

e-document		T-1428-24-ID 1	
F	FEDERAL COURT		D
I	COUR FÉDÉRALE		É
L			P
E			O
D			S
		June 12, 2024	É
		12 juin 2024	
Veton Mamudov			
TOR		1	

Court File No. T-

FEDERAL COURT

Parvinder Singh Sandhu

Plaintiff

And

**Discipline Committee of the College of Immigration and Citizenship Consultants (DC)
College of Immigration and Citizenship Consultants (CICC)**

Defendants

STATEMENT OF CLAIM

TO THE DEFENDANT:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or a solicitor acting for you are required to prepare a statement of defence in Form 171B prescribed by the Federal Court Rules, serve it on the plaintiff's solicitor or, if the plaintiff does not have a solicitor, serve it on the plaintiff, and file it, with proof of service, at a local office of this Court

WITHIN 30 DAYS after the day on which this statement of claim is served on you, if you are served in Canada or the United States; or

WITHIN 60 DAYS after the day on which this statement of claim is served on you, if you are served outside Canada and the United States.

TEN ADDITIONAL DAYS are provided for the filing and service of the statement of defence if you or a solicitor acting for you serves and files a notice of intention to respond in Form 204.1 prescribed by the Federal Court Rules.

Copies of the Federal Court Rules, information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO DEFEND THIS PROCEEDING, judgment may be given against you in your absence and without further notice to you.

Date: June 7, 2024

Issued by:
(Registry Officer)

Address of local office: 180 Queen St W, Suite 200
Toronto, Ontario
M5V 3L6

TO:
Discipline Committee of the College of Immigration and Citizenship Consultants (DC)
5500 North Service Road, Suite 1002
Burlington, Ontario L7L 6W6 Canada
Phone: 289-348-0422
Toll-free: 1-877-836-7543
Fax: 1-877-315-9868

And

College of Immigration and Citizenship Consultants
(CICC) 5500 North Service Road, Suite 1002
Burlington, Ontario L7L 6W6
Canada Phone: 289-348-0422
Toll-free: 1-877-836-7543
Fax: 1-877-315-9868

Claim

The plaintiff claims:

1. INTRODUCTION

1.1 I, Parvinder Singh Sandhu, am representing myself in this Action against the Defendants, Discipline Committee of the College of Immigration and Citizenship Consultants (DC) and the College of Immigration and Citizenship Consultants (CICC).

1.2 The Defendant, College of Immigration and Citizenship Consultants (CICC) is regulating body of Immigration and Citizenship Consultants formed under the provisions of College of Immigration and Citizenship Consultants Act and the Defendant, Discipline Committee of the College of Immigration and Citizenship Consultants (DC) handles complaints involving professionalism or competence. Presently CICC has approximately 17,000 immigration and citizenship consultants as its registered members.

1.3 This is regarding my Discipline Committee (DC) hearing matter regarding certain client complaints (consolidated into one matter) which has been concluded and orders have been passed against me. During the hearing proceedings as well as the orders passed during and on conclusion of the hearing in the matter entails CICC officials being involved in very serious criminal violations which include tampering with evidence, authoring, tailoring and editing the evidence, signing on behalf of the witnesses, making fraudulent documents and affidavits, forgery of documents, forgery of signatures of Discipline Committee (DC) and CICC officials, passing fraudulent Discipline Committee (DC) orders with forged signatures of Discipline Committee (DC) Panel members as well as other very serious violations which include submitting fraudulent documents and affidavits with forged signatures even to the Federal Court in numerous matters.

Following are the specific criminal violations done at CICC:-

1. Forgery of signatures of complaints investigator of CICC, Natalie Wruck.
2. Forgery of signatures of Investigation Supervisor of CICC, Robert Stewart.
3. Forgery of signatures of Justin Gattesco, Counsel for CICC.
4. Submitting Fraudulent Affidavit of Robert Stewart, Investigation Supervisor of CICC.
5. Submitting Fraudulent Affidavit of Danielle Kim, Counsel for CICC.
6. Submitting Fraudulent Affidavit of Nicole Jones, Law Clerk of CICC.
7. Submitting Fraudulent Affidavit of Natalie Wruck, Complaints Investigator.
8. Forgery of signatures of 17 officials of CICC and Discipline Committee (DC) officials of CICC on documents, affidavits, decisions and orders by four (4) individuals.

9. Forgery of signatures involving Stan Belevici, Chair of the Board of Directors of CICC and John Murray, President and CEO of CICC.
10. Submitting fraudulent documents with forged signature in Hearing Matters as well as to the Federal Court.
11. Authoring, tailoring and editing of the evidence on behalf of the witnesses (complainants) and Signing of the evidence documents on behalf of the witnesses (complainants).
12. In my hearing matter issuing Four (4) Fraudulent Decisions with Forged Signatures of DC members and in particular Perminder Sidhu, DC member.

Note: This is supported by undeniable and irrefutable evidence which stands on solid unshakable foundation of eight (8) Forensic Reports as well as supporting documentation.

13. The fraudulent order passed with the forged signatures imposed the following sanction on me:-
 - i. My licence was immediately revoked and I was told to notify both current and prospective customers of this revocation;
 - ii. I was prohibited from applying for licence for a period of two years from the date of the decision;
 - iii. I will be jointly and severally liable to pay refunds to Complainants in the amount of \$22,057;
 - iv. I will be liable to pay refunds to Complainants in the amount of \$10,649;
 - v. I will be liable to pay refunds to Complainants in the amount of \$7,736;
 - vi. I will be jointly and severally liable to pay fines to the College in the amount of \$10,000.
 - vii. I will be liable to pay an amount of \$152,800 on account of the costs of the College in investigating and litigating the matter.
 - viii. I have to notify all current clients of the WWICS Group who are using immigration consulting services of WWICS Group of my revocation using the following wording in that notice:

We, Devinder Sandhu and Parvinder Sandhu, are advising you that our licences to practice as Regulated Canadian Immigration Consultants have

been revoked by the College of Immigration and Citizenship Consultants. This means that we can no longer practice as Regulated Immigration Consultants and we can no longer offer, or hold ourselves out as qualified to offer, any immigration consulting service which requires an immigration consulting licence to provide.

- ix I have to post prominently on the home page of any web site of the Sandhu brothers that offers or promotes immigration consulting services the following notice, which will be contained in a bordered box. The notice will read:

This is to advise that the licences of Mr. Parvinder Sandhu and of Mr. Devinder Sandhu as Regulated Canadian Immigration Consultants have been revoked by order of the College of Immigration and Citizenship Consultants. This means that Mr. P. Sandhu and Mr. D. Sandhu may no longer practice as licenced immigration consultants and may no longer offer, or hold themselves out as qualified to offer, any immigration consulting services which require an immigration consulting licence to provide.

1.4 It is to be noted that the Discipline Committee did not have the legislative authority of imposing any of the sanctions mentioned above other than revoking the license and, if at all allowed by the legislation, at the very most imposing a penalty of not more than the prescribed amount. Imposition of a Penalty on revoking of the license is also questionable as penalty is applicable only when the license is not being revoked and after paying the penalty the member is allowed to practice.

1.5 Regarding rest of the sanctions, it is a matter of grave concern that the College of Immigration and Citizenship Consultants in direct contravention of the s.81(1) and s.81(2) of the Act has been making certain by-laws and in particular by-laws on subject matter contained within paragraphs of s.81(1) (c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) illegally for the purpose of imposing such illegal sanctions, as imposed on me, and the Discipline Committee of the College has been imposing such illegal sanctions on members for years altogether now.

1.6 The College has been enforcing these illegal by-laws mentioned above and have been subjecting people to the harsh penalties and punishments as per s.79(1) of the Act for years now.

1.7 No justification for CICC having taken on the complaint matters "as is" from its predecessor regulating body ICCRC was provided. It is to be noted that this was done although the operations of ICCRC were found to be tainted by the House of Commons Standing

Committee of Citizenship and Immigration with respect to mismanagement, un-ethical practices, irregularities in its operations, failing to meet its mandate & mismanagement of the complaints process including but not limited to outsourcing of the complaints process to a company owned by the wife of a senior complaint investigator of ICCRC and as well as other serious violations done by ICCRC on several accounts.

1.8 My submissions that my rights under the Canadian Charter of Rights and Freedom have been violated due to exorbitantly long and unjustified delay in concluding the Complaint matters have been rejected by the Discipline Committee.

1.9 This is a very serious matter not only due to 17,000 Immigration and Citizenship Consultant members of College of Immigration and Citizenship Consultants (CICC) being affected, but also due to the element of causes and effects on the entire Immigration Sector nationally within Canada as well as internationally for Canada as a nation due to and directly as a result of fraudulency, forgery, deceit and deception in criminally duplicitous functionality and operations of CICC at a magnitude of astonishing extremity.

