VOICE

Practice Pointers | What's Trending | Inter Alia | Get Connected | Lifestyle | Member Advantage

MARCH 2014 ▶ ISSUE 4.1

@AILANATIONAL

AMERICAN IMMIGRATION LAWYERS ASSOCIATION

ASYLUM FOR DEAF IMMIGRANTS

Answering the Call for 'Help'

What happens when deaf citizens within a society are denied the opportunity to participate in their own culture? Excluded and alone, these immigrants have become easy targets of violence and discrimination. *9*

IMMIGRATION & CRIMES

SCOTUS Analyzes Crimes Through 'Categorical' Lens

GET CONNECTED

Dual Representation in Pro Bono

IMMIGRATION & HEALTH CARE

Trends in Schedule A Occupations

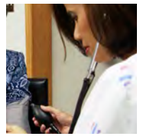
TABLE OF CONTENTS

TABLE OF CONTENTS

PRACTICE POINTERS

SCOTUS Adopts Categorical Lens

SCOTUS issues two decisions involving the classification of crimes. *3*



Schedule A Occupations

Six trends that present challenges for immigration attorneys and clients. *5*

Also in Practice Pointers:
Behind the Case: *Saldana v. Holder* 7

WHAT'S TRENDING

INTER ALIA

From Artist to Lawyer

Follow Alina Cruz's creative journey. *15*

GET CONNECTED

Dual Representation and Pro Bono Work

Prospective clients considering joint representation can cause complications. *17*

AILA InfoNet Doc. No. 14026140. (Posted 2/26/14)

LIFESTYLE

A Line in the Sand

Novel explores creation of U.S.-Mexican border. *20*

Also in Lifestyle: What's Happening *21*

MEMBER ADVANTAGE

AILA Takes on India

AILA members head to India to better understand consular processes. *22*

SCOTUS Analyzes Crimes Through 'Categorical' Lens

by Mary E. Kramer

In the past year, the U.S. Supreme Court has issued two important decisions involving the classification of crimes based on a categorical approach. Already, immigration law attorneys are experiencing success from the use of these cases in their motions to dismiss the charge(s) of removability. These cases also arguably abrogate Board of Immigration Appeals (BIA) precedent, and are important for contesting not only removability, but arguing the burden of proof and eligibility for relief.

Georgia Statute vs. Federal CSA

In Moncrieffe v. Holder, 133 S. Ct. 1678 (2012), the Court confronted the issue of whether a Georgia controlled-substance conviction could qualify as an aggravated felony drug-trafficking crime where the state statute was not a categorical match to the federal Controlled Substances Act (CSA). *See* INA §101(a)(43)(B). As background, the CSA contains a provision for distribution of a small amount of marijuana without remuneration. 21 USC §841(b)(1)(D).

According to the Court, the conviction did not necessarily involve facts that correspond to an offense punishable as a felony under the CSA. Assuming the least culpable conduct described by statute, the Court would proceed as if this was a misdemeanor offense, not a federal felony. Moncrieffe did not have an aggravated felony drug-trafficking conviction.

Cases to read with *Moncrieffe* that require the state statute to present a categorical match to a federal felony based on the CSA include Lopez v. Gonzales, 549 U.S. 47, 53–54 (2006) and Carachuri-Rosendo v. Holder, 130 S. Ct. 2577 (2010).

Notably, before *Moncrieffe*, the BIA had acknowledged the problem that some state statutes lack a distribution-without-remuneration provision and, thus, did not present a categorical match to the CSA. Indeed, as early as 2008, the BIA ruled that the amount of marijuana and the issue of remuneration are "non-elemental facts" that are adjudicated through a "circumstance-specific" approach. *See* Matter of Aruna, 24 I&N Dec. 452 (BIA 2008).

