

CITATION: Adams v. Queen’s University, 2026 ONSC 1427
DIVISIONAL COURT FILE NO.: DC-25-00000534-00JR
DATE: 20260312

ONTARIO
SUPERIOR COURT OF JUSTICE
DIVISIONAL COURT
MATHESON, O’BRIEN AND MANDHANE JJ

BETWEEN:)
)
SAMANTHA ADAMS) *Howard Krongold and Zoe Hountalas, for*
) the Applicant
Applicant)
)
– and –)
)
QUEEN’S UNIVERSITY) *Andrea Risk and Tony Virgin, for the*
) Respondent
Respondent)
)
) **HEARD on March 9, 2026 in Toronto**
)

MATHESON J. (ORALLY)

[1] The applicant is a doctor who was enrolled in the Queen’s Family Medicine program as a resident. An investigation by an Academic Review Board (“ARB”) required that she withdraw. Her appeal to the Postgraduate Tribunal was dismissed by decision dated June 11, 2025.

[2] The applicant now seeks judicial review of the Postgraduate Tribunal decision, alleging procedural unfairness due to bias and inadequate disclosure. Those issues were also raised, and were addressed, on the appeal to the Tribunal itself.

[3] The Tribunal found that the applicant was entitled to a high degree of procedure fairness in the circumstances of this case. We agree.

[4] The bias issue relates to one of the members of the ARB Panel, Dr. Walker. He was appointed to Emergency Medicine, with a cross-appointment to Family Medicine. The ARB Policy precluded members of the residency program from being on an ARB Panel. Dr. Walker was not part of the residency program. Further, he had minimal involvement with Family Medicine. The Tribunal considered the evidence on the bias issue, including from Dr. Walker, concluding that there was no reasonable apprehension of bias. Actual bias was and is not alleged. We do not agree

that a reasonable person, viewing all of the evidence including the e-mail from Dr. Walker to his assistant, would have a reasonable apprehension of bias.

[5] Similarly, the Tribunal considered the non-disclosure allegations, finding that there was sufficient disclosure on all the issues. With respect to the medical records where the patient information was redacted, the applicant should not have been looking at medical records when she was suspended. Further, for the disputed records, there was no connection between the applicant and those patients, and the Tribunal concluded that production of the redacted patient information could not reasonably be used by the applicant in the circumstances of this case. The other disclosure points appear to turn on speculation that is not sufficiently grounded in the evidence.

[6] We conclude, substantially for the reasons set out by the Tribunal, that the applicant has not shown the alleged procedural unfairness.

[7] Cost to the respondent in agreed amount of \$7,500.

Matheson J.

O'Brien J.

Mandhane J.

Released Orally: March 9, 2026

Released Written: March 12, 2026

CITATION: Adams v. Queen’s University, 2026 ONSC 1427
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DATE: 202603**

ONTARIO

SUPERIOR COURT OF JUSTICE

Matheson, O’Brien and Mandhane JJ

B E T W E E N :

SAMANTHA ADAMS

Applicant

– and –

QUEEN’S UNIVERSITY

Respondent

REASONS FOR DECISION

Matheson, J.

Released Orally: March 9, 2026
Released Written: March **, 2026