1.10 It is a cause of very serious concern that a regulatory body that has absolutely no qualms about engaging in such serious criminal and unethical violations is in possession and control of an exorbitantly enormous sum of money collected from its members as membership fee, continuing education fee, fines and penalties etc. and is using the money with little or no accountability whatsoever. And as this has been going on from the time of predecessors of CICC - CSIC & ICCRC since 21 long years one can very well imagine its magnitude what it has costed the Nation. This amount when added up over these years will amount to if not more Hundreds of Millions of Dollars.

1.11 CICC was formed after dismantling of it's two (2) predecessors one after the other-CSIC & ICCRC on the same account - failure to meet the mandate. It has been 21 long years of failure to establish an effective independent self-regulating body of immigration and citizenship consultants. It is about time that now an effective and accountable regulating body for immigration and citizenship consultants is formed.

2. BACKGROUND

2.1. The client complaint matters (consolidated as one matter in the Discipline Committee hearing proceedings) were kept open for numerous years with some of the complaint matters having a 10 year long vintage. The entire hearing proceedings over the last 10 years leading to the final decision as well as the sanctions imposed on me involves serious criminal violations which include imposing illegal sanctions on me. The entire process until now has taken a huge toll on me, which includes but is not limited to mental, emotional and physical stress and harm, as well as it has impacted my practice due to the lasting effects on my reputation and credibility over such an extended period and as a result of the fraudulent final order and illegal sanctions imposed upon me and the company, WWICS of which I am a Director.

2.1.1 It is noteworthy that the complaints were kept open although I had given extensive

evidence of complaints not having any merit and of my being in compliance with regulations, code of conduct and ethics etc. as per the requirements of CICC as well as some of the complaints matter having been settled. These settlements were facilitated either due to the usual internal customer care process or because the clients were in communication to resolve the matter as well as through other third parties involved in the matter. I would also like to submit that the complaint matters were not serious matters and in case if they were the regulating body would not have kept the matters open for such a long period of time and that too without having me take any corrective measures.

2.2 My submissions that my rights under the Canadian Charter of Rights and Freedom were violated due to exorbitantly long and unjustified delay in concluding the Complaint matters, was rejected by the Discipline Committee.

2.3 During the process I discovered that the Complaint Investigator's Witness Evidence Form (WEF) submitted by CICC were unsigned and undated. It also came to my attention that the signatures of other witnesses on the evidence forms did not match with their actual signatures on various other documents on record. Additionally, I also noticed that the contents, grammatical flow, and vocabulary used in the evidence documents of the witnesses had striking coherence clearly establishing author of the evidence documents being the same individual. It also became clear that the evidence was purposely authored to give it a specific direction that the author intended it to have. This was not only unethical and unjust but was also in violation of Rule 46.1 d) of the Tribunal Committee Rules of Procedure states that "Only the witness's evidence should be in the Witness Evidence Form;....".

2.4 When I informed the Discipline Committee that the evidence documents of CICC's complaints investigator were unsigned and undated I was provided signed and dated documents. However, I found that the signatures were a total mismatch with the complaints investigator's actual signatures on numerous documents she had signed over several years which are on record in the hearing matter as part of Disclosures of CICC.

2.5 The fact that signatures of witnesses on evidence documents, especially those of the complaint's investigator did not match at all with the actual signatures of the witnesses and the actual signatures of the complaints investigator of CICC, was repeatedly brought to the attention of the Discipline Committee in case management conferences, via written submissions and the formal Motions. It was also pointed out that the supporting documents having the actual signatures of the witnesses and the lead investigator, substantiating signature mismatch on the evidence documents, were already a part of the proceedings as documents with the actual signatures were already part of the Disclosures of the College. In spite of clear and precise evidence of the signature mismatch the Complaints Committee repeatedly denied me justice by rejecting my submissions and Motions.

2.6 My submissions regarding, the coherence in the contents, grammatical flow, and vocabulary used in the evidence documents of the witnesses making it clear that the same individual had authored the evidence documents and had purposely given it a specific direction that the author intended, were not given any consideration at all.

2.7 I was also informed that some of the witnesses had given authority to the Counsel for the College to sign the evidence on behalf of the witnesses. When I asked for

the proof of authorization, I was provided with scanned copies of some documents that looked like email communication but without any proof of authenticity which can only be determined if Headers* of the emails are provided along with the emails. Our request for the Headers* was categorically denied.

2.8 It is also imperative to point out that there is not even a single supporting document provided by CICC to establish that the evidence submitted on behalf of Complaints Investigator Ms. Natalie Wruck is in fact her own evidence. The only thing provided by the college in response to my Motion filed regarding the evidence alleged to be that of Ms. Wruck is a blank document which appears to be an email with an attachment but with no written contents and no Header has been provided to establish its authenticity and if there was an actual document attached as an attachment. As stated above there is no other communication to support unsigned and undated version is in fact her own evidence. This is also applicable for the signed evidence documents with forged signatures of Ms. Wruck. Therefore admitting such documents as evidence is clear violation of the Law, procedural fairness, established legal norms and my legal rights.

2.9 Furthermore, when I requested copies of the observations made by the predecessor regulating body ICCRC's Complaints Investigator, as well as the finding of the complaints investigator of CICC made at the time of taking on the complaints matters against me from ICCRC, I was informed that there were no such reports or finding made by the ICCRC's Investigator or by CICC's complaint's investigator. It's important to note that all pending complaints previously under the purview of the predecessor regulatory body, ICCRC, were taken over by CICC without determining validity and grounds for continuity.

2.10 No justification for CICC having taken on the complaint matters "as is" from its predecessor regulating body ICCRC has been provided. It is to be noted that this was done although the operations of ICCRC were found to be tainted by the House of Commons Standing Committee of Citizenship and Immigration with respect to mismanagement, un-ethical practices, irregularities in its operations, failing to meet its mandate & mismanagement of the complaints process including but not limited to outsourcing of the complaints process to a company owned by the wife of a senior complaint investigator of ICCRC and as well as other serious violations done by ICCRC on several accounts.

2.11 Following are the factual details regarding CICC officials being involved in very serious criminal violations which include tampering with evidence, authoring, tailoring and editing the evidence, signing on behalf of the witnesses, making fraudulent documents and affidavits, forgery of documents, forgery of signatures of Discipline Committee (DC) and CICC officials, passing fraudulent Discipline Committee (DC) orders with forged signatures of Discipline Committee (DC) Panel members as well as other very serious violations which include submitting fraudulent documents and affidavits with forged signatures even to the Federal Court in numerous matters.

- (i) **Forgery of signatures of complaints investigator:** On November 24, 2022 **Adel Mian, Counsel for CICC** submitted evidence dated October 21, 2022 that he alleged was that of **complaints Investigator of CICC, Natalie Wruck** in my Hearing matter with forged signatures and claimed the signatures to be authentic.

I obtained two (2) separate Forensic Expert Reports specifically for verification of the signatures of complaints investigator, Natalie Wruck. Finding of two (2) Independent Professional Handwriting Forensic Experts state that the signatures on the Evidence documents dated October 21, 2022 alleged to be those of the complaints investigator, Natalie Wreck are forged signatures. Therefore, CICC presented evidence with forged signatures of Complaints Investigator Natalie Wruck.

- (ii) **Unauthentic and Inadmissible Evidence:** Adel Mian, Counsel for CICC is responsible for **Authoring, tailoring, editing and tempering with the evidence as well as signing the evidence on behalf of the witnesses:** The coherence in the contents, grammatical flow, and vocabulary used in the evidence documents of the witnesses substantiate that the same individual authored the evidence on behalf of witnesses. This was done purposely to give a specific direction to the Hearing matter that the author intended to give it. Moreover, this fabricated evidence was signed at CICC under the supervision on Adel Mian. When I challenged the authenticity of the evidence as well as the signatures not being genuine signatures of the complainants (witnesses) as they did not match with the signatures on agreements and other documents signed by the complainants (witnesses) I was informed that some of the witnesses had given authority to CICC to draft up and edit their evidence and to sign the evidence on behalf of them. When I asked for the proof of authorization I was provided with scanned copies of some documents that looked like email communication but without any proof of authenticity which can only be determined if Headers of the emails are provided along with the emails. This has also been confirmed by the Digital Forensic Expert in his report attached herewith and which is already on records of CICC and DC. My request for the Headers was categorically denied by Adel Mian as well as the Discipline Committee which only exists on paper but is actually run illegally by certain officials of CICC and its prosecution wing.

Thereafter I decided to have the Evidence Examined by Digital Forensic Expert and obtained a Digital Forensic Examination Report on the evidence. Findings given in the Digital Forensic Examination Report are as follows:-

- (i) The documents are not digitally signed.
- (ii) The data on the Evidence documents can be easily edited.
- (iii) A good practice when signing documents not digitally is to have a witness also sign the document. None of the documents examined have been witnessed.
- (iv) An even better practice for entering documents as evidence is to have the document(s) sworn or affirmed in front of a commissioner for taking affidavits in the province of jurisdiction. The process would look like this: The person wanting to enter documents as evidence would prepare a PDF file which contains a combination of typed

documents, scanned documents and/or images. The completed PDF file will be printed to paper. This paper document would then be taken to a commissioner for taking affidavits and the contents would be sworn or affirmed as being true. Each page would be

initialed and the last page signed by both parties. This initialed and signed document would then be scanned and this would create the final version. This final version would be suitable for presenting as evidence which is not the case in this matter.

