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Citizenship and Immigration

CITIZENSHIP AND IMMIGRATION SECTION / SECTION DE LA CITOYENNETÉ DE LA IMMIGRATION

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OBA • ABO

Beware of Misrepresentations in Canadian Immigration Law!

*Sergio R. Karas**

The *Immigration and Refugee Protection Act* ("*IRPA*")[1] in force since June 28, 2002 contains a number of provisions dealing with misrepresentations made by foreign nationals or by other persons with respect to applications for immigration status. Applicants, sponsors, employers, and any other person who is a party to an application should be particularly careful to ensure that no misrepresentation is made to the authorities. The spectre of potential liability is very real under the new immigration legislation.

Section 40(1) of the *IRPA* specifically states that:

> *"A permanent resident or a foreign national is inadmissible for misrepresentation*
>
> *(a) for directly or indirectly misrepresenting or withholding material facts relating to a relevant matter that induces or could induce an error in the administration of this Act;*
> *(b) for being or having been sponsored by a person who is determined to be inadmissible for misrepresentation;*
> *(c) on a final determination to vacate a decision to allow the claim for refugee protection by the permanent resident or the foreign national; or*
> *(d) on ceasing to be a citizen under paragraph 10(1)(a) of the Citizenship Act, in the circumstances set out in subsection 10(2) of that Act."*

This provision is directed against an applicant attempting to misrepresent to gain any immigration status. In the recent noteworthy case of ***Wang v. Canada***,[2] the Federal Court held that the broad language of Section 40 (1)(a) of the *IRPA* includes inadmissibility for misrepresentations made by a third party, even where the third party was not making it knowingly. In that case, the applicant, Ms. Wang, came to Canada on a student visa. She married her husband several years prior to coming to Canada. Her husband, unbeknownst to her, was already married and had a son. When her husband applied for immigration status as an Entrepreneur, Ms. Wang was included as an accompanying spouse; however, her husband's previous relationship was never disclosed to immigration authorities. Both Ms. Wang and her husband became Permanent Residents of Canada. Several years later, Ms. Wang applied for Canadian Citizenship and around the time of being interviewed, her husband told her for the first time that he was previously married and had a son on his application for Permanent Residence. As a result of the husband's failure to disclose that he was already married and had a son, an exclusion order was issued

against the husband for directly misrepresenting a material fact and also against Ms. Wang for indirectly misrepresenting a material fact as the accompanying spouse. The exclusion order against Ms. Wang was issued pursuant to paragraph 40(1)(a) of *IRPA.* Ms. Wang argued that she should not be held accountable for her husband's misrepresentation, as she was unaware of it at the time of the application for residency in Canada. The court rejected her argument.

In ***Wang***[3] the question became whether the language in paragraph 40(1)(a) of the *IRPA*, *"indirectly misrepresenting or withholding material facts"* includes the situation of an applicant who was unaware of her husband's misrepresentation. After carefully examining the arguments, the court held that allowing a person to benefit from the misrepresentation of another would lead to a potential absurdity, in that an applicant could directly misrepresent and his accompanying spouse could then not be removable from Canada, if that person could argue that he or she had no knowledge of the misrepresentation. The court further held that the word "indirectly" can be interpreted to cover the situation where an applicant relies on being included in another person's application, even though he or she did not know that a misrepresentation was being made. The court stressed in its decision that the purpose of the provision was to eliminate abuse. Although the decision seems harsh, at first glance, its reasoning appears to be correct and in line with Parliament's legislative intent, as indicated by the court in its opinion citing the parliamentary debates prior to the passage of the *IRPA.*

In ***Mendiratta v. Canada***,[4] the court dismissed the judicial review application brought by a 65 year old citizen of India who was the subject of a removal order. The applicant obtained permanent resident status under Humanitarian and Compassionate grounds, stating that she was a widow and had no relatives outside Canada, and resided with her Canadian citizen daughter, her son-in-law and the couple's two children. After eight years in Canada, the applicant decided to return to India and spent over five months there. During her last stay, she was persuaded to resume her relationship with her husband from whom she was separated. Upon her return to Canada, she became the subject of a report indicating that she was inadmissible under Section 40(1)(a) of the Act for directly or indirectly misrepresenting or withholding material facts to a relevant matter that induces or can induce an error in the administration of the Act. The authorities took the view that the person concerned, having previously indicated that she was widowed when she applied for permanent resident status, sought to sponsor her husband in India, where she also had one son as well as two daughters. Her Record of Landing indicated her marital status as widowed, and the supplementary information provided to establish the existence of Humanitarian and Compassionate grounds also made extensive references to the fact that she had no other relatives in her country of origin. The Immigration Appeal Division upheld the validity of her removal order. The Federal Court reaffirmed the principle that *the obligation to disclose information accurately ultimately rests on the applicant.*[5]

