

Ministry of Training,  
Colleges and Universities

Office of the Superintendent

Private Career Colleges Branch  
9<sup>th</sup> Floor, Mowat Block  
900 Bay Street  
Toronto ON M7A 1L2

Ministère de la Formation  
et des Collèges et Universités

Bureau du Surintendant

Direction des collèges  
privés d'enseignement professionnel  
9<sup>e</sup> étage, édifice Mowat  
900, rue Bay  
Toronto ON M7A 1L2



# RESTRAINING ORDER

March 24, 2011

Curtis Desrosiers  
Level 3 – GSS Inc.  
Known as Level 3 Global Security Services  
3843 Maple Hill Way  
Inverary ON  
K0H 1X0

Dear Mr. Desrosiers:

This is a Restraining Order issued under s. 46(1) of the *Private Career Colleges Act, 2005* (“Act”). As the Superintendent of Private Career Colleges, I believe that Level 3 – GSS Inc. known as Level 3 Global Security Services (“School”) has contravened the Act and/or regulations, and I order the School to stop contravening the following provisions of the Act and/or regulations:

- Advertising an unregistered private career college and advertising unapproved vocational programs, contrary to subsections 11(1) and (2) of the Act, respectively.

Detailed reasons in support of my decision to issue this order are found in Schedule “A”, attached. Failure to comply with this order may result in any or all of the following, further enforcement actions:

- Application for an order from the Superior Court of Justice;
- The issuance of further Administrative Monetary Penalties; and/or
- Prosecution for offences under the Act. Upon conviction by a court,
  - A corporation is subject to a fine of up to \$250,000;
  - An individual is subject to a fine of up to \$100,000, a prison term of up to one year, or both; and

- An officer or director of a corporation who concurs in the commission of the offence, is subject to a fine of up to \$25,000, a prison term of up to one year, or both.

You must provide written confirmation signed by a person with authority to bind the School, together with all available supporting evidence, that the steps outlined below have been taken. This written confirmation must be delivered by March 30, 2011 by registered mail or courier to my attention and confirm that the School:

- has stopped advertising an unregistered private career college and unapproved vocational programs that require approval.

As noted above, the applicable legislation is the *Private Career Colleges Act, 2005* and the regulations made thereunder. The legislation and regulations are available at [www.e-laws.gov.on.ca](http://www.e-laws.gov.on.ca). If you are unable to access any relevant information on e-laws, you may contact our offices at (416) 314-0500 to request that a copy of the legislation and regulations be sent to you.

#### **Superintendent's Policy Directive**

Should you choose to submit an application to register the School as a Private Career College and apply for approval to deliver this program it will be subject to the requirements of Policy Directive #3 – Standards for Programs in the Security Guard or Private Investigator Fields.

Pursuant to sections 49(2) and 49(6) of the Act, this order is published on the Ministry of Training, Colleges and Universities' website.