- (v) The documents examined do not meet this standard and everything in them can be questioned.
- (vi) Also the expert opinion about the email evidence received from CICC states that the emails appear to be a standard email printout and anything in the emails can be edited and changed including the header.
- (vii) Original emails in the email file format including headers are needed to make a proper determination of authenticity (common email file formats are .eml and .msg).

The Forensic Evidence clearly substantiates the forgery of signatures and the evidence of CICC being completely unreliable, unauthenticated and inadmissible. Therefore, the proceedings in my hearing matter were based on Witness Evidence Documents which were authored, tailored, edited and tempered with and were signed on behalf of the witnesses. The evidence was totally unreliable, unauthentic and inadmissible as per the Digital Forensic Report I obtained on the evidence.

- (iii) **Adel Mian**, Counsel for CICC even went to the extent of:
 - Submitting a **fraudulent Affidavit** on behalf of Investigation Supervisor of CICC, **Robert Stewart** with **forged Robert Stewart signatures** to fraudulently support that the forged signatures of Natalie Wruck were her authentic signatures.
 - On this affidavit a signature was cut and digitally applied under the name of **Justin Gattesco** who is Counsel for CICC - as the lawyer attesting the Affidavit. **These signatures are also forged signatures.**
 - It is to be noted that Adel Mian has presented documents **under the forged signature of Justin Gattesco even to the Federal Court of Canada.**

Justin Gattesco signatures on various documents from a Federal Court case file (Immigration Consultants of Canada Regulatory Council v. Syed Atiqur Rahman and the Minister of Citizenship and Immigration Docket: IMM-2834-19 Citation: 2020FC832) along with the Robert Stewart Affidavit was submitted for Forensic Evaluation and Examination and a Forensic Report was obtained.

The Forensic Report established that:-

- Justin Gattesco signatures and Robert Stewart signatures are digitally applied on the affidavit submitted by Adel Mian.
- However, the Justin Gattesco signature has been written then digitally applied. The signature of Robert Stewart is a keyed script font digitally applied. A keyed script font is a computer font that was typed, copied then applied as a digital signature to mimic a written signature.
- There were multiple hands that authored additional Justin Gattesco signatures on the documents obtained from the Federal Court case file. In Forensic Expert's opinion 5 different authors signed Justin Gattesco signatures on the Federal Court case file documents.
- Justin Gattesco signatures on Robert Stewart's affidavit are not genuine and has been written by altogether a different hand.

Adel Mian, Counsel for CICC also submitted a **fraudulent Affidavit** on behalf of **Danielle Kim, Counsel for CIC** along with fraudulent Robert Stewart Affidavit. This affidavit has same **Justin Gattesco forged signatures** cut and pasted on this fraudulent Affidavit as done on the fraudulent Robert Stewart Affidavit.

(iv) CICC and Adel Mian, Counsel for CICC are also responsible for the Discipline Committee (DC) orders being issued under the names of **Officials of Discipline Committee with Forged Signatures**.

For the same reasons CICC and Adel Mian are responsible for the documentation produced and submitted in matters with **forged signatures of CICC officials**.

It is to be noted that Adel Mian has presented such documents under the **forged signature even to the Federal Court of Canada**.

I obtained handwriting Identification Information and Forensic Document Report of Brenda Petty which established that **as many as four (4) different hands wrote the 17 different signatures of the officials of DC and CICC and thereafter cut and pasted the signatures digitally**.

Following are the names of the 17 officials of CICC and DC mentioned in the report:-

1. Timothy (Tim) Snell – Lead Counsel (CICC)
2. Michael Huynh – Director of Professional Conduct (CICC)
3. Eban Bayefsky – Panel Member (DC), Public Representative
4. Vincenzina Buffa – Panel Member (DC), Public Representative
5. Enza Buffa – Panel Member (DC), Public Representative
6. Ben Fok – Panel Member (DC) & Member (CICC)

7. Cindy Ramkissoon – Chairperson (DC) & Member (CICC)
8. Sylvia Bertrand – Chairperson (DC) & Member (CICC)
9. Mila Aberten – Chairperson (DC) & Member (CICC)
10. Teddy Kwan – Panel Member (DC), Public Representative
11. Alicia Swinamer – Panel Member (DC), Public Representative
12. Tom Ryan – Chairperson (DC), Public Representative
13. Lauri Sanford – Chairperson (DC), Public Representative
14. Perminder Sidhu – Panel Member (DC) & Member (CICC)
15. Eli Fellman – Chairperson (DC), Public Representative
16. Louis-Rene Gagnon – Panel Member (DC), Public Representative
17. Rakesh Mehta – Chairperson (DC) & Member (CICC)

(v) Upon investigating the issue concerning forgery of signatures further I discovered that the signatures of Stan Belevici, Chair of Board of Directors of CICC and John Murray, President and CEO of CICC had striking similarities with some signatures in the Forensic Report – On forgery of 17 signatures of CICC and DC officials mentioned above.

Hence I had another Forensic Evaluation and Examination done and got the Forensic Report which states that:-

- a. Stan Belevici Signatures and John Murray Signatures have extraordinary amount of handwriting similarities and writing habits therefore they could have been written by the same hand.
- b. John Murray Signatures have significant similarities in writing habit to Mila Aberten, Teddy Kwan, and Cindy Ramkissoon signatures (the signatures in the Forensic Report – On forgery of 17 signatures).
- c. Likewise Stan Belevici signatures have significant similarities in writing habit to Ben Fok and Sylvia Bertrand signatures (the signatures in the Forensic Report – On forgery of 17 signatures).
- d. Forensic Expert has mentioned that it is also her professional opinion that with the similarity in writing habits between John Murray and Stan Belevici and the probability that the signatures were written by the same hand, it would also follow suite that all the signatures contained in the red graph could have been written by the same hand and not seven (7) individual hands.
- e. All the signatures have been digitally affixed.

(vi) I requested and received from the Federal Court from the Federal Court Case file - Khan v. Immigration Consultants of Canada Regulatory Council – 2021 FC 381 – 2021-04-29, Docket: IMM-1767-21 Federal Court Decision - Mumtaz Ali Khan Membership # R4413223 Discipline Committee Decision - 01-APR-21 Counsel for ICCRC – **Adel Mian** DC official - **Cindy Ramkissoon** – Chairperson (DC) & Member (ICCRC/CICC).

- (i) It became clear from these documents that **Adel Mian**, represented the matter as Counsel for ICCRC (now CICC) and submitted documents to Federal Court with the same **Justin Gattesco forged signatures** cut and pasted on the documents as was done on the **fraudulent Affidavits of Robert Stewart and Danielle Kim** in my hearing matter.
- (ii) **Adel Mian** has also knowingly submitted the DC documents with cut and pasted **Cindy Ramkissoon** signatures to the Federal Court. **Cindy Ramkissoon** is one of the DC officials named on the Forensic Report – on forgery of 17 signatures of CICC and DC officials.
- (iii) **Adel Mian** even went to the extent of submitting a **fraudulent Affidavit** on behalf of **Nicole Jones, Law Clerk for CICC to the Federal Court**. This affidavit has same **Justin Gattesco forged signatures** cut and pasted on this fraudulent Affidavit as done on the fraudulent Affidavits of Robert Stewart and Danielle kim in my Hearing Matter.
- (vii) Thereafter I received additional documents from the Federal Court Case File in the above-noted matter, which include an Affidavit under the name of **Natalie Wruck**, Complaints Investigator for (ICCRC & CICC).

It is to be noted that **Natalie Wruck** signatures placed on this affidavit were forged signatures. Additionally, same **Justin Gattesco forged signatures** had been affixed to this **fraudulent Natalie Wruck** affidavit to attest it as was done on the **fraudulent affidavits of Robert Stewart, Danielle Kim and Nicole Jones**.

Therefore, this is yet another instance in which fraudulent documents, an affidavit in this case in addition to Nicole Jones Affidavit, with forged signatures has directly been submitted to the Federal Court by **Adel Mian**.

- (viii) Upon finding similarities in the handwriting of the Forged Natalie Wruck Signatures on the Witness Evidence Form submitted by Adel Mian on November 24, 2022, Forged Natalie Wruck signatures on the Fraudulent Natalie Wruck Affidavit submitted by Adel Mian to the Federal court mentioned above and Signatures of Adel Mian, I got Forensic Examination and Evaluation done of these signatures and obtained a Forensic Report. The findings mentioned in the Forensic Report are as follows:-

- Natalie Wruck Signatures on the Natalie Wruck Affidavit are forged signatures.

