



June 25, 2026
Sandra E. Martin, Standards Editor
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The Globe and Mail
351 King Street East, Suite 1600
Toronto, ON M5A 0N1

Re: Correction request – "End the Sleight of Hand of Immigration Consultants" (Editorial, May 17, 2026)

Dear Ms. Martin,

Thank you for getting back to me. I am writing to share the information you requested, which may be helpful for a future piece.

The "ghost consultants" identified in your editorial are only the most visible part of a broader problem. Under paragraph [91\(9\)](#) of IRPA, the wider category of unauthorized practitioners (UAPs) includes anyone who provides charged immigration advice or representation without being an authorized representative under paragraphs 91(2) to (4). These are the actors driving the fraud your editorial rightly condemns, and CAPIC members are often the first to see the harm they cause.

Several related issues may not yet be fully visible: the scale of UAP activity compared with the licensed profession; gaps in federal enforcement, including how IRPA paragraph 91(9) is and is not prosecuted in practice; recent overseas trends involving shell credentials, fee-splitting, and document fraud directed to Canada; and the day-to-day realities licensed consultants encounter that rarely appear in public coverage.

I have attached a short briefing note outlining the points above: scale, enforcement gaps, recurring UAP patterns, and source contacts, for your reference as you see fit. If helpful, I would be glad to arrange a brief call at your convenience, even for just 10 minutes.

Thank you for your time and consideration.

Sincerely,

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



cc: Hon. Lena Metlege Diab, Minister of Immigration, Refugees and Citizenship
David Walmsley, Editor-in-Chief, The Globe and Mail
Patrick Brethour, Editorials Editor, The Globe and Mail

CAPIC-ACCPI | BRIEFING NOTE

Subject: Unauthorized Practitioners and Immigration Fraud in Canada

Prepared for: Sandra E. Martin, Standards Editor, The Globe and Mail

Date: June 25, 2026

Contact: Dory Jade, Chief Executive Officer, CAPIC-ACCPI | dory.jade@capic.ca | (416) 483-7044 ext. 26

Summary

Immigration fraud in Canada is driven primarily by **unauthorized practitioners (UAPs)**. They are individuals who offer immigration advice or representation without licensure under the Immigration and Refugee Protection Act, SC 2001, c. 27 (IRPA). The conduct is criminalized under [s. 91\(9\)](#) of IRPA, but enforcement is limited. [Immigration consultants](#) encounter UAP-related harm daily and are the most reliable source of on-the-ground intelligence on how the fraud operates.

1. The legal framework

- **IRPA s. 91(9):** It is a federal offence to represent or advise a person on an immigration matter for consideration unless authorized.
- **IRPA s. 91(2): Authorized representatives** are limited to: licensees of the College of Immigration and Citizenship Consultants, members of a provincial law society (lawyers and, in some provinces, paralegals), and members of the Chambre des notaires du Québec.
- **The College of Immigration and Citizenship Consultants Act, SC 2019, c. 29, s. 292, s. 77:** The title “immigration consultant” and its variations are reserved for College licensees.

Anyone else providing immigration advice for a fee, in Canada or overseas, is operating outside the law.

2. Scale

- RCICs and RISIAs as of June 30, 2025: **11,994 and 507, respectively**¹
 - The number of UAP operations shut down by the College in 2025: **5,390**²
 - The number of UAPs being reported to the College since 2021: 682³
 - UAPs convicted under IRPA in 2024 to 2025: 6⁴
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3. Enforcement gaps

- IRPA s. 91 is prosecuted rarely. Investigative resources sit with the CBSA and RCMP,⁵ both with broader mandates and competing priorities.
- The College’s enforcement jurisdiction extends only to its own licensees. It can discipline RCICs and RISIAs; it cannot prosecute UAPs. That gap is structural.

- Overseas UAPs are largely beyond Canadian reach: no jurisdiction, and host-country authorities rarely prioritize the conduct.
- Civil remedies for defrauded applicants are slow, costly, and frequently uncollectible against operators using shell entities.

4. How UAP fraud operates (recurring patterns)

- **Shell credentials:** UAPs misrepresent themselves as RCICs,⁶ lawyers, or generic “consultants” – including by cloning RCIC numbers and licensee names on websites and WeChat/WhatsApp channels.
- **Fee-splitting and referral chains:** Overseas agents collect fees and route applicants to (sometimes complicit, sometimes unwitting) Canadian intermediaries.
- **Document fraud:** Fabricated employment records, education credentials, and language test results – often supplied as part of the UAP service package.
- **Major source markets according to IRCC:** Abu Dhabi, Beijing, Bogota, Chandigarh and Lagos.⁷
- **Target programs:** economic class,⁸ study permits,⁹ LMIA-linked work permits,¹⁰ asylum, spousal sponsorship.¹¹

5. What immigration consultants see that does not reach coverage

- Applicants arriving at an RCIC’s office after losing status because of UAP-prepared filings.
- Fee theft cases – applicants who paid five-figure sums to a UAP and received nothing.
- Misrepresentation findings under IRPA s. 40 (five-year inadmissibility) imposed on applicants who were themselves the victims of UAP-prepared applications.
- Pressure on RCICs to remediate UAP-damaged files with limited remedies available.

6. Sources available

CAPIC can connect the Globe and Mail with:

- RCICs in Toronto, Vancouver, and Montréal who handle UAP-related fallout regularly.
- RCICs with overseas-market experience (South Asia, East Asia, MENA, Latin America).
- Aggregate, anonymized case data on request.

¹ [CICC 2025 Annual Report](#), pp. 12-13

² [CICC 2025 Annual Report](#), p. 18

³ Pratyush Dayal, “Rising problem’ of ghost consultancies hits man who lost \$12K trying to get Canadian visa for wife,” CBC News, updated March 19, 2025, [online](#).

⁴ [Canada Border Services Agency’s 2024 to 2025 Departmental results report](#), modified November 17, 2025.

⁵ IRCC, “Question Period Note: IMMIGRATION AND CITIZENSHIP CONSULTANTS,” April 15, 2024, [online](#).

⁶ Jon Hernandez, “B.C. immigration consultant discovers forged foreign worker documents — with her name on them,” CBC News, updated May 3, 2025, [online](#).

⁷ *Supra*, note 5.

⁸ Kerry Campbell, “‘Everybody knows’ PNP immigrants were bypassing P.E.I., accused told investigator,” CBC News, posted January 9, 2019, [online](#).

⁹ The Economic Times, “Indian immigration agent pleads guilty in international students fraud case in Canada; sentenced to three years in jail,” updated May 31, 2024, [online](#).

¹⁰ CAPIC, “CAPIC’s Recommendations for the Temporary Foreign Worker Program Reform,” submitted October 2, 2024, p.8, [online](#).

¹¹ IRCC, “Immigration marriage fraud,” May 15, 2025, [online](#).