

## CITIZENSHIP AND IMMIGRATION

### IMMIGRATION PRACTICE

MANIVANNAN V. CANADA (MINISTER OF CITIZENSHIP AND IMMIGRATION) (IMM-2353-08, 2008 FC 1392, Russell J., judgment dated December 17, 2008, 22 pp.)

Application under *Immigration and Refugee Protection Act*, S.C. 2001, c. 27, s. 87 for non-disclosure of information considered, relied upon by visa officer in determining applicant inadmissible to Canada on security grounds; judicial review of visa officer's rejection of application for permanent resident status from abroad—Visa officer's concerns about inadmissibility on security grounds related to applicant's involvement with Liberation Tigers of Tamil Eelam—Disclosure of redacted information in certified tribunal record (CTR) injurious to national security or safety—Because applicant not even living in Canada, liberty, security interests not threatened by limiting disclosure of information—Also, clear from CTR only small portion of information redacted, that applicant aware of majority of information officer relying on—Application dismissed.