- Natalie Wruck Signatures on the Natalie Wruck Witness Evidence Form are forged signatures.
 - Natalie Wruck signatures placed on Natalie Wruck affidavit are forged signatures and in addition Justin Gattesco forged signatures have been affixed on Natalie Wruck Affidavit.
 - The Affidavit is a completely fraudulent affidavit just like Robert Stewart Affidavit mentioned in the Forensic Report on Robert Stewart & Justin Gattesco signatures.
 - Forensic report made it clear that Forged Natalie Wruck signatures on Natalie Wruck Witness Evidence Form and Forged Natalie Wruck Signatures on Natalie Wruck Affidavit have been crafted by the same hand.
 - It is to be noted that the Forensic Expert found similarities between the writing habits of Adel Mian and the hand that crafted the two (2) forged Natalie Wruck signatures and has explained the similarities in the report. Therefore she has suggested that Adel Mian authored the forged Natalie Wruck signatures on the Affidavit as well as on the Natalie Wruck Witness Evidence Form.
- (ix) The officials of CICC and its Prosecution wing passed the final order in my hearing matter on November 24, 2023 showing on paper that the order has been passed by Discipline Committee Panel Members. However, in fact the order has been drafted and passed under forged signatures of the Discipline Committee Panel Members by these officials of CICC and its Prosecution wing. In the order they have pinned on me every single allegation they tailored themselves against me. In doing so they did not agree to include the Forensic Reports on forgery of complaints investigator, Natalie Wruck's signatures as well as other very crucial and important Forensic Reports as evidence in the Hearing Matter but instead admitted fraudulent Affidavits of Robert Stewart and Danielle Kim along with other inadmissible evidence they themselves prepared.

It is to be noted that these orders are under the names of DC officials named on the Forensic Report – on forgery of 17 signatures by 4 individuals and have the same cut and pasted signatures as on the other DC orders as well as given in the Forensic Report. The names of DC officials are – **Lauri Sanford** – Chairperson (DC), Public Representative, **Perminder Sidhu** – Panel Member (DC) & Member (CICC) & **Vicenzina Buffa** – Panel Member (DC), Public Representative.

Note – All three (3) decisions - Decision in My Hearing Matter – Dated, November 24, 2023, Decision on Motion Moved by My Brother, Devinder

Sandhu in the Same Hearing Matter - Dated, November 24, 2023, Decision on my Motion - Dated,

August 3, 2023 have been issued under the names of the same three (3) Discipline Committee Panel Members with the forged signatures of the three (3) Panel Members on all three (3) orders which are identified as forged signatures in the Forensic Report – on forgery of 17 signatures of officials of CICC and DC by 4 individuals.

- (x) Further to the details mentioned above I would also like bring it to the attention of the court that - I was able to obtained authentic signatures of one (1) of the three (3) DC members, Perminder Sidhu who has been named as the one of the DC members out of three (3) DC members on three (3) Decisions - two (2) decisions dated November 24, 2023 and one (1) decision dated August 3, 2023.

Kirandeep Kaur, a resident of Brampton and an employee of WWICS Canada Inc. visited the office of Prime Immigration Inc. on January 9, 2024 after taking a prior appointment with Perminder Sidhu of Prime Immigration Inc. located at 2120 North Park Drive, Unit 1, Brampton, Ontario, L6S 0C9. One of the staff members of Prime Immigration Inc. introduced Kirandeep Kaur to Perminder Sidhu by his name. Perminder Sidhu introduced himself to Kirandeep Kaur by his name as well. Kirandeep Kaur discussed the requirements of Super Visa for her mother with Perminder Sidhu and at end of the consultation session Kirandeep was allowed to take a picture of the Initial Consultation Agreement that Perminder Sidhu had her sign and that Perminder Sidhu signed himself as well. Perminder Sidhu kept the original. When Kirandeep questioned Perminder Sidhu about the name of the Immigration Consultant mentioned on Prime Immigration Inc's Initial Consultation Agreement as Mandeep Dhaliwal instead of Perminder Sidhu's name Perminder Sidhu stated that it is a standard Initial Consultation Agreement that they use at Prime Immigration Inc. and although Mandeep Dhaliwal's name is mentioned on it, he signed it as he can do so being a member in good standing with the College of Immigration and Citizenship Consultants.

After obtaining the authentic signatures of Perminder Sidhu which he signed on his company's - Prime Immigration Inc's Initial Consultation Agreement I sent the Initial Consultation Agreement with his authentic signatures for Forensic Examination along with the three (3) decisions with forged signatures of the DC members and obtained a Forensic Report. **This Forensic Report clearly states that someone did indeed forge the signatures of Perminder Sidhu on the three (3) DC Decisions mentioned above – two (2) decisions dated November 24, 2023 and one (1) decision dated August 3, 2023.**

I therefore respectfully submit that all of these three (3) Decisions are Fraudulent.

- (xi) Furthermore, CICC went on to pass an Order against me dated April 10, 2024 on Penalties, Sanctions and Costs concluding the Hearing Matter **with the same forged signatures of DC Panel Member- Perminder Sidhu as well as forged signatures of the other DC Panel members.**

The fraudulent order passed with the forged signatures imposed the following sanction on me:-

- i. My licence was immediately revoked and I was told to notify both current and prospective customers of this revocation;
- ii. I was prohibited from applying for licence for a period of two years from the date of the decision;
- iii. I will be jointly and severally liable to pay refunds to Complainants in the amount of \$22,057;
- iv. I will be liable to pay refunds to Complainants in the amount of \$10,649;
- v. I will be liable to pay refunds to Complainants in the amount of \$7,736;
- vi. I will be jointly and severally liable to pay fines to the College in the amount of \$10,000.
- vii. I will be liable to pay an amount of \$152,800 on account of the costs of the College in investigating and litigating the matter.
- viii. I have to notify all current clients of the WWICS Group who are using immigration consulting services of WWICS Group of my revocation using the following wording in that notice:

We, Devinder Sandhu and Parvinder Sandhu, are advising you that our licences to practice as Regulated Canadian Immigration Consultants have been revoked by the College of Immigration and Citizenship Consultants. This means that we can no longer practice as Regulated Immigration Consultants and we can no longer offer, or hold ourselves out as qualified to offer, any immigration consulting service which requires an immigration consulting licence to provide.

- ix I have to post prominently on the home page of any web site of the Sandhu brothers that offers or promotes immigration consulting services the following notice, which will be contained in a bordered box. The notice will read:

This is to advise that the licences of Mr. Parvinder

Sandhu and of Mr. Devinder Sandhu as Regulated Canadian Immigration Consultants have been revoked by order of the College of Immigration and Citizenship Consultants. This means that Mr. P. Sandhu and Mr. D. Sandhu may no longer practice as licenced immigration consultants and may no longer offer, or hold themselves out as qualified to offer, any immigration consulting services which require an immigration consulting licence to provide.

2.12 It is to be noted that the Discipline Committee did not have the legislative authority of imposing any of the sanctions mentioned above other than revoking the license and, if at all allowed by the legislation, at the very most imposing a penalty of not more than the prescribed amount. Imposition of a Penalty on revoking of the license is also questionable as penalty is applicable only when the license is not being revoked and after paying the penalty the member is allowed to practice.

2.13 Regarding rest of the sanctions, it is a matter of grave concern that the College of Immigration and Citizenship Consultants in direct contravention of the s.81(1) and s.81(2) of the Act has been making certain by-laws and in particular by-laws on subject matter contained within paragraphs of s.81(1))(c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) illegally for the purpose of imposing such illegal sanctions and the Discipline Committee of the College has been imposing such illegal sanctions for years altogether now.

2.13.1 As per the College of Immigration and Citizenship Consultants Act s.69(3) If the Discipline Committee determines that the licensee has committed professional misconduct or was incompetent, the Committee may, in its decision, take or require one or more of the following actions as well as any other action set out in the regulations:

- (a) impose conditions or restrictions on the licensee's licence;
- (b) suspend the licensee's licence for not more than the prescribed period or until specified conditions are met, or both;
- (c) revoke the licensee's licence; or
- (d) require the licensee to pay a penalty of not more than the prescribed amount to the College.
- (e) **[Repealed, 2023, c. 26, s. 292]**

2.13.2 As stated above the Discipline Committee can only take one or more of the actions stated above **or any other actions set out in the regulations.** Therefore, it is a mandatory legal requirement as per the legislation that Discipline Committee's actions other than the actions stated above must be set out in the regulations.

