

MEMORANDUM OF AGREEMENT

BETWEEN:

Ontario College of Teachers

- and -

John Craig Williams

WHEREAS John Craig Williams is a member of the Ontario College of Teachers (Registry number 239125);

AND WHEREAS, W. Douglas Wilson, Registrar and Chief Executive Officer (the "complainant"), has filed a complaint, dated June 2, 2003, with respect to the conduct or actions of John Craig Williams;

THE PARTIES to this agreement are the Ontario College of Teachers (the "College") and John Craig Williams (the "member"). The Registrar's signature on this Memorandum of Agreement (the "MOA") does not bind the Investigation Committee in its function to consider and dispose of this matter.

The parties agree to resolve the complaint as follows:

1. the member acknowledges that he engaged in the conduct described in the Registrar's complaint attached as Appendix "A" and that said conduct amounts to professional misconduct;
2. the parties agree and understand that the terms of this MOA constitute a proposed settlement of this matter and that the terms are subject to ratification by the Investigation Committee of the College. Accordingly, this MOA is not considered final and binding on the parties until such time as it is ratified by the Investigation Committee;
3. the parties agree and understand that if the Investigation Committee ratifies this MOA, there shall be no appeal of any or all of the terms of this agreement, to any forum of the College;
4. pursuant to subsection 14(2) of the *Ontario College of Teachers Act, 1996*, the member agrees and undertakes to resign his membership in the College to take effect upon ratification of the MOA by the Investigation Committee;
5. the member agrees and understands that, upon ratification of this MOA, the Registrar shall cancel his certificate of qualification and registration pursuant to subsection 14(3) of the *Ontario College of Teachers Act, 1996*;
6. the member agrees and understands that upon ratification of this MOA, he will surrender his certificate of qualification and registration to the Registrar;

7. the member agrees and undertakes not to reapply to the College for a certificate of qualification and registration for a period of two years to commence upon the ratification of this MOA by the Investigation Committee;
8. the member agrees and understands that should he apply for a certificate of qualification and registration, pursuant to section 18 of the *Ontario College of Teachers Act, 1996*, the Registrar shall review this MOA in considering the member's application;
9. the member agrees and understands that a notation will be placed on the public register maintained by the Registrar, in accordance with section 23 of the *Ontario College of Teachers Act, 1996*, which will include the following information:
 - (a) on (date of ratification by the Investigation Committee), the member resigned his membership in the College;
 - (b) on (date of ratification by the Investigation Committee), the Registrar cancelled the member's certificate of qualification and registration; and
 - (c) at the time of the member's resignation, a professional misconduct investigation was in progress at the College regarding allegations that the member engaged in a sexual relationship with a [XXX] year old female student and made inappropriate comments to several other students;
10. the member agrees and understands that the College shall publish his name with a summary of the complaint and the nature of the resolution contained in this MOA. Such publication will be made in the College's official publication, *Professionally Speaking/Pour parler profession*, on the College's website, and in such other manner as the Registrar and Chief Executive Officer deems appropriate;
11. the member agrees and understands that upon ratification of this MOA by the Investigation Committee, the College shall maintain a copy of the Investigation Committee's Decision and Reasons, including this MOA, in the College's Margaret Wilson Library. The member agrees and understands that said Decision and Reasons are available for public review;
12. the member agrees and understands that the College will provide notice of the cancellation of the member's certificate of qualification and registration to any Canadian school or school board, any Canadian teacher federation or affiliate, the Ontario Directors of Education and Heads of Private Schools, and the teacher licensing and governing bodies in Canada and elsewhere who are routinely notified by the College of such cancellations;
13. pursuant to section 43.4 of the *Ontario College of Teachers Act, 1996*, the member agrees and understands that if the Investigation Committee ratifies this MOA, the College will provide the member's former employer, the Bluewater District School Board, with the committee's Decision and Reasons, including this MOA;
14. the parties agree and undertake to take no further action with respect to the complaint provided that the terms of this MOA are complied with;

Appendix "A"
Registrar's Complaint against John Craig Williams

The Registrar alleges that John Williams, [XXX] teacher at [XXX] School, of the Bluewater District School Board acted inappropriately and unprofessionally when he:

1. In respect of [XXX], who was [XXX], then [XXX] from September 1995 through to January 1996, and thereafter a student at the school until 1998:
 - a) commencing in and about 1996, engaged in inappropriate discussions with [XXX], including expressing his love for her;
 - b) commencing in and about 1996, when the student was [XXX] years of age, engaged in a consensual sexual relationship with [XXX] which continued until October 2002; and
 - c) commencing when [XXX] was [XXX] years of age and continuing until [XXX] terminated the relationship, engaged in sexual activities with her including sexual intercourse.

2. In respect of several of his students, or students at the school, in 1996, the member:
 - a) engaged in a series of inappropriate personal conversations with the said students which included topics that were not part of the curriculum such as instruction on spirituality as well as details of the personal lives of the students, and during which the member gave them advice on how to conduct their daily lives; and
 - b) the said students were provided with books and materials and were advised by the member not to show the materials to others and to conceal the nature of his discussions with them.