

F I L E D	FEDERAL COURT COUR FÉDÉRALE May 19, 2026 19 mai 2026 Justin DeSousa	D É P O S É
MTL	7	

Court File No.: IMM-7743-26

FEDERAL COURT
(Cour fédérale)

MOTION RECORD

Motion in writing (Rule 369 FCR) for leave to intervene under Rule 109

Applicants: [REDACTED] and [REDACTED] a minor
Respondents: Minister of Citizenship and Immigration; Minister of Public Safety and Emergency Preparedness
Proposed Intervener: Victor Manuel Gutierrez Verduzco

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FEDERAL COURT

(Cour fédérale)

BETWEEN:

██

and

██

a minor, represented by his litigation guardian

██

Applicants

— and —

(1) THE MINISTER OF CITIZENSHIP AND IMMIGRATION

(2) THE MINISTER OF PUBLIC SAFETY AND EMERGENCY PREPAREDNESS

Respondents

— and —

VICTOR MANUEL GUTIERREZ VERDUZCO

Proposed Intervener

NOTICE OF MOTION

(Form 359)

*Motion in writing under Rule 369 of the Federal Courts Rules,
seeking leave to intervene under Rule 109*

TAKE NOTICE that **Victor Manuel Gutierrez Verduzco**, of ██████████
Montreal, Quebec, ██████████ self-represented, brings this motion in writing under **Rule 369 of the Federal Courts Rules, SOR/98-106**.

THE PROPOSED INTERVENER, EXERCISING THE RIGHT CONFERRED BY RULE 109(1) OF THE FEDERAL COURTS RULES — which empowers any person to seek, by motion, leave to intervene in a proceeding — **RESPECTFULLY MOVES THIS HONOURABLE COURT** to grant such leave to the proposed intervener in the present matter.

CONTENT REQUIRED BY RULE 109(2) OF THE FEDERAL COURTS RULES

(a) Particulars of the proposed intervenor (Rule 109(2)(a)). The proposed intervenor is Victor Manuel Gutierrez Verduzco, of [REDACTED], self-represented.

(b) The manner in which the proposed intervenor wishes to participate and the way in which that participation will assist the determination of a factual or legal issue related to the proceeding (Rule 109(2)(b)).

(b)(i) The proposed intervenor wishes to participate, in order of preference and in the alternative to one another, in any of the following procedural capacities:

- 1. Primarily, as an intervenor with full procedural rights**, in his dual capacity as: (i) father of the minor applicant [REDACTED] and former spouse of the applicant [REDACTED] with shared parental responsibility for the child at the time of the impugned events; and (ii) a person personally affected by the impugned administrative actions, in that those same actions comprise conduct and statements which the CBSA officers attributed to the proposed intervenor (including, without limitation, the M-1 Notice of Arrest issued by Officer LUCIER on 21 March 2026), which are recorded in the proposed intervenor's immigration record.
- 2. In the alternative**, as an intervenor with a scope limited to the factual and legal issues over which the proposed intervenor has first-hand personal knowledge, having been subjected, together with the applicants, to the same administrative process conducted by the CBSA on 21 March 2026 at the Montreal-Pierre Elliott Trudeau International Airport;
- 3. In the further alternative**, as a witness permitted to file an affidavit in the present matter, with a right of cross-examination, as granted to an intervenor with first-hand personal knowledge in *Molnar v. Canada (Citizenship and Immigration)*, 2012 FC 1076, at para. 25 and Order, para. 1(vi);
4. Such further and other relief as this Honourable Court considers just.

(b)(ii) That participation will assist this Court's determination of the factual and legal issues related to the proceeding for the following reasons:

The events of 21 March 2026 that gave rise to the present judicial review constitute a single procedural sequence conducted by the same CBSA officers in respect of the applicants and in respect of the proposed intervener at the same place and time. The issues raised in the IR-1 form — the alleged withdrawal by the applicants, the narrative attributed by the officers, the procedural sequence followed, and the coercive environment — and the personal impact on the proposed intervener are two sides of the same factual and legal situation: the proposed intervener can establish, through his first-hand personal knowledge, that the facts attributed by the officers did not occur as recorded, which is in turn consistent with the applicants' denial of the alleged withdrawal. Accordingly:

- a. with respect to the factual issues raised in Ground 2 of the IR-1 form (*withdrawal not free, informed and unequivocal*) and in Ground 4 (*procedural unfairness* in the coercive environment of 21 March 2026), the proposed intervener has first-hand personal knowledge, having been processed in the **same procedural sequence**, at the same place and time, by the same CBSA officers whose conduct is impugned (including, without limitation, Officers L. BEDROS, badge 6M93, and LUCIER), such that his direct evidence of what actually occurred is **consistent with and complementary to** the applicants' denial of the alleged *withdrawal*;
- b. with respect to the factual issue raised in Ground 5 of the IR-1 form (*CBSA officer-authored attributed narrative*), the statements and conduct that the CBSA officers attributed to the proposed intervener during that same procedural sequence — including, without limitation, those recorded in the M-1 *Notice of Arrest* issued by Officer LUCIER — form an **integral part of the same official narrative** whose validity is impugned in respect of the applicants; the proposed intervener can adduce evidence directly addressing those attributions, which the proposed intervener disputes and which are recorded in his Canadian immigration record, bearing, without limitation, on: (i) the inadmissibility proceeding under s. 44(2) IRPA currently open against him before the Immigration Division; (ii) the hearing of his own refugee protection claim pending before the Refugee Protection Division; and (iii) any future immigration, citizenship or public-safety proceeding in which that record is considered;

- c. with respect to the legal issue raised in Ground 3 of the IR-1 form (best interests of the child under *Baker v. Canada*, [1999] 2 SCR 817, and *Kanthasamy v. Canada*, 2015 SCC 61), the proposed intervener is the biological father of the minor applicant [REDACTED] [REDACTED] (8 years old, severely disabled), and the family separation resulting from the **same procedural sequence** affects the minor applicant and the proposed intervener as his father simultaneously, such that the parent-child relationship forms an integral part of the *best interests of the child* analysis the Court must conduct;
- d. with respect to the legal issue raised in Ground 1 of the IR-1 form (*ultra vires* under s. 42(2) IRPR), the proposed intervener can adduce documentary and testimonial evidence on the procedural sequence and administrative actions conducted by the CBSA on 21 March 2026 — **the same sequence** impugned in respect of the applicants — of which he has first-hand personal knowledge.

DECLARATION ON THE USE OF ARTIFICIAL INTELLIGENCE

The proposed intervener acknowledges that this Notice of Motion was prepared with the assistance of artificial intelligence tools. The proposed intervener has personally reviewed the entirety of the content of this document, assumes full responsibility for the statements of fact and law contained herein, and has verified each citation to the Federal Courts Rules, the Federal Courts Citizenship, Immigration and Refugee Protection Rules, the *Immigration and Refugee Protection Act*, and the case law relied upon.

DIRECTIONS OF THE COURT UNDER RULE 109(3)

The terms, conditions and directions applicable to the role of the intervener — including the service of documents, costs, rights of appeal and any other matter relating to the procedure to be followed by the intervener — are submitted to the determination of the Court under Rule 109(3) of the Federal Courts Rules.

FEDERAL COURT

(Cour fédérale)

SCHEDULE A — LIST OF EXHIBITS

*Referred to in the Affidavit of Victor Manuel Gutierrez Verduzco
Rule 80(3) of the Federal Courts Rules*

Exhibit	Description	Page
A-00	██████████ Birth Certificate of ██████████ ██████████	8
A-01	Refugee Protection Claimant Document (brown paper) of Victor Manuel Gutierrez Verduzco	10
A-02	Order for Release — Immigration Division, Member Yves Dumoulin (24 March 2026)	12
A-03	Form BSF 776 — Notice of Rights (Charter + Vienna Convention)	14
A-04	Form C-1 — List of Exhibits signed by Etienne Boily, CBSA Hearings Officer	16
A-05	Form M-1 — Notice of Arrest under s. 55 IRPA, Officer LUCIER (21 March 2026)	18
A-06	Form C-1 — Request for Admissibility Hearing / Detention Review	23
A-07	Form C-2 — Referral under s. 44(2) IRPA	25
A-08	Form IMM 5480 — Report under s. 44(1) IRPA, Doc ██████████	27
A-09	CBSA Call-in Letter to Victor Manuel Gutierrez Verduzco (26 March 2026)	30
A-10	CBSA documentary package — ██████████ + ██████████ (Forms IMM 5317, 5480, 1282)	32
A-11	eTA ██████████ — ██████████ — cancellation record	39
A-12	eTA ██████████ — ██████████ — cancellation record	42
A-13	MRI study of the minor applicant's skull (10 Sep 2024)	45
A-14	MRI study of the minor applicant's total spine (10 Sep 2024)	49

FEDERAL COURT

(Cour fédérale)

BETWEEN:

[Redacted]

and

[Redacted]

a minor, represented by his litigation guardian

[Redacted]

Applicants

— and —

(1) THE MINISTER OF CITIZENSHIP AND IMMIGRATION

(2) THE MINISTER OF PUBLIC SAFETY AND EMERGENCY PREPAREDNESS

Respondents

— and —

VICTOR MANUEL GUTIERREZ VERDUZCO

Proposed Intervener

AFFIDAVIT

(Form 80A)

Affidavit of Victor Manuel Gutierrez Verduzco


in support of the motion for leave to intervene under Rule 109

I, **Victor Manuel GUTIERREZ VERDUZCO**, in my capacity as proposed intervener under Rule 109(1) of the Federal Courts Rules, of [Redacted] Quebec, [Redacted], self-represented, being duly sworn, do hereby depose and say as follows:

The statements of fact are set out **as appearing in this document**, including the Notice of Motion preceding this Affidavit, the List of Exhibits (Schedule A), and Exhibits «A-00» through «A-14» accompanying it, which form an integral part of this Affidavit. I depose to these facts on the basis of my first-hand personal knowledge in accordance with Rule 81(1) of the Federal Courts Rules, except where I expressly state otherwise on the basis of information and belief.

SWORN (or AFFIRMED) before me at the City of Montreal, Province of Quebec, this _____ day of _____, 2026.

Commissioner for Taking Affidavits
(or as the case may be)



Signature of Deponent
Victor Manuel Gutierrez Verduzco

FEDERAL COURT

(Cour fédérale)

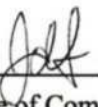
IDENTIFICATION BY THE COMMISSIONER

(Rule 80(3) of the Federal Courts Rules)

I, the Commissioner for Taking Affidavits before whom the foregoing Affidavit of Victor Manuel Gutierrez Verduzco was sworn (or affirmed), do hereby identify the exhibits listed below as the documentary evidence referred to in that Affidavit, in compliance with Rule 80(3) of the Federal Courts Rules:

Exhibits «A-00» through «A-14»

Identified at the City of Montreal, Province of Quebec, this 13 day of May, 2026.

