# ONTARIO SUPERIOR COURT OF JUSTICE

THE HONOURABLE	)	WEDNESDAY, THE 7 <sup>Th</sup>
	)	
JUSTICE CHIAPPETTA	)	DAY OF MARCH, 2018

BETWEEN:

### THE LAW SOCIETY OF UPPER CANADA

**Applicant** 

and

### **TIMOTHY EDWARD LEAHY**

Respondent

APPLICATION UNDER Rule 14.05(2) of the Rules of Civil Procedure and s. 26.3 of the Law Society Act

### ORDER

**THIS APPLICATION**, by the Applicant, The Law Society of Upper Canada ("LSUC"), for a permanent injunction against the Respondent, Timothy Edward Leahy ("Leahy"), was heard this day at 393 University Ave., Toronto, Ontario M5G 1E6.

ON READING the Notice of Application, the Affidavit of Nicholas Woloszczuk sworn January 16, 2018 contained in the Application Record, the Supplementary Affidavit of Nicholas Woloszczuk sworn February 12, 2018 contained in the Supplementary Application Record and on hearing the submissions of the lawyers for the LSUC and Leahy, self-represented.

- 1. **THIS COURT ORDERS** that Leahy and any company or business entity controlled by him including, but not limited to, Forefront Migration Ltd., Forefront Placement Ltd. and Immigration North America, Inc. shall be permanently enjoined from advertising or holding Leahy out as a person who may practice law or provide legal services in Ontario in contravention of section 26.1 of the *Law Society Act*, R.S.O. 1990, c. L.8 ("*Act*").
- 2. **THIS COURT ORDERS** that Leahy shall take all such steps as are necessary to remove the current version of the website of Forefront Migration Ltd. (a copy of which is attached as **Schedule "A"** to this Order) from the Internet and any other media within ten (10) days of the date of this Order.
- 3. **THIS COURT ORDERS** that Leahy shall take all such steps as are necessary to remove the current version of his LinkedIn profile (a copy of which is attached as **Schedule "B"** to this Order) from the Internet and any other media within ten (10) days of the date of this Order.
- 4. **THIS COURT ORDERS** that Leahy shall take all such steps as are necessary to remove the current version of the LinkedIn profile of Forefront Migration Ltd. (a copy of which is attached as **Schedule "C"** to this Order) from the Internet and any other media within ten (10) days of the date of this Order.
- 5. **THIS COURT ORDERS** that Leahy shall take all such steps as are necessary to remove the current version of the LinkedIn profile of Forefront Placement Ltd. (a copy of which is attached as **Schedule "D"** to this Order) from the Internet and any other media within ten (10) days of the date of this Order.

- 6. THIS COURT ORDERS that Leahy shall take all such steps as are necessary to remove the current version of his curriculum vitae (a copy of which is attached as **Schedule** "E" to this Order) from the Internet and any other media within ten (10) days of the date of this Order.
- 7. **THIS COURT ORDERS** that Leahy shall take all such steps as are necessary to remove any representations in any and all media that Leahy is a lawyer or immigration lawyer or immigration law practitioner or general counsel within ten (10) days of the date of this Order.
- 8. THIS COURT ORDERS that Leahy shall provide a copy of this Order to each of his current clients by letter, facsimile transmission or email message and to copy counsel for the LSUC with such letters, facsimile transmissions or email messages, as the case may be, within ten (10) days of this Order. For clarity, this shall include clients of Forefront Migration Ltd., Forefront Placement Ltd., Immigration North America, Inc. and any other company or entity through which Leahy provides services.
- 9. **THIS COURT ORDERS** that Leahy shall provide a copy of this Order to any of his prospective clients by letter, facsimile transmission or email message, as the case may be, within ten (10) days of this Order and to copy counsel for the LSUC with such letters, facsimile transmissions or email messages. For clarity, this shall include prospective clients of Forefront Migration Ltd., Forefront Placement Ltd., Immigration North America, Inc. and any other company or entity through which Leahy provides services.