The circumstance-specific approach is applied where the INA includes a non-elemental fact—a fact that will never be included in the federal statute—within its definition or classification of aggravated felony, such as financial loss to a victim. *See* Nijhawan v. Holder, 557 U.S. 29 (2009). The Supreme Court specifically rejected this "hypothetical felony" approach, and clarified that it is a categorical approach that applies in the context of the aggravated felony drug-trafficking crime definition. *Moncrieffe*, 133 S. Ct. 1678, at 1688.

On a practical level, practitioners whose clients appear to have a "trafficking" crime should review the relevant state code to determine whether there is a provision for distribution of marijuana without remuneration. If there is, then is the language close enough to the federal law? But if there is no such provision at all—as in the case with the Georgia Code—then it cannot be said that the client has been convicted of a federal felony drug-trafficking crime.

BACKTRACK

High Court Takes on Gay Marriage

AMERICAN IMMIGRATION COUNCIL

AIC Report: Immigrants and Crime

But *Moncrieffe* is significant not only for the purposes of the aggravated felony drug-trafficking conviction. The decision is literally an immigration law gold mine, in that it cites to a litany of important cases because it describes the evolution of the categorical approach in the immigration law context. There is good language and citations outside of the trafficking context; it is the analysis that counts.

California vs. the Federal ACCA

Moncrieffe's adherence to the categorical approach is complemented by the Court's decision in Descamps v. U.S., 133 S. Ct. 2276 (2013), a federal criminal-sentencing case under the Armed Criminal Career Act or (ACCA). The issue in *Descamps* was whether the defendant, who had been convicted under a federal firearm statute, would have his sentence enhanced by virtue of three prior convictions for "a violent felony." 18 USC §924(e). The definition of "violent felony" is almost identical to the definition of "crime of violence" according to 18 USC §16, which, in turn, is used to define a "crime of violence" under the INA's aggravated felony definition. *See* INA §101(a)(43)(F).

What is important about *Descamps* in the immigration law context is that the Supreme Court clarifies what is a divisible statute, justifying recourse to the record of conviction through a modified categorical approach. True divisibility occurs when a criminal statute lists "potential offense elements in the alternative," such as thorough punctuation or formatting. *Descamps*, 133 S. Ct. 2276, at 2283.

The modified categorical approach is limited to a very "narrow range of cases" that offer alternative offenses; it is not an equal counterpart to the categorical approach, but a "tool" for implementing the overriding analysis, which is categorical. *Id.* at 2283–84. This tool allows the adjudicator to review documents such as the jury instructions, charging papers, plea and judgment, in an attempt to identify which offense was charged and disposed of. *Id.* at 2283–84. However, a statute that is missing an element altogether is not divisible, and the modified categorical approach cannot be used to look for the desired element.

What does *Descamps* mean for immigration adjudications? The BIA has traditionally applied an elements-based test to classifying crimes in the aggravated felony, moral turpitude (and other) contexts, and at least has paid lip service to the idea that the underlying facts are not determinative. *See, e.g.*, Matter of Short, 20 I&N Dec.136 (BIA 1989). However, in cases like Matter of Silva-Trevino, 24 I&N Dec. 687 (AG 2008), and Matter of Lanferman, 25 I&N Dec. 721 (BIA 2012), the Board has pushed the proverbial envelope and stretched the concept, justifying a modified categorical approach to find the "missing element" or determine a "non-elemental fact." *Descamps* (and *Moncrieffe*) appear to abrogate these cases because the Court has clarified what qualifies as a divisible statute; and in the absence of divisibility, there is no recourse to the record of conviction—or any other evidence. The analysis on removability ends with the essential elements of the criminal statute. If based on the elements of the criminal statute, the crime of conviction is not a categorical match to the generic crime, then the offense cannot qualify as a removable offense—for example, an aggravated felony or moral turpitude crime.

For a comprehensive discussion of the various terms and analyses, like "categorical" and "modified" categorical approach, "non-element" crime, and "circumstance-specific" approach, see the author's book, Immigration Consequences of Criminal Activity (5th Ed. 2013). A further look at *Moncrieffe* and *Descamps'* impact on immigration law will appear in the May 2014 issue of VOICE.