2.13.3 With respect to the Regulations, the College of Immigration and Citizenship Consultants Act states the following:

Regulations — Governor in Council

s. 81 (1) The Governor in Council may make regulations for carrying out the purposes and provisions of this Act, including regulations

- **(a)** respecting the compensation fund referred to in section 13, including the circumstances in which compensation may be paid;
- **(b)** respecting the reports and information that must be provided or submitted to the Minister;
- **(c)** prescribing ineligibility criteria for the purposes of section 20;
- **(d)** respecting the consequences of meeting the ineligibility criteria referred to in section 20 while in office;
- **(e)** respecting the conflicts of interest of directors, members of the Complaints Committee, members of the Discipline Committee and members of any other committee of the College;
- **(f)** respecting the Complaints Committee, the Discipline Committee and any other committees of the College, including the powers, duties and functions of those committees, the eligibility requirements for membership in them, the remuneration of members, the terms of members and their removal;
- **(g)** establishing committees of the College;
- **(h)** respecting the eligibility requirements to be appointed as Registrar and the Registrar's remuneration;
- **(i)** respecting the register of licensees, including the contents of the register and the manner in which it is to be made available to the public;
- **(j)** respecting the issuance of licences, establishing a process for making decisions under subsection 33(1) and prescribing the circumstances in which the process is to be followed;
- **(k)** respecting the verifications referred to in section 35 and imposing limits on the exercise of the powers under that section;
- **(l)** prescribing the circumstances in which the Registrar must initiate a complaint and refer it to the Complaints Committee for consideration;
- **(m)** establishing a process for making decisions under section 38 and prescribing the circumstances in which the process is to be followed;

- **(n)** respecting the actions that may be taken or required by the Registrar under section 38, which may include the requirement to pay a monetary penalty, and specifying the amount or maximum amount of such a penalty;
- **(o)** limiting the powers, duties and functions that may be delegated by the Registrar and the persons to whom they may be delegated;
- **(p)** respecting the examination and copying of a thing under section 51 and the removal of the thing for examination or copying;
- **(q)** respecting the circumstances in which the Registrar, the Complaints Committee, an investigator and the Discipline Committee may obtain and use privileged information, the process to be followed by them in order to obtain and use that information and the limits to obtaining and using that information;
- **(r)** prescribing the circumstances in which the Complaints Committee must refer a complaint, in whole or in part, to the Discipline Committee;
- **(s)** respecting the actions that may be taken or required by the Discipline Committee under subsections 68(1) and 69(3), which may include the requirement to reimburse all or a portion of the costs incurred by the College or by any other person during the proceeding before the Committee or all or a portion of the fees or disbursements paid to the licensee by a client or to pay a monetary penalty, and specifying the amount or maximum amount of such a penalty;
- **(t)** prescribing the circumstances in which the actions referred to in paragraph (s) may be taken or required;
- **(u)** prescribing the manner in which decisions and reasons of the Discipline Committee are to be made available to the public and the circumstances in which decisions and reasons of the Committee are not required to be made available to the public;
- **(v)** prescribing the circumstances in which the Minister may appoint a person under section 75 and imposing limits on the powers, duties, functions, conditions and period that the Minister may specify under that section;
- **(w)** respecting the collection, retention, use, disclosure and disposal of personal information for the purposes of this Act; and
- **(x)** prescribing anything that, by this Act, is to be or may be prescribed.

Note:- s.81(1) makes it clear that only Governor in Council may make regulations.

2.13.4 College of Immigration and Citizenship Consultants Act further states the following regarding the Regulations and Authorization given by the Regulations:

Marginal note: Authorization

s. 81(2) Regulations made under paragraphs (1)(c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) may authorize the College to make by-laws with respect to all or part of the subject matter of the regulations and, for greater certainty, those by-laws are regulations for the purposes of the Statutory Instruments Act.

2.13.5. I would like to bring the following facts to the attention of the court :

- (a) s. 80(1) of the College of Immigration and Citizenship Consultants Act authorizes CICC to make By-Laws. Such By-laws that are made are only by-laws and not regulations.
- (b) s. 81(1) states that the Governor in Council may make regulations for carrying out the purposes and provisions of this Act, including regulations as stated in paragraphs (a) to (x).
- (c) It is to be noted that s. 80(1) which authorizes by-laws to be made has been drafted separately from s.81(1) which authorizes Governor in Council to make Regulations.
- (d) The powers of making regulations under s.81(1) are only conferred upon the higher authority of – Governor in Council for a reason. On close examination of the subject matter contained within the paragraphs of s.81(1) (a) to (x) it becomes absolutely clear that the subject matter contained therein requires a higher degree of authority than what CICC can be authorized to exercise and therefore they are conferred upon the Governor in Council to make regulations on. It is for this reason s.81(1) - for making regulations has been separated from s.80(1)- for making by-laws.
- (e) Furthermore, it has been clearly stated in s.81(2) of the Act that if Governor in Council makes the regulations with respect to the subject matter contained within paragraphs of s.81(1))(c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) and authorizes the College within those regulations to make by-laws with respect to all or part of the subject matter of the regulations and, for greater certainty, those by-laws are regulations for the purposes of the Statutory Instruments Act.

- (f) Therefore, it is absolutely clear that Governor in Council has to first make the Regulations with respect to the subject matter contained within the paragraphs of s.81(1) (c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) and within those regulations authorize the College to make by-laws with respect to all or part of the subject matter of such regulations for such by-laws to be considered regulations for the purpose of the Statutory Instruments Act.
- (g) As Governor in Council has not made any Regulation with respect to the subject matter contained within the paragraphs of s.81(1) (c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) and in particular has not made any regulations authorizing the College to make any of the by-laws with respect to all or part of the subject matter of the regulations, therefore any such by-laws made on the subject matter by the College are illegal and furthermore, cannot by any means be considered regulations for the purposes of the Statutory Instruments Act and therefore fail to meet the requirements of s. 69(3) of the Act that requires them to be regulations in order for them to be imposed.
- (h) Consequently, it is clearly established that the College of Immigration and Citizenship Consultants has been making certain by-laws and in particular by-laws on subject matter contained within paragraphs of s.81(1) (c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) illegally and in direct contravention of the s.81(1) and s.81(2) of the Act.
- (i) Furthermore, CICC has been doing so for the purpose of imposing illegal sanctions and the Discipline Committee of the College has been imposing such illegal sanctions for years altogether now and has done so in my case as well.

2.14 Furthermore the College of Immigration and Citizenship Consultants Act states the following:

Offences and Punishment

Marginal note: Offences and punishment

- s. 79 (1)** Every person who contravenes section 55, 70 or 73.4 or an order made under paragraph 66(a) is guilty of an offence and liable
 - **(a)** on conviction on indictment, to a fine of not more than \$50,000 or to imprisonment for a term of not more than two years, or to both; or
 - **(b)** on summary conviction, to a fine of not more than \$10,000 or to imprisonment for a term of not more than six months, or to both.

2.15 Therefore, CICC has been engaged in serious criminal violations which includes enforcing the illegal by-laws and have been subjecting people to the harsh penalties and punishments mentioned in s.79(1) of the Act for years now.

2.16 Discipline Committee of CICC is required to be an independent adjudicative panel operating free from the influence of CICC, Complaints Committee and CICC's Prosecution wing. It is mandatory for it to operate at "an arm's length". However, as things have come to light in this matter it is clear that CICC and its Prosecution wing has not only overshadowed the "independent adjudicative wing" but has completely in its absolute totality taken over the "independent adjudicative wing" – Discipline Committee and the Tribunal Office by completely dissipating it and leaving its existence merely on paper. This has been executed to an extent whereby CICC and its Prosecution wing are preparing the orders themselves and are placing forged signatures of the DC panel members on the orders and at times decisions are being conveyed by using Tribunal office staff email ids without any signatures.

2.17 The state of affairs with respect to the complaints process at CICC is such that CICC and its Prosecution wing are making up fraudulent documents and fraudulent affidavits to suit their needs and as convenient to them. Thereafter to give it finality and authenticity forged signatures of officials are cut and placed digitally and in case of affidavits they are attested with cut and digitally pasted forged signatures.

2.18 Following is a list of about 33 cases out of a large number of cases affected by the unprincipled, deceitful, unethical and devious functionality of CICC involving CICC preparing the orders and forgery of signatures on the orders. In these cases Discipline Committee Orders and Decisions have been issued under the names of DC officials named in the Forensic Report - on forgery of 17 signatures of CICC and DC officials by 4 hands. Also included are cases in which Timothy (Tim) Snell, Adel Mian and Justin Gattesco were Counsels. In all of these cases extent of severity of orders passed range from license Revocation, Suspension and Restrictions to practice.