However, in ***Huang v. Canada***,[6] the Federal Court granted judicial review to an investor applicant from China, who had made contradictory statements in his application for permanent residence concerning the provenance of his funds. In his characteristic colourful language, Harrington J. disagreed with the proposition that, while a finding of misrepresentation is subject to a patent unreasonableness standard of review, the "inducement" portion of Section 40 may be reviewed on a reasonableness simpliciter standard. In that case, Mr. Huang had applied to the Newfoundland Provincial Nominee Program, and when his file was considered, visa officers became concerned that his financial interests in a Chinese company were not readily verifiable. Mr. Huang submitted a verification report from an audit firm confirming that he had an 80% interest in his construction company. However, the document indicated that the commercial concern was a "sole proprietorship", a contradictory characterization of the venture. Apparently, the visa officers attempted to contact the audit firm, which unfortunately first claimed that his report was a fraud, and that it had no records of it in its files, but later recanted and indicated that it had been lost in the course of moving. This heightened the concern of the visa officers about Mr. Huang's business activities. Harrington J. referred to the evidence in the case, which suggested difficulties with the definition of "sole proprietorship" and "corporation" under Chinese law, and he also chastised the visa officers for lack of follow up and further inquiries to clear their doubts. Despite the positive outcome for the applicant in this case, it must be cautioned that it appears to have been decided solely on its facts. In addition, the decision is very brief and does not appear to be clearly reasoned.

Section 40(2) allows the authorities to consider an individual to be inadmissible for a period of two years following the final determination of the application, after the misrepresentation is discovered and the decision communicated to the applicant:

> *"The following provisions govern subsection (1):*
>
> *(a) the permanent resident or the foreign national continues to be inadmissible for misrepresentation for a period of two years following, in the case of a determination outside Canada, a final determination of inadmissibility under subsection (1) or, in the case of a determination in Canada, the date the removal order is enforced; and*
> *(b) paragraph (1)(b) does not apply unless the Minister is satisfied that the facts of the case justify the inadmissibility."*

A different provision, but one that may affect all applicants more directly is found in Section 127 of *IRPA* which states:

> *"No person shall knowingly*
>
> (*a) directly or indirectly misrepresent or withhold material facts relating to a relevant matter that induces or could induce an error in the administration of this Act;*
>
> *(b) communicate, directly or indirectly, by any means, false or misleading information or declarations with intent to induce or deter immigration to Canada;*
>
> *(c) refuse to be sworn or to affirm or declare, as the case may be, or to answer a question put to the person at an examination or at a proceeding held under this Act."*

This broad language appears to be a deliberate attempt to encompass almost any form of misrepresentation or withholding or information by anyone, including an applicant, employer or third party representative. However, the use of the qualifying word "knowingly" would suggest a high threshold to be met in any prosecution.

Counselling or aiding misrepresentation, directly or indirectly, or withholding material facts relating to a relevant matter that *"induces or could induce an error in the administration of the Act"* is an offence under Section 126, and can lead to very serious consequences for those found guilty of a breach:

> *"Every person who knowingly counsels, induces, aids or abets or attempts to counsel, induce, aid or abet any person to directly or indirectly misrepresent or withhold material facts relating to a relevant matter that induces or could induce an error in the administration of this Act is guilty of an offence."*

The matter arose in ***R. v. Tongo***,[7] a case dealing with organizing the entry of illegal immigrants into Canada, where the provisions of Section 127 of the *IRPA* were considered. In that case, a British Columbia Provincial Court judge held that the *IRPA* establishes a number of general offences to discourage persons from engaging in activities such as employing illegal migrants or withholding relevant information. The accused pleaded guilty to misrepresentation of a material fact under Section 127(a) of *IRPA*, the material fact in fact case was concealing the presence of three Chinese illegal migrants on board a ship. Although the case dealt with transporting illegal migrants, it is noteworthy that the court chose to make a general statement endorsing Parliament's policy goal of attempting to curtail illegal immigration and misrepresentation and combating organized crime and human smuggling.

