

August 11, 2026¹

VIA EMAIL to fc_reception_cf@cas-satj.gc.ca

Federal Court of Canada

Re: Typos identified in citations in 38 Federal Court decisions over a 19-month period

Dear Federal Court,

I am Tom Macintosh Zheng, co-founder of Courtready (courtready.ca), where we build practical tools for Canadians who litigate and conduct original research on access to justice issues in Canada.

I write to bring to the Court's attention 38 citations, appearing in 38 decisions released between January 2025 and August 2026, in which the neutral citation given does not appear to point to the decision the Court intended to cite.

We reviewed 2,468 Federal Court decisions released between January 1, 2025, and August 1, 2026, that are included in the [Access to Algorithmic Justice project](#) (A2AJ) database. We examined every citation in those decisions to other Federal Court, Federal Court of Appeal and Supreme Court of Canada decisions, comparing the case name given against the neutral citation given in each instance. The full list of citations identified is set out in the enclosed table, together with the relevant paragraph from the decision.

The Federal Court cites tens of thousands of decisions each year, and the accuracy of that record is, based on what we reviewed, remarkable. We raise these instances only because they are the small residue that manual review is unlikely to reach.

We conducted this review of the Federal Court first because it is among the most comprehensively published courts in Canada and its decisions are available in machine-readable form at scale. This method could be applied to any court or tribunal whose decisions are similarly published, and we intend to extend it.

We excluded from this review every decision in which the Court identified fictitious or AI-generated citations submitted by a party. Those decisions form the subject of separate research,² and none appears in the enclosed table. A small number of the citations

¹ At the request of the Federal Court, we have updated the title of this letter on August 30, 2026.

² *AI Hallucinated Cases in Canadian Courts: Database of Fictitious Citations* (Toronto: Courtready, 2026), online: <https://courtready.ca/fictitious-citations-in-canadian-courts/> [accessed 10 August 2026].

identified appear in the reasons as part of the Court's reference to a party's submissions rather than as the Court's findings, and these are flagged separately in the table.

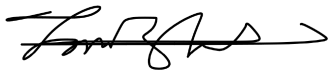
We set out below why we think these citations are worth bringing to the Court's attention.

First, the “noting-up” process becomes inaccurate. Noting up depends on machines reading citations from published reasons. Third-party research databases build their citing-reference tables by extracting neutral citations from the text as decisions are released. When a neutral citation points to a different case than the one intended, the table records a reference to a case that the Court did not intend to cite, while the case the Court meant to cite does not receive the accurate reference.

Second, the citation is probably the common law's most well-known expression of trust. It is a promise that anyone can follow a reference to a source and find the authority standing behind the claim. This trust is essential to the integrity of our justice system. When a citation leads to a different decision than the one intended, that trust is eroded.

Third, the rise of AI-hallucinated case law in Canadian courts and tribunals³ has changed how a mismatched citation reads. Just a few years ago, a citation that led to a different decision than the one the Court intended was self-evidently a typographical issue. That is no longer true today. There should be no ambiguity on the face of the Court's own published decisions. Correcting these citations settles the question of how these typographical issues came about before it is asked.

Respectfully submitted,



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Encl. Table of 38 citations appearing in 38 decisions.

³ *Courtready*, *supra* note 2.

Enclosure: Citations identified

38 citations appearing in 38 Federal Court decisions released between January 1, 2025, and August 1, 2026, listed in order of the date of the deciding decision. The citation in question is highlighted in each paragraph. Decision names and citations link to the source.

* *The citation appears in the reasons as part of the Court's reference to a party's submissions rather than as the Court's own findings.*

#	Decision and date	Relevant paragraph as published	Decision at the citation as published
1	Mantilla Zuniga v. Canada (Citizenship and Immigration), 2025 FC 161 2025-01-27	[40] The applicant is essentially asking the Court to re-examine and reweigh the evidence that the RPD itself examined and weighed. Unfortunately, this is not the Court's role on judicial review (Wu v Canada (Citizenship and Immigration), 2023 FC 1308 at para 36; Vavilov at para 125).	Zhang v. Canada (Citizenship and Immigration), 2023 FC 1308
2	Goodyer v. Canada (Attorney General), 2025 FC 380 2025-02-28	[86] In my opinion, the decision in Mand v. Canada, 2023 FC 94 applies to the present circumstances.	Canada (Privacy Commissioner) v. Facebook, Inc., 2023 FC 94
3	Mohamed v. Canada (Citizenship and Immigration), 2025 FC 604 * 2025-04-01	AND UPON having considered the submissions of the parties and jurisprudence cited including that cited by the Applicant: (Sedoh v Canada (Citizenship and Immigration), 2021 FC 1431; Ghirmatsion v Canada (Citizenship and Immigration), 2011 FC 519; Hungbeke v Canada (Citizenship and Immigration), 2020 FC 955; Ezou v Canada (Citizenship and Immigration), 2021 FC 1146) and cited by the Respondent (Kaur et al v Canada (Public Safety and Emergency Preparedness) (17 December 2024), IMM-17994-24 (FC); Kajangu et al v Canada (Citizenship and	Agbon-Edobor v. Canada (Citizenship and Immigration), 2023 FC 454