1. Abeer Qita R506904 17-Apr-20 – DC official - **Lauri Sanford** – Chairperson (DC), Public Representative, **Permindar Sidhu** – Panel Member (DC) & Member (CICC), **Louis-Rene Gagnon** – Panel Member (DC), Public Representative
2. Amandeep Singh Khaira R413191 24-March-23 – DC Official - **Eli Fellman** – Chairperson (DC), Public Representative
3. Artem Djukic R409919 8-Jan-20 – DC Officials - **Ben Fok** – Panel Member (DC) & Member (CICC), **Louis-Rene Gagnon** – Panel Member (DC), Public Representative, **Alicia Swinamer** – Panel Member (DC), Public Representative.
4. Balbir Singh Hothi R412031 12-Oct-22 Counsel for CICC- **Justin Gattesco** DC Official - **Ben Fok** – Panel Member (DC) & Member (CICC)
5. Baljit Singh Kailay R509415 18-Oct-21 DC Official - **Eli Fellman** – Chairperson (DC), Public Representative
6. Carl Mark Benito R515855 14-Sep-18 DC Official - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC)
7. Carlito Manansala Benito R508779 14-Sep-18 DC Official - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC)
8. Cem Turetken R508954 17-Apr-19 DC Officials - **Ben Fok** – Panel Member (DC) & Member (CICC), **Alicia Swinamer** – Panel Member (DC), Public Representative
9. Charles Benito R516032 14-Sep-18 DC Official - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC)

10. Dunstan Munro R416111 8-Nov-18 DC Official - **Perminder Sidhu** – Panel Member (DC) & Member (CICC)
11. Garsendy Emmanuel Guillaume R507422 14-Apr-21 DC Official - **Louis-Rene Gagnon** – Panel Member (DC), Public Representative
12. Ghazal Lankarani R507069 12-Jun-23 DC Officials - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC), **Alicia Swinamer** – Panel Member (DC), Public Representative
13. Gurpreet Khaira R413175 24-March-23 Counsel for CICC – **Justine Gattesco** DC Official - **Eli Fellman** – Chairperson (DC), Public Representative
14. Hartar Singh Sohi R512927 22-Jun-22 Counsel for CICC – **Adel Mian** DC official - **Lauri Sanford** – Chairperson (DC), Public Representative
15. Hazel Roque R511671 17-Mar-22 Counsel for CICC – **Justine Gattesco** DC Officials - **Lauri Sanford** – Chairperson (DC), Public Representative, **Sylvia Bertrand** – Chairperson (DC) & Member (CICC)
16. James Norris R416599 17-Dec-22 DC Official - **Lauri Sanford** – Chairperson (DC), Public Representative
17. Kamalpreet Singh Khaira R413167 24-March-23 Counsel for CICC- **Justin Gattesco** DC Official - **Eli Fellman** – Chairperson (DC), Public Representative
18. Kuldeep Kaur R507741 08-Sep-22 Counsel for CICC- **Justin Gattesco** DC Official - **Lauri Sanford** – Chairperson (DC), Public Representative
19. Kwang Woo Park R416999 DC Official - **Lauri Sanford** – Chairperson (DC), Public Representative
20. Liza Lucion R506401 Counsel for CICC – **Timothy (Tim) Snell**
21. Nageshwar Yendamuri R423199 29-Jul-20 DC Officials - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC), **Eban Bayefsky** – Panel Member (DC), Public Representative
22. Nana Mikhelidze R415671 12-Jul-19 DC Official - **Sylvia Bertrand** – Chairperson (DC) & Member (CICC)
23. Natasha Thompson R420415 3-Feb-22 DC Officials - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC), **Ben Fok** – Panel Member (DC) & Member (CICC), **Eban Bayefsky** – Panel Member (DC), Public Representative
24. Navdeep Batth R535853 28-Jan-21 DC Officials - **Lauri Sanford** – Chairperson (DC), Public Representative, **Ben Fok** – Panel Member (DC) & Member (CICC), **Enza Buffa** – Panel Member (DC), Public Representative
25. Nir Babani R407271 14-Dec-21 DC officials - **Lauri Sanford** – Chairperson (DC), Public Representative
26. Oleksandr Arbetov R407007 27-Feb-19 DC Officials - **Rakesh Mehta** – Chairperson (DC) & Member (CICC), **Alicia Swinamer** – Panel Member (DC), Public Representative
27. Osama Ebid R530337 26-May-21 DC Officials - **Rakesh Mehta** – Panel Member (DC) & Member (CICC), **Eban Bayefsky** – Panel Member (DC), Public Representative
28. Robert Busby R515176 30-Nov-21 Counsel for CICC – **Adel Mian** DC Official - **Louis-Rene Gagnon** – Panel Member (DC), Public Representative

29. Robert Proulx R417415 23-Jan-19 DC Officials - **Louis-Rene Gagnon** – Panel Member (DC), Public Representative, **Sylvia Bertrand** – Chairperson (DC) & Member (CICC)
30. Robin Edoh R410167 11-Jul-23 Counsel for CICC – **Justin Gattesco**
31. Rupinder Batth R407671 28-Jan-21 DC Officials - **Lauri Sanford** – Chairperson (DC), Public Representative, **Ben Fok** – Panel Member (DC) & Member (CICC), **Enza Buffa** – Panel Member (DC), Public Representative
32. Sumit Sen R418703 19-Oct-21 Counsel for CICC- **Adel Mian** DC Official - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC)
33. Yan Chi R509252 12-Apr-22 Counsel for CICC – **Adel Mian** DC Official - **Sylvia Bertrand** – Chairperson (DC) & Member (CICC)

2.19 Given the Forensic Examination and Evaluation findings of forgery of Justin Gattesco signatures mentioned in the Forensic Report mentioned above and already on CICC and DC records, it is crucial to bring the following cases to your attention in which Justin Gattesco has been shown to be representing CICC/ICCRC in the Federal Court. It is also important to bring it to your attention that in some of these cases DC orders and decisions submitted to the Federal Court are under the names of DC officials named in the Forensic Report - on forgery of 17 signatures by four (4) individuals.

Therefore, I request you to take a note of this and hold the Counsel and other officials who submitted forged documents in these cases to the Federal Court accountable.

1. Immigration Consultants of Canada Regulatory Council v. Rahman - 2020 FC 832 - 2020-08-18, Docket: IMM-2834-19 - Federal Court Decision - **Justin Gattesco** For The Applicant Daniel Kingwell For The Respondent.
2. Boldt v. College of Immigration and Citizenship Consultants - 2021 FC 1465 - 2021-12-23, Docket: T-1890-21 Federal Court Decisions - **Justin Gattesco** For The Respondent SOLICITORS OF RECORD: Pitblado LLP
 - a. Douglas Randal Boldt R407999 12-NOV-19 DC Official - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC)
 - b. 20-May-20 DC Official - **Lauri Sanford** – Chairperson (DC), Public Representative
3. Boldt v. College of Immigration and Citizenship Consultants - 2023 FC 802 - 2023-06-07, Docket: T-1890-21 Federal Court Decisions **Justin Gattesco** For The Respondent SOLICITORS OF RECORD: Todd C. Andres
 - a. Douglas Randal Boldt R407999 12-NOV-19 DC Official - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC)
 - b. 20-May-20 DC Official - **Lauri Sanford** – Chairperson (DC), Public Representative

4. Bansal v. Immigration Consultants of Canada Regulatory Council - 2019 FC 1273 - 2019-10-09, Docket: IMM-5458-19 Federal Court Decisions – **Justin Gattesco** FOR the Respondent IMMIGRATION CONSULTANTS OF CANADA REGULATORY COUNCIL
5. Yendamuri v. Immigration Consultants of Canada Regulatory Council - 2022 FC 888 - 2022-06-14, Docket: IMM-5181-20 Federal Court Decisions – **Justin Gattesco** FOR THE RESPONDENT IRCC Marherita Braccio FOR THE RESPONDENT MINISTER OF CITIZENSHIP AND IMMIGRATION
 - a. Nageshwar Yendamuri R423199 29-Jul-20 DC Officials - Cindy Ramkissoon – Chairperson (DC) & Member (CICC), Eban Bayefsky – Panel Member (DC), Public Representative
6. Following is a list of some other Federal Court cases in which DC orders and decisions submitted to the court are under the names of DC officials named in the Forensic Report - on forgery of 17 signatures by 4 hands.
1. Immigration Consultants of Canada Regulatory Council v. Bansal – 2022 FC 1070 – 2022-07-19, Docket: IMM-6736-20 Federal Court Decision
 - a. Kuldeep Bansal R407527 22-APR-20 DC official - **Eli Fellman** – Chairperson (DC), Public Representative
 - b. 17-JUN-20 DC officials - **Lauri Sanford** – Chairperson (DC), Public Representative, **Rakesh Mehta** – member (DC) & Member (CICC)
2. Khan v. Immigration Consultants of Canada Regulatory Council – 2021 FC 381 – 2021-04-29, Docket: IMM-1767-21 Federal Court Decision
 - a. Mumtaz Ali Khan R4413223 01-APR-21 Counsel for ICCRC – **Adel Mian** DC official - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC)
3. Ebid v. Immigration Consultants of Canada Regulatory Council – 2021 FC 755 – 2021-07-16, Docket: IMM-3590-21 Federal Court Decision
 - a. Osama Ebid R530337 26-May-21 DC Officials - **Rakesh Mehta** – Panel Member (DC) & Member (CICC), **Eban Bayefsky** – Panel Member (DC), Public Representative
4. Benito v. Immigration Consultants of Canada Regulatory Council - 2019 FC 1628 - 2019-12-18 Federal Court Decisions
 - a. Carlito Manansala Benito R508779 14-Sep-18 DC Official - **Cindy Ramkissoon** – Chairperson (DC) & Member (CICC)

2.20 From the cases listed above, which are although only a small part of the actual totality, the extent of damage caused by criminal violations happening at CICC can be well imagined.