Kindly govern yourself accordingly,

ORIGINAL SIGNED BY

Allan Scott  
Superintendent of Private Career Colleges

## Schedule "A"

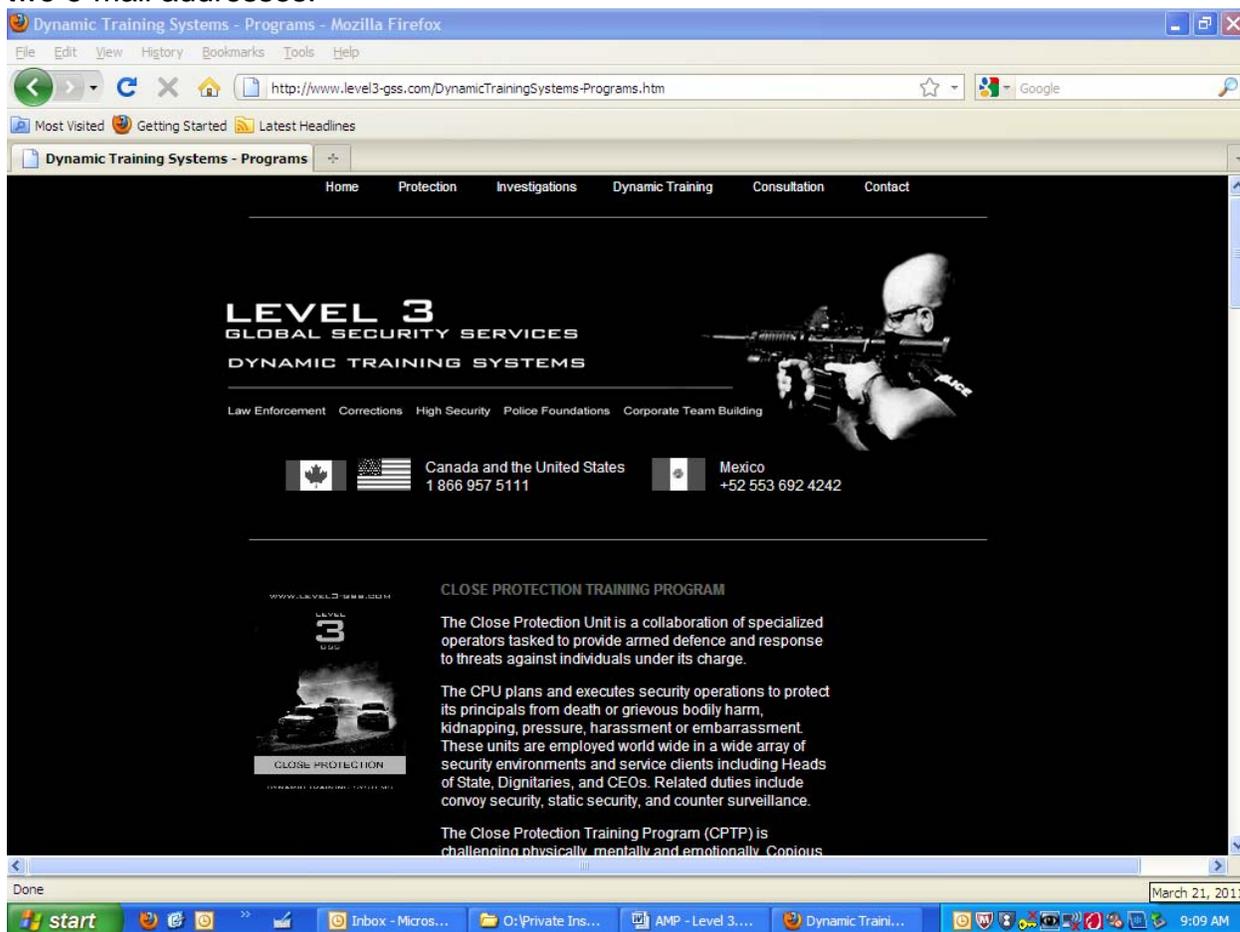
### Detailed Reasons and Findings

The Superintendent has issued this order based on the following findings and supporting facts and evidence:

#### Contravention of section 11 of the Act – Restrictions on Advertising and Soliciting

Between March 11 and March 14, 2011 a Designate exchanged e-mails with the School's Director of Training regarding the School's Close Protection program. In these e-mails, the Director of Training advises that the School is currently taking names of prospective students who will be contacted once a sufficient number of people have expressed an interest, and that he anticipates a start date in June or July, 2011. He describes the course as being 3 weeks in durations with 37-38 hours of training per week (111-114 hours total), and costing approximately \$2,500.

On March 18, 2011 the School's website, [www.level3-gss.com](http://www.level3-gss.com) was reviewed by a Designate, and was found to contain advertisements for a Close Protection program. The website also provides a phone number for the school as well as two e-mail addresses.



The screenshot shows a Mozilla Firefox browser window displaying the website for Level 3 Global Security Services. The browser's address bar shows the URL <http://www.level3-gss.com/DynamicTrainingSystems-Programs.htm>. The website's navigation menu includes Home, Protection, Investigations, Dynamic Training, Consultation, and Contact. The main content area features the company logo, "LEVEL 3 GLOBAL SECURITY SERVICES DYNAMIC TRAINING SYSTEMS", and a list of services: Law Enforcement, Corrections, High Security, Police Foundations, and Corporate Team Building. Contact information is provided for Canada and the United States (1 866 957 5111) and Mexico (+52 553 692 4242). A section titled "CLOSE PROTECTION TRAINING PROGRAM" describes the unit as a collaboration of specialized operators providing armed defence and response to threats against individuals. It also mentions that the CPU plans and executes security operations to protect principals from death or grievous bodily harm, kidnapping, pressure, harassment or embarrassment. The Close Protection Training Program (CPTP) is described as challenging physically, mentally and emotionally. The browser's taskbar at the bottom shows the date as March 21, 2011, and the time as 9:09 AM.

The Close Protection program corresponds to National Occupational Classification (NOC) code 6651 - Security Guards and Related Occupations. Based on the evidence gathered the Close Protection program offered by the School fits the definition of a vocational program requiring approval of the Superintendent according to the Act. Since this program is not approved, advertising of same is prohibited in accordance with Section 11 of the Act.

### **Previous Efforts to Obtain Compliance Ignored**

On October 6, 2010 a Designate sent a letter to Curtis Desrosiers advising that the Close Protection program requires approval by the Superintendent. This letter was sent to the same address that is still listed in ONBIS as the School's head office. The School has not yet applied to receive this approval and has continued to advertise this program, despite the letter expressly stating that "Until such time as your institution has been registered and your program has been approved, it is a violation...to deliver or advertise the delivery of your vocational program."

### **Ministry of Community Safety and Correctional Services**

On March 23, 2011 a Designate reviewed the Ministry of Community Safety and Correctional Services (MCSCS) list of approved training providers for Security Guard and Private Investigator courses; the School is approved by MCSCS to provide training leading to both licences.

According to the Private Security and Investigative Services Act, 2005, a person "...who performs work, for remuneration, that consists primarily of guarding or patrolling for the purpose of protecting persons or property" is classified as a security guard and requires a licence to operate in Ontario. As the training provided by the School prepares individuals for this type of work, this program is subject to the requirements of Policy Directive # 3 - Standards for Programs in the Security Guard or Private Investigator Fields and requires approval under the Private Career Colleges Act, 2005.

### **Legal and Operating Entities**

According to an ONBIS search, Level 3 – GSS Inc. was registered as a corporation in Ontario on January 14, 2010. Curtis Desrosiers is currently listed as one of its Directors.