



March 22, 2024

CUPE Ontario  
80 Commerce Valley Dr E Suite 1  
Thornhill, ON L3T 0B2  
Attention: Fred Hahn, President  
(via email: fhahn@cupe.ca)

Office of the Counsel

Christine Silversides  
General Counsel

1050 KANEFF TOWER  
4700 KEELE ST.  
TORONTO ON  
CANADA M3J 1P3  
silverc@yorku.ca

AND TO

Canadian Union of Public Employees Local 3903  
143 Atkinson Building  
York University  
4700 Keele Street  
Toronto, Ontario M3J 1P3  
Attention: Mackenzie Edwards, Acting Chairperson  
(via email: cupe3903chairperson@gmail.com)

Dear Mr. Hahn and Ms. Edwards

**RE: Picketing conduct – safety concerns**

By separate correspondence, the University is communicating with CUPE 3903 regarding a picket protocol. Vice-President, Finance & Administration Carol McAulay has proposed reasonable provisions that would enable CUPE 3903 to safely exercise its right to engage in lawful informational picketing.

We are writing today about serious and pressing safety concerns on the University campus flowing from CUPE 3903's picketing conduct. This is an issue which we expect is as of paramount importance to CUPE as it is to the University. The University will not tolerate actions of CUPE 3903 and persons acting on its behalf that compromise the health and safety of users of the University campuses.

Picket locations were placed well within the boundaries of University private property. Picketers have blockaded University community safety and maintenance vehicles from transiting through the campus. Such conduct is knowingly interfering with the University's ability to respond to safety and vital maintenance matters.

The near blockade of entrances to the University campus is also resulting in tempers flaring and persons with the legitimate right to access campus driving or attempting to drive around pickets. CUPE 3903's picketing conduct carries a real risk of causing personal injury and property damage.

The current picketing is designed to and is creating a near total blockade of University premises. This is not lawful picketing and is instead intentional interference in our operation and the operation of the many businesses and others who operate or work on our campus. This activity is not only not peaceful communication protected by law, but is in breach of law and actionable.



If you do not immediately direct your picketers to comply with the law then be advised that the University will hold CUPE Ontario, CUPE 3903, your leadership and executives and individual picketers legally responsible for any damages that may result and may also take disciplinary action, up to and including termination, for illegal off duty conduct.

Yours truly,

YORK UNIVERSITY

Per:

A handwritten signature in blue ink that reads "CMSilversides". The signature is written in a cursive, somewhat stylized font.

Christine Silversides  
General Counsel