

Federal Court



Cour fédérale

**Date: 20250826**

**Docket: IMM-4835-24**

**Citation: 2025 FC 1424**

**Ottawa, Ontario, August 26, 2025**

**PRESENT: The Honourable Mr. Justice Thorne**

**BETWEEN:**

**IMRAN ILYAS**

**Applicant**

**and**

**THE MINISTER OF CITIZENSHIP AND IMMIGRATION**

**Respondent**

**JUDGMENT AND REASONS**

**I. Overview**

[1] The Applicant, Imran Ilyas [the “Applicant”], seeks judicial review of a decision by Immigration, Refugees and Citizenship Canada [“IRCC”] that refused his application for a visitor’s temporary resident visa [“TRV”]. The Applicant states that he intended to set up a business in Canada and sought the visa to undertake a preliminary trip to gather information to help him do so. IRCC refused the Applicant’s TRV application because they were not satisfied the Applicant intended to enter Canada for a legitimate business purpose. The Applicant alleges

that the IRCC's decision was unreasonable, as it provided no explanation of the decision-maker's reasoning and had failed to take into account the information in his application.

[2] For the reasons that follow, I grant the application and return the decision to the IRCC for redetermination.

## II. Background

[3] The Applicant, a citizen of Pakistan, states that he is an entrepreneur and educator, and a person of significant financial means. In his TRV application, he indicated that he wished to establish a business in Canada related to education services. He also attached business documents to demonstrate his experience in this sector. The application states that he intended to visit Canada to explore the market for such businesses.

[4] In a March 3, 2024 letter, an IRCC officer [the "Officer"] refused the Applicant's TRV application [the "Decision"]. The Decision stated that the Officer was not satisfied that the Applicant had a legitimate business purpose for visiting Canada. The TRV was specifically denied on the grounds that the Applicant's stated business purpose was insufficiently substantiated, and that the Officer was not satisfied the Applicant would depart Canada at the end of his authorized stay.

[5] The reasoning behind the Decision was recorded in the IRCC Global Case Management System [the "GCMS"] notes. In its entirety, it reads as follows:

I have reviewed the application. The applicant's stated business purpose is insufficiently substantiated. Weighing the factors in this

application, I am not satisfied that the applicant will depart Canada at the end of the period authorized for their stay. For the reasons above, I have refused the application.

III. Issue and standard of review

[6] The sole issue at play in this matter is whether the decision under review is reasonable.

[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*]. In undertaking reasonableness review, the Court must assess whether the decision bears the hallmarks of reasonableness, namely justification, transparency and intelligibility: *Vavilov* at para 99. In particular, when reviewing a decision on this standard, “a court must consider the outcome of the administrative decision in light of its underlying rationale in order to ensure that the decision as a whole is transparent, intelligible and justified”: *Vavilov* at para 15. Ultimately, a reasonable decision is one which is “based on an internally coherent and rational chain of analysis and that is justified in relation to the facts and law”: *Vavilov* at para 85.

IV. Analysis

A. *The Decision is unreasonable*

[8] Having regard to this standard of review, I have little difficulty finding that the Decision was not reasonable.

[9] The arguments of the Applicant are straightforward. He asserts that the Officer provided no explanation as to how and why he had reached the conclusion that the stated business purpose of the Applicant’s trip was insufficiently substantiated, and that the Officer had failed to set out

the key elements of their analysis in the Decision or the accompanying GCMS notes. He argues that some explanation was necessary and that in coming to the unsubstantiated conclusion, the Officer had also ignored the evidence of the Applicant contrary to the finding. The Applicant also submits that though he had explained the intended purpose of his visit and supported his application with corroborative evidence as to this, it was evident that the Officer had failed to review the Applicant's statement of purpose, supporting documents, and the other aspects of his application.

[10] The Applicant also asserts that the holding in the Decision seemed to be unsupported boilerplate language which did not engage with any of the information that he had provided. He frames the refusal letter as making boilerplate pronouncements without specific reference to any issues or weaknesses in his application. Accordingly, the Applicant submits that there is no indication that the Officer turned their mind to the facts of the case. Finally, the Applicant submits that, given that the timestamps on the three GCMS entries on the date of the decision all read identical times of 4:47:48 pm, and that no deciding officer is identified in the GCMS, it is likely the Decision did not involve a human being, but was rather solely the product of the IRCC's Chinook3+ AI tool ["Chinook"].

[11] For their part, the Respondent argues that neither the use of boilerplate language nor the Chinook tool is an error where a decision's reasons are intelligible and outline a reasonable path to the decision that was made. The Respondent further states that the Officer's reasons are sufficient to enable the Court to understand how the Officer reached their conclusion. They also note that the Federal Court has made clear that in the context of TRV applications, extensive

reasons are not required, and that such reasons are not to be assessed against a standard of perfection. They assert that, in relation to the information provided by the Applicant, officers are generally presumed to have weighed and considered all the evidence and need not refer to every piece of evidence in their reasons. They also contend that with respect to the Applicant's stated travel purpose, he had indicated his intention to establish a business in Canada related to education services and that he would thus visit different educational institutes, meet with a real estate agent, and conduct market research. However, the Respondent points out that no further details nor documents, such as itineraries or the like, were provided by the Applicant to support these claims. As such, the Respondent submits it was reasonable for the Officer to find that the Applicant's stated business purpose had been insufficiently set out or substantiated.