 **JUSTIN DE SOUSA**
AGENT DU GREFFE
REGISTRY OFFICER
Name of Commissioner (printed): for the Federal Courts

Seal / Stamp:

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-00»

██████████ BIRTH CERTIFICATE OF

DOCUMENT TYPE	Mexican civil registry — Birth Certificate
SOURCE / ISSUER	Civil Registry of ██████████
DOCUMENT DATE	██████████
PAGES	1

This is Exhibit " A-00 " referred to in
the affidavit of Victor Manuel Gutierrez Verdugo
sworn before me in MAY 13 2026
on the 13 day of MAY 2026
[Signature]
Commissioner of oaths

**JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER**

FOLIO



Identificador Electrónico

A

Estados Unidos Mexicanos

Acta de Nacimiento

Clave Única de Registro de Población

Número de Certificado de Nacimiento

Entidad de Registro

Municipio de Registro

Comparación	Oficialia	Fecha de Registro	Libro	Número de Acta
AMBOS PROGENITORES	03009	23/04/2018	001	00182

Datos de la Persona Registrada

Nombre(s) _____ Primer Apellido _____ Segundo Apellido _____

MASCULINO _____

Sexo _____ Fecha de Nacimiento _____ Lugar de Nacimiento _____

Datos de Filiación de la Persona Registrada

VICTOR MANUEL _____ GUTIERREZ _____ VERDUZCO _____

Nombre(s) _____ Primer Apellido _____ Segundo Apellido _____ Nacionalidad _____ CURP _____

_____ _____ _____ _____

Nombre(s) _____ Primer Apellido _____ Segundo Apellido _____ Nacionalidad _____ CURP _____

Anotaciones Marginales	Certificación
-----	<p>EN NOMBRE DEL ESTADO DE SONORA Y CON LA FACULTAD QUE LE OTORGA EL ARTICULO 28 Y 37 DE LA LEY DEL REGISTRO CIVIL Y EL ARTICULO 18 FRACCIÓN III DEL REGLAMENTO INTERIOR DE LA SECRETARÍA DE GOBIERNO VIGENTE EN EL ESTADO DIRECTOR DE ARCHIVO ESTATAL DEL REGISTRO CIVIL:</p> <p>CERTIFICA</p> <p>QUE LOS DATOS QUE APARECEN EN LA PRESENTE ACTA SON UN EXTRACTO FIEL Y EXACTO DE SU ORIGINAL QUE OBRA EN EL LIBRO CORRESPONDIENTE EN EL ARCHIVO ESTATAL DEL REGISTRO CIVIL DEL ESTADO DE SONORA EXPEDIDA EN LÍNEA A MIÉRCOLES 20 DE SEPTIEMBRE DEL 2024. LOS DATOS ASENTADOS DE LAS ACTAS Y COPIAS CERTIFICADAS SE PRESUMIRÁN ACTUALIZADOS SALVO PRUEBA EN CONTRARIO DOY FE.</p>

Firma Electrónica Estatal Avanzada

Yrk.Herjgk0Nhe9P... [Redacted Signature]



ARCHIVO ESTATAL DEL REGISTRO CIVIL HERMOSILLO, SONORA

[Handwritten Signature]

LIC. HÉCTOR ADRIAN IBARRA LUNA DIRECTOR DE ARCHIVO ESTATAL DEL REGISTRO CIVIL

El contenido de esta acta puede ser verificado en la siguiente página: <https://registrocivil.sonora.gob.mx/validacion>

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-01»

REFUGEE PROTECTION CLAIMANT DOCUMENT

(brown paper)

OF VICTOR MANUEL GUTIERREZ VERDUZCO

DOCUMENT TYPE	Refugee Protection Claimant Document (RPCD)
SOURCE / ISSUER	Immigration, Refugees and Citizenship Canada (IRCC)
DOCUMENT DATE	21 March 2026
PAGES	1

This is Exhibit " A-01 " referred to in
the affidavit of VICTOR MANUEL GUTIERREZ VERDUZCO
sworn before me in MTL MAY 13 2026
on the _____ day of _____



Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER



CANADA

EB120 721 020

REFUGEE PROTECTION IDENTITY DOCUMENT / DOCUMENT D'IDENTITÉ DU DEMANDEUR D'ASILE

THIS IS TO CERTIFY THAT THE PERSON HEREIN HAS MADE A CLAIM FOR REFUGEE PROTECTION WITHIN THE MEANING OF THE IMMIGRATION AND REFUGEE PROTECTION ACT / CECI EST POUR CERTIFIER QUE LA PERSONNE CI-DESSOUS A FAIT UNE DEMANDE DE PROTECTION DES RÉFUGIÉS AU SENS DE LA LOI SUR L'IMMIGRATION ET LA PROTECTION DES RÉFUGIÉS

Application No. / Demande : [REDACTED]

UCI / IUC : [REDACTED]

CLIENT INFORMATION / INFORMATION DU CLIENT

Family Name / Nom de famille : GUTIERREZ VERDUZCO
Given Name(s) / Prénom(s) : VICTOR MANUEL
Date of Birth / Date de naissance : [REDACTED]
Country of Birth / Pays de naissance : [REDACTED]
Country of Citizenship / Citoyen de : [REDACTED]
Date Issued / Délivré le : 2026/03/21
Expiry Date / Date d'expiration : 2032/03/19

COPIE CONFORME

DATE: 24 MAR 2026 CODE: [REDACTED]

ADDITIONAL INFORMATION / INFORMATION SUPPLÉMENTAIRE

As of 2026/03/20 the above-named individual is eligible for the Interim Federal Health Program (IFHP). Eligibility can be cancelled without notice if the individual's immigration status changes.

- I, the undersigned:
- declare that I require coverage under the IFHP. I will notify IRCC immediately of any changes to my immigration status, or if I become eligible for or receive other health insurance;
- understand that my medical and personal information will be shared with IRCC, IFHP claims administration and other appropriate third-parties for the administration of the IFHP and that my personal information may be shared with other government institutions and other third-parties in accordance with the Privacy Act and the Department of Citizenship and Immigration Act.

À partir du 2026/03/20 la personne susmentionnée est admissible au Programme fédéral de santé intérimaire (PFSI). L'admissibilité peut être annulée sans préavis si le statut d'immigration de la personne change.

- Je, soussigné(e) :
- déclare que j'ai besoin de la couverture en vertu du PFSI. J'informerai immédiatement IRCC de tout changement quant à mon statut d'immigrant ou si je deviens admissible ou adhère à un autre régime d'assurance-santé;
- comprends que mes renseignements de nature médicale et personnelle seront communiqués à IRCC, à l'administrateur des demandes de règlement du PFSI et aux tierces parties appropriées aux fins de l'administration du PFSI, et que mes renseignements personnels pourraient être communiqués à d'autres institutions gouvernementales ou tierces parties en conformité avec la Loi sur la protection des renseignements personnels et la Loi sur le ministère de la citoyenneté et de l'immigration.

School age children do not need student authorization to attend primary or secondary schools. / Les enfants d'âge scolaire n'ont pas besoin d'une autorisation d'étude pour fréquenter une école primaire ou secondaire.



Signature of person concerned or guardian / Signature du titulaire ou tuteur/tutrice

S. Lucier
Immigration Official / Agent(e) d'immigration

NOT VALID FOR TRAVEL / NON VALIDE POUR VOYAGER

THIS FORM HAS BEEN ESTABLISHED BY THE MINISTER OF IMMIGRATION, REFUGEE AND CITIZENSHIP SERVICES / CE DOCUMENT EST LA PROPRIÉTÉ DU GOUVERNEMENT DU CANADA

Agence des services frontaliers du Canada
Canadian Border Services Agency
Audiences et détention - Section Immigration
Hearings and Detention - Immigration Division
1010, rue St-Antoine Ouest
Montréal (Québec) H3C 1B2

IMM 1442B (1 2018)



Canada

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-02»

ORDER FOR RELEASE
IMMIGRATION DIVISION
MEMBER YVES DUMOULIN

(24 March 2026)

DOCUMENT TYPE	Order for Release (Immigration Division)
SOURCE / ISSUER	Immigration and Refugee Board of Canada — Immigration Division
DOCUMENT DATE	24 March 2026
PAGES	1

This is Exhibit " A-02 " referred to in
the affidavit of VICTOR MANUEL GUTIERREZ VERDUZCO
sworn before me in montreal
on the day of MAY 13 2026

[Signature]
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER



Immigration and
Refugee Board of Canada
**Immigration
Division**

Commission de l'immigration
et du statut de réfugié du Canada
**Section de
l'immigration**

ID File Number: [REDACTED]

UCI / Client ID Number: [REDACTED]

Date of Birth: [REDACTED]

3-2026
CONDITIONS

ORDER FOR RELEASE

In the matter of the Minister of Public Safety and Emergency Preparedness and
GUTIERREZ VERDUZCO, Victor Manuel
[surname, given names of person concerned]

Before : YVES DUMOULIN, Member of the Immigration Division
[given names and surname in block letters]

Pursuant to the *Immigration and Refugee Protection Act (IRPA)*, it is hereby ordered that the person concerned be released from detention subject to the following conditions:

_____ Choose an item. _____ **
* performance bond ** in favour of the Receiver General for Canada

The person concerned shall:

- Present themselves at the date, time and place that a Canada Border Services Agency (CBSA) officer or the Immigration Division requires them to appear to comply with any obligation imposed on them under the IRPA, including removal, if necessary.
- Provide CBSA prior to release with their residential address and advise CBSA in person of any change in address prior to the change being made.
- Report to an officer Choose an item. at the CBSA office at Canada Border Services Agency, 1010 Saint-Antoine St. W, 2nd Floor, Montréal, QC H3C 1B2, Fax: 514-283-0460 on or before [date] _____ Date _____ and [frequency] _____ thereafter. A CBSA officer may, in writing, reduce the frequency or change the reporting location or the way to report.
- Confirm their departure with a CBSA officer prior to leaving Canada.
- Reside at all times with [name] _____
- Fully cooperate with CBSA with respect to obtaining travel documents and any other document pertinent to his case
- Not engage in any activity subsequent to release which results in a conviction under any Act of Parliament.
- Not work or study without authorization in accordance with the IRPA.

I fully understand and agree to abide by the conditions imposed above (and in the annex). (and in the s.34 Prescribed Conditions annex).

24 March 2026 VICTOR MANUEL GUTIERREZ VERDUZCO Via MsTeam
[mm/dd/yyyy] [given names and surname of person concerned in block letters] [signature]

I have faithfully and accurately interpreted in the SPANISH language the information provided above.

24 March 2026 Desiree Latour Villamil Via MsTeam
[mm/dd/yyyy] [given names and surname of interpreter in block letters] [signature]

If the person concerned is not released, the next detention review is scheduled for: March 30, 2026 at 13h15
[time]

Signed on March 24, 2026 at Montréal Yves Dumoulin
[city] [signature of member]

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-03»

FORM BSF 776

NOTICE OF RIGHTS UNDER THE CANADIAN CHARTER
OF RIGHTS AND FREEDOMS AND THE VIENNA CONVENTION

DOCUMENT TYPE	Notice of Rights (CBSA — BSF 776)
SOURCE / ISSUER	Canada Border Services Agency
DOCUMENT DATE	21 March 2026
PAGES	1

This is Exhibit " A-03 " referred to in
the affidavit of VICTOR MANUEL GUTIERREZ VERDUZCO
sworn before me in Montreal
on the _____ day of MAY 13 2026

[Signature]
Commissioner of oaths

**JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER**



Notice of Rights Conferred by the Canadian Charter of Rights and Freedoms and by the Vienna Convention Following Section 55 Immigration and Refugee Protection Act Arrest or Detention

Avis des droits conférés en vertu de la Charte canadienne des droits et libertés et de la Convention de Vienne en cas d'arrestation ou de détention en vertu de l'article 55 de la Loi sur l'immigration et la protection des réfugiés

<p>Surname - Nom de famille GUTIERREZ VERDOZCO</p> <p>Date of birth (YYYY-MM-DD) - Date de naissance (AAAA-MM-JJ) [REDACTED]</p>	<p>Given name(s) - Prénom(s) VICTOR MANUEL</p> <p>Country of birth - Pays de naissance [REDACTED]</p>	<p>Client ID - N° du client [REDACTED]</p> <p>Country of citizenship - Pays de citoyenneté [REDACTED]</p>
<p>Subsections 10(a) and (b) of the <i>Canadian Charter of Rights and Freedoms</i> provide that:</p> <p>Everyone has the right on arrest or detention:</p> <p>a) to be informed promptly of the reasons therefor; b) to retain and instruct counsel without delay and to be informed of that right;</p> <p>Article 36 of the Vienna Convention on Consular Relations</p> <p>If you so request, an officer will inform the nearest representative of your government that you have been arrested or detained. Any communication addressed by you to the nearest representative of your government will be forwarded by an officer without delay. Your government representative will not be contacted at this time if you do not request it.</p> <p>The nearest representative of your government is: Embassy/consulate of [REDACTED] 2055 Peel Street, Suite 1000 Montréal, Quebec, H3A 1V4, Canada (514) 288-2502 or (514) 288-2507 (514) 288-8287 www.sre.gob.mx/montreal - informacionmon@sre.gob.mx</p> <p>Do you want your government representative to be informed of your arrest or detention? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>I acknowledge being advised of the Charter and Vienna Convention Rights</p> <p><input checked="" type="checkbox"/> Refused to sign - A refusé de signer</p>		
<p>Les paragraphes 10(a) et (b) de la <i>Charte canadienne des droits et libertés</i> prévoient que:</p> <p>Chacun a le droit, en cas d'arrestation ou de détention:</p> <p>a) d'être informé dans les plus brefs délais des motifs de son arrestation ou de sa détention; b) d'avoir recours sans délai à l'assistance d'un avocat et d'être informé de ce droit;</p> <p>L'article 36 de la Convention de Vienne sur les relations consulaires</p> <p>Si vous en faites la demande, un agent informera le représentant de votre gouvernement le plus près du fait que vous avez été arrêté(e) ou mis(e) sous garde. Toute communication de votre part à l'intention de ce dernier sera transmise sans retard par l'agent. Le représentant de votre gouvernement ne sera pas informé de la situation, pour l'instant, si vous ne faites pas de demande à cette fin.</p> <p>Le représentant de votre gouvernement le plus près est:</p> <p>Voulez-vous que le représentant de votre gouvernement soit informé de votre arrestation ou de votre mise sous garde? <input type="checkbox"/> Oui <input type="checkbox"/> Non</p> <p>Je reconnais avoir été informé des droits en vertu de la Charte et de la Convention de Vienne</p>		
<p>Signature of person concerned - Signature de la personne concernée</p>		<p>Date (YYYY-MM-DD) - Date (AAAA-MM-JJ) 2026-03-21</p>
<p>Detention Status - Détention situation</p> <p>Consular officials may contact Canada Border Services Agency at the following number (514) 633-5236</p> <p>Les autorités consulaires peuvent communiquer avec l'Agence des services frontaliers du Canada au numéro suivant (514) 633-5236</p> <p><input checked="" type="checkbox"/> Detained - Détenu(e) <input type="checkbox"/> Released - Libéré(e)</p>		
<p>I, <u>VEGA, MARCELO</u> solemnly declare that I have faithfully Name of interpreter</p> <p>and accurately interpreted in <u>SPANISH</u> (language) the information provided above. I make this solemn declaration conscientiously believe it to be true and knowing that it is of the same force and effect as if made under oath.</p> <p><input checked="" type="checkbox"/> By phone - Par téléphone</p>		
<p>Signature of person making declaration - Signature du déclarant</p>		<p>Date (YYYY-MM-DD) - Date (AAAA-MM-JJ) 2026-03-21</p>
<p>Declared before me <u>LUCIER</u> at <u>DORVAL</u> this <u>21</u> day of <u>March</u> of the year <u>2026</u></p> <p>Officer name City</p> <p>à <u>Ville</u> ce <u>jour</u> de <u>de l'année</u></p> <p>Signature of the officer - Signature de l'agent</p>		
<p>The information provided on this document is collected under the authority of the Immigration and Refugee Protection Act for the purpose of informing the designated Officer of the reason(s) for arresting and detaining the person concerned named on the face of this form. The information will be stored in Personal Information Bank number CBSA PPU 032, Enforcement Data System. It is protected and accessible under the provisions of the Privacy Act.</p> <p>Les renseignements fournis dans le présent document sont recueillis en vertu de la Loi sur l'immigration et la protection des réfugiés pour informer l'agent désigné du (des) motif(s) d'arrestation et de détention de la personne concernée nommée au recto du présent formulaire. Ces renseignements seront versés dans le fichier de renseignements personnels ASFC PPU 032. Système de données sur l'exécution de la Loi. Ils sont protégés et accessibles en vertu de la Loi sur la protection des renseignements personnels.</p>		

