Discrimination and Harassment Awareness: Creating a Harassment-Free Campus



186.	2011	Equity Office Discrimination & Harassment Report 2011
187.	2010	Equity Office Discrimination & Harassment Report 2010
188.	Undated	Frequently Asked Questions about Discrimination and Harassment: Guide for Faculty and Staff
189.	Undated	UBC Report: Renewing Our Commitment to Equity and Diversity
190.	Undated	The Student Guide to Discrimination and Harassment
191.	Undated	Tips for Working with Complainants
192.	Undated	Tips for Working with Respondents
193.	Undated	Tips for Working with Complainants
194.	Undated	Tips for Working with Respondents
195.	Undated	10 Tips for De-Escalation Conflict
196.	Undated	Title page re Policies and Procedures Specific to Green College
197.	2010-2011	Green College Resident Handbook
198.	2011-2012	Green College Resident Handbook
199.	2012-2013	Green College Resident Handbook
200.	2013-2014	Green College Resident Handbook
201.	2014-2015	Green College Resident Handbook
202.	2015-2016	Green College Resident Handbook
203.	Undated	"Sexual Assault – Responding to a Disclosure" (Ending Violence Association of BC)
204.	Undated	Title page re Policies and Procedures Specific to St. John's College
205.	Undated	Emergency Contact Information – Mental Health and Physical Health Concerns
206.	Undated	Title page re Policies and Procedures Specific to Student Development and Access & Diversity
207.	Undated	Emergency, Safety and Policy Information
208.	April 2013	UBC Case Management Approach

### Other Materials

209.	April 4, 2011	Dear Colleague Letter from Assistant Secretary for Civil Rights Russlynn Ali (U.S. Department of Education)
210.	April 4, 2011	Fact Sheet. Dear Colleague Letter: Sexual Violence Background, Summary, and Fast Facts (U.S. Department of Education)
211.	April 2011	Know Your Rights: Title IX Prohibits Sexual Harassment and Sexual Violence Where You Go to School (U.S. Department of Education)
212.	2015	Evaluation of Sexual Assault Policies of Eleven Canadian Universities (Miller & Quinlan)
213.	January 2015	Spotted: Obligations to Protect Women Students'

		Safety & Equality (End Violence Against Women Coalition)
214.	August 2015	Responding to Sexual Assault on Campus: What Can Canadian Universities Learn from US Law and Policy? (E. Sheehy and D. Gilbert)

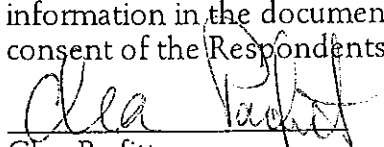
**PART II: DOCUMENTS WHICH HAVE BEEN BUT ARE NOT NOW IN OUR POSSESSION**

Nil

**PART III: DOCUMENTS FROM WHICH PRIVILEGE FROM PRODUCTION IS CLAIMED**

1. Confidential letters and other communications passing between the Complainant and the Complainant's agents and/or legal advisor in their professional capacity and for the purpose of obtaining legal advice.
2. All notes, drafts, memoranda, statements and correspondence prepared in contemplation of litigation.
3. All documents passing between the Complainant's solicitors and the Respondents' solicitors in furtherance of resolution of the complaint, whether or not marked "without prejudice" or communications between the parties and any mediator.

**TAKE NOTICE** that the documents disclosed in this list are governed by a rule of confidentiality such that disclosure is given for the purposes of this complaint and hearing only. Use of the list of documents, copies of the document or any of the information in the documents for any other purpose without the express written consent of the Respondents is prohibited.

  
Clea Parfitt

February 23, 2018

TO: The Respondent

THIS LIST OF DOCUMENTS of the Complainant was prepared by Clea Parfitt, 407- 825 Granville Street, Vancouver, B.C., V6Z 1K9. Telephone: 604 689 7778. Fax: 604 689 5572.