[12] With respect, and despite the able submissions of counsel for the Respondent, by and large I do not find these arguments persuasive. I will note, however, that I agree with the Respondent that the Applicant did not provide any evidence in support of the contention that his decision had been solely made by the Chinook tool, and further that the Applicant was incorrect in stating that the Officer had not been identified, given that the GCMS listed his identification number.

[13] The Respondent is also correct that decisions need not be extensive or specifically cite all of the information provided to the decision-maker. Nor are decisions to be assessed against a standard of perfection or avoid so-called boilerplate language. However, ultimately a logical chain of analysis indicating why the Officer reached their decision must be discernable from the reasons provided. Here, that simply is not the case. The reasons in the GCMS baldly declare,

without any explanation whatsoever, that the Applicant's stated business purpose was insufficiently substantiated. Why this is so, or how this conclusion was reached by the Officer given the information and evidence provided is wholly unspoken and unaddressed. As a result, it is not possible to glean the reasoning or trace the chain of logic which led the Officer to that conclusion.

[14] Obviously, the Officer was free to come to the conclusion they did, had they, in any way, supported it with regard to the evidentiary record or otherwise explained their thought process. However, there were no such justifications provided. For example, I note that the Applicant included in his TRV application, among other documents, a letter describing his management of the operations and finances of his educational institution in Pakistan. The Applicant also provided financial documents in support of his assets. While the Officer could certainly have determined that they were not satisfied with this evidence for any number of reasons, I find that the Officer erred in failing to provide any explanation for why the Applicant's stated business purpose was "insufficiently substantiated," given that relevant evidence such as this was in the record before them. Thus, I agree with the Applicant that the Officer's reasons did not demonstrate regard to the evidence, and lacked the requisite hallmarks of justification, transparency and intelligibility: *Vavilov* at para 99.

[15] In their submissions, the Respondent states that it may be that the Officer was dissatisfied with the Applicant's given purpose for his travel to Canada because, while he had asserted in his application that he would visit different educational institutes, meet with agents, and conduct market research while in Canada, the Applicant had not provided documents fleshing out these

intentions. I agree that this might indeed have been a valid reason to have concluded that the Applicant's stated business purpose was insufficiently set out or substantiated – had the Officer actually said this, or given any indication of such reasoning in the Decision. In lieu of this, I must refuse the Respondent's invitation to speculate as to the reasoning underlying the Officer's conclusions. The reasoning of the Officer cannot be buttressed in this fashion, after the fact, through speculation about a potential line of analysis by the Officer that is not apparent in the Decision itself. I do not agree that merely having baldly stated that the Applicant's business purpose was not substantiated reasonably leads to the conclusion that this was the Officer's line of reasoning. In any event, the jurisprudence is clear that reasonableness review does not permit this Court to entertain supplemental reasons beyond those issued in the decision under review: see e.g. *Alexion Pharmaceuticals Inc. v. Canada (Attorney General)*, 2021 FCA 157 at paras 8, 15, citing *Vavilov* at para 97, *Rezaei v Canada (Immigration, Refugees and Citizenship)*, 2020 FC 444 at para 28. A reasonable path to the decision rendered cannot be followed where such a trail simply does not exist.

[16] Given the Decision's complete absence of any explanation, without engaging in such speculation the Court is also simply unable to assess whether or not the Officer ignored any pull back factors or evidence regarding the Applicant's purpose of visit or his ties to Pakistan. The Officer's reasons do not give any indication as to whether they turned their mind to such considerations. I find that without any hint of how various facts were weighed, how inferences were drawn, or what considerations led to the Officer's conclusions, it is not possible to discern a logical chain of reasoning which yielded the outcome of the Decision. As such, the Decision was not transparent, intelligible, or justified, and is unreasonable.

V. Conclusion

[17] For these reasons, the decision in this case is set aside and the matter is returned for redetermination by a different IRCC Officer.

[18] The parties proposed no question for certification, and I agree that none arises.



**JUDGMENT IN IMM-4835-24**

**THIS COURT'S JUDGMENT is that:**

1. The judicial review application is granted.
2. The decision of the Officer dated March 3, 2024, is set aside and the matter is returned for redetermination by a different IRCC Officer.
3. No question of general importance is certified.

"Darren R. Thorne"

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Judge

**FEDERAL COURT**  
**SOLICITORS OF RECORD**

**DOCKET:** IMM-4835-24

**STYLE OF CAUSE:** IMRAN ILYAS v. MCI

**PLACE OF HEARING:** TORONTO, ONTARIO

**DATE OF HEARING:** AUGUST 12, 2025

**REASONS AND JUDGMENT:** THORNE J.

**DATED:** AUGUST 26, 2025

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