In ***R. v. Parmar***,[8] the accused, Ms. Parmar was charged under Section 127 (b) of *IRPA,* that she falsely told Canadian immigration officers that she wished to immigrate from India to Canada to be with her husband, while in reality she only wished to come to Canada to visit. Apparently, as soon as she arrived in Canada, she and her relatives were subjected to demands for financial payment by her husband in exchange for sponsoring her as a dependent. Ms. Parmar was convicted at trial and sentenced to four months imprisonment. However, the conviction was quashed on appeal by the Alberta Court of Queen's Bench, based on their interpretation the evidence presented at trial, as the opposing parties had made numerous contradictory statements. In words of the court, *"it could not be determined who was telling the truth".* Despite the ultimate acquittal, the case should be a warning sign to those who misrepresent their true intentions when applying for any type of visa.

In ***R. v. Lin***,[9] the accused was charged by indictment with five counts of counselling, inducing, aiding or abetting, five Chinese nationals to directly or indirectly misrepresent or withhold material facts relating to a

matter that could induce an error in the administration of the Act, contrary to the provisions of Section 126 of *IRPA.* The charges arose in connection with a well organized and planned venture to transport the said five individuals to Canada on board the cruise ship *Star Princess,* claiming to be Korean nationals and tourists. Mr. Lin apparently counselled them as to the false statements that would support their bogus identities and, since he was the only one in the group who could speak English, he made representations on their behalf when questioned by immigration officers. It was later discovered that Mr. Lin was part of an organized crime ring moving individuals surreptitiously to Canada. The court convicted him and referred to the case of ***R. v. Tongo***,[10] but disagreed with the sentence and based on the factual situation, imposed a higher sentence of one year's imprisonment in a penitentiary.

Lawyers and their staff should be particularly cautious and ensure that they do not participate, knowingly or unwittingly, in assisting an applicant or a third party to an application (e.g. an employer or a sponsor) in making any misrepresentation or withholding any material facts, or they may find themselves embroiled in potential litigation or facing criminal charges. It remains to be seen how aggressive prosecutions will be in this area.

Employers in particular should be cautious when assigning a foreign worker to perform specific duties within the organization. Section 124(1)(c) of the *IRPA* states that it is a contravention of the *Act* to *"employ a foreign national in a capacity in which the foreign national is not authorized under this Act to be employed".* It is therefore critical that employers who intend to reassign foreign workers to different duties or positions within the organization obtain legal advice prior to doing so, and take active steps to file the appropriate documentation to obtain changes to the terms and conditions attached to the Work Permit or Labour Market Opinion, if one was obtained.

Applicants and their lawyers may find solace in the fact that the legislation recognizes a defence of "due diligence" and states that no one can be found guilty of an offence for a contravention if reasonable steps were taken to prevent it. That situation arose in an obscure reported case in the Northwest Territories; ***R. v. Perez***[11] where a person who had an expired visitor's visa and an application pending for permanent residence in Canada had also applied for an extension of a Work Permit, but had not received it before continuing his employment. Immigration officers visited the workplace and the accused was charged with working without authorization, but was acquitted because the court recognized that he had "honest and reasonable belief" that he was not working without authorization. The court noted in that case that the accused took reasonable care in the circumstances to avoid committing an offence and, therefore, was not liable.

However, the British Columbia Court of Appeal was less inclined to be forgiving in ***R. v. John Doe*** (also cited as ***R. v. Mohammed Rafik Kahan***),[12] where the appellant pleaded guilty to three indictable offences relating to misrepresentation of his identity as he attempted to enter the country using a forged Canadian passport. The evidence in that case disclosed that the appellant was a "fraud artist" who had also obtained a false United Kingdom passport. He was convicted of misrepresentation and use of false documents and sentenced to twenty three months in jail. In a strongly worded judgement, the court determined the sentence to be a fit one and even somewhat in the low range.

The misrepresentation provisions of the legislation highlight the duty of care and due diligence that applicants and their lawyers must exercise in the context of immigration representation. Those who grossly exaggerate the qualifications of potential applicants, or misrepresent their circumstances, financial records, documentary evidence, family status, and employment offered, or any other material fact, may expose themselves to liability and serious penalties. Exercising caution and obtaining the appropriate legal advice is the most prudent course of action in situations involving immigration applications.