2.21 It is a cause of very serious concern that a regulatory body that has absolutely no qualms about engaging in such serious criminal and unethical violations is in possession and control of an exorbitantly enormous sum of money collected from its members as membership fee, continuing education fee, fines and penalties etc. and is using the money with little or no accountability whatsoever. And as this has been going on from the time of predecessors of CICC - CSIC & ICCRC since 21 long years one can very well imagine its magnitude what it has costed the Nation. This amount when added up over these years will amount to if not more Hundreds of Millions of Dollars.

2.22 CICC was formed after dismantling of its two (2) predecessors one after the other-CSIC & ICCRC on the same account - failure to meet the mandate. It has been 21 long years of failure to establish an effective independent self-regulating body of immigration and citizenship consultants. It is about time that now an effective and accountable regulating body for immigration and citizenship consultants is formed.

2.23 This is a very serious matter not only due to 17,000 Immigration and Citizenship Consultant members of College of Immigration and Citizenship Consultants (CICC) being affected, but also due to the element of causes and effects on the entire Immigration Sector nationally within Canada as well as internationally for Canada as a nation due to and directly as a result of fraudulency, forgery, deceit and deception in criminally duplicitous functionality and operations of CICC at a magnitude of astonishing extremity.

2.24 I have provided the essential information, facts and have evidence in form of Eight (8) forensic reports and supporting documentation, a copy of which is already with the Defendants, which clearly establish that these proceedings are based on solid grounds supported by concrete facts with undeniable and irrefutable evidence.

2.25 I have filed a Judicial Review against CICC which is underway at the Federal Court, Court File Number: T-983-24. However, the domain of Judicial Review and its scope is different from this Action Lawsuit and hence this Action Lawsuit is being filed separately.

3. Reasons for the Action:

3.1 The hearing proceedings as well as the orders passed during and on conclusion of the hearing in the matter entails CICC officials being involved in very serious criminal violations which include tampering with evidence, authoring, tailoring and editing the evidence, signing on behalf of the witnesses, making fraudulent documents and affidavits, forgery of documents, forgery of signatures of Discipline Committee (DC) and CICC officials, passing fraudulent Discipline Committee (DC) orders with forged signatures of Discipline Committee (DC) Panel members as well as other very serious violations which include submitting fraudulent documents and affidavits with forged signatures even to the Federal Court in numerous matters.

Following are the specific criminal violations done at CICC:-

1. Forgery of signatures of complaints investigator of CICC, Natalie Wruck.
2. Forgery of signatures of Investigation Supervisor of CICC, Robert Stewart.
3. Forgery of signatures of Justin Gattesco, Counsel for CICC.
4. Submitting Fraudulent Affidavit of Robert Stewart, Investigation Supervisor of CICC.
5. Submitting Fraudulent Affidavit of Danielle Kim, Counsel for CICC.
6. Submitting Fraudulent Affidavit of Nicole Jones, Law Clerk of CICC.
7. Submitting Fraudulent Affidavit of Natalie Wruck, Complaints Investigator.
8. Forgery of signatures of 17 officials of CICC and Discipline Committee (DC) officials of CICC on documents, affidavits, decisions and orders by four (4) individuals.
9. Forgery of signatures involving Stan Belevici, Chair of the Board of Directors of CICC and John Murray, President and CEO of CICC.
10. Submitting fraudulent documents with forged signature in Hearing Matters as well as to the Federal Court.
11. Authoring, tailoring and editing of the evidence on behalf of the witnesses (complainants) and Signing of the evidence documents on behalf of the witnesses (complainants).
12. In my hearing matter issuing Four (4) Fraudulent Decisions with Forged Signatures of DC members and in particular Perminder Sidhu, DC member.

Note: This is supported by undeniable and irrefutable evidence which stands on solid unshakable foundation of eight (8) Forensic Reports as well as supporting documentation.

13. The fraudulent order passed with the forged signatures imposed the following sanction on me:-
 - i. My licence was immediately revoked and I was told to notify both current and prospective customers of this revocation;

- ii. I was prohibited from applying for licence for a period of two years from the date of the decision;
- iii. I will be jointly and severally liable to pay refunds to Complainants in the amount of \$22,057;
- iv. I will be liable to pay refunds to Complainants in the amount of \$10,649;
- v. I will be liable to pay refunds to Complainants in the amount of \$7,736;
- vi. I will be jointly and severally liable to pay fines to the College in the amount of \$10,000.
- vii. I will be liable to pay an amount of \$152,800 on account of the costs of the College in investigating and litigating the matter.
- viii. I have to notify all current clients of the WWICS Group who are using immigration consulting services of WWICS Group of my revocation using the following wording in that notice:

We, Devinder Sandhu and Parvinder Sandhu, are advising you that our licences to practice as Regulated Canadian Immigration Consultants have been revoked by the College of Immigration and Citizenship Consultants. This means that we can no longer practice as Regulated Immigration Consultants and we can no longer offer, or hold ourselves out as qualified to offer, any immigration consulting service which requires an immigration consulting licence to provide.

- ix. I have to post prominently on the home page of any web site of the Sandhu brothers that offers or promotes immigration consulting services the following notice, which will be contained in a bordered box. The notice will read:

This is to advise that the licences of Mr. Parvinder Sandhu and of Mr. Devinder Sandhu as Regulated Canadian Immigration Consultants have been revoked by order of the College of Immigration and Citizenship Consultants. This means that Mr. P. Sandhu and Mr. D. Sandhu may no longer practice as licenced immigration consultants and may no longer offer, or hold themselves out as

qualified to offer, any immigration consulting services which require an immigration consulting licence to provide.

3.2 It is to be noted that the Discipline Committee did not have the legislative authority of imposing any of the sanctions mentioned above other than revoking the license and, if at all allowed by the legislation, at the very most imposing a penalty of not more than the prescribed amount. Imposition of a Penalty on revoking of the license is also questionable as penalty is applicable only when the license is not being revoked and after paying the penalty the member is allowed to practice.

3.3 Regarding rest of the sanctions, it is a matter of grave concern that the College of Immigration and Citizenship Consultants in direct contravention of the s.81(1) and s.81(2) of the Act has been making certain by-laws and in particular by-laws on subject matter contained within paragraphs of s.81(1) (c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) illegally for the purpose of imposing such illegal sanctions, as imposed on me, and the Discipline Committee of the College has been imposing such illegal sanctions on members for years altogether now.

3.4 The College has been enforcing these illegal by-laws mentioned above and have been subjecting people to the harsh penalties and punishments as per s.79(1) of the Act for years now.

3.5 No justification for CICC having taken on the complaint matters “as is” from its predecessor regulating body ICCRC was provided. It is to be noted that this was done although the operations of ICCRC were found to be tainted by the House of Commons Standing Committee of Citizenship and Immigration with respect to mismanagement, un-ethical practices, irregularities in its operations, failing to meet its mandate & mismanagement of the complaints process including but not limited to outsourcing of the complaints process to a company owned by the wife of a senior complaint investigator of ICCRC and as well as other serious violations done by ICCRC on several accounts.

3.6 My submissions that my rights under the Canadian Charter of Rights and Freedom have been violated due to exorbitantly long and unjustified delay in concluding the Complaint matters have been rejected by the Discipline Committee.

3.7 The entire hearing proceedings over the last 10 years leading to the final decision as well as the sanctions imposed on me involves serious criminal violations which include imposing illegal sanctions on me. The entire process until now has taken a huge toll on me, which includes but is not limited to mental, emotional and physical stress and harm, as well as it has impacted my practice due to the lasting effects on my reputation and credibility over such an extended period and as a result of the fraudulent final order and illegal sanctions imposed upon me and the company, WWICS of which I am a Director.