- 10. **THIS COURT ORDERS** that in the event Leahy fails to take any of the steps required by the terms of this Order that the LSUC will be at liberty to move for such further and ancillary relief as may be necessary to compel Leahy to comply with the terms of this Order including, but not limited to, an Order declaring Leahy to be in contempt of court.
- 11. **THIS COURT** seeks the aid and recognition of such foreign courts or other adjudicative bodies as may be necessary to give full effect to the terms of this Order.
- 12. **THIS COURT ORDERS** that the balance of the Application shall be adjourned to be heard on a date agreed to by the LSUC and Leahy as set by the Registrar.
- 13. **THIS COURT ORDERS** that the costs of today shall be adjourned to the Judge hearing the "provision of legal services" portion of the Application.
- 14. **THIS COURT ORDERS** that the "provision of legal services" portion of the Application shall be adjourned to July 13, 2018.

CATELOGY TO SERVED.

PERIPARI.

# **SCHEDULE "A"**

Immigration and Naturalisation Service for Great Britain and Canada - Immigration lawyer practicing U.K. migration and Canadian immigration law, e.g., U.K. work permits and permanent residence for Canada and employment services such as guidance on British and Canadian job-search and finding jobs in Great Britain or Canada. U.K. and Canada migration services include assisting skilled-workers and business-owners, including those seeking an investment visa, as well as those who wish to study in Britain or Canada on a student visa. Our British and Canadian immigration service visa site offers a free assessment for migration to Britain, Canada and Australia. Complimentary Assessment Offered.

Welcome to our Canadian website, please make your selection below:

### For Canadian migration programme







Canada

United Kingdom

----- Canadian Immigration and Visa Site Map -----

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Immigration lawyer, Mr. Leahy is a member of the Canadian Bar Association (CBA) and has since handled immigration matters since 1989. We receive daily up-dates on issues and changes. In addition, if a problem stumps us, Mr. Leahy may seek the advice and insight of other lawyers through the CBA listserve. Thus, when you allow us to assist you, you gain access to almost all of Canada's most experienced immigration lawyers.

This site also features information and legal services on Canada visa and canadian permanent residence, family sponsorship, Canada employment, work visa and relocation information for Toronto immigration, Vancouver immigration, Victoria immigration, Saskatoon immigration, Regina immigration, Edmonton immigration, Calgary immigration, Halifax immigration, Montreal immigration, Quebec immigration, Ontario immigration, Saskatchewan immigration, Alberta immigration, Manitoba immigration, British Columbia immigration,

Nova Scotia immigration, Newfoundland immigration and Prince Edward Island immigration. Information on skilled worker class, provincial nominee class, economic class, Canada Citizenship, Canadian Visa, immigrant visa, family class visa, family reunification, sponsored relatives. Information on Canada green card, work study tourist visa, NAFTA, self-employed migration, entrepreneur and investor migration, business immigration, business immigrants and business visa (s), settlement and work in Canada, studying in Canada, education in Canada, the Canadian labor (labour) market, Canadian economy, Canada Immigration Appeal. Refer to Profile About Us and Questions and Answers Section for more information.

In addition to Canada, we also cover immigration to Australia, Great Britain, New Zealand and the United States (USA).



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### **About Us**

There is no requirement that visa-applicants retain counsel. In fact, for those whose educational and employment histories are clear, counsel would only be needed if

- 1. they have better ways to allocate their time than dealing with imperious immigration functionaries,
- 2. if processing stalls or
- 3. if anything goes wrong.

Unfortunately, however, it is impossible to know whether any of these contingencies will occur and, if they do, remedying them is more difficult than avoiding them in the first place.

### WHY

The reasons, therefore, for retaining competent counsel are:

- · to receive proper counseling so that only those likely to be approved submit an application and pay non-refundable Immigration fees;
- to convince the visa-officer to approve the application without an interview, thereby expediting visa-issuance by at least one year;
- to package you in order to achieve the best result by highlighting the strengths while endeavouring to overcome any negative factors;
- to prepare a complete submission so that processing starts immediately, rather than having it delayed until the minimum documentation is sent;
- to co-ordinate matters between the visa-post and client;
- · to prepare the client for interview;
- to address any problems which arise;
- · to move the file forward if it has been stalled and
- · if the visa is refused, to seek redress either administratively through the visa-post or Ottawa or from the Federal Court of Canada.

Having legal counsel will not guarantee visa-issuance for an unqualified applicant. However, qualified applicants who fail to "put their best foot forward" may be refused, whereas, had competent counsel submitted the case, the refusal might have been averted. Therefore, how we "package" you may make all the difference in a marginal case or where the employment history or educational background does not clearly correspond to what Immigration requires.