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[1] S.C. 2001, c.27.
[2] (2005) F.C. 1059.
[3] *Supra*.
[4] 2005 F.C.293.
[5] See *Mohammed* v. *Canada* [1997] 3 F.C. 299 (Fed. T.D.), cited with approval.
[6] 2005 F.C. 1615.
[7] (2002) BCPC 463.
[7] 44 Imm. L.R. (3d) 136.
[8] 2005 W.L. 3118447 (NFLD. Prov.) ct.

[9] 2005 W.L. 3118447 (NFLD. Prov.) ct.
[10] *Supra.*
[11] (2002) NWTTC A13.
[12] (2004) BCCA 143, 196. B.C. A.C.16, 322 W.A.C. 16.

New Chair of Sections

OBA is pleased to announce that Roderick Flynn of the law firm of Evenson Bundgard Flynn and Past Chair of the Education Law Section has been appointed to the position of Chair of Sections. His e-mail address is r.flynn@ebf-law.com.

As Chair of Sections, Rod will work with both the Chair of Professional Development and the leaders of Sections (and their membership) as a conduit for ideas and input on how to continue the OBA tradition of excellent professional development and advocacy on behalf of its membership.

The OBA and the current Chair of Professional Development, Ben Hanuka, welcome Rod.

Message from the Chair

*Janet L. Bomza**

We are half way into the 2005-2006 OBA year and the past 6 months have been action packed for our Section's Executive.

Our HRSDC (now Service Canada) Subcommittee held a very informative meeting with a few senior officials from Service Canada in the fall. Issues such as the reorganization of the Foreign Worker Unit as part of Service Canada, service standards, communicating with Foreign Worker Unit officers, and the new application forms were discussed. Our newly created Enforcement Subcommittee met with Reg Williams of CBSA and addressed various GTEC issues. A future meeting with senior CBSA officer's overseeing the other four regions of Ontario is scheduled to take place in March. Both Reinhard Mantzel and Paul Dowden met with our Port of Entry Subcommittee in November. The IAD Subcommittee participated in highly productive discussions with several members of the IRB in December and our Bill 14 (Schedule C) Regulating Paralegals Subcommittee has worked tirelessly to convince our own OBA to oppose the implementation of "Schedule C" as it stands. Finally, in November, the Executive participated in a joint CIC/OBA meeting with Mike Finnerty, Paul Dowden, Cheryl Munroe, Joe Carelli and Wilma Jenkins of RHQ, GTA East, West and Central. Minutes from each Subcommittee meeting together with valuable contact telephone lists are now accessible on the OBA website under the heading "Subcommittee Minutes".

Special thanks are due to our Program Coordinator, Randy Hahn (who with Shoshana Green, Lainie Appleby and Sergio Karas), organized several highly informative luncheon programs. Ann Arnott from Case Management shared lots of valuable information while David Cranton of CBSA provided a very practical presentation on dealing with "inadmissibility" issues. With upcoming topical luncheon programs such as Service Canada's "How To" program together with a Tax seminar and an Overseas Processing program, our future luncheon programs are guaranteed to be riveting and of course, well attended.

Randy Hahn and I co-chaired the Citizenship and Immigration Section's half day program at OBA's 2006 Institute Conference. Our Section's topic, 'Crossing the Canada/USA Border' was well received. Speakers, including Mendel Green, Lorne Waldman, Drew Porter, Henry Chang and several others, provided practical information and lots of humour. The half-day event was followed by a delicious lunch and a few words from our Attorney General, Michael Bryant.

These first 6 months have passed quickly. There still remains so much to do. On behalf of our Executive, I would like to say that we look forward to our ongoing work over the next few months, ensuring the delivery of exceptional CLE programs, Section representation with various government bodies and the continued dissemination of valuable information to all Section members.

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Editor's Message

*Nan Berezowski**

In this edition of *Citizenship & Immigration*, one of two scheduled for publication this year, the 2005-2006 Section Executive highlights key issues affecting the Section and updates the Section membership of its work to date.

In reading the newsletter you will undoubtedly note that emphasis on professional responsibility and the profession. In his article on misrepresentation, Section Vice-Chair Sergio Karas reviews the obligations set out in the *Immigration and Refugee Protection Act* and surveys the case law reminding all of us of the difficult factual situations and the corresponding obligations that often go hand-in-hand with the practice of immigration law.