4. Claim:

College of Immigration and Citizenship Consultants is responsible for:

- 4.1 Violating my rights under the Canadian Charter of Rights and Freedom by denying me justice over a period of 10 years by keeping the complaints matters open;
- 4.2 Preparing and presenting fraudulent documents and affidavits;
- 4.3 Preparing and presenting documents with forged signatures of CICC officials;
- 4.4 Preparing and presenting documents with cut and digitally applied forged signatures of CICC officials;
- 4.5 Preparing and presenting fraudulent Discipline Committee Orders;
- 4.6 Preparing and presenting Discipline Committee Orders with forged signatures of Discipline Committee members;
- 4.7 Preparing and presenting Discipline Committee Orders with cut and digitally applied forged signatures of Discipline Committee members;
- 4.8 Making by-laws illegally in direct contravention of s.81(1) and s.81(2) of the Act;
- 4.9 Making illegal by-laws - in particular by-laws on subject matters contained within paragraphs of s.81(1)) (c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) for the purpose of imposing illegal sanctions on exorbitantly large number of members as done in my case;
- 4.9 Enforcing the illegal by-laws and subjecting people to the harsh penalties and punishments mentioned in s.79(1) of the Act;
- 4.10 Denying my basic rights such as refusal to provide substantive proof including Headers of emails from witnesses authorizing CICC to prepare and sign the Evidence on their behalf;
- 4.11 Denying to provide any justifiable basis for taking on the complaint matters handled by its predecessor ICCRC "as is" without investigating them especially when operations of ICCRC were found to be tainted by the House of Commons Standing Committee of Citizenship and Immigration;
- 4.12 This is a very serious matter not only due to 17,000 Immigration and Citizenship Consultant members of College of Immigration and Citizenship Consultants (CICC) being affected, but also due to the element of causes and effects on the entire Immigration Sector nationally within Canada as well as internationally for Canada as a nation due to and directly as a result of fraudulency, forgery, deceit and deception in criminally duplicitous functionality and operations of CICC at a magnitude of astonishing extremity.
- 4.13 It is a cause of very serious concern that a regulatory body that has absolutely no qualms about engaging in such serious criminal and unethical violations is in

possession and control of an exorbitantly enormous sum of money collected from its members as membership fee, continuing education fee, fines and penalties etc. and is using the money with little or no accountability whatsoever. And as this has been going on from the time of predecessors of CICC - CSIC & ICCRC since 21 long years one can very well imagine its magnitude what it has costed the Nation. This amount when added up over these years will amount to if not more Hundreds of Millions of Dollars.

4.14 CICC was formed after dismantling of it's two (2) predecessors one after the other-CSIC & ICCRC on the same account - failure to meet the mandate. It has been 21 long years of failure to establish an effective independent self-regulating body of immigration and citizenship consultants. It is about time that now an effective and accountable regulating body for immigration and citizenship consultants is formed.

5. DAMAGES

The defendant knew or ought to have known that the consequence of their actions, criminal violations, illegal acts, violation of my rights under the Canadian Charter of Rights and Freedom, denial of justice at each step of the process would result in a huge toll on me in multiple ways, which would include but would not be limited to mental, emotional and physical stress and harm, as well as it would impact my practice due to the lasting effects on my reputation and credibility over such an extended period and as a result of the fraudulent final order and illegal sanctions imposed upon me and the company, WWICS I am a Director. I have suffered and continue to suffer from the harm, injury and damages including but not limited to:

- 5.1 Loss of professional reputation and credibility;
- 5.2 Loss of credibility of WWICS, the company I am a Director of;
- 5.3 Extreme Difficulties in the operations of WWICS due to loss of credibility;
- 5.4 Exorbitant Financial loss in the professional practice;
- 5.5 Exorbitant Financial loss in the business of WWICS;
- 5.6 Effects on my other businesses
- 5.7 Extreme emotional suffering;
- 5.8 Extreme psychological suffering;
- 5.9 Extreme mental suffering;
- 5.10 Extreme physical suffering;

- 5.11 Loss of income;
- 5.12 Extreme humiliation in society;
- 5.13 Loss of enjoyment in life
- 5.14 Depression;
- 5.15 Effects on self esteem;
- 5.16 Effects on self confidence;
- 5.17 Expenses and Costs incurred during the complaint process, hearing proceedings, on the orders being issued and thereafter;
- 5.18 Legal Expenses and Costs incurred till date;
- 5.19 Value of effort, energy and resources consumed since the very beginning;
- 5.20 Such other past, present and future damages as I, the plaintiff may advise and this Honorable Court may Consider.

6. RELIEF SOUGHT

The Plaintiff seeks the following relief from the Court:

- 6.1 A declaration that CICC violated my rights under the Canadian Charter of Rights and Freedom by denying me justice over a period of 10 years by keeping the complaints matters open.
- 6.2 A declaration that during the hearing proceedings as well as the orders passed during and on conclusion of the hearing in the matter entails CICC officials being involved in very serious criminal violations which include tampering with evidence, authoring, tailoring and editing the evidence, signing on behalf of the witnesses, making fraudulent documents and affidavits, forgery of documents, forgery of signatures of Discipline Committee (DC) and CICC officials, passing fraudulent Discipline Committee (DC) orders with forged signatures of Discipline Committee (DC) Panel members as well as other very serious violations which include submitting fraudulent documents and affidavits with forged signatures even to the Federal Court in numerous matters.
- 6.3 A declaration that CICC is responsible for the following specific criminal violations:-
 - 1. Forgery of signatures of complaints investigator of CICC, Natalie Wruck.
 - 2. Forgery of signatures of Investigation Supervisor of CICC, Robert Stewart.
 - 3. Forgery of signatures of Justin Gattesco, Counsel for CICC.
 - 4. Submitting Fraudulent Affidavit of Robert Stewart, Investigation Supervisor of

CICC.

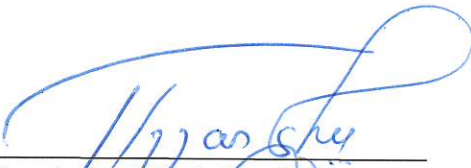
5. Submitting Fraudulent Affidavit of Danielle Kim, Counsel for CICC.
 6. Submitting Fraudulent Affidavit of Nicole Jones, Law Clerk of CICC.
 7. Submitting Fraudulent Affidavit of Natalie Wruck, Complaints Investigator.
 8. Forgery of signatures of 17 officials of CICC and Discipline Committee (DC) officials of CICC on documents, affidavits, decisions and orders by four (4) individuals.
 9. Forgery of signatures involving Stan Belevici, Chair of the Board of Directors of CICC and John Murray, President and CEO of CICC.
 10. Submitting fraudulent documents with forged signature in Hearing Matters as well as to the Federal Court.
 11. Authoring, tailoring and editing of the evidence on behalf of the witnesses (complainants) and Signing of the evidence documents on behalf of the witnesses (complainants).
 12. In my hearing matter issuing Four (4) Fraudulent Decisions with Forged Signatures of DC members and in particular Perminder Sidhu, DC member.
 13. Preparing and presenting Discipline Committee Orders with forged signatures of Discipline Committee members
 14. Preparing and presenting Discipline Committee Orders with cut and digitally applied forged signatures of Discipline Committee members.
- 6.4 A declaration that CICC is responsible for making by-laws illegally in direct contravention of s.81(1) and s.81(2) of the College of Immigration and Citizenship Consultants Act;
- 6.5 A declaration that CICC is responsible for making illegal by-laws - in particular by-laws on subject matters contained within paragraphs of s.81(1))(c) to (f), (h) to (j), (l) to (p), (r), (s), (u) and (x) for the purpose of imposing illegal sanctions on exorbitantly large number of members as done in my case.
- 6.6 A declaration that CICC is responsible for enforcing the illegal by-laws and subjecting people to the harsh penalties and punishments mentioned in s.79(1) of the Act.
- 6.7 A declaration that CICC is responsible for denying my basic rights such as refusal to provide substantive proof including Headers of emails from witnesses authorizing CICC to prepare and sign the Evidence on their behalf.
- 6.8 A declaration that CICC is responsible for denying to provide any justifiable basis for taking on the complaint matters handled by its predecessor ICCRC "as is" without investigating them especially when operations of ICCRC were found to be tainted by the House of Commons Standing Committee of Citizenship and Immigration.
- 6.9 A declaration that CICC is liable to me, the plaintiff for the consequence of its actions, criminal violations, illegal acts, violation of my rights under the Canadian Charter of Rights and Freedom, denial of justice as a result of which I have suffered and continue to suffer from the harm, injury and damages in multiple ways elaborated in section 5 above.

- 6.10 Damages in the amount of 333 Million
- 6.11 Punitive and Exemplary damages in the amount of 111 Million
- 6.12 Cost of this action on a substantial indemnity scale or in an amount that provides full indemnity
- 6.13 Such further and other relief as this Honorable Court deems just and appropriate in the given circumstances
- 6.14 As CICC violations concern all Registered Canadian Immigration Consultants (RCIC) who are licensed and regulated by CICC approximately 17000 as well as multiple other facets related to Canadian Immigration Sector. Therefore, it is requested that this aspect be dealt by this Honorable Court as deemed just and suitable.

The plaintiff proposes that this action be tried at Toronto.

Respectfully submitted this 7th day of June, 2024.

Sincerely,



Parvinder Singh Sandhu
WWICS Canada Inc.
160 Traders Blvd, Suite 211
Mississauga, Ontario, L4Z 3K7
Phone: (416) 414-8906,
Email: parvindersandhu.ps@gmail.com
Plaintiff