#	Decision and date	Relevant paragraph as published	Decision at the citation as published
		Immigration) (20 November 2023), IMM-11710-23 (FC); Haghshenas v Canada (Citizenship and Immigration), 2023 FC 454)	
4	<u>Horvathne Majoros v. Canada (Citizenship and Immigration), 2025 FC 843</u> 2025-05-08	[16] The RPD cited Canada (Public Safety and Emergency Preparedness) v Gunasingam, 2008 FC 81 (at para 7) [Gunasingam] as determining the three elements to be considered under IRPA s 109(1):	<u>Maritime Employers Association v. Canada, 2008 FC 81</u>
5	<u>Eisapour v. Canada (Citizenship and Immigration), 2025 FC 1000</u> 2025-06-04	[7] This Court has repeatedly held that visa officers (1) have wide discretion in assessing the evidence to determine whether legislative requirements are met by applicants; (2) are presumed to have considered all the evidence before them even if they do not explicitly refer to each document; and (3) should be afforded a significant degree of deference for factual findings (see Mehrjoo v Canada (Citizenship and Immigration), 2023 FC 886 at paras 6–7, 16 [Mehrjoo]; Bahrami v Canada (Citizenship and Immigration), 2024 FC 957 at para 3 [Bahrami]; Shahani v Canada (Citizenship and Immigration), 2024 FC 111 at para 16).	<u>Canada (Citizenship and Immigration) v. Howard, 2024 FC 111</u>
6	<u>Neri v. Canada (Citizenship and Immigration), 2025 FC 1087</u> 2025-06-17	[16] The standard of review of the merits of a decision is reasonableness: Canada (Minister of Citizenship and Immigration) v Vavilov, 2018 SCC 65 at paras 10, 25 [Vavilov].	<i>No decision appears to carry the citation of “2018 SCC 65”. Vavilov is found at 2019 SCC 65.</i>

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7	<u>Taduvayai v. Canada (Immigration, Refugees and Citizenship), 2025 FC 1173</u> 2025-07-02	[18] The standard of review of the merits of a decision is reasonableness: Canada (Minister of Citizenship and Immigration) v Vavilov, 2018 SCC 65 at paras 10, 25 [Vavilov].	<i>No decision appears to carry the citation of “2018 SCC 65”. Vavilov is found at 2019 SCC 65.</i>
8	<u>Olanipekun v. Canada (Citizenship and Immigration), 2025 FC 1255</u> 2025-07-15	[13] The standard of review of the merits of a decision is reasonableness (Canada (Minister of Citizenship and Immigration) v Vavilov, 2018 SCC 65 at paras 10, 25 [Vavilov]).	<i>No decision appears to carry the citation of “2018 SCC 65”. Vavilov is found at 2019 SCC 65.</i>
9	<u>Zahrebelnyi v. Canada (Citizenship and Immigration), 2025 FC 1338</u> 2025-07-29	[85] The Court’s decision in Gakumba v Canada (Citizenship and Immigration), 2025 FC 1561 , also does not assist the Applicants.	<u>Maloshicky v. Medical Review Committee, 2025 FC 1561</u>
10	<u>Steinhauer v. Saddle Lake Cree Nation, 2025 FC 1362</u> 2025-08-08	[24] At a minimum, quorum is the number of persons required to constitute a valid meeting. As noted above, as there are nine members of the SLCN Council, a minimum of five members of the SLNC Council are required for a valid meeting, (Dennis v Community Panel of the Adams Lake Indian Band, 2010 FC 62, at para 13). In addition, this Court has noted that democratic principles and procedural fairness require more than simply achieving minimum quorum, rather the “spirit and intention” should be respected. In my view, in addition to the minimum requirement for quorum, the jurisprudence indicates that a duly	<u>De Paiva v. Canada (Minister of Citizenship and Immigration), 2006 FC 231</u>