THIS FORM HAS BEEN ESTABLISHED BY THE MINISTER OF PUBLIC SAFETY / FORMULAIRE ÉTABLI PAR LE MINISTRE DE LA SÉCURITÉ PUBLIQUE
PERSON CONCERNED / PERSONNE CONCERNÉE

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-04»

FORM C-1 — LIST OF EXHIBITS
 SIGNED BY ETIENNE BOILY
 CBSA HEARINGS OFFICER

DOCUMENT TYPE	CBSA List of Exhibits (C-1)
SOURCE / ISSUER	Canada Border Services Agency — Hearings Officer Etienne Boily
DOCUMENT DATE	21 March 2026
PAGES	1

This is Exhibit " A-04 " referred to in
 the affidavit of VICTOR MANUEL GAUTIERREZ VERDUZCO
 sworn before me in Montreal
 on the _____ day of MAY 13 2026


 Commissioner of oaths

**JUSTIN DE SOUSA
 AGENT DU GREFFE
 REGISTRY OFFICER**



CANADA
PROVINCE OF | DE QUÉBEC
CITY OF | VILLE DE MONTRÉAL

IMMIGRATION AND REFUGEE BOARD
IMMIGRATION DIVISION
COMMISSION DE L'IMMIGRATION
ET DU STATUT DE RÉFUGIÉ
SECTION IMMIGRATION

U.C.I. | I.U.C.: [REDACTED]

Minister of Public Safety and Emergency Preparedness |
Ministre de la Sécurité publique et de la Protection civile

et | and

GUTIERREZ VERDUZCO, Victor Manuel
person concerned - Intéressé(e)

LIST OF EXHIBITS / LISTE DES PIÈCES

Exhibit	Description	Pages
M-1	Notice of Arrest under Section 55 of IRPA	1 -4

Montreal, March 26th, 2026

Étienne Boily
Hearings Officer
Immigration Division
Canada Border Services Agency (CBSA)

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-05»

FORM M-1

NOTICE OF ARREST AND DETENTION UNDER s. 55 IRPA

SIGNED BY OFFICER LUCIER

(21 March 2026)

DOCUMENT TYPE	Notice of Arrest and Detention under s. 55 IRPA
SOURCE / ISSUER	Canada Border Services Agency — Officer LUCIER
DOCUMENT DATE	21 March 2026
PAGES	4

This is Exhibit " A-05 " referred to in
the affidavit of VICTOR MANUEL GUTIERREZ VERDUZCO
sworn before me in MAY 13 2026
on the 20 day of MAY

[Signature]
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER

NOTICE OF ARREST AND/OR DETENTION UNDER SECTION 55 OF THE IMMIGRATION AND REFUGEE PROTECTION ACT
AVIS D'ARRESTATION ET/OU DE DÉTENTION EN VERTU DE L'ARTICLE 55 DE LA LOI SUR L'IMMIGRATION ET LA PROTECTION DES RÉFUGIÉS

BIOGRAPHICAL DETAILS AND STATUS - RENSEIGNEMENTS PERSONNELS ET STATUT		
Surname - Nom de famille GUTIERREZ VERDUZCO		Given name(s) - Prénom(s) VICTOR MANUEL
Date of birth (YYYY-MM-DD) - Date de naissance (AAAA-MM-JJ): [REDACTED]		Country of birth - Pays de naissance Mexico
Country(ies) of citizenship - Pays de citoyenneté Mexico		UCI - IUC [REDACTED]
Gender - Genre <input checked="" type="checkbox"/> Male / Homme <input type="checkbox"/> Female / Femme <input type="checkbox"/> X - Other Gender / X - Autre genre		
Status - Statut <input type="checkbox"/> Permanent Resident / Résident permanent <input checked="" type="checkbox"/> Foreign National (other than a protected person) / Étranger (autre qu'une personne protégée) <input type="checkbox"/> Foreign National - Protected Person / Étranger - Personne protégée		
ARRESTED AND/OR DETAINED PURSUANT TO SECTION 55 OF THE IRPA (SELECT ONE A55 AUTHORITY ONLY): ARRÊTÉ(E) ET/OU DÉTENU(E) EN VERTU DE L'ARTICLE 55 DE LA LIPR (NE CHOISIR QU'UNE SEULE AUTORITÉ EN VERTU DU L65) :		
<input type="checkbox"/> A55(1) ARREST AND DETENTION WITH A WARRANT - L65(1) ARRESTATION SUR MANDAT ET DÉTENTION		
Was arrested on / A été arrêté(e) le _____ at _____ hrs and detained under subsection 55(1) of the Immigration and Refugee Protection Act (IRPA). h et détenu(e) en vertu de l'article 55(1) de la Loi sur l'immigration et la protection des réfugiés (LIPR)		
<input type="checkbox"/> For examination / Aux fins de contrôle <input type="checkbox"/> For admissibility hearing / Aux fins d'enquête <input type="checkbox"/> For removal / Aux fins de renvoi		
<input type="checkbox"/> For a proceeding that could lead to the making of a removal order by the Minister under subsection 44(2) Aux fins d'une procédure pouvant mener à la prise par le ministre d'une mesure de renvoi en vertu du paragraphe 44(2)		
As there are reasonable grounds to believe that the person is inadmissible pursuant to paragraph _____ of the IRPA, and in my opinion the person Il y a des motifs raisonnables de croire que la personne est interdite de territoire conformément à l'alinéa _____ de la LIPR et à mon avis cette personne		
<input type="checkbox"/> Is a danger to the public / Constitue un danger pour la sécurité publique <input type="checkbox"/> Is unlikely to appear / Ne se présentera pas <input type="checkbox"/> Is unlikely to appear/Danger to the public / Ne se présentera pas/ Constitue un danger pour la sécurité publique		
<input checked="" type="checkbox"/> A55(2) ARREST AND DETENTION WITHOUT A WARRANT - L65(2) ARRESTATION SANS MANDAT ET DÉTENTION		
Was arrested on / A été arrêté(e) le 2026-03-21 at 19:43 hrs and detained under subsection 55(2)(a) of the Immigration and Refugee Protection Act (IRPA). h et détenu(e) en vertu de l'article 55(2)(a) de la Loi sur l'immigration et la protection des réfugiés (LIPR).		
<input type="checkbox"/> For examination / Aux fins de contrôle <input checked="" type="checkbox"/> For admissibility hearing / Aux fins d'enquête <input type="checkbox"/> For removal / Aux fins de renvoi		
<input type="checkbox"/> For a proceeding that could lead to the making of a removal order by the Minister under subsection 44(2) Aux fins d'une procédure pouvant mener à la prise par le ministre d'une mesure de renvoi en vertu du paragraphe 44(2)		
As there are reasonable grounds to believe that the person is inadmissible pursuant to paragraph _____ A41 (a) x A20 (1) (a) of the IRPA, and in my opinion the person Il y a des motifs raisonnables de croire que la personne est interdite de territoire conformément à l'alinéa _____ x B6 de la LIPR et, à mon avis, cette personne		
<input type="checkbox"/> Is a danger to the public / Constitue un danger pour la sécurité publique or - ou <input type="checkbox"/> Is unlikely to appear / Ne se présentera pas <input checked="" type="checkbox"/> Is unlikely to appear/Danger to the public / Ne se présentera pas/ Constitue un danger pour la sécurité publique		
Was arrested on / A été arrêté(e) le _____ at _____ hrs and detained under subsection 55(2)(b) of the Immigration and Refugee Protection Act (IRPA). h et détenu(e) en vertu de l'article 55(2)(b) de la Loi sur l'immigration et la protection des réfugiés (LIPR)		
<input type="checkbox"/> as I am not satisfied of the identity of the foreign national in the course of any procedure under IRPA car l'identité de celui-ci n'a pas été prouvée dans le cadre d'une procédure prévue par la présente loi.		
<input type="checkbox"/> A55(3) DETENTION ON ENTRY - L65(3) DÉTENTION À L'ENTRÉE		
Was detained on / A été détenu(e) le _____ at _____ hrs under subsection 55(3) of the Immigration and Refugee Protection Act h en vertu de l'article 55(3) de la Loi sur l'immigration et la protection des réfugiés		
<input type="checkbox"/> in order for the examination to be completed / nécessaire afin que soit complété le contrôle		
<input type="checkbox"/> because there are reasonable grounds to suspect that the permanent resident or the foreign national is inadmissible on grounds of security, violating human or international rights, serious criminality, criminality or organized criminality il a des motifs raisonnables de soupçonner que celui-ci est interdit de territoire pour raison de sécurité, pour atteinte aux droits humains ou internationaux ou pour grande criminalité criminelle ou criminalité organisée		