Although hiring competent counsel will not cause an applicant to "jump the queue", applicants who fail to submit all required documents promptly will cause the process to be prolonged. Thus, owing to our experience, we may be able to cause a visa to be issued earlier simply because we know what to do, how to do it and when to do it.

In addition, if the visa-post refuses to respond – a frequent occurrence at all too many Canadian visa-posts – counsel (but not applicants) have the means to prompt action by seeking assistance from Ottawa. This venue has often proven to be the most effective means for prompting action.

Moreover, because Mr. Leahy is a member of the Canadian Bar Association (CBA), we receive daily up-dates on issues and changes. In addition, if a problem stumps us, Mr. Leahy may seek the advice and insight of other lawyers through the CBA listserve. Thus, when you allow us to assist you, you gain access to almost all of Canada's most experienced immigration lawyers.

Furthermore, having handled immigration matters since 1989, Mr. Leahy has learned how to prepare a case so that, should a visa be refused, he will likely be able to have the refusal overturned. Thus, we may be able to avert a refusal or, if we cannot, lay the groundwork during processing so that, should litigation ensue, you will be successful. As the renowned U.S. trial lawyer, F. Lee Bailey, observed: "A trial is not won in the courtroom . . . It is won in the preparation". We know how to prepare a file properly whatever the contingency.

Finally, in addition to Canada, we also can handle, or refer to our affiliated offices, immigration to Australia, Great Britain, New Zealand and the United States. Thus, we can advise you on alternative destinations should your first choice prove not to be a viable option.

In summation, we can assist you in putting together a complete submission, emphasizing your strengths while seeking to overcome any deficiencies, improve the likelihood of smooth processing or, when delays ensue, prompt action and, if problems arise, address them effectively by deploying proven methods or accessing senior or home-office personnel. After all, our continued success depends on our clients' success. Thus, because assisting you inures to our benefit, too, you can be assured that we will do our best to achieve the optimum result for you.

### ABOUT US



LEFT: Rt. Hon. Paul Martin Jr., Prime Minister of Canada

RIGHT: Timothy E. Leahy

Forefront Migration, Ltd. is headed by Timothy E. Leahy, who, by virtue of having passed the bar examinations in Ontario and Michigan, has been admitted to practice law before the federal courts of Canada and the United States. Since 1989, he and has been practicing immigration law exclusively and incorporated this immigration consultancy in August 1994. Mr. Leahy, a member of the Canadian Bar Association, Immigration Section, was elected to the Executive Committee of the Ontario Immigration Law Section. He has been member of the American Immigration Lawyers Association and a speaker at immigration seminars for lawyers in Canada and the United States and in China, Dubai, Doha and India for prospective immigrants. In addition, Canadian television networks and radio stations have interviewed him and Canadian newspapers have quoted him on immigration matters.

Mr. Leahy is one of the few immigration law practitioners who has carried on a mixed practice of overseas processing, inland defence, immigration appeal and litigation before the Federal Court of Canada, where he has gained some notable victories — and lost a few along the way, as well. The Federal Court, for example, appointed him lead counsel in 2002 in a successful collective action, involving lawyers from three provinces, obliging Immigration Canada to assess their clients before its self-imposed deadline for applying new, more restrictive selection-criteria on immigrant-visa applicants whose application pre-dated the new regulations.

As a result of this victory, 7,000 more Federal Court application were filed resulting in the Minister agreeing to eliminate retrospective application of the new selection-criteria on over 100,000 pre-2002 applicants and his lowering the pass-mark. As a result, Mr. Leahy is well-versed in most aspects of immigration procedure, ranging from family-class cases through the skilled-worker to the business categories, and on how to pursue a case so that if, in the end, it is necessary to litigate, his client is likely to prevail. His strong advocacy of his clients' interest has caused Immigration officials to take notice.

Mr. Leahy entered the private practice of immigration law after resigning his commission as a U.S. Foreign Service Officer (Political). Prior to becoming a diplomat, Mr. Leahy, who is a Chartered Life Underwriter and Licensed Insurance Counselor, and previously held U.S. securities licences, designed group programs and set up pensions for small businesses while doing estate-planning for the owners.