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		convened meeting requires that notice of the meeting be provided to all members of council, and that all members of council have the ability to participate, (Key v Cote, 2025 FC 1329 at paras 127-133, citing Peguis First Nation v Bear, 2017 FC 179, at para 58; Vollant v Sioui, 2006 FC 487 at para 36 and Balfour v Norway House Cree Nation, 2006 FC 231 at paras 12-14).	
11	<u>Ali v. Canada (Attorney General), 2025 FC 1363</u> 2025-08-11	[24] The standard of review of the merits of a decision is reasonableness: Canada (Minister of Citizenship and Immigration) v Vavilov, 2018 SCC 65 at paras 10, 25 [Vavilov].	<i>No decision appears to carry the citation of “2018 SCC 65”. Vavilov is found at 2019 SCC 65.</i>
12	<u>Ilyas v. Canada (Citizenship and Immigration), 2025 FC 1424</u> 2025-08-26	[7] The standard of review of the merits of a decision is reasonableness: Canada (Minister of Citizenship and Immigration) v Vavilov, 2018 SCC 65 at paras 10, 25 [Vavilov].	<i>No decision appears to carry the citation of “2018 SCC 65”. Vavilov is found at 2019 SCC 65.</i>
13	<u>Morgan v. Canada (Immigration, Refugees and Citizenship), 2025 FC 1422</u> 2025-08-26	[9] The standard of review of the merits of a decision is reasonableness: Canada (Minister of Citizenship and Immigration) v Vavilov, 2018 SCC 65 at paras 10, 25 [Vavilov].	<i>No decision appears to carry the citation of “2018 SCC 65”. Vavilov is found at 2019 SCC 65.</i>
14	<u>Lightbody v. Canada, 2025 FC 1433</u> 2025-08-28	[73] The effect of section 236 as an ouster of the court’s jurisdiction in respect to matters that are otherwise grievable under the FPSLR has been consistently recognized by this Court as well as the Federal Court of	<u>Ahadi v. Canada (Citizenship and Immigration), 2023 FC 25</u>

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		Appeal (Hudson at para 73; Ebadi FC paras 37 and 51; Adelberg v Canada, 2023 FC 25 [Adelberg FC] at para 13;	
15	<u>Applicants listed in Schedule A v. Canada (Indigenous Services), 2025 FC 1524</u> 2025-09-16	[16] I also note that this Court recently decided cases based on Jordan's Principle, in which the individual applicants were represented by a lawyer: Cully v Canada (Attorney General), 2025 FC 1132 [Cully]; Powless v Canada (Attorney General), 2025 FC 1277 [Powless].	<u>Dahela v. Canada (Citizenship and Immigration), 2025 FC 1277</u>
16	<u>Lawal v. Canada (Citizenship and Immigration), 2025 FC 1609 *</u> 2025-09-29	[24] Citing Maldonado, the Applicant submits that the RAD should have given more weight to his testimony under oath that he was told by neighbour that strangers came looking for him but could not get a support letter because he did not want to tell his neighbour about his refugee claim. The Applicant argues that the generality of the support letters he submitted should not have undermined their relevance to the Applicant's case. The Applicant also contends that the support letters should have been assessed separately and with the presumption of truthfulness: N'kuly v Canada (Citizenship and Immigration), 2016 FC 112 at para 41	<u>Canada (Attorney General) v. Hines, 2016 FC 112</u>
17	<u>Tavira Silva v. Canada (Citizenship and Immigration), 2025 FC 1635</u> 2025-10-03	[29] Refugee claimants bear the onus of establishing that a proposed IFA is not viable. This onus can be discharged by defeating at least one prong of the two-pronged IFA test: Aigbe v Canada (Citizenship and Immigration), 2020 FC 89 at para 9.	<u>Ebrahimshani v. Canada (Citizenship and Immigration), 2020 FC 89</u>
18	<u>Singh v. Canada (Immigration,</u>	[24] It is trite law that credibility findings are part of the fact-finding process of the decision-maker and are afforded significant deference	<u>Teamsters Canada Rail Conference v. Canadian</u>