<input type="checkbox"/> A55(3.1) MANDATORY ARREST AND DETENTION - DESIGNATED FOREIGN NATIONAL L56(3.1) ARRESTATION ET DÉTENTION OBLIGATOIRES - ÉTRANGER DÉSIGNÉ		
Was arrested / A été arrêté	at / à	hrs under subsection 51(3.1) of the Immigration and Refugee Protection Act h et détenue) en vertu du paragraphe 51(3.1) de la Loi sur l'immigration et la protection des réfugiés
<input type="checkbox"/> Is a designated foreign national under subsection 20.1(2) of the Immigration and Refugee Protection Act Est un étranger désigné en vertu de l'article 20.1(2) de la Loi sur l'immigration et la protection des réfugiés		
<input checked="" type="checkbox"/> Person advised of rights under the Charter and Vienna Convention and BSF 776 completed and given La personne a été informée de ses droits en vertu de la Charte et de la Convention de Vienne et le formulaire BSF 776 a été complété et remis		
Arresting Agency (for A55(1) and A55(2) arrests only) Arrestation effectuée par (pour les arrestations en vertu de L55(1) et L55(2) seulement):		
<input checked="" type="checkbox"/> CBSA <input type="checkbox"/> Other peace officer (specify arresting agency) Autre agent de la paix (préciser l'agence)		
Location of arrest/detention (specify name of police station, court, port of entry, CBSA office) Lieu d'arrestation/détention (spécifier le nom du poste de police, tribunal, point d'entrée, bureau de l'ASFC)		
2476 YUL MONTREAL AIRPORT		
REASONS AND GROUNDS FOR ARREST/DETENTION AND ALTERNATIVES TO DETENTION LES MOTIFS ET RAISONS POUR L'ARRESTATION/DÉTENTION ET LES SOLUTIONS DE RECHANGE À LA DÉTENTION		
OFFICER MUST SPECIFY REASONS AND GROUNDS FOR ARREST/DETENTION (EXCEPT FOR A56(3.1) - DESIGNATED FOREIGN NATIONALS) WITH PARTICULAR CONSIDERATION GIVEN TO SECTIONS 244-248 OF THE IMMIGRATION AND REFUGEE PROTECTION REGULATIONS. IN ADDITION, OFFICER MUST CLEARLY ARTICULATE:		
<ul style="list-style-type: none"> • THAT ALTERNATIVES TO DETENTION HAVE BEEN CONSIDERED AND WEIGHED AGAINST THE IDENTIFIED RISKS POSED BY THE INDIVIDUAL TAKING INTO ACCOUNT ALL OF THE CIRCUMSTANCES OF THE CASE AND PRESCRIBED FACTORS, AND • WHICH REASONABLY AVAILABLE ALTERNATIVES TO DETENTION (E.G., CONDITIONS ALONE, DEPOSIT/GUARANTEE, IN PERSON OR VOICE REPORTING, ETC.) HAVE BEEN CONSIDERED, AND • REASONS FOR FORMING THE OPINION THAT THESE WOULD OR WOULD NOT MITIGATE THE IDENTIFIED RISKS. 		
L'AGENT DOIT PRÉCISER LES MOTIFS ET RAISONS POUR L'ARRESTATION/DÉTENTION (SAUF POUR LE L56(3.1) - ÉTRANGERS DÉSIGNÉS) EN PORTANT UNE ATTENTION PARTICULIÈRE AUX ARTICLES 244 À 248 DU RÈGLEMENT SUR L'IMMIGRATION ET LA PROTECTION DES RÉFUGIÉS. DE PLUS, L'AGENT DOIT CLAIEMENT DÉMONTRER:		
<ul style="list-style-type: none"> • QUE LES SOLUTIONS DE RECHANGE À LA DÉTENTION ONT ÉTÉ EXAMINÉES ET ÉVALUÉES PAR RAPPORT AUX RISQUES IDENTIFIÉS POSÉS PAR L'INDIVIDU, EN TENANT COMPTE DE TOUTES LES CIRCONSTANCES DU CAS ET DE TOUTS LES FACTEURS RÉGLEMENTAIRES, ET • QUE LES SOLUTIONS DE RECHANGE À LA DÉTENTION RAISONNABLEMENT DISPONIBLES ONT ÉTÉ CONSIDÉRÉES (P. EX. CONDITIONS SEULEMENT, VERSEMENT D'UN DÉPÔT OU D'UNE GARANTIE, PRÉSENTATION EN PERSONNE OU PAR RECONNAISSANCE VOCALE, ETC.), ET • LES RAISONS QUI ONT MENÉ À L'OPINION QUE CES DERNIÈRES ATTÉNUERAIENT OU NON LES RISQUES IDENTIFIÉS. 		
In the course of my duties, on 21 March 2026, I interviewed Victor Manuel GUTIERREZ VERDUZCO at the port of entry located at 975 boul. Roméo-Vachon N, Dorval, QC H4Y 1H1.		
I was assigned to assist Officer Luke BEDROS on the treatment of a family of [REDACTED] citizens who had previously arrived in Canada the night before. Officer Josue ESTRADA had previously interviewed the subject and subject declared that he was a police officer in [REDACTED] for over 20 years.		
All interactions with the subject were conducted in Spanish with the help of accredited interpreter.		
When conducting the refugee interview with subject, we asked him to give us a timeline of his time spent with the police in [REDACTED]. During the exam, subject mentioned that he worked for the [REDACTED] police department. When BEDROS wrote the information on the IMM0150 (Details of Police Service Form), subject became argumentative and said that he was writing it wrong. BEDROS and I clarified the spelling with the interpreter and subject stated that he did not trust us writing the information and that he wanted us to translate word for word what the forms said. I read the entirety of the IMM0150 to the subject and then he continued to refuse to answer details of his police service as he described our examination as a "trick" and he already explained this to the officer the night before. I explained that we were not present for the examination and we need to collect this information in order to proceed with the refugee claim. Subject continued to be argumentative and stated that we would be using this information against him and he did not want to answer. I then presented a photo copy of several police forms that subject gave to officer ESTRADA the night before. Subject stated that he believed we had manipulated the information on the forms, because on the second (of three) forms, the number '2' was cut off due to the photo copying process. Subject stated that he wanted to verify every line of the documents as he believed we had manipulated the information and were plotting against him. He stated that because I did not witness ESTRADA put the documents in his file, it was impossible to determine that he had not manipulated them. I said he has every right to examine the documents, however I would like to continue the refugee claim and I asked him to leave the room and bring his wife in so we can complete her documents. Subject left the room and his wife entered.		
During interactions with the subject, his eyes were starting to close and roll up and down in his head. I asked subject if he was ok and if he needed medical attention and he said he was fine. Subject continued to close his eyes and appeared confused and not totally coherent during the interview.		
Upon entering the room, his wife appeared very distressed and uncomfortable. She did not answer initially		

and I asked if everything was ok with her and her husband. She stated that 'He is not doing well' and that they are separated and no longer husband and wife. Subject stated that he has been abusive in the past, since their separation, he has stopped abusing her. She appeared uncomfortable and did not want to elaborate on the subject anymore. She said that he is 'very rough' with her, but did not elaborate further. She eventually stated that she did not feel safe with subject anymore and stated that he was paranoid and said people were following him and harassing him in [redacted]. She stated that she was not comfortable and safe being with the subject if they went to PRAIDA or YMCA together. She then broke into tears and her body language displayed visible distress and looked extremely uncomfortable.

At this point I left the room and went to inform my superintendent Lucas ATENCIA of the case as I was beginning to worry for the safety of this woman and her child as well as the mental state of her ex-husband. BEDROS and I continued to process subject's refugee claim and separate the subject and his ex-wife. Subject's ex-wife was entered in the One-Touch refugee processing as we believed she was One-Touch eligible and could be treated that way. While BEDROS and I were speaking with his wife, we heard an officer May-Linda NADEAU yell at the subject. Subject had called 911 on his personal phone and was screaming 'Help me, help me!'. NADEAU took subject's phone and spoke to the police and explained the situation to them. Subject was argumentative and aggressive with our officers stating that he did not want to respond to our questions and decided to call the police. ATENCIA explained to subject that if he wanted us to proceed with his asylum claim, he needs to answer our questions and provide background information. During the refugee process, subject did not want to give his most recent addresses as he stated that we would be sending this information to the [redacted] government and that we would be sending him back to [redacted]. We stated that no information would be provided to the [redacted] government and that we were simply collecting his most recent addresses in order to complete his refugee documents. Subject said he did not believe us and that we were trying to 'trick' him.

When subject was separated from his wife, he began to stare at the wall and start talking to the wall, throwing his hands up and it appeared that he was having a conversation with himself. Subject appeared agitated. At this point, as the Minister's Delegate, I believed that subject had a potential mental health illness and wanted to defer his case to the Immigration Division as I did not believe subject was able to appreciate the nature of the procedures against him at this point for the following reasons:

- Subject has made incoherent statements that officers were manipulating information he provided and that we were trying to 'plot against him' and trick him.
- Subject's wife stated that he is extremely paranoid and often talks about people following him in [redacted].
- Subject's wife states that he is abusive and violent and is 'very rough' with her.
- Subject was talking to himself and was mumbling to himself when officers were interviewing him.

My belief that subject was unable to appreciate the immigration procedures was further reinforced by the following interactions:

- While subject was being detained by myself and officer BEDROS, I was calling the lawyer on a cellphone as subject required an interpreter. Subject then grabbed a phone on the wall and asked if there was anyone listening to him as he believed there was someone on the line listening.
- When a lawyer was finally contacted, we left the subject in a room alone to speak to the lawyer and closed the door, however for health and safety reasons, we were able to see him through the glass window. Subject was refusing to touch the phone as he did not want his fingerprints on the phone and used his shirt to move the phone around.
- Subject stated that he wanted a lawyer in person in order to verify that he was really a lawyer and not a stranger listening to his conversation.

Subject does not have a fixed place of residence or a solid connection to Canada. It would therefore be impossible to locate him.

Subject has no family or friends in Canada who could exert a credible influence and who would be willing to provide a guarantee or bond for his release.

According to the officer's assessment, the subject may not show up for his admissibility hearing if allowed to leave the control area and then return of his own will.

Subject has a history of suspected domestic violence and his ex-wife fears for her safety when he is around.

Previously detained in [redacted] following an altercation with a police cruiser and his vehicle.

Subject presented documents that he was being accused of falsifying documents in [redacted].

Subject has no knowledge of his surroundings in Canada.

Based on the detention grounds and according to officers assessment, there is no other possible alternatives to detention.


Subject was detained at approximately 19:43 for flight risk and danger to the public.

Lawyer right offered and accepted: Legal aid Pascal GILBERT (35419-2) was contacted.

M-1

Vienna right offered and initially refused stating that if he was fleeing [REDACTED] it does not make sense to contact the embassy. Subject then changed his mind and asked us to advise the embassy.

Subject is place in the detention cell and was shown where the toilet, camera and bed would be. Subject then waved to the camera and started talking to the camera when he was placed in the cell.

Date signed (YYYY-MM-DD) - Signé le (AAAA-MM-JJ): 2026-03-21	Officer Name - Nom de l'agent: LUCIER	Officer Signature - Signature de l'agent: 
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The information provided on this document is collected under the authority of the Immigration and Refugee Protection Act for the purpose of informing the designated Officer of the reason(s) for arresting and detaining the person concerned named on the face of this form. The information will be stored in Personal Information Bank number CBSA PPU 032 Enforcement Data System; it is protected and accessible under the provisions of the Privacy Act.

Les renseignements fournis dans le présent document sont recueillis en vertu de la Loi sur l'immigration et la protection des réfugiés pour informer l'agent désigné du (des) motif(s) d'arrestation et de détention de la personne concernée nommée au recto du présent formulaire. Ces renseignements seront versés dans le fichier de renseignements personnels ASFC PPU 032 Système de données sur l'exécution de la Loi; ils sont protégés et accessibles en vertu de la Loi sur la protection des renseignements personnels.

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-06»

FORM C-1

REQUEST FOR ADMISSIBILITY HEARING /
DETENTION REVIEW

DOCUMENT TYPE	Request for Admissibility Hearing / Detention Review
SOURCE / ISSUER	Canada Border Services Agency
DOCUMENT DATE	21 March 2026
PAGES	1

This is Exhibit " A-06 " referred to in
the affidavit of VICTOR MANUEL GUTIERREZ VERDUZCO
sworn before me in MTO
on the 20 day of MAY 13 2026
[Signature]
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER

REQUEST FOR ADMISSIBILITY HEARING/DETENTION REVIEW PURSUANT TO THE IMMIGRATION DIVISION RULES

DEMANDE D'ENQUÊTE/DEMANDE D'EXAMEN DES MOTIFS DE LA GARDE CONFORMÉMENT AUX RÈGLES DE LA SECTION IMMIGRATION

ID no - N° d'ID [redacted]
File no - N° de dossier [redacted]

To: Registrar, Immigration Division
In accordance with the Immigration Division rules, I am sending you the following information and requesting:

À: Greffier, Section de l'immigration
Conformément aux règles de la Section de l'immigration, je vous transmets les renseignements suivants et vous demande:

An admissibility hearing to be held pursuant to subsection A44(2)
Following an arrest under Section 55
Detention review to be held under Section 57
Detention review to be held under Section 57.1

TO BE COMPLETED IN ALL CASES - À REMPLIR DANS TOUS LES CAS

Summary - Nom de famille: VICTORRE VERDUZCO
Given name(s) - Prénom(s): VICTOR MANUEL
Country of citizenship - Pays de citoyenneté: Mexico
Sex - Sexe: M
Date of birth - Date de naissance: [redacted]
Mental status - État civil: Single
Home address in Canada - Adresse du domicile au Canada: [redacted]
Minister believes that the person is less than 18 years of age or unable to appreciate the nature of the procedures
Allegation(s) - Allégation(s): A41(a) x A20(1)(a) x 36 & A41(a) x A20(1)(a) x R5
Report
Claim for refugee protection made - Demande d'asile faite: Yes
Official language chosen for admissibility hearing/examination review - Langue officielle choisie pour l'enquête/examen des motifs de la garde: English
Interpreter's language (where required) - Langue de l'interprète (le cas échéant): SPANISH
Family members to be included for the purposes of R227 of the Regulations - Membres de la famille à être inclus en application de R227 des Règlements