In addition to his business experience, Mr. Leahy has an extensive academic background. During his junior year as an undergraduate, Mr. Leahy studied in Bogota, Colombia, where his classes were in Spanish, and in Vienna, Austria, where he also sold student trans-Atlantic charter airplane tickets, amassing the second highest record of sales in Europe. Graduating a semester early and magna cum laude (with high honours), placing him in the top ten percent of his class, Mr. Leahy was named a 'Michigan Scholar' and inducted into Phi Beta Kappa, the United States' most prestigious academic honourary. He earned a Master's degree at the University of Michigan and fulfilled all the requirements for a Ph.D. except for the most daunting, the dissertation. In 1983, Mr. Leahy entered Detroit's Wayne State University Law School and again was graduated a semester early but this time only cum laude (with honours), placing him in the top quarter of his class. He simultaneously attended law classes at the University of Windsor, across the river from Detroit, and fulfilled the academic requirements for being called to the Bar in Ontario by attending class at Osgoode Hall in Toronto while continuing to work in the State Department's Office of Protocol in Washington, D.C.

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### Useful Tips

Forefront Migration Ltd. can shorten the immigration queue to two years for qualified candidates willing to work in the Persian Gulf where there is no income tax.

### Welcome

Since 1994, Forefront Migration Ltd., in affiliation with Immigration North America, Inc., has been assisting those wishing to visit, study or work in, or immigrate to, Canada, as well as those facing immigration enforcement actions. Its affiliated offices assist those wishing to visit, study or work in Great Britain and the United States.

The United Nations has long lauded Canada for being amongst the best countries in which to live, owing to her entrenched democratic tradition, adherence to rule of law, commitment to human rights, vibrant economy, vaunted social mobility, widely-accessible public education from kindergarten through university, publicly-funded health-care, absence of civil strife and low crime rate.

Peaceful Canada, widely admired for having quickly come to the defence of liberty in the 20th century and for her frequent participation in U.N. peace-keeping operations throughout the world, opens her arms to all who wish to contribute her future, prides herself in being "multi-cultural" and confers upon her citizens the most respected passport in the world.

Today's Canadians, in addition to including many descendents of British and French settlers, encompass those who have come from every corner of the earth. The current Head of State, the Governor General, fled to Canada for Haiti and her predecessor aarived as a Chinese refugee during World War II. The current prime minister, the Rt. Hon. Paul Martin and his predecessor, the Rt. Hon. Jean Crétien, appointed to their cabinets Members of Parliament who emigrated from Argentina, China, Greece, Great Britain, Grenada, India, Italy, Malta, the Philippines, Trinidad and Tunisia. The current cabinet contains members of different major faiths, and the previous governments included two known homosexuals, reflecting Canada's willingness to embrace those who are different and to promote them on the basis of their talents.

The Citizenship Act reaffirms Canada commitment to full inclusion of immigrants by not forcing immigrants to renounce their citizenship before becoming Canadian citizens. Naturalized Canadians may retain their citizenship-of-birth as well as acquire citizenship in other countries.

In addition to offering immigrants the opportunity to prosper in a peaceful, law-abiding country, immigration to Canada brings with it the opportunity to access the United States because, under the North America Free Trade Agreement, Canadian citizens may be issued a U.S. work permits at the border so long as they have a have a job-offer in certain occupations and are qualified to hold that position. Thus, Canada has afforded many immigrants entree to the United States, which, like Canada, recognizes multiple citizenship, thereby allowing Canadians to become U.S. citizens without losing their right to return at will and resume residence in peaceful Canada.

So, welcome to our website. We hope that it will meet your expectations and, by so doing, instill in you sufficient confidence that you will trust us with the privilege of assisting you to join us in Canada. We look forward to saying to you in person: Welcome to Canada!

Timothy E. Leahy, Esq. General Counsel

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# **SCHEDULE "B"**





### Tim Leahy

Managing Director and General Counsel at Forefront Migration Ltd

Toronto, Canada Area Legal Services

Forefront Migration Ltd, Forefront Placement Ltd., Immigration North America, Inc

Icon International WLL - Doha, Qatar, U.S Previous Department of Sate, The Phoenix Companies

York University - Osgoode Hall Law School

Company Website Websites

### View Tim Leahy's full profile. It's free!

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### Summary

Forefront Migration Ltd, assists those seeking to migrate to Canada and the United Kingdom as business owners, investors, skilled workers or family-class members. In addition, we handle appeals to immigration tribunals and to the Federal Court of Canada.