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	<u>Refugees and Citizenship), 2025 FC 1706</u> 2025-10-21	upon judicial review. Justice Tsimberis recently summarized the Court’s jurisprudence on determinations of credibility by the RPD and the RAD. Such determinations by the RPD and the RAD demand a high level of judicial deference and should only be overturned “in the clearest of cases”. Credibility determinations have been described as lying within “the heartland of the discretion of triers of fact and cannot be overturned unless they are perverse, capricious or made without regard to the evidence” (Singh v Canada (Citizenship and Immigration), 2024 FC 125 at para 7, other citations omitted).	<u>Pacific Railway Company, 2024 FC 125</u>
19	<u>Mohamed Abdille v. Canada (Citizenship and Immigration), 2025 FC 1841</u> 2025-11-19	[25] With respect to the DNA Testing Report, despite acknowledging that the three children were her husband’s biological children, the Officer did not consider that fact in their analysis on the genuineness of their marriage. The conception of children, while not determinative, is an important factor in assessing the genuineness of a relationship and ought to be accorded significant weight (Amin v Canada (Citizenship and Immigration), 2021 FC 67 at para 23	<u>Valverde Perez v. Canada (Citizenship and Immigration), 2021 FC 67</u>
20	<u>Slepcsik v. Canada (Citizenship and Immigration), 2025 FC 1840</u> 2025-11-19	[145] At this stage of the analysis, a Court must consider the legislative intent of the impugned legislative provisions to determine whether the effect of the law is (1) arbitrary—it is not connected to the objective of the law; (2) overbroad—it exceeds its objective by interfering with some conduct with no connection to the objective, and/or (3) grossly disproportionate—it is connected to the legislative intent, but the impact of the law violates basic values and norms (Bedford at paras 97-104). In addition, the SCC has recognized that the “principles of fundamental justice” have both a procedural and substantive element (R v JJ, 2022	<i>No decision appears to carry the citation of “2022 SCC 283”.</i>

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		SCC 283 at paras 116, 363–364, citing Re BC Motor Vehicle Act, [1985] 2 SCR 486, 1985 CanLII 81 (SCC)).	
21	<u>Razneas v. Canada (Citizenship and Immigration), 2025 FC 1961</u> 2025-12-12	[32] Further, the Supreme Court has clearly stated that applicants must provide evidence of subjective fear to be successful in a claim for refugee protection; (Canada (Attorney General) v Ward, 1993 CanLII 105 (SCC), 1993 2 SCR 689 [“Ward”]. Where the applicants have a demonstrated pattern of continuous reavilment, this is a reasonable basis for a decision maker to conclude a lack of subjective fear of prosecution: Obozuwa v Canada (Minister of Citizenship and Immigration), 2019 FC 1007 at para 25; Khakimov v Canada (Minister of Citizenship and Immigration), 2017 FC 18 at para 27; de la Cruz v Canada (Minister of Citizenship and Immigration), 2024 FC 390	<u>Oyaga Pava v. Canada (Citizenship and Immigration), 2024 FC 390</u>
22	<u>Louie v. Lower Kootenay First Nation, 2026 FC 39 *</u> 2026-01-12	[66] The Applicant also submits that as noted in Annapolis Valley First Nations Band v Toney, 2021 FC 7112 at paragraph 28, any fiduciary relationship includes the duties of good faith of the fiduciary to the beneficiary and the duty to act in the beneficiary’s best interests.	<i>No decision appears to carry the citation of “2021 FC 7112”.</i>
23	<u>Ullah v. Canada (Citizenship and Immigration), 2026 FC 70 *</u> 2026-01-16	[26] The Applicant relies on several Federal Court decisions where refusals based on an applicant's ability to perform the work were found unreasonable because the decision-making officers failed to explain why they discounted documentary evidence of relevant skills or imposed additional requirements not grounded in the applicable job criteria (He v Canada (Citizenship and Immigration), 2021 FC 1027 [He]; Longa Diaz v Canada (Citizenship and Immigration), 2021 FC 538; Afuah v Canada (Citizenship and Immigration), 2021 FC 596; Pal v Canada (Citizenship and Immigration), 2025 FC 1008 [Pal]; Mohammad v Canada (Citizenship and Immigration), 2025 FC 1343 [Mohammad]; Azizulla v	<u>Kakar v. Canada (Citizenship and Immigration), 2023 FC 153</u>

