

Canada Border Services Agency  
Email: [media@cbsa-asfc.gc.ca](mailto:media@cbsa-asfc.gc.ca)

May 7, 2024

**Re: Request to replace “immigration consultant” with UAP when referring to Maneet ‘Mani’ Malhotra**

Dear Sir/Madam,

On behalf of the Canadian Association of Professional Immigration Consultants (CAPIC), while I would like to thank the Agency’s crackdown on unauthorized practitioners (UAPs), I also I would like to bring to your attention a significant issue with the news release in [“CBSA investigation leads to conviction of immigration consultant for fraud”](#) dated May 6, 2024.

In the headline, the term “immigration consultant” was used to describe this unauthorized practitioner (UAP) who committed the offence prescribed in [s 91\(9\)](#) the *Immigration and Refugee Protection Act*, SC 2001, c. 27 (IRPA). However, after the coming into force of the *College of Immigration and Citizenship Act*, SC 2019, c. 29, s. 292 (the College Act), “immigration and citizenship consultant” becomes a designation for licensees, namely, RCICs or RISIAs, of the College of Immigration and Citizenship Consultants (CICC). In addition, any variations of the designation, including “immigration consultant” are only to be used to refer to the RCICs or RISIAs. Please refer to [s 2](#) and [77\(a\)](#) to see the stipulations mentioned.

CAPIC respectfully requests the Agency to make the necessary changes to the text and replace “immigration consultant” with the appropriate term “unauthorized practitioner” (UAP), which describe persons like Maneet ‘Mani’ Malhotra who carry out immigration services without legal authorization.

I trust the above clarifications are helpful to both the Agency and the general public.

Being the sole association recognized by the Government of Canada as the voice of RCICs, CAPIC is committed to promoting the ethics and competence of our members and protecting the integrity of the RCIC profession and the Canadian immigration



Canadian Association of  
Professional Immigration Consultants  
L'Association Canadienne des  
Conseillers Professionnels en Immigration

system. If CAPIC may further assist with the Department, we will be glad to work with you and your team.

Yours Truly,

Dory Jade, C. Dir.  
Chief Executive Officer  
CAPIC-ACCPI

c John Murray  
President & CEO, Registrar, CICC

Julie Watkinson  
Executive Director and Senior General Counsel, CBSA

Aaron McCrorie  
Vice-President, Intelligence and Enforcement Branch, CBSA

A/Lisa Laurencelle-Peace  
Regional Director General: Prairie, CBSA

**RE: Request to replace “immigration consultant” with UAP when referring to Maneet ‘Mani’ Malhotra**

@cbsa-asfc.gc.ca>

Tue 2024-05-07 3:02 PM

To: Hui Zhang, CAPIC <communications@capic.ca>; Media (CBSA/ASFC) <MediaCBSA-ASFC@cbsa-asfc.gc.ca>

Good Afternoon Mr. Zhang,

Thank you for your email. The Canada Border Services Agency has already updated the title of our News Release to clarify, including our social media.

Warm regards,

Spokesperson, Media Relations | Porte-parole, Relations avec les médias  
Canada Border Services Agency | Agence des services frontaliers du Canada

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**From:** Hui Zhang, CAPIC <communications@capic.ca>  
**Sent:** May 7, 2024 5:35 PM  
**To:** Media (CBSA/ASFC) <MediaCBSA-ASFC@cbsa-asfc.gc.ca>

**Subject:** Request to replace “immigration consultant” with UAP when referring to Maneet ‘Mani’ Malhotra

Dear Sir/Madam,

I'm sending this letter on behalf of the CEO, Mr. Dory Jade, of the Canadian Association of Professional Immigration Consultants (CAPIC).

Mr. Jade would like to thank the Agency's crackdown on unauthorized practitioners (UAPs). He also would like to bring to your attention a significant issue with the news release "[CBSA investigation leads to conviction of immigration consultant for fraud](#)" dated May 6, 2024.

Respectfully, he requests the Agency to replace "immigration consultant" with "unauthorized practitioner".

Please see the enclosed letter for details. Thank you.

Yours truly,

**Hui Zhang, RCIC-IRB**  
**Policy & Lobbying Research Coordinator | Coordonnatrice de Recherche, Politiques et Lobbying**

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**The Canadian Association of Professional Immigration Consultants (CAPIC)**



[www.capic.ca](http://www.capic.ca)



The Canadian Association of Professional Immigration Consultants (CAPIC) leads, connects, protects, and develops the profession, serving the best interests of its members.

L'Association Canadienne des Conseillers Professionnels en Immigration dirige, branche, protège et développe la profession de conseiller en immigration, servant les intérêts de ses membres.