Specialties: British and Canadian immigration law

### Experience

### General Counsel

Forefront Migration Ltd

2004 - Present (14 years) Toronto, Canada Area

assist those wishing to immigrate to, or work or study in Canada; interact with Canadian officials; secure competent legal counsel for those challenging immigration decisions and raise issues of concern to MPs.

### General Counsel and Managing Director

Forefront Placement Ltd.

2004 - Present (14 years)

General Counsel • We assist Canadian companies wishing to import qualified, foreign workers, primarily those who possess overseas working experience, by (a) obtaining permission to import the workers and (b) processing their visa applications through our sister company, Forefront Migration

Director of forge liaisons with recruiting agencles In Britain, Hungary, Romania, Lebanon, Jordan, Egypt, Tunisia, South Africa, Nepal, Malaysla, Indonesia, Philippines and China in pursuit of suitable employees for employers in the Gulf area.

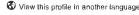
### General Counsel

Immigration North America, Inc. August 1994 - Present (23 years 7 months)

Director and General Counsel - submit detailed analyses to ImmIgration Canada officials, Members of Parliament (MP's) and Immigration Bar on proposed legislation and regulations; lobby MP's; appear on television and speak to the press and at conferences on immigration matters; assist those seeking to remain In, migrate to, work or study in, Canada, including appearing before immigration tribunals deciding asylum claims, immigration appeals and deportation; advise lawyers and consultants, and interact with CIC officials based abroad, regionally, locally or at headquarters



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### Jen Park

Licensed Immigration Consultant at LEE LAW



Hung Viet Can Immigration Consultant at Immigration Pro Canada



Danny Ramrakhiani RCIC, Commissioner of Oath



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Certified Immigration Consultant

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Tim Leahy

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Tim Leahy

Managing Director, Portfolio Manager at Goldman Sachs Asset Management United States



Tim Leahy

SVP, Assistant General Counsel at AT&T United States



Tim Leahy



Timothy E. Leahy, Esq.

August 1989 - Present (28 years 7 months)

Immigration Lawyer • represent clients of my consultancies by appearing as counsel before immigration tribunals in the U.S and Canada and before the Federal Court of Canada; prepare affidavits and written arguments for the Court and tribunals; cross-examine Immigration officers; secure the aid of, and draft correspondence for, Members of Parliament on behalf of their constituents/my clients; and perform the other tasks delineated in the preceding positions.

### **Public Relations Manager**

Icon International WLL - Doha, Qatar June 2006 - January 2010 (1 year 8 months)

wrote and edited copy; assisted graphic artist on brochures layouts, etc.; responsible for organizing the GCC League Dermatologists 2009 Anti-Aging Conference in Qatar and drove a graphic artist to and from the office.

### Foreign Service Officer

U.S Department of Sate

February 1986 - August 1989 (3 years 7 months)

Vice Consul adjudicate visitor, work and student visas applications; assist distressed Americans; and visit imprisoned Americans, etc.

Office of Protocol Washington, D.C.

mediate civil (and criminal) disputes between foreign diplomats, consular officers and diplomatic missions, on one hand, and U.S. residents on the other, draft diplomatic notes and correspondence; co-write Chief of Protocol's testimony regarding "diplomatic crime" before the Senate Foreign Relations Committee, write Q's&A's for Chief of Protocol in preparation thereof.

HR/Foreign Service Nationals Washington, D.C.

write talking-points for Secretary of State James A<sub>0</sub> Baker; write a speech for Under Secretary Lawrence Eagleberger; organize visit for 1988's top five locally-hired staff praised for having created the best visit for the winners by changing the hotel, arranging embassy receptions and securing free admission to performances at the Kennedy Center, Virginia Symphony and Washington Ballet and for tours of the White House, Blair House (for the President's official guests), the Congress and the U.S. Supreme Court and Mr. Justice Thurgood Marshall's Chambers.