COMPLETE THE FOLLOWING FOR DETAINED CASES ONLY - À REMPLIR DANS LE CAS DES PERSONNES DÉTENUES SEULEMENT

Time that the person was first placed in detention - Heure de la première mise en détention: 19:43
Date: 20100320
Place of detention and address - Lieu de garde et l'adresse: IRC - Lava
Previous detention review - Dernier examen des motifs de la garde: Tuesday 20100320 10:00
Detained for - Sous garde aux fins de: Admissibility hearing
Grounds - Motifs: Danger, Would not appear
Examination to be completed - Compléter le contrôle: Identify
Review being made after - L'examen des motifs doit avoir lieu dans les: 14 days
Designated foreign national 20.1(2) - Étranger désigné 20.1(2): GILBERT, Pascal Bar# 35419-2
Minister counsel name and title (if known) - Nom et titre du conseil du ministre (si connu): [redacted]

89F04 (7)

THIS FORM HAS BEEN ESTABLISHED BY THE MINISTER OF PUBLIC SAFETY / FORMULAIRE ÉTABLI PAR LE MINISTRE DE LA SÉCURITÉ PUBLIQUE



FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-07»

FORM C-2

REFERRAL UNDER s. 44(2) IRPA

DOCUMENT TYPE	Referral of the s. 44(1) report to the Immigration Division
SOURCE / ISSUER	Canada Border Services Agency — Minister's Delegate
DOCUMENT DATE	21 March 2026
PAGES	1

This is Exhibit " A-07 " referred to in
the affidavit of Victor Manuel Gutierrez Verdugo
sworn before me in Mt
on the 13 day of MAY 2026
Jdt
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER



PROTECTED (when completed) / PROTÉGÉ (une fois rempli)

A

REFERRAL UNDER SUBSECTION 44(2) OF THE IMMIGRATION AND REFUGEE PROTECTION ACT FOR AN ADMISSIBILITY HEARING

DÉFÉRÉ POUR ENQUÊTE AUX TERMES DU PARAGRAPHE 44(2) DE LA LOI SUR L'IMMIGRATION ET LA PROTECTION DES RÉFUGIÉS

Redacted box containing file number information: File N° - N° de référence

Main form body with bilingual text for referral details, including names (GUTIERREZ VERDUZCO), dates (2026-03-21), and locations (DORVAL, QUEBEC).

Signature of the Minister's delegate / Délégué du ministre

THIS FORM HAS BEEN ESTABLISHED BY THE MINISTER OF PUBLIC SAFETY / FORMULAIRE ÉTABLI PAR LE MINISTRE DE LA SÉCURITÉ PUBLIQUE

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-08»

FORM IMM 5480

REPORT UNDER s. 44(1) IRPA

DOCUMENT [REDACTED]

DOCUMENT TYPE	Inadmissibility Report under s. 44(1) IRPA (IMM 5480)
SOURCE / ISSUER	Canada Border Services Agency
DOCUMENT DATE	21 March 2026
PAGES	2

This is Exhibit " A08 " referred to in
the affidavit of Victor Manuel Gutierrez Verdugo
sworn before me in Me
on the day of MAY 13 2026

Joh
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER



REPORT UNDER SUBSECTION 44(1) OF THE IMMIGRATION AND REFUGEE PROTECTION ACT

TO: THE MINISTER OF IMMIGRATION, REFUGEES AND CITIZENSHIP CANADA

FROM: L. Bedros

[Redacted] UCI: [Redacted]

[Redacted]

Document no.: [Redacted]

In accordance with subsection 44(1) of the *Immigration and Refugee Protection Act*, I hereby report that:

Family name: GUTIERREZ VERDUZCO

Given name(s): VICTOR MANUEL

Date of birth: [Redacted] (yyyy/mm/dd)

Sex: Male

Citizenship: [Redacted]

is a person who is a foreign national who has not been authorized to enter Canada and who, in my opinion, is inadmissible pursuant to:

Subsection 41(a) in that, on a balance of probabilities, there are grounds to believe is a foreign national who is inadmissible for failing to comply with this Act through an act or omission which contravenes, directly or indirectly, a provision of this Act, specifically:

The requirement of paragraph 20(1)(a) of the Act that every foreign national, other than a foreign national referred to in section 19, who seeks to enter or remain in Canada must establish, to become a permanent resident, that they hold the visa or other document required under the Regulations.

The requirement of section 6 of the Regulations that a foreign national may not enter Canada to remain on a permanent basis without first obtaining a permanent resident visa.

This report is based on the following information that the above-named individual:

Is not a Canadian Citizen.

Is not a Permanent Resident.

Is a foreign national seeking to reside permanently in Canada and has not obtained a Permanent Resident visa or other document required before coming to Canada.

DATED at Montreal Pierre Elliott Trudeau Int'l Airport POE

on 2026/03/21
(yyyy/mm/dd)

Signature of Officer

VICTOR MANUEL
GUTIERREZ VERDUZCO

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-09»

CBSA CALL-IN LETTER

ADDRESSED TO VICTOR MANUEL GUTIERREZ VERDUZCO

(26 March 2026)

DOCUMENT TYPE	CBSA Call-in Letter
SOURCE / ISSUER	Canada Border Services Agency — 1010 Saint-Antoine Street West, Montreal
DOCUMENT DATE	26 March 2026
PAGES	1

This is Exhibit " A-09 " referred to in
the affidavit of Victor Manuel Gutierrez Verduzco
sworn before me in Montreal
on the 13 day of MAY 2026
[Signature]
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER

Remise en main propre | Hand delivered

IUC | UCI # [REDACTED]

Nom | Name: GUTTIEREZ VERDUZCO VICTOR MANUEL

Adresse | Address:

Membre de la famille accompagnateur / Accompanying family member

[Empty table for accompanying family member details]

LETTRÉ DE CONVOCATION À UNE ENTREVUE | CALL IN LETTER FOR AN INTERVIEW

Afin de mettre votre dossier à jour, vous et les personnes à votre charge indiquées ci-dessus devez vous présenter au bureau de l'Agence des services frontaliers du Canada (ASFC) situé au:

In order to update your file, you and your dependants listed above must report as to the Canada Border Services Agency (CBSA) located at:

ASFC Montréal
1010 rue Saint-Antoine Ouest, 2e étage,
Montréal, Québec, H3C 1B2

CBSA Montreal
1010 Saint-Antoine Street West, 2nd floor,
Montreal, Quebec, H3C 1B2

* Note la date et l'heure

08 avril | April 2026
08: 30 am 08: 30

* Note the date and time

Le défaut de vous présenter à l'entrevue peut entraîner l'émission d'un mandat d'arrestation contre vous.

Failure to report to the interview may result in an **arrest warrant** issued against you.

Dans le but de vous identifier, vous devez avoir en votre possession tous les documents d'identité délivrés par votre pays de citoyenneté ou par le gouvernement canadien.

In order to identify yourself, you are required to be in possession of all the identity documents issued by your country of origin or by the Canadian government.

Si vous ne parlez pas français ou anglais, vous pouvez être accompagné d'une personne qui parle une de ces deux langues. Vous pouvez aussi être assisté par un avocat ou un consultant en immigration autorisé.

If you do not speak French or English, you may be accompanied by a person who speaks one of these two languages. You can also be assisted by a lawyer or an authorized immigration representative.

[Empty signature line]

L'Agence des services frontaliers du Canada ne tolérera aucune forme d'agressivité envers nos employés ou toutes autres personnes dans nos locaux.

The Canada Border Service Agency will not tolerate any form of **hostility** towards our employees or any other person in our workplace.

Cordialement,

Cordially,

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-10»

CBSA DOCUMENTARY PACKAGE

IN RESPECT OF [REDACTED]

AND THE MINOR APPLICANT:

FORMS IMM 5317, IMM 5480 AND IMM 1282

(21 March 2026)

DOCUMENT TYPE	CBSA Package — withdrawal + s. 44(1) + Allowed to Leave
SOURCE / ISSUER	Canada Border Services Agency
DOCUMENT DATE	21 March 2026
PAGES	6

This is Exhibit " A-10 " referred to in
the affidavit of Victor Manuel Gutierrez Verdugo
sworn before me in KC
on the 12 day of MAY 2026
[Signature]
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER



WITHDRAWAL OF A CLAIM FOR REFUGEE PROTECTION PRIOR TO REFERRAL TO THE REFUGEE PROTECTION DIVISION

RENONCIATION À UNE DEMANDE D'ASILE AVANT LE RENVOI À LA SECTION DE LA PROTECTION DES RÉFUGIÉS

Client ID - ID du client [REDACTED]
CIC file no. - CIC-dossier n° [REDACTED]

In the matter of a claim for refugee protection made by / Relativement à la demande de l'asile au sens de la Convention présentée par	Surname - Nom [REDACTED]	Given name(s) - Prénom(s) [REDACTED]
Date of birth / Date de naissance	Y - A [REDACTED] M [REDACTED] D - J	Country of citizenship / Pays de citoyenneté [REDACTED]

I, [REDACTED], withdraw my claim for refugee protection.

Je soussigné(e), [REDACTED], renonce à ma demande d'asile au sens de la Convention.

I freely make the withdrawal of my claim for refugee protection and I fully appreciate the nature and consequences of the withdrawal. I am aware of the possibility of my being required to leave Canada as a result of the withdrawal of my claim.

Je renonce librement à ma demande d'asile au sens de la Convention et je me rends pleinement compte de la nature de cette renonciation et des conséquences qu'elle entraîne. Je suis conscient(e) que, suite à cette renonciation, on peut me demander de quitter le Canada.

Signed at / Signé à DORVAL in the province of / dans la province de QUEBEC

on the / le 21 day of / jour de MARCH of the year / de l'an 2026

[REDACTED SIGNATURE]

Signature of the person concerned

AFFIX PHOTOGRAPH / APPOSER LA PHOTOGRAPHIE

INTERPRETER'S DECLARATION

DÉCLARATION DE L'INTERPRÈTE

I, VC, solemnly declare that I have faithfully and accurately interpreted in the

Je, [REDACTED], déclare solennellement avoir interprété fidèlement et exactement en

Spanish language the information provided above. I make this solemn declaration conscientiously believing it to be true and knowing that it is of the same force and effect as if made under oath.

[REDACTED] les renseignements indiqués ci-dessus. Je fais cette déclaration solennelle croyant en conscience qu'elle est vraie et sachant qu'elle a la même force et les mêmes effets que si elle était faite sous serment.

Signature of person making declaration / Signature du déclarant

Declared before me / Déclaré devant moi BEDROS

at / à DORVAL

This / Ce 21 day of / jour de MARCH of the year / de l'an 2026

[REDACTED SIGNATURE] 61113
Signature of officer / Signature de l'agent

The information provided on this form is collected under the authority of the Immigration and Refugee Protection Act. This information will be stored in Personal Information Bank number CIC PPU 008 and you have the right of access to it and to its protection under the provisions of the Privacy Act.

Les renseignements fournis dans le présent formulaire sont recueillis en vertu de la Loi sur l'immigration et la protection des réfugiés. Les renseignements seront versés dans le fichier de renseignements personnels CIC PPU 008. Ils sont protégés et accessibles en vertu des dispositions de la Loi sur la protection des renseignements personnels.



WITHDRAWAL OF A CLAIM FOR REFUGEE PROTECTION PRIOR TO REFERRAL TO THE REFUGEE PROTECTION DIVISION

RENONCIATION À UNE DEMANDE D'ASILE AVANT LE RENVOI À LA SECTION DE LA PROTECTION DES RÉFUGIÉS

Client ID - ID du client [REDACTED]
CIC file no. - CiC-dossier n°

In the matter of a claim for refugee protection made by Relativement à la demande de l'asile au sens de la Convention présentée par	Surname - Nom [REDACTED]	Given name(s) - Prénom(s) [REDACTED]
	Date of birth Date de naissance	Country of citizenship Pays de citoyenneté

I, [REDACTED], withdraw my claim for refugee protection.

I freely make the withdrawal of my claim for refugee protection and I fully appreciate the nature and consequences of the withdrawal. I am aware of the possibility of my being required to leave Canada as a result of the withdrawal of my claim.

Je soussigné(e), [REDACTED], renonce à ma demande d'asile au sens de la Convention.

Je renonce librement à ma demande d'asile au sens de la Convention et je me rends pleinement compte de la nature de cette renonciation et des conséquences qu'elle entraîne. Je suis conscient(e) que, suite à cette renonciation, on peut me demander de quitter le Canada.

