

**DISCIPLINE COMMITTEE OF THE
ONTARIO COLLEGE OF TEACHERS**

BETWEEN:

ONTARIO COLLEGE OF TEACHERS

and

CHERYL CATHERINE GOULD

NOTICE OF HEARING

THE INVESTIGATION COMMITTEE OF THE ONTARIO COLLEGE OF TEACHERS, pursuant to section 26, subsection (5) of the *Ontario College of Teachers Act, 1996* (the "*Act*"), Statutes of Ontario, 1996, chapter 12, has directed that the matter hereinafter described regarding the conduct or actions of Cheryl Catherine Gould, Certificate No. 450388, be referred to the Discipline Committee of the Ontario College of Teachers.

IT IS ALLEGED that Cheryl Catherine Gould is guilty of professional misconduct as defined in the *Act* in that:

- (a) she failed to comply with the *Act* or the regulations or the by-laws, specifically section 26 of the by-laws, contrary to Ontario Regulation 437/97, subsection 1(14);
- (b) she failed to comply with the *Education Act*, Revised Statutes of Ontario, 1990, chapter E.2, and specifically subsection 264(1) thereof or the

Regulations made under that Act, contrary to Ontario Regulation 437/97, subsection 1(15);

- (c) she committed acts that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional, contrary to Ontario Regulation 437/97, subsection 1(18);
- (d) she engaged in conduct unbecoming a member, contrary to Ontario Regulation 437/97, subsection 1(19).

PARTICULARS OF THESE ALLEGATIONS ARE AS FOLLOWS:

1. Cheryl Catherine Gould (the “Member”) is a member of the Ontario College of Teachers.
2. At all material times, the Member was employed by the Toronto Catholic District School Board (the “Board”) as a teacher at Monsignor Fraser College, (the “School”) in Scarborough, Ontario.
3. In or around the academic year 2020-2021, the Member posted content on a public Facebook account, wherein she identified herself as a teacher at an Ontario Catholic school, including, but not limited to:
 - (a) on or about August 27, 2020 posted her own biography, which read: “Harvey C Catherine...hateful, pathetic, xenophobic, transphobic, far-right, racist that better people feel sorry for;”
 - (b) on or about October 16, 2020, posted a screen capture of her exchange with another individual, whose name and profile picture is visible, in which she calls the other individual an “inbred Ahmed” with the caption “I don’t engage much with the enemy any more, bc [sic] when I do, it always ends something like this;”

- (c) on or about October 29, 2020, in reference to an online news article, posted the caption: "It's a sick death cult that should not be permitted to thrive in nonMuslim [sic] nations, as it inevitably creates traitors and is a public safety threat. It's an enemy ideology that randomly weaponizes adherents, turning everyday Muslims into dangerous enemies of state who are willing to martyr themselves for the cause while murdering total strangers;"
- (d) on or about November 2, 2020, in reference to an online news article, posted the caption: "Many shot today in Vienna, and many more Islamists will slaughter many more innocent Westerners in the months ahead. Tens (if not hundreds) of thousands of Islamists live in Europe now. So, Europe is bleeding. The continent has been invaded and is under attack by Islamists. They are rabid and famished for conquest...Immigration from many nations must stop, and Islamists and their families living in Europe must be expelled or imprisoned as enemies of the state. Entire families must be expelled if they will not denounce their Islamist members;"
- (e) on or about November 4, 2020 responded to a comment on her post with an image of a Caucasian individual wearing blackface walking through a crowd of people with the comment: "Hello fellow Black people;"
- (f) on or about November 18, 2020, posted an image which gives drawing instructions starting with a penis and completing the image with the Prophet Muhammad;
- (g) on or about November 28, 2020, posted the caption "LOL" along with a cartoon image depicting a person with brown skin, a machete, and head dress holding and raising in celebration the arm of a white male with glasses, and a beard. The white male is decapitated and his head hovers over his body. The text in the picture reads "Celebrate Diversity;"

- (h) on or about February 8, 2021 in reference to an image of a person about to undergo gender reassignment surgery, posted:
 - (i) the caption, “I can’t even. Sorry, folks, maybe it’s too gross to share...? But when will this tr [sic] madness end? And very importantly, WHY are we ENABLING these abusive medical practices and celebrating human illness, self-mutilation, and depravity?”;
 - (ii) the comment, “I kind of agree. But I am torn. Medical professionals have ethical duties and most of these people are mentally ill. I teach at-risk youth and at legal age (18 in Canada), many are still unable to think straight or properly care for themselves. They’ve been parented just that badly. It’s awful.”;
- (i) on or about January 10, 2021 posted a photo of a white clenched fist and the words “Black Lives Matter” and responded to a commenter on the post stating, “it won’t be there long...everyone who knows me knows it’s not there as a serious statement;”
- (j) on or about February 25, 2021, posted the caption: “New PotatoHead [sic] Ma’am coming later this year. Designers are busy working on the prototypes for new detachable bits,” in reference to an image of a Mrs. Potato Head doll where a penis and lipstick were added by hand;
- (k) on or about March 27, 2021, posted the caption: “Absurd that such images of Muhammed should be disallowed in western schools. Our leaders are passive and weak and bowing to our civilizational and cultural enemies when the enemies demand (backed by precedents of murder and of other violence) that we change our culture to become more like theirs...in one of the worst possible ways. I remember the days when we had freedom of conscience and speech. Anyone else remember those days?” in reference

to an image of the Prophet Muhammad wearing a bomb with a lit fuse on his head instead of a turban;