### sales representative

The Phoenix Companies

January 1981 – February 1986 (5 years 2 months)

Insurance Agent, NASD-licensed Securities Salesman, licensed Real Estate Syndication Agent broker for other companies Licensed in Michigan, Indiana, Texas and Arizona designed and marketed employee benefit programs, such as major medical, self-funded medical plan, group life and pension programs; estate planning for business owners; sale of mutual fund; personal pension plans and disability and life insurance became a C.L.U. in two years (passing eight examinations at once) and amongst the first to pass the State of Michigan test to become a Licensed Insurance Counselor, permitted to charge a fee for giving insurance advice.

### Education

### York University - Osgoode Hall Law School

Joint Committee Student

1988 – 1989

PHOENIX

U

### **Wayne State University**

J.D<sub>11</sub> cum laude, Law 1984 – 1986

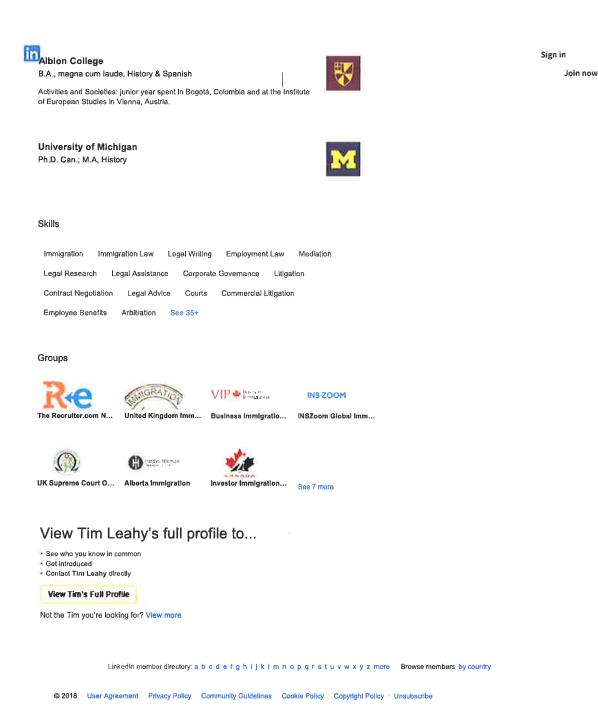
completed three-year degree in 21/2 years



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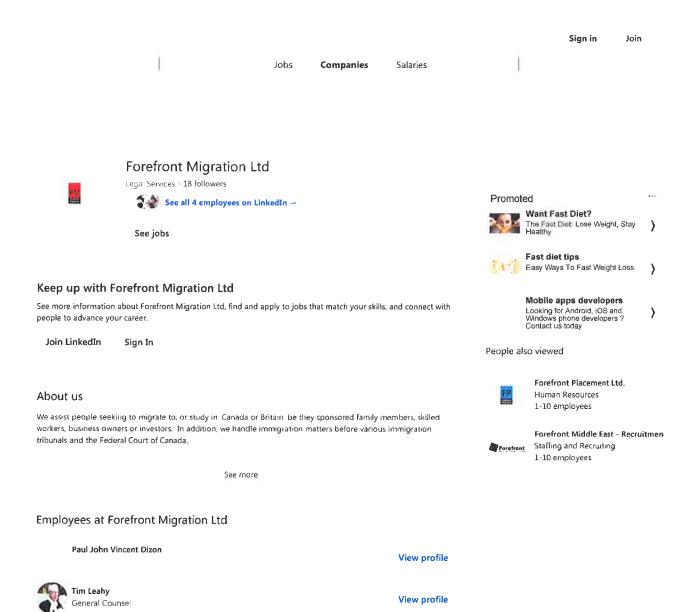