On a related theme, Jacqueline Bart writes of the proposed Ontario provincial legislation, Bill 14 (Schedule C Amendments to the *Law Society Act and Related Amendments to Other Acts*) amending *The Access to Justice Act*, 2005. Bill 14 provides for, among other provisions, the regulation of "paralegals" by the Law Society of Upper Canada. As many of you are aware, the federal regulation of non-lawyers practicing in the area of immigration law through CSIC continues to be under attack for its serious shortcomings. In this context, the Ontario government has now tabled plans to establish an alternative means of regulating certain non-lawyers through the Law Society of Upper Canada.

Executive sub-committee members working on the Section position paper have been extremely diligent in their efforts to persuade the OBA of the importance of appropriate paralegal regulation to the public at large and the Section membership in particular. As outlined in the Section's position paper, http://oba.org/en/imm/imm%5Fen/Bill14.aspx, the Executive has taken the position that the proposed amendments fail to achieve the stated public protection goals and, moreover, are likely to be irreparably prejudicial to the legal profession in Ontario. On this latter point, author and sub-committee member Jacqueline Bart elaborates that in the proposed scheme, where non-lawyers would be regulated by the Law Society there is every reason to be concerned that the distinction between the two classes of licensees (lawyers and paralegals) would be blurred.

As this fundamental matter is being debated within the OBA and the Ontario legislature a very different approach is taking place in some American jurisdictions. By way of comparison, Texas Attorney General Greg Abbott announced on February 6, 2006 a nearly USD$10 million judgment against a fraudulent Pasadena-based immigration consultant who misrepresented her qualifications and authority to provide legal advice and immigration-related services. To see the Texas Attorney General press release, go to http://www.oag.state.tx.us/oagnews/release.php?id=1438. I raise the Texas case as an example of but one possible approach to the complicated issue of non-lawyers and the practice of law.

In closing, I urge you to read the proposed Bill and the Section's position paper and, perhaps to take a minute from the obligations of your practice, to consider the position of the immigration lawyer in the context of this debate on what it means to be a Member of the Law Society of Upper Canada and, ultimately what it means to be a lawyer.

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Call for Submissions

The OBA *Citizenship and Immigration* Editor invites Section Members to submit contributions for the May edition of the newsletter. Authors must be Section members; contributions should be relevant to the practice of immigration law in Ontario. Contributions can take the form of case law review, commentary or updates. Please send contribution ideas or materials to Nan Berezowski at nan@mobilitylaw. com or call me at (416) 850-5112 to discuss.

Ontario Bill 14 Update: Paralegal Regulations

*Jacqueline Bart**

On Monday, February 6, 2006, the Citizenship and Immigration Section Subcommittee on Paralegal Regulation forwarded a Position Summary to the OBA urging the OBA to oppose the legislation on the basis that the amendments of the *Law Society Act*, contained in Bill 14 Schedule "C", fail to meet minimum standards of protection for the Ontario public seeking legal services.

Our subcommittee took the position that the protection of the public in Ontario is paramount in all matters related to the delivery of legal services and that paralegal regulation is essential to public protection in the immigration field. We indicated that the regulation of immigration legal services at the federal level, through CSIC, fails to protect the Ontario public.

Our subcommittee also clarified that the provision of legal services in the area of immigration law must be included in any provincial consumer protection legislation concerning the delivery of legal services. We expressed support for the OBA's historical position that paralegals be prohibited from representing applicants in immigration matters in Ontario.

The proposed legislation is silent on the substance of how the public protection goals will be implemented. Furthermore, it is likely to degrade the stature of Barristers and Solicitors in the province by blurring the distinction between the two classes of licensees (lawyers and paralegals). In addition, lawyers will no longer be 'members' of the LSUC.

By way of background, in March 3, 2000, the CBA (Ontario) made a submission to The Honorable Peter Cory as a response to a Request For Comments on the Regulation of Paralegal Practice in Ontario. In that report, the CBA (Ontario) concluded, "*Consumers in Ontario must be protected by prohibiting paralegals from representing applicants in immigration matters*" (pg. 13). Our Section supports the CBA (Ontario) position, as stated in the above-noted report, and has urged the OBA to continue advocating on behalf of our Section for the prohibition of immigration paralegals in Ontario.

Our Paralegal Regulation Section Subcommittee is comprised of our Chair, Janet Bomza, our Vice Chair, Sergio Karas, Marshall Drukarsh (whom assisted in the drafting of the above noted March 3, 2000 OBA Report concerning immigration paralegal prohibition in Ontario) and the writer, Jacqueline Bart. Our Position Summary is available for your review and commentary on our Section website and we encourage comments or suggestions from our members on this matter.