Signed at DORVAL in the province of QUEBEC
Signé à _____ dans la province de _____

on the 21 day of MARCH of the year 2026
le _____ jour de _____ de l'an _____

[REDACTED SIGNATURE]

Signature of person concerned
Signature de la personne concernée



INTERPRETER'S DECLARATION

DÉCLARATION DE L'INTERPRÈTE

I, VC, solemnly declare that I have faithfully and accurately interpreted in the

SPANISH language the information provided above. I make this solemn declaration conscientiously believing it to be true and knowing that it is of the same force and effect as if made under oath.

Je, _____, déclare solennellement avoir interprété fidèlement et exactement en

les renseignements indiqués ci-dessus. Je fais cette déclaration solennelle croyant en conscience qu'elle est vraie et sachant qu'elle a la même force et les mêmes effets que si elle était faite sous serment.

Signature of person making declaration
Signature du déclarant

Declared before me BEDROS at DORVAL
Déclaré devant moi _____ à _____

This 21 day of MARCH of the year 2026
Ce _____ jour de _____ de l'an _____

[Signature of officer] 61113
Signature of officer
Signature de l'agent

The information provided on this form is collected under the authority of the Immigration and Refugee Protection Act. This information will be stored in Personal Information Bank number CIC PPU 008 and you have the right of access to it and to its protection under the provisions of the Privacy Act.

Les renseignements fournis dans le présent formulaire sont recueillis en vertu de la Loi sur l'immigration et la protection des réfugiés. Les renseignements seront versés dans le fichier de renseignements personnels CIC PPU 008. Ils sont protégés et accessibles en vertu des dispositions de la Loi sur la protection des renseignements personnels.



DATED at Montreal Pierre Elliott Trudeau Int'l Airport POE

on 2026/03/21
(yyyy/mm/dd)


Signature of Officer





REPORT UNDER SUBSECTION 44(1) OF THE IMMIGRATION AND REFUGEE PROTECTION ACT

TO: THE MINISTER OF IMMIGRATION, REFUGEES AND CITIZENSHIP CANADA
FROM: L. Bedros



UCI: [REDACTED]

Document no.: [REDACTED]

In accordance with subsection 44(1) of the *Immigration and Refugee Protection Act*, I hereby report that:

Family name: [REDACTED]
Given name(s): [REDACTED]
Date of birth: [REDACTED] (yyyy/mm/dd)
Sex: Female
Citizenship: [REDACTED]

is a person who is a foreign national who has not been authorized to enter Canada and who, in my opinion, is inadmissible pursuant to:

Subsection 41(a) in that, on a balance of probabilities, there are grounds to believe is a foreign national who is inadmissible for failing to comply with this Act through an act or omission which contravenes, directly or indirectly, a provision of this Act, specifically:

The requirement of paragraph 20(1)(a) of the Act that every foreign national, other than a foreign national referred to in section 19, who seeks to enter or remain in Canada must establish, to become a permanent resident, that they hold the visa or other document required under the Regulations.

The requirement of section 6 of the Regulations that a foreign national may not enter Canada to remain on a permanent basis without first obtaining a permanent resident visa.

This report is based on the following information that the above-named individual:

- Is not a Canadian Citizen.
- Is not a Permanent Resident.
- Is a foreign national seeking to reside permanently in Canada and has not obtained a Permanent Resident visa or other document required before coming to Canada.



ALLOWED TO LEAVE CANADA

Family name: [REDACTED]

Given name(s): [REDACTED]

Date of birth: [REDACTED] (yyyy/mm/dd)

Sex: Male

Citizenship: [REDACTED]

Document no.: [REDACTED]

UCI: [REDACTED]

Application no.: [REDACTED]

Pursuant to paragraph 42(1) of the *Immigration and Refugee Protection Regulations*, I am allowing you to withdraw your application to enter Canada and to leave Canada without delay.

The information provided on this form is collected under the authority of the *Immigration and Refugee Protection Regulations* for the purpose of allowing you to leave Canada. This information will be stored in Personal Information Bank number CIC PPU 001, Enforcement Data System, and you have the right of access to it and to its protection under the provisions of the *Privacy Act*.

Dated at: Montreal Pierre Elliott Trudeau Int'l Airport PCon 2026/03/21 (yyyy/mm/dd)

Signature of officer

I hereby voluntarily withdraw my application to enter Canada and agree to leave Canada without delay.

Signature of person concerned



ALLOWED TO LEAVE CANADA

Family name: [REDACTED]

Given name(s): [REDACTED]

Date of birth: [REDACTED] (yyyy/mm/dd)

Sex: Female

Citizenship: [REDACTED]

Document no.: [REDACTED]

UCI: [REDACTED]

Application no.: [REDACTED]

Pursuant to paragraph 42(1) of the *Immigration and Refugee Protection Regulations*, I am allowing you to withdraw your application to enter Canada and to leave Canada without delay.

The information provided on this form is collected under the authority of the *Immigration and Refugee Protection Regulations* for the purpose of allowing you to leave Canada. This information will be stored in Personal Information Bank number CIC PPU 001, Enforcement Data System, and you have the right of access to it and to its protection under the provisions of the *Privacy Act*.

Dated at: Montreal Pierre Elliott Trudeau Int'l Airport PCon 2026/03/21 (yyyy/mm/dd)

Signature of officer

I hereby voluntarily withdraw my application to enter Canada and agree to leave Canada without delay.

Signature of person concerned

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-11»

ELECTRONIC TRAVEL AUTHORIZATION (eTA)

██████████ — ██████████

CANCELLATION RECORD

DOCUMENT TYPE	eTA cancellation record (Emmanuel)
SOURCE / ISSUER	Immigration, Refugees and Citizenship Canada (IRCC)
DOCUMENT DATE	21 March 2026
PAGES	1

This is Exhibit " A-11 " referred to in
the affidavit of Victor Manuel Gutierrez Verdugo
sworn before me in Pitt
on the day of MAY 13, 2026

[Signature]
Commissioner of oaths

**JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER**



Government
of Canada

Gouvernement
du Canada

Estado de la Autorización Electrónica de Viaje (eTA)

*** Verifica tu estado (obligatorio)**

Recibí una eTA. Quiero revisar mi expediente.

*** Seleccione una opción (obligatorio)**

Número eTA

*** Número eTA (obligatorio)**

Este número, que comienza con la letra J, se encuentra en la parte superior del correo electrónico que recibió cuando se aprobó su eTA.

[Redacted]

Introduzca la siguiente información **exactamente** como la introdujo en su formulario de solicitud:

*** Número de pasaporte (obligatorio)**

[Redacted]

*** País/territorio de emisión (obligatorio)**

[Redacted]

*** Fecha de emisión (obligatoria)**

[Redacted]

Noviembre

[Redacted]

*** Fecha de caducidad (obligatoria)**

[Redacted]

[Redacted]

[Redacted]

Verificar el estado de la solicitud

Cancelar

Estado de la solicitud

¿Dónde se encuentra esta aplicación?	Detalles
Estado de la solicitud	Su solicitud fue cancelada.
Se ha tomado una decisión final.	
Número eTA	[Redacted]
Fecha de caducidad	[Redacted]
estado del documento eTA	Tras revisar su expediente, hemos determinado que usted ya no cumple con los requisitos para obtener una eTA. Su expediente está cerrado. Deberá volver a solicitarlo una vez que haya solucionado el/los motivo(s) de la cancelación. Ya no dispone de una autorización electrónica de viaje (eTA) válida. Por lo tanto, no debe planificar ni realizar un viaje a Canadá.

Fecha de modificación:

22/01/2026

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-12»

ELECTRONIC TRAVEL AUTHORIZATION (eTA)

██████████ — ██████████

CANCELLATION RECORD

DOCUMENT TYPE	eTA cancellation record (Rosa)
SOURCE / ISSUER	Immigration, Refugees and Citizenship Canada (IRCC)
DOCUMENT DATE	21 March 2026
PAGES	1

This is Exhibit " A-12 " referred to in
the affidavit of Victor Manuel Morales Gutierrez Verdugo
sworn before me in 1177
on the MAY 13 2026 day of 20
[Signature]
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER



Government of Canada

Gouvernement du Canada

Electronic Travel Authorization (eTA) Status

*** Check your status (required)**

I received an eTA. I want to check my file. ▼

*** Please select one (required)**

eTA Number ▼

*** eTA Number (required)**

This number, which begins with the letter J, can be found at the top of the email you received when your eTA was approved.

[Redacted]

Enter the following information **exactly** as you entered it on your application form:

*** Passport number (required)**

[Redacted]

*** Country / territory of issue (required)**

[Redacted] ▼

*** Issue date (required)**

[Redacted] ▼

[Redacted] ▼

[Redacted] ▼

*** Expiry date (required)**

[Redacted] ▼

[Redacted] ▼

[Redacted] ▼

Application status

Where is this application?	Details
Application status	Your application was cancelled.
A final decision has been reached	
eTA Number	[Redacted]
Expiry date	[Redacted]
eTA document status	After reviewing your file, we've determined that you no longer meet the requirements for an Electronic Travel Authorization. Your file is now closed. You should reapply once you have addressed the reason(s) why your eTA was cancelled. You no longer hold a valid eTA. As such, you should not plan or undertake any travel to Canada.

Date modified:

2026-01-22

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-13»

MAGNETIC RESONANCE IMAGING (MRI) STUDY
OF THE MINOR APPLICANT'S SKULL

(10 September 2024)

DOCUMENT TYPE	Medical imaging study — skull MRI
SOURCE / ISSUER	Medical institution (Sonora, Mexico)
DOCUMENT DATE	10 September 2024
PAGES	3

This is Exhibit " A-13 " referred to in
the affidavit of Victor Manuel Gutierrez Verdugo
sworn before me in MtL
on the day of MAY 13 2026
[Signature]
Commissioner of oaths

**JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER**

Fecha: 10 de septiembre de 2024

Nombre: [REDACTED]

Fecha de nacimiento: [REDACTED]

Edad: 6 años

Estudio: Resonancia Magnética simple de Cráneo

Técnica: Se realiza RM simple de cráneo obteniendo secuencias en los distintos planos ortogonales.

Limitaciones: Ninguna.

Descripción:

Tejido blando del cuero cabelludo de morfología e intensidad de señal normal.

Cerebelo de morfología anormal, con hipoplasia del hemisferio cerebeloso izquierdo.

Puente de morfología normal, con intensidad de señal característica en las distintas secuencias.

Ganglios basales de morfología e intensidad de señal normal en las distintas secuencias. Mesencéfalo de morfología normal con intensidad de señal adecuada.

Región selar de morfología normal, con glándula hipófisis morfología y tamaño normal, con intensidad de señal adecuada en las distintas secuencias.

Cuerpo calloso con adelgazamiento del esplenio.

Sistema ventricular infra y supratentorial dilatado, con morfología alterada del cuerpo de los ventrículos laterales; los plexos coroideos son normales. Presencia de válvula de derivación ventricular occipital derecha.

Espacio subaracnoideo de amplitud normal, con adecuada profundidad de surcos y cisuras. Línea media central, no hay evidencia de herniaciones.

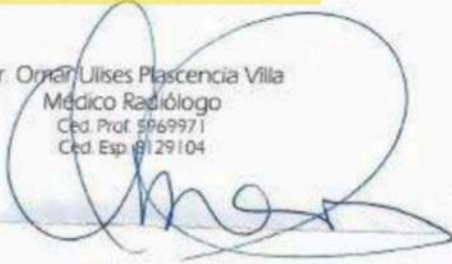
Hemisferios cerebrales de morfología normal, el parénquima presenta una adecuada diferenciación sustancia gris-blanca, con intensidad de señal adecuada en las distintas secuencias.

Estructuras vasculares del polígono de Willis de morfología normal.

Conclusión:

- Malformación de Chiari tipo II con datos de ventriculomegalia infra y supratentorial, disgenesia del esplenio del cuerpo calloso, hipoplasia del hemisferio cerebeloso izquierdo.
- Presencia de válvula de derivación ventricular occipital derecha.

Dr. Omar Ulises Plascencia Villa
Médico Radiólogo
Ced. Prof. 5969971
Ced. Esp. 9129104



Clínica del Noroeste, S.A. de C.V.
Juárez y Luis Donaldo Colosio S/N
Colonia Centro, C.P. [REDACTED]

Centro Médico del Noroeste, S.A. de C.V.
Luis Donaldo Colosio No. 23 Ote.
Colonia Centro, C.P. [REDACTED] Hermosillo [REDACTED]

Centro de Diagnóstico Integral del Noroeste, S.A. de C.V.
Luis Donaldo Colosio No. 23 Ote.
Colonia Centro, C.P. [REDACTED]

Fecha: 10 de septiembre de 2024

Nombre: [REDACTED]

Fecha de nacimiento: [REDACTED]

Edad: 6 años

Estudio: Resonancia Magnética de Columna total

Técnica: Se realiza RM de columna total obteniendo secuencias en los distintos planos ortogonales.