# **SCHEDULE "C"**

**Dolly Lacag** 

Office Manager

Hannah Yancha



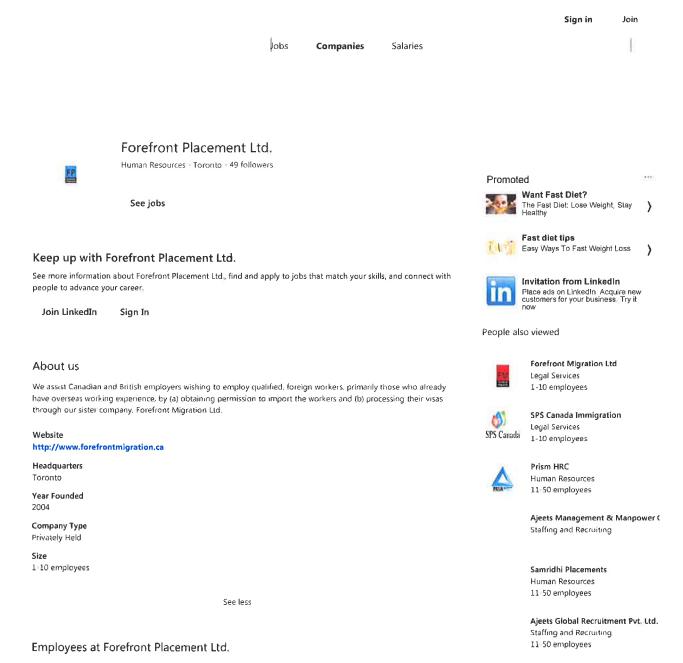
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# **SCHEDULE "D"**



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Tim Leahy

General Counsel and Managing Director

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# **SCHEDULE "E"**



# FOREFRONT PLACEMENT Ltd.

90 Long Acre • Mezzanine Level • London, UK WC2E 9RZ 45 Sheppard Avenue East • Suite 900 • Toronto, Ontario • Canada M2N 5W9

United Kingdom

Telecopier: +44 844 778 7272 Telephone: +44 **20 7717 8999** Web: www.ForefrontMigration.co.uk **Gulf Arc** 

Telephone: +974 423 2112 Direct Line: +974 657 9077 email: info@myForefront.com

## Timothy Edward Leahy

Nationality: Canadian and American Residency: United Kingdom and Qatar

Residence: Doha, Qatar · London, U.K. Telephone: +974 657 9077 or 423 1221

Fax: -

+44 844 778 7272

email:

TELeahy@gmail.com or

TEL@myForefront.com

Website:

ForefrontMigration.co.uk

### Education

1988/89 Osgoode Hall Law School • Toronto, Ontario

completed requirements for a Canadian law degree

1984-1986 Wayne State University • Detroit, Michigan

J.D. cum laude (hons) • law degree completed three-year degree in 2½ years

1983 (?) The American College • Bryn Mawr, Pennsylvania U.S.A.

C.L.U. • Chartered Life Underwriter

(series of ten examinations on various insurance subjects)

University of Michigan • Ann Arbor, Michigan U.S.A.

Ph.D. Candidate in History (passage of oral examinations)

M.A. in History

Albion College · Albion, Michigan U.S.A.

B.A. magna cum laude (high hons) • History and Spanish inducted into the national honorary Phi Beta Kappa and named "Michigan Scholar" after having completed a four-year degree in 3½ years and having studied in Bogotá, Colombia (in Spanish) and

Vienna, Austria (in English)

### Professional Memberships

Michigan State Bar Association (since 1986)
District of Columbia Bar Ass'n (since 1988)
Law Society of Upper Canada (since 1991)
Canadian Bar Association (1989-2004)
American Immigration Lawyer Ass'n (1989-2004)

### Experience

09/04 to date

Forefront Placement Ltd. • head office: London, U.K. Director • forge liaisons with recruiting agencies in Britain, Hungary, Romania, Lebanon, Jordan, Egypt, Tunisia, South Africa, Nepal, Malaysia, Indonesia, Philippines and China in pursuit of suitable employees for employers in the Gulf area.

04/04 to date

Forefront Migration Ltd. • London, UK and Toronto Director and General Counsel • oversee offices in Toronto, London, Doha and Manila; liaise with associated offices in Singapore and Kuala Lumpur; hold immigration seminars in Saudi Arabia, Qatar, India, China and the Philippines; assist those wishing to immigrate to, or work or study in, Britain and Canada; interact with Canadian and British officials; and write and design two websites, as well as print ads and brochures.

08/94 to date

Immigration North America, Inc. • Toronto, Canada Director and General Counsel • submit detailed analyses to Immigration Canada officials, Members of Parliament (MP's) and Immigration Bar on proposed legislation and regulations; lobby MP's; appear on television and speak to the press and at conferences on immigration matters; assist those seeking to remain in, migrate to, work or study in, Canada, including appearing before immigration tribunals deciding asylum claims, immigration appeals and deportation; advise lawyers and consultants, and interact with CIC officials based abroad, regionally, locally or at headquarters.