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		Canada (Citizenship and Immigration), 2021 FC 1226; Pirhadi v Canada (Citizenship and Immigration), 2023 FC 153 ;	
24	<u>Bdaiwi v. Canada (Citizenship and Immigration), 2026 FC 76</u> 2026-01-19	[38] Finally, I note the Applicants generally make the argument that the Decision was unreasonably “silent” with respect to evidence that contradicted its conclusions. However, this is not accurate. The Applicants are correct that while an officer is “not obliged to refer to all of the evidence in making their decision and is generally presumed to have considered all the evidence” (Thavaratnam v Canada (Citizenship and Immigration), 2022 FC 967 at para 18 citing Brar v Canada (Citizenship and Immigration), 2020 FC 445 at para 20; Florea v Canada (Minister of Employment and Immigration), [1993] FCJ No 598, 1993 CarswellNat 3983 (FCA), the decision must still be justified in light of the evidence before the administrative decision maker. (Vavilov at paras 125-126; Kupriianova v Canada (Citizenship and Immigration), 2021 FC 95 at para 13).	<u>Messenger v. Canada (Attorney General), 2021 FC 95</u>
25	<u>Konarowski v. Canada (Attorney General), 2026 FC 73</u> 2026-01-19	[15] The presumptive standard of review of an administrative decision on its merits is reasonableness (Canada (Minister of Citizenship and Immigration) v Vavilov, 2018 SCC 65 [Vavilov] at paras 10, 25;	<i>No decision appears to carry the citation of “2018 SCC 65”. Vavilov is found at 2019 SCC 65.</i>
26	<u>Kamyab v. Canada (Citizenship and Immigration), 2026 FC 97 *</u> 2026-01-22	[52] Mr. Kamyab’s reliance on Tafreshi is misplaced and distinguishable. Tafreshi addressed material changes by IRCC to guidelines relating to the procedure and the content of applications for permanent residence in the self-employed class (i.e., removing the availability of interviews, adding a more stringent requirement of a detailed business plan, and removing specific procedural fairness provisions regarding the opportunity to be heard on eligibility) after the applications were submitted, resulting in	<u>Aslam v. Canada (Citizenship and Immigration), 2024 FC 4</u>

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		“significantly different requirements” (at paras 61-76; see also Mortezaei v Canada (Citizenship and Immigration), 2024 FC 4 for similar findings).	
27	<u>Zentner v. Canada (Attorney General), 2026 FC 118</u> 2026-01-27	[50] Aspects of the claim against IOGC which relate to staffing decisions are grievable under the PSEA where they relate to individual complaints, or under the FPSLRA where they relate to allegations of systemic discrimination (Dubé v Canada, 2006 FC 796 at paras 41–42; Johal v Canada Revenue Agency, 2009 FCA 176 at paras 6, 38–40).	<u>Canada (Attorney General) v. Vallée, 2009 FCA 176</u>
28	<u>Singh v. Canada (Citizenship and Immigration), 2026 FC 123</u> 2026-01-28	[22] The presumptive standard of review of the merits of an administrative decision is reasonableness (Canada (Minister of Citizenship and Immigration) v Vavilov, 2018 SCC 65 at paras 10, 25 [Vavilov]).	<i>No decision appears to carry the citation of “2018 SCC 65”. Vavilov is found at 2019 SCC 65.</i>
29	<u>Jackson v. Canada (Public Safety and Emergency Preparedness), 2026 FC 144</u> 2026-01-30	[10] The starting point for Charter claimants is the identification of the source of the alleged Charter violation (Little Sisters Book and Art Emporium v Canada (Minister of Justice), 2000 SCC 69 at para 108). In the administrative context, the Charter may be enforced by either challenging a decision maker’s conduct or discretionary decision (Canadian Council for Refugees v Canada (Citizenship and Immigration), 2023 SCC 17, at para 61; Doré v Barreau du Québec, 2012 SCC 12 at para 24), or by challenging the legislation under which the decision maker operates (Charter, s. 52(1)). As stated by the Federal Court of Appeal: A Charter remedy will be given only for state action that causes a Charter infringement. Where the state action is legislation and the effect of the legislation is to infringe Charter rights in an unjustifiable way, the legislation is liable to be struck. But if, in reality, administrative action	<u>Cadostin v. Canada (Attorney General), 2021 FCA 22</u>