Limitaciones: Ninguna.

Descripción:

Tejido celular subcutáneo de morfología e intensidad de señal normal.

Curvatura fisiológica cervical con tendencia a la rectificación.

Curvatura fisiológica dorsal conservada.

Curvatura fisiológica lumbar conservada.

No hay evidencia de listesis de los cuerpos vertebrales.

Rotoescoliosis dorsolumbar derecha.

Discos intervertebrales de morfología normal, con intensidad de señal normal en las distintas secuencias.

Cuerpos vertebrales de morfología normal, sin evidencia de lesiones líticas o blásticas, con intensidad de señal homogénea en las distintas secuencias.

Ligamentos interespinosos con intensidad de señal normal en las distintas secuencias.

Facetas articulares de morfología normal, con márgenes íntegros, sin evidencia de alteraciones.

Médula espinal con presencia de una hiperseñal generalizada en T2 en toda la médula asociada a una aparente dilatación del canal central. Cono medular a nivel de T12-L1.

Cambios postquirúrgicos a nivel del sacro.

Canal radicular de diámetro normal, sin evidencia de estenosis.

Ligamentos amarillos de grosor normal.

Conclusión:

- Hidrosiringomielia de toda la médula.
- Curvatura fisiológica cervical con tendencia a la rectificación.
- Rotoescoliosis dorsolumbar derecha
- Cambios postquirúrgicos a nivel del sacro.

Dr. Omar Ulises Plascencia Villa

Médico Radiólogo

Ced. Prof. 5969971

Ced. Esp. 8129104



Clínica del Noroeste, S.A. de C.V.


Juárez y Luis Donald Colosio S/N

Centro Médico del Noroeste, S.A. de C.V.

Luis Donald Colosio No. 23 Ote

Centro de Diagnóstico Integral del Noroeste, S.A. de C.V.

Luis Donald Colosio No. 23 Ote

 Centro de Diagnostico Integral del Noroeste S.A. de C.V.
Clínica del Noroeste Av. Luis Donaldo Colosio y Horacio soria #23 ote.
Col. Centro C.P. [REDACTED]
Tel: [REDACTED] ExL300 v

Paciente: [REDACTED]

Edad: 6 Fecha solicitud: 09/09/2024

Médico solicita: TAPIA NAVA MANUEL

RESONANCIA: CEREBRO S/MEDIO CONTRASTE

LE RECORDAMOS TRAER ESTE ESTUDIO LA PROXIMA VEZ QUE
ACUDA A ESTE SERVICIO



**Clínica
del Noroeste**

CLÍNICA DEL NOROESTE, S.A. DE C.V.
Juárez y Luis Donaldo Colosio

Teléfono 662 212 18 90

CENTRO MÉDICO DEL NOROESTE, S.A. DE C.V.
Luis Donaldo Colosio y Horacio Soria No. 23 Ote

Teléfono [REDACTED]

www.clinicadelnoroeste.com
01 800 4000-CMN

CENTRO DE DIAGNOSTICO INTEGRAL DEL NOROESTE, S.A. DE C.V.
Ave. Luis Donaldo Colosio No. 23 Ote

FEDERAL COURT

(Cour fédérale)

EXHIBIT «A-14»

MAGNETIC RESONANCE IMAGING (MRI) STUDY
OF THE MINOR APPLICANT'S TOTAL SPINE

(10 September 2024)

DOCUMENT TYPE	Medical imaging study — total spine MRI
SOURCE / ISSUER	Medical institution [REDACTED]
DOCUMENT DATE	10 September 2024
PAGES	1

This is Exhibit " A-14 " referred to in
the affidavit of Victor Manuel Gutierrez Verdugo
sworn before me in PH
on the 10 day of MAY 13 2026
[Signature]
Commissioner of oaths

JUSTIN DE SOUSA
AGENT DU GREFFE
REGISTRY OFFICER

Fecha: 10 de septiembre de 2024

Nombre: [REDACTED]

Fecha de nacimiento: [REDACTED]

Edad: 6 años

Estudio: Resonancia Magnética simple de Cráneo

Técnica: Se realiza RM simple de cráneo obteniendo secuencias en los distintos planos ortogonales.

Limitaciones: Ninguna.

Descripción:

Tejido blando del cuero cabelludo de morfología e intensidad de señal normal.

Cerebelo de morfología anormal, con hipoplasia del hemisferio cerebeloso izquierdo.

Puente de morfología normal, con intensidad de señal característica en las distintas secuencias.

Ganglios basales de morfología e intensidad de señal normal en las distintas secuencias. Mesencéfalo de morfología normal con intensidad de señal adecuada.

Región selar de morfología normal, con glándula hipófisis morfología y tamaño normal, con intensidad de señal adecuada en las distintas secuencias.

Cuerpo caloso con adelgazamiento del esplenio.

Sistema ventricular infra y supratentorial dilatado, con morfología alterada del cuerpo de los ventrículos laterales; los plexos coroideos son normales. Presencia de válvula de derivación ventricular occipital derecha.

Espacio subaracnoideo de amplitud normal, con adecuada profundidad de surcos y cisuras. Línea media central, no hay evidencia de herniaciones.

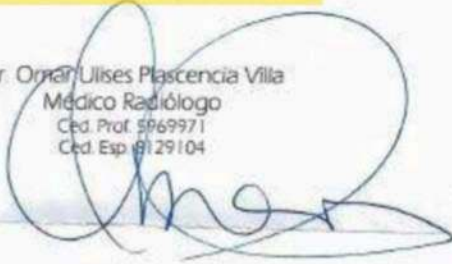
Hemisferios cerebrales de morfología normal, el parénquima presenta una adecuada diferenciación sustancia gris-blanca, con intensidad de señal adecuada en las distintas secuencias.

Estructuras vasculares del polígono de Willis de morfología normal.

Conclusión:

- Malformación de Chiari tipo II con datos de ventriculomegalia infra y supratentorial, disgenesia del esplenio del cuerpo caloso, hipoplasia del hemisferio cerebeloso izquierdo.
- Presencia de válvula de derivación ventricular occipital derecha.

Dr. Omar Ulises Plascencia Villa
Médico Radiólogo
Ced. Prof. 5969971
Ced. Esp. 9129104



Clínica del Noroeste, S.A. de C.V.
Juárez y Luis Donaldo Colosio S/N
Colonia Centro, C.P. [REDACTED]

Centro Médico del Noroeste, S.A. de C.V.
Luis Donaldo Colosio No. 23 Ote.
Colonia Centro, C.P. [REDACTED] Hermosillo [REDACTED]

Centro de Diagnóstico Integral del Noroeste, S.A. de C.V.
Luis Donaldo Colosio No. 23 Ote.
Colonia Centro, C.P. [REDACTED]

FEDERAL COURT

(Cour fédérale)

BETWEEN:

[REDACTED]

and

[REDACTED]

a minor, represented by his litigation guardian

[REDACTED]

Applicants

— and —

(1) THE MINISTER OF CITIZENSHIP AND IMMIGRATION

(2) THE MINISTER OF PUBLIC SAFETY AND EMERGENCY PREPAREDNESS

Respondents

— and —

VICTOR MANUEL GUTIERREZ VERDUZCO

Proposed Intervener

WRITTEN REPRESENTATIONS

(Rule 364(2)(e) FCR)

In support of the motion for leave to intervene under Rule 109

Victor Manuel Gutierrez Verduzco — Proposed Intervener

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PART I — OVERVIEW

(Aperçu)

1. The proposed intervener, Victor Manuel Gutierrez Verduzco, brings this motion in writing under Rule 369 of the Federal Courts Rules, SOR/98-106, in exercise of the right conferred by Rule 109(1) of the same Rules, seeking from this Honourable Court leave to intervene in the present application for judicial review IMM-7743-26 (*Morales-Ochoa et al v The Minister of Citizenship and Immigration and The Minister of Public Safety and Emergency Preparedness*).
2. The proposed intervener appears in his own right, self-represented. He is the father of the minor applicant [REDACTED] and the former spouse of the principal applicant [REDACTED]. He is personally affected by the impugned administrative actions of 21 March 2026, conducted by the same CBSA officers in the same procedural sequence at the Montreal-Pierre Elliott Trudeau International Airport.
3. This motion is brought in express compliance with the direction received from the Courts Administration Service by e-mail dated 8 May 2026, according to which the proposed intervener must bring a motion for leave to intervene as a prerequisite to any participation in the file.
4. These Written Representations, filed under Rule 364(2)(e) of the Federal Courts Rules, set out the applicable statutory framework (Part IV), formulate the issue to be decided (Part III), apply the prevailing test for granting leave to intervene (Part V), and specify the Order whose issuance is sought (Part VI).

PART II — FACTS

(Faits)

5. On 5 April 2026, [REDACTED] signed the IR-1 Form (*Application for Leave and for Judicial Review*) in respect of court file IMM-7743-26, on her own behalf and as litigation guardian (*ad litem*) of the minor applicant [REDACTED]

[REDACTED] born on [REDACTED]. The Court filed and sealed the IR-1 Form on 13 April 2026.

6. The administrative actions impugned in the underlying judicial review comprise the set of decisions and actions of the Canada Border Services Agency (CBSA) of 21 March 2026 at the Montreal-Pierre Elliott Trudeau International Airport, including, without limitation: (i) the alleged *withdrawal* of the applicants' refugee protection claims (Forms IMM 5317); (ii) the report under s. 44(1) IRPA (Document [REDACTED] and (iii) the IMM 1282 *Allowed to Leave Canada* authorizations.

7. The proposed intervener was processed by the same CBSA officers (including, without limitation, Officers L. BEDROS, badge 6M93, and LUCIER) in the same procedural sequence of 21 March 2026, and was arrested under s. 55 IRPA on that same 21 March 2026 at 19:43 hours, as literally recorded in the Form M-1 *Notice of Arrest* issued by Officer LUCIER (Exhibit «A-05»). From that time forward, the principal applicant and the minor applicant remained without the proposed intervener's presence in the CBSA secondary inspection area at the Montreal-Pierre Elliott Trudeau International Airport. The proposed intervener was released on 24 March 2026 by order of *Member* Yves Dumoulin of the Immigration Division, under conditions imposed pursuant to s. 58(3) IRPA. The admissibility proceeding under s. 44(2) IRPA against him remains open before the Immigration Division.

8. The CBSA officers attributed to the proposed intervener conduct and statements recorded in the Form M-1 *Notice of Arrest* of 21 March 2026 issued by Officer LUCIER — the same form which expressly recognizes the proposed intervener's *former-spouse* status in respect of the principal applicant and the joint arrival of the members of the family unit as [REDACTED] citizens.

9. On 22 March 2026, the principal applicant and the minor applicant were removed to [REDACTED] as a direct consequence of the impugned actions. The proposed intervener remains in Canada under the jurisdiction of the Court.

10. On 8 May 2026, the proposed intervener received an e-mail from the Courts Administration Service, by which he was advised that, not being a party to the file, he must bring a motion for leave to intervene as a prerequisite to any participation in the proceeding. This motion is brought in compliance with that direction.

11. The facts relevant to this motion are set out in the Affidavit of Victor Manuel Gutierrez Verduzco, Form 80A, which precedes these Written Representations and is accompanied by Exhibits A-00 through A-14 identified in the List of Exhibits (Schedule A).

PART III — ISSUE

9. The issue raised by this motion is whether the proposed intervener satisfies the test for granting leave to intervene under Rule 109 of the *Federal Courts Rules*.

10. More specifically, whether the proposed intervener: (i) offers *useful and different submissions* on issues raised by the parties; (ii) has a *genuine interest* in the matter; and (iii) whether granting leave is in the *interests of justice*.