- (l) on or about March 29, 2021 posted a photo of a mural of George Floyd guarded by two police officers and responded to a comment on the photo stating “he is a BLM martyr;”
- (m) on or about March 31, 2021 in reference to an online news article, posted the caption “I am sick to my stomach after reading this. I’m an English, art, and media teacher. Like Paty and this teacher did, I also teach students about freedom of conscience and expression, western traditions of satire, and the serious conflicts between Islamic prohibitions and western freedoms. This is one of a number of issues (all related to so-called Progressive ideology) causing substantial constriction of liberty in our Brave New Multi-kulti [sic] World.”

THE DISCIPLINE COMMITTEE WILL HOLD A HEARING pursuant to sections 30, 32 and 32.1 of the *Act* to decide whether the allegations are true and whether Cheryl Catherine Gould is guilty of professional misconduct. A copy of the *Rules of Procedure of the Discipline Committee and of the Fitness to Practise Committee* (the “*Rules of Procedure*”) will be provided upon request and is also available on the College’s website.

THE DISCIPLINE COMMITTEE WILL HEAR THIS MATTER on a date to be determined after consultation between College Counsel and you or your counsel and fixed by the Tribunals Office.

IF A DATE FOR THE HEARING AND/OR THE FORMAT OF THE HEARING ARE NOT AGREED UPON, THE DISCIPLINE COMMITTEE WILL CONVENE TO DEAL WITH

THE PROCEDURAL MATTER OF SETTING A DATE FOR THE HEARING. The set date hearing will be held in-person on the 12th floor of the offices of the Ontario College of Teachers at 101 Bloor Street West, Toronto, Ontario or will be held electronically using audio or video conferencing equipment, pursuant to the *Rules of Procedure* and the *Statutory Powers Procedure Act*, R.S.O. 1990, c.S.22 (the “the *SPPA*”).

YOU ARE ENTITLED TO BE PRESENT WHEN THE COMMITTEE CONVENES TO SET A DATE FOR THE HEARING AND TO BE REPRESENTED BY LEGAL COUNSEL. IF YOU DO NOT ATTEND BEFORE THE COMMITTEE TO SET A HEARING DATE, THE DISCIPLINE COMMITTEE MAY PROCEED IN YOUR ABSENCE TO SET A HEARING DATE. NOTICE OF THE HEARING DATE SET BY THE COMMITTEE WILL BE PROVIDED TO YOU IN WRITING AT YOUR LAST KNOWN ADDRESS AS SHOWN IN THE RECORDS OF THE COLLEGE.

YOU ARE ENTITLED TO BE PRESENT AT THE HEARING AND TO BE REPRESENTED BY LEGAL COUNSEL. The hearing will be held in-person on the 12th floor of the offices of the Ontario College of Teachers at 101 Bloor Street West, Toronto, Ontario or will be held electronically using audio or video conferencing equipment, pursuant to the *Rules of Procedure* and the *SPPA*.

IF YOU DO NOT ATTEND ON THE SCHEDULED HEARING DATE, IN ACCORDANCE WITH ANY DIRECTION FROM THE TRIBUNALS OFFICE WITH RESPECT TO THE MANNER OF PARTICIPATION, THE DISCIPLINE COMMITTEE MAY PROCEED WITH AN IN-PERSON HEARING OR ELECTRONIC HEARING IN YOUR ABSENCE AND YOU WILL NOT BE PROVIDED WITH ANY FURTHER NOTICE OF PROCEEDINGS.

IF YOU BELIEVE THAT AN ELECTRONIC HEARING OR ELECTRONIC SET DATE HEARING IS LIKELY TO CAUSE YOU SIGNIFICANT PREJUDICE, you must notify the Tribunals Office at 101 Bloor Street West, Toronto, Ontario, M5S 0A1, telephone 416-961-8800. The Discipline Committee will then determine whether the hearing will proceed electronically or not.

IF THE DISCIPLINE COMMITTEE FINDS YOU GUILTY of professional misconduct, you are liable to the penalties set out in section 30 of the *Act*.

A MEMBER whose conduct is being investigated in proceedings before the Discipline Committee may examine before the hearing any written or documentary evidence that will be produced or any report, the contents of which will be given as evidence at the hearing.

You or your representative may contact the office of Caroline Zayid of McCarthy Tétrault LLP, solicitor for the College in this matter, at Suite 5300, Toronto Dominion Bank Tower, Toronto, ON M5K 1E6, telephone 416-601-7768.

Date: November 8, 2022

Registrar's Signature

Chantal Bélisle, OCT

Interim Registrar and Chief Executive
Officer

Ontario College of Teachers

101 Bloor Street West

Toronto, ON M5S 0A1

TO: Cheryl Catherine Gould
[XXX]
[XXX]

B E T W E E N :

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