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		under the legislation is alone responsible for the unjustified Charter infringement, the Charter challenge must focus on the administrative action or inaction, not the legislation. (Canada (Citizenship and Immigration) v Canadian Council for Refugees 2021 FCA 22 at para 84)	
30	<u>Hart v. Canada (Attorney General), 2026 FC 219</u> 2026-02-17	[38] Moreover, as was made clear to Mr. Hart through his exchanges with CRA officials regarding his Record of Employment, it was his responsibility to obtain the documents he needed to establish his entitlement to the benefit; there is no onus on the CRA to take any measures to validate his income or seek to obtain third party records: Ntuer v Canada (Attorney General), 2022 FC 159 at para 22 [Ntuer];	<u>Hamadouche v. Canada (Citizenship and Immigration), 2022 FC 159</u>
31	<u>Akbar Pour Shandiz v. Canada (Citizenship and Immigration), 2026 FC 255 *</u> 2026-02-23	[17] The arguments of the Applicant are straightforward as, in summary, they contend that the Decision lacks a logical chain of analysis, given that they had submitted evidence contrary to the Officer’s determination that the Decision fails to account for, and that the Decision fails to “link the supporting materials submitted by the Applicant to the decision made”. The Applicant relies on Farkhondehfal v Canada (MCI), 2024 FC 629 at para 16	<u>Mahdavi v. Canada (Citizenship and Immigration), 2024 FC 629</u>
32	<u>Solar Sepulveda v. Canada (Public Safety and Emergency Preparedness), 2026 FC 263</u> 2026-02-25	[13] While the imminence of a decision is certainly a relevant consideration, as found by the Officer, I agree with the Applicant that it is not necessarily determinative (Ortiz v. Canada (Public Safety and Emergency Preparedness), 2017 FC 93 , at para 13).	<u>Ogbonna v. Canada (Citizenship and Immigration), 2017 FC 93</u>

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33	<u>Potvin v. Canada (Attorney General), 2026 FC 565</u> 2026-04-29	[14] Under paragraph 6(1)(a) of the CERBA and paragraph 3(1)(f) of the CRBA, one of the conditions for qualification was the cessation of employment for reasons related to COVID-19. To receive the benefits, Ms. Potvin bore the burden of proving to the CRA, on a balance of probabilities, that she met all the criteria for these benefit programs (Cantin v Canada (Attorney General), 2022 FC 939 at para 15; Fortin v Canada (Attorney General), 2024 FC 203 at para 15 [Fortin] citing Ntuer v Canada (Attorney General), 2022 FC 1596 at para 22).	<u>De Lara v. Canada (Citizenship and Immigration), 2024 FC 203</u>
34	<u>Rickard v. Canada, 2026 FC 667</u> 2026-05-25	[49] Appeals from an associate judge's orders are to be decided on the material that was before the associate judge at the time the order under appeal was made (Canjura v Canada (Attorney General), 2021 FC 102 at para 12;	<u>Nova-Biorubber Green Technologies, Inc. v. Sustainable Development Technology Canada, 2021 FC 102</u>
35	<u>Ramirez Tamayo v. Canada (Citizenship and Immigration), 2026 FC 761</u> 2026-06-09	[43] Officers are presumed to have acquired knowledge of the most up to date country conditions, whether submitted or not, and rely upon this knowledge and all information before them, absent evidence to the contrary: Idu v Canada (Citizenship and Immigration), 2021 FC 1081 at paras 32-33. Indeed, this Court's jurisprudence has recognized the duty of PRRA officers to consider recent, credible country condition evidence: Hussain v Canada (Citizenship and Immigration), 2025 FC 158	<u>Askari v. Canada (Public Safety and Emergency Preparedness), 2025 FC 158</u>
36	<u>Fahs v. Canada (Citizenship and Immigration), 2026 FC 782</u> 2026-06-11	[4] It is unnecessary for me to address all the issues Mr. Fahs raised on judicial review. The determinative issue is the RPD's treatment of the security precautions taken by Mr. Fahs while he was in Lebanon. I find, similar to my colleagues' determinations in Gorgis v Canada (Public Safety and Emergency Preparedness), 2025 FC 117 [Gorgis] and Cao v Canada (Citizenship and Immigration), 2025 FC 2018	<u>Covenoho v. College of Immigration and Citizenship Consultants, 2025 FC 2018</u>

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37	<u>Padilla Munoz v. Canada (Citizenship and Immigration), 2026 FC 910</u> 2026-07-06	[56] In Palaguru v Canada (minister of Citizenship and Immigration), 2009 FC 31 , this Court found that where a PRRA officer examines an IFA in a new or previously unconsidered location without notice, this is a breach of procedural fairness;	<u>Savundaranayaga v. Canada (Citizenship and Immigration), 2009 FC 31</u>
38	<u>Bear River First Nation v. Currie, 2026 FC 954</u> 2026-07-15	[78] In Millbrook First Nation v Tabor, 2016 FC 895 [Millbrook] at paras 26 and 62, this Court set out a test to establish a case of retaliation. Claimants must illustrate that	<u>Caesarstone Sdot-Yam Ltd v. Ceramiche Caesar S.P.A, 2016 FC 895</u>