08/89 to date

**Timothy E. Leahy, Esq** ° Toronto, Canada & London, U.K. *Immigration Lawyer* ° represent clients of my consultancies by appearing as counsel before immigration tribunals in the U.S. and Canada and before the Federal Court of Canada; prepare affidavits and written arguments for the Court and tribunals; cross-examine Immigration officers; secure the aid of, and draft correspondence for, Members of Parliament on behalf of their constituents/my clients; and perform the other tasks delineated in the preceding positions.

08/89 to 07/90

**Rotenberg, Martinello** ∘ Toronto, Ontario, Canada Apprentice Lawyer ∘ assist litigating lawyer; de facto head of asylum-claims unit ♦ secured asylum for seventy-eight citizens of without losing one claim

FF

02/86 to 08/89

**U.S. Department of State** • Washington, D.C., U.S.A. Foreign Service Officer (Political)

- HR/Foreign Service Nationals Washington, D.C write talking-points for Secretary of State James A. Baker; write a speech for Under Secretary Lawrence Eagleberger; organize visit for 1988's top five locally-hired staff
   praised for having created the best visit for the winners by changing the hotel, arranging embassy receptions and securing free admission to performances at the Kennedy Center, Virginia Symphony and Washington Ballet and for tours of the White House, Blair House (for the President's official guests), the Congress and the U.S. Supreme Court and Mr. Justice Thurgood Marshall's Chambers.
- Office of Protocol Washington, D.C mediate civil (and criminal) disputes between foreign diplomats, consular officers and diplomatic missions, on one hand, and U.S. residents on the other; draft diplomatic notes and correspondence; co-write Chief of Protocol's testimony regarding "diplomatic crime" before the Senate Foreign Relations Committee, write Q's&A's for Chief of Protocol in preparation thereof.
- <u>U.S. Consulate General</u> Toronto, Ontario, Canada
   *Vice Consul* adjudicate visitor, work and student visas applications; assist distressed Americans; and visit imprisoned Americans, etc.

1981-02/86

The Phoenix Companies • Southfield (Detroit), Michigan Phoenix Mutual Life Assurance & Phoenix Equity Planning Insurance Agent, NASD-licensed Securities Salesman, licensed Real Estate Syndication Agent • broker for other companies Licensed in Michigan, Indiana, Texas and Arizona designed and marketed employee benefit programs, such as major medical, self-funded medical plan, group life and pension programs; estate planning for business owners; sale of mutual fund; personal pension plans and disability and life insurance • became a C.L.U. in two years (passing eight examinations at once) and amongst the first to pass the State of Michigan test to become a Licensed Insurance Counselor, permitted to charge a fee for giving insurance advice.

1981-1987

**Phoenix Real Estate Co.** • Ann Arbor, Michigan, U.S.A. Owner • became a real estate broker in order to redirect referral business to other real estate firms.



### Other Employment Experience

Western Reserve Life Assurance • HQ: Clearwater, Florida After establishing my private self-employed retirement plan, funded with mutual funds, I joined this firm and began doing likewise for others before joining Phoenix Mutual.

**Real Estate companies** • suburban Detroit, Michigan, U.S.A. *Salesman* • primarily resale but also new homes; mastered the craft of writing brief, catchy advertisements and developing effective direct mail campaigns, prompting a psychiatrist to tell my father that he enjoyed reading my junk mail because it was the best and most interesting he received.

**J. Walter Thompson Advertising Co.** • Detroit, Michigan *Clerical* • my first job as a freshly minted college graduate

Office of Off-Campus Study • Albion College • Michigan Assistant and, in the director's absence, Acting Director (about 20% of the time) • to assist students in studying abroad, to provide support for those who are abroad and to investigate additional overseas study opportunities for college students.

Ass'n of English and American Students Abroad • London Sales Representative, Vienna • sale of trans-Atlantic, chartered airplane tickets ♦ recorded the second highest level of sales on the Continent (behind an official of an Italian youth group).

Ford Motor Company • Dearborn, Michigan, U.S.A. Worker • worked summers at the Rouge Complex and at the Rawsonville plant.

**Camp Pokagon** • Lake James • Angola, Indiana, U.S.A. *Camp Counselor* • my first real job, when I was age seventeen.



# TIMOTHY EDWARD LEAHY

Respondent

# ONTARIO SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT TORONTO

# ORDER

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