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Case Management Update

*B.J. Caruso**

On September 22, 2005, Ann Arnott, the Director General for Case Management Branch in Ottawa for the last three years, spoke at the OBA lunch Seminar. She started her presentation by stressing that the Liberal Government, under Paul Martin's leadership, has clearly stated that immigration is a priority for the government. She provided a review of the Case Management Branch, emphasizing that their jurisdiction is wide including the Citizenship and Immigration Minister, as well as the Minister of Justice, and staff within each of these departments. Case Management Branch has the jurisdiction to decide to defend, negotiate or consent to various immigration litigation matters. They are also responsible for managing high profile cases, which requires them to co-ordinate the information between the various departments and the media. In addition to litigation cases, Case Management Branch deals with serious criminal cases, pre-removal risk assessment cases, where a risk is determined, and witness protection cases.

Although Case Management Branch will receive and respond to inquiries made by legal representatives, they openly acknowledge that their priority is to respond to senior management of CIC, the CBSA, and the Department of Justice, as well as the Ministers of Citizenship and Immigration and Department of Justice. Accordingly, responses to third-party representations are not always answered in a reasonable timeframe, although best efforts are made in this regard. The Case Management Branch has a staff of less than 50, and their resources are very limited. Calls will be returned to counsel where counsel has demonstrated that they have used their judgment in calling for their input. Counsel that repeatedly call on a daily or weekly basis, are not likely to have their calls returned.

Ms. Arnott made it clear that the Case Management Branch is not responsible for pressing issues pertaining to service standards, complaints alleging officers were rude to counsel, or issues dealing with policy. She recommended that when dealing with a case specific inquiry counsel should initiate requests with the local office dealing with the file before contacting Case Management. However, where the matter was urgent, it would be appropriate to copy the Case Management Branch on the initial correspondence.

Ms. Arnott commented on a few new initiatives, including a fast approval system for rehabilitation cases, dealing with truck drivers between Canada and the United States, and a new procedure at CPC Vegreville, where inland spousal cases dealing with out of status sponsorees, would be opened and noted in the computer system so as to alert Removal Officers to the fact that the case was pending.

The fax number for Case Management Branch in Ottawa is (613) 941-6754.

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Change in Government; Change in Policy?

*Lloyd W. Ament**

While new governments ordinarily create new challenges for those of us who interact with government departments, immigration practitioners have an even greater challenge as differing ideology can often translate into new policy.

Consider the following policy matters espoused by the Conservative Party prior to the election. While obviously not cast in stone, it certainly does give food for thought:

1. The annual immigration quota should continue to rise, subject to certain concerns mentioned below.
2. In order to clear backlogs (in advance of any quota increase), they recognize the need to hire more processing officers *AND* (emphasis added) monitor application levels.
3. Favour more regionalization, with respect for Charter mobility rights.
4. The point system for skilled workers needs to be changed; points need to be assigned for skills that don't involve university education.
5. Illegal workers need to be dealt with, yet they insist they must be fair to those who play by the rules.
6. No firm commitment for raising settlement funds, but will work with the provinces to channel resources to those in greatest need.
7. Intention to establish (in advance of any quota increase) an agency to pre-assess international credentials and experience.
8. Develop a refugee appeals process that is fair and timely.
9. Would establish a panel of specially trained judges to preside over issues pertaining to national security cases.

It most certainly will be interesting times ahead.

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Law Day
La Journée du droit

Call for Volunteers
Law Day – Province-Wide

Law Day is scheduled for Thursday, April 6, 2006 with activities planned across the province throughout the week of April 3 - 7. The OBA continues to develop and organize Law Day events across Ontario. The feedback from past events makes it clear that the students, teachers and adults who participate truly appreciate their interaction with volunteer lawyers. Equally clear is the fact that volunteer lawyers get as much satisfaction from the activities as does the public. Activities planned for 2006 include Opening Ceremonies, the Grade 5 Poster Contest, Elementary Mock Trials, High School Moot Competition, Phone-A-Lawyer, Citizenship Court, Photography Contest, Law in the Mall, Court Tours and an Awards Banquet. More information is available on www.oba.org - follow the Law Day links.

Most of the programs are volunteer-driven. If you are interested in volunteering for one or more of the Law Day programs please contact Law Day Chair Kelly Smith at 416-594-4523 or kelly.smith@rogersmoore.com.

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