PART IV — STATUTORY FRAMEWORK

11. Rule 109(1) — Leave to intervene: *"The Court may, on motion, grant leave to any person to intervene in a proceeding."*

12. Rule 109(2): *"Notice of a motion under subsection (1) shall (a) set out the full name and address of the proposed intervener and of any solicitor acting for the proposed intervener; and (b) describe how the proposed intervener wishes to participate in the proceeding and how that participation will assist the determination of a factual or legal issue related to the proceeding."*

13. Rule 109(3): *"In granting a motion under subsection (1), the Court shall give directions regarding (a) the service of documents; and (b) the role of the intervener, including costs, rights of appeal and any other matters relating to the procedure to be followed by the intervener."*

14. Rule 369(1) — Motion in writing: *"A party may, in a notice of motion, request that the motion be decided on the basis of written representations."*

15. Rule 81(1) — Affidavits on personal knowledge.

16. Rule 4(1) FC-CIRPR: The general Federal Courts Rules apply to immigration JR proceedings.

17. Section 18.1(1) Federal Courts Act — judicial review of federal administrative actions.

PART V — TEST AND APPLICATION

A. The prevailing test

20. The prevailing test for granting leave to intervene under Rule 109 of the Federal Courts Rules was set down by the Honourable Mr. Justice Stratas of the Federal Court of Appeal in *Canada (Citizenship and Immigration) v Canadian Council for Refugees*, 2021 FCA 13, at para. 6, and subsequently affirmed in *Chelsea (Municipality) v Canada (Attorney General)*, 2023 FCA 179, at para. 9.

21. Under that test, the person seeking to intervene must satisfy three requirements:

(I) Useful and different submissions: the proposed intervener must offer submissions, perspectives and ideas that are different and useful, applying the four *CCR FCA* questions: (a) what issues have the parties raised?; (b) what does the proposed intervener intend to submit concerning those issues?; (c) are the proposed intervener's submissions doomed to fail?; (d) will the proposed intervener's arguable submissions assist the determination of the actual, real issues in the proceeding?

(II) Genuine interest in the matter before the Court.

(III) Interests of justice support the intervention.

22. The test is applied flexibly (*CCR FCA*, at para. 7). The centre of the analysis lies in the usefulness of the proposed intervener's submissions (*Canada (Attorney General) v Kattenburg*, 2020 FCA 164, at para. 8).

22-bis. The contemporary framework reiterates the flexibility of the Rule 109 analysis. As the Honourable Mr. Justice Rennie of the Federal Court of Appeal observed in *Alliance for Equality of Blind Canadians v Attorney General of Canada*, 2022 FCA 131, at para. 11, “a grocery list approach to intervention criteria is to be avoided”; the single invariable requirement is that the intervention be useful — i.e., that it “assist the determination of a factual or legal issue” as required by Rule 109(2) (*ibid.* at para. 12). This reasoning builds upon the foundational framework in *Sport Maska Inc v Bauer Hockey Corp*, 2016 FCA 44, and reinforces the test articulated in *CCR FCA*, 2021 FCA 13.

B. Application of the test to the present case

(I) Useful and different submissions

23. Issues raised by the applicants. The applicants raise in their IR-1 Form five *Grounds* in respect of the administrative actions of 21 March 2026: **Ground 1** (*ultra vires* under s. 42(2) IRPR); **Ground 2** (*the withdrawal was not free, informed, or unequivocal*); **Ground 3** (*failure to consider the best interests of the minor child*); **Ground 4** (*procedural unfairness: coercive environment*); and **Ground 5** (*CBSA officer-authored attributed narrative*).

24. How the proposed intervenor intends to assist. The proposed intervenor has first-hand personal knowledge of the same procedural sequence of 21 March 2026, having been processed by the same CBSA officers at the same place and time, and having been arrested under s. 55 IRPA at **19:43 hours on 21 March 2026**, as literally recorded in the Form M-1 *Notice of Arrest* (Exhibit «A-05»). His evidence is consistent with and complementary to the applicants' denial of the alleged *withdrawal*.

25. Submissions not doomed to fail. The proposed intervenor's submissions do not introduce new issues; rather, they contribute evidentiary elements and a factual perspective in respect of the *Grounds* already raised by the applicants.

26. Contribution to the determination of the actual issues. The proposed intervenor's submissions will assist the Court's determination as follows: (a) with respect to **Ground 3** (best interests of the child under *Baker v Canada*, [1999] 2 SCR 817, and *Kanthisamy v Canada*, 2015 SCC 61), by providing the perspective of the biological father affected by the resulting family separation; (b) with respect to **Ground 4** (*procedural unfairness*), by providing direct observation of the environment of 21 March 2026 up to the moment of his arrest; (c) with respect to **Ground 5** (*officer-authored attributed narrative*), by providing evidence in respect of the attributions that the same officers made to the proposed intervenor in the Form M-1.

26-bis. Directly analogous Federal Court precedent — Rozas del Solar. This Honourable Court has granted intervenor status to public-interest intervenors in materially analogous circumstances. In *Rozas del Solar v Canada (Citizenship and Immigration)*, 2018 FC 156, the Honourable Mr. Justice Diner granted intervention in an immigration judicial review at the Federal Court trial level, applying the Rule 109(2) test and finding that the proposed intervenors offered a useful and different perspective from the parties on issues affecting refugee determination. The factual matrix in the present case is closely aligned: same court level (Federal Court trial), same subject-matter (immigration judicial review), same governing rule (Rule 109), and substantially overlapping public interest in the integrity of CBSA processing at ports of entry. The reasoning in *Rozas del Solar* directly supports the granting of the present motion.

(II) Genuine interest

27. The proposed intervener has a genuine and direct interest in the outcome of the proceeding, in his dual capacity as: (i) biological father of the minor applicant [REDACTED] [REDACTED] (Exhibit «A-00»); and (ii) a person personally affected by the same impugned procedural sequence of 21 March 2026 (Exhibits «A-01» through «A-09»). The Form M-1 issued by Officer LUCIER himself identifies the proposed intervener as *former spouse* of the principal applicant and as a member of the family unit.

28. The conduct and statements attributed to the proposed intervener by the CBSA officers during the same procedural sequence — recorded in the LUCIER Form M-1 — are part of his Canadian immigration record and are liable to bear on (i) the inadmissibility proceeding under s. 44(2) IRPA; (ii) the hearing of his own refugee protection claim; and (iii) any future immigration, citizenship or public-safety proceeding.

29. The proposed intervener is physically present in Canada, under the jurisdiction of the Court, subject to conditions imposed under s. 58(3) IRPA by order of *Member Yves Dumoulin* of the Immigration Division (Exhibit «A-02»), and has the time, documents and personal commitment necessary to dedicate them to the present proceeding.

(III) Interests of justice

30. The requirement that intervention be in the *interests of justice* under Rule 109 is interpreted according to the objective considerations this Honourable Court has developed in its case law — particularly in *CCR FCA 2021 FCA 13*, at para. 9, *Canada (Attorney General) v Pictou Landing First Nation*, 2014 FCA 21, at para. 9, and *Sport Maska Inc v Bauer Hockey Corp*, 2016 FCA 44 — without prejudice to the flexibility inherent in that principle. Applied to the present case, those considerations favour granting the leave sought, for the following reasons.

31. Consistency with the imperatives of Rule 3 FCR. This motion is brought before any decision on the leave application in the underlying proceeding and before any hearing date is set. The proposed intervention does not disrupt the procedural calendar or the orderly progress of the file, and is consistent with the just, most expeditious and least expensive determination of every proceeding on its merits that Rule 3 of the Federal Courts Rules establishes as the guiding criterion (see also *Hryniak v Mauldin*, 2014 SCC 7, and *Canada (Attorney General) v Pictou Landing First Nation*, 2014 FCA 21, at para. 10).

32. Contribution of a perspective not available among the existing parties. In accordance with the criterion expressed in *Pictou Landing*, 2014 FCA 21, at para. 9, the relevant consideration under Rule 109(2) is whether the proposed intervener will provide the Court with *further, different and valuable insights and perspectives*. The applicants are physically present in ██████ having been removed. The Court does not have, among the existing parties, a witness present in Canadian jurisdiction with first-hand personal knowledge of the same procedural sequence of 21 March 2026 up to the moment of the proposed intervener's arrest at 19:43 hours. Admitting the proposed intervener will permit the Court to access that additional factual perspective.

33. Absence of inequality of arms. The proposed intervener's participation does not give rise to either the reality or the appearance of procedural imbalance. The Respondents are two Ministers of the Government of Canada represented by the Department of Justice. The addition of a single individual intervener, self-represented, with a scope limited to the factual and legal issues already raised by the applicants, does not approach the scenarios identified as problematic in *Gitxaala Nation v Canada*, 2015 FCA 73, at paras. 21–24, or in *Tsleil-Waututh Nation v Canada (Attorney General)*, 2017 FCA 174.

34. Directly applicable precedent. The circumstances of the present case are materially analogous to those considered by this Honourable Court in *Molnar v Canada (Citizenship and Immigration)*, 2012 FC 1076, in which the Honourable Mr. Justice Zinn granted *leave to intervene* to an individual intervener with first-hand personal knowledge of the facts in dispute and defined a tailored procedural role for that intervener — including the right to cross-examine (*at para. 25 and Order, para. 1(vi)*). The proposed intervener appears self-represented, as expressly permitted by Rule 119 of the Federal Courts Rules. The proposed intervener relies on *Molnar* for the procedural form thereby afforded (defined role, evidentiary record, cross-examination), not for any symmetry of status with the intervener in that case.

35. The proposed intervener does not seek to replace or represent the applicants. He appears in his own right, in exercise of the right conferred by Rule 109(1), and acknowledges that the terms, conditions and directions applicable to the role of the intervener are submitted to the determination of the Court under Rule 109(3).

PART VI — ORDER SOUGHT

36. For the reasons set out in Parts I through V above, the proposed intervener respectfully requests this Honourable Court to make an Order in the following terms:

(a) granting the proposed intervener **Victor Manuel Gutierrez Verduzco** leave to intervene in the application for judicial review **IMM-7743-26** under **Rule 109(1) of the Federal Courts Rules**;

(b) amending the *style of cause* of the file to include the proposed intervener in his capacity as intervener, in accordance with the practice established by this Honourable Court in *Molnar v Canada (Citizenship and Immigration)*, 2012 FC 1076, Order, para. 3;

(c) giving such directions as this Honourable Court considers appropriate under **Rule 109(3)** in respect of the service of documents on the proposed intervener and of the role of the intervener, including, without limitation:

(i) time limits for service and filing of the intervener's *memorandum of fact and law*;
(ii) time limits for response by the other participants; (iii) limits of the intervener's *evidentiary record*; (iv) the intervener's right to file an additional affidavit and to cross-examine, in accordance with the practice recognized in *Molnar*, 2012 FC 1076, at para. 25 and Order, para. 1(vi); (v) length of oral submissions, if any; and (vi) the costs regime;

(d) awarding no costs either for or against the proposed intervener in relation to this motion, in accordance with the practice recognized in *Gnanapragasam v Canada (MPSEP)*, 2023 FC 1735, Order, para. 2(g); and

(e) such further and other relief as this Honourable Court considers just.

PART VII — LIST OF AUTHORITIES

A. Legislation and regulations

37. *Immigration and Refugee Protection Act*, SC 2001, c 27 — subsections 44(2), 55, 58(3) and 72(1).
38. *Federal Courts Act*, RSC 1985, c F-7 — subsection 18.1(1).
39. *Federal Courts Rules*, SOR/98-106 — Rules 3, 81(1), 109(1), 109(2), 109(3), 119, 139(1) (e), 364(2)(e) and 369(1).
40. *Federal Courts Citizenship, Immigration and Refugee Protection Rules*, SOR/93-22 — Rule 4(1).

B. Case law

41. *Canada (Citizenship and Immigration) v Canadian Council for Refugees*, 2021 FCA 13.
42. *Chelsea (Municipality) v Canada (Attorney General)*, 2023 FCA 179.
43. *Canada (Attorney General) v Kattenburg*, 2020 FCA 164.
44. *Canada (Attorney General) v Pictou Landing First Nation*, 2014 FCA 21, [2015] 2 FCR 253.
45. *Sport Maska Inc v Bauer Hockey Corp*, 2016 FCA 44, [2016] 4 FCR 3.
46. *Gitxaala Nation v Canada*, 2015 FCA 73.
47. *Tsleil-Waututh Nation v Canada (Attorney General)*, 2017 FCA 174.
48. *Molnar v Canada (Citizenship and Immigration)*, 2012 FC 1076.
49. *Gnanapragasam v Canada (Public Safety and Emergency Preparedness)*, 2023 FC 1735.
50. *Baker v Canada (Minister of Citizenship and Immigration)*, [1999] 2 SCR 817.
51. *Kanthisamy v Canada (Citizenship and Immigration)*, 2015 SCC 61, [2015] 3 SCR 909.
- 51-bis. *Rozas del Solar v Canada (Citizenship and Immigration)*, 2018 FC 156 (Diner J).
- 51-ter. *Alliance for Equality of Blind Canadians v Attorney General of Canada*, 2022 FCA 131 (Rennie JA).
- 51-quater. *Hryniak v Mauldin*, 2014 SCC 7, [2014] 1 SCR 87.