MARY E. KRAMER is author of Immigration Consequences of Criminal Activity. She is a solo practitioner in Miami and serves on AILA's DOS Liaison Committee and the Access to Counsel Taskforce. The author's views do not necessarily represent the views of AILA nor do they constitute legal advice or representation.

AILA InfoNet Doc. No. 14026140. (Posted 2/26/14)

Trends in Health Care Immigration Cases

by Sherry Neal

Six key trends in immigration cases for Schedule A occupations and allied health care workers present challenges for immigration attorneys and their clients. These trends are described below, with helpful practice tips for practitioners.

Health Care Certificate Renewals

Some health care workers are fooled into thinking that if an individual already has used a health care certificate to enter on a nonimmigrant status, it won't be needed for adjustment of status. However, U.S. Citizenship and Immigration Services (USCIS) relies on 8 CFR §212.15(d)(1) for the opinion that a health care worker must present the certificate at "each" admission until lawful permanent residency is granted, thus requiring a valid health care certificate before approving the Form I-485, Application to Register Permanent Residence or Adjust Status.

> **Practice pointer:** Advise clients to renew the health care certificate before it expires. If they wait to renew until they receive a request for evidence (RFE) from USCIS, then there may not be sufficient time to obtain the renewal, since the renewal may require re-taking an English proficiency exam, as well as additional courses to meet current educational standards.

EB-2s for Physical Therapists

USCIS is strict with master's degree equivalency for physical therapists. The Foreign Credentialing Commission on Physical Therapy (FCCPT), one of the agencies responsible for issuing health care certificates, and other education evaluation companies conclude that a five-year program in physical therapy is substantially equivalent to a master's degree. But USCIS often disregards the evaluation from FCCPT and other reputable organizations by stating in its RFEs that it is "not in accordance with other evidence." The "other evidence" relied on by USCIS is American Association of Collegiate Registrars and Admissions Office's EDGE database.

> **Practice pointer:** Expect an EB-2 case based on a bachelor's degree and five years of experience to fare much better than an EB-2 with a master's degree requirement.

Proof of Passing National Council Licensure Examination (NCLEX)

USCIS has been questioning the letters issued by some state boards of nursing regarding the beneficiary's passing of the NCLEX (nursing examination) because the agency thinks that the state board is not the appropriate source to verify a passing score. This becomes an issue when some candidates who took the exam years ago have confirmation of the passing score from a state board instead of the testing authority.

> **Practice pointer:** The issue can be overcome, but it requires additional proof, such as an e-mail from the state board confirming the authenticity of the passing score letter.

Priority Date Retention

With the visa backlog, it's common for Schedule A nurses to no longer have job offers with the original sponsor and to find another employer to file a new Form I-140, Immigrant Petition for Alien Worker, on their behalf. The employment-based applicant is entitled to keep the priority date from the earliest I-140 approval unless the petition was revoked for fraud or misrepresentation. Unfortunately, when cases are filed under the premium processing method, there is inconsistency in retaining the priority date at the outset. The problem seems to be limited to the premium processing unit, presumably because that department is under time constraints to process petitions within 15 days. Although a copy of the earlier approval is included in the initial filing, along with a clear request to retain the earlier date, the premium processing department doesn't always take the time or effort to confirm the earlier approval and retain the priority date on the subsequent approval notice.

Practice pointer: When you get notification of approval, check if the earlier priority date was retained. If not, contact USCIS immediately before it transfers the file to the National Visa Center (NVC) to request correction of the error. It may take multiple calls/e-mails to the Premium Processing Unit, but they will correct the error.

Duplicate Immigrant Visa Fees

Some foreign nationals who already paid their immigrant visa fee during retrogression may be incorrectly billed again. The visa fee is required to be repaid only if a new I-140 is filed (not an "amended I-140" to reflect a corporate change) or if the beneficiary fails to contact the NVC for one year when the visa number is available. The NVC has incorrectly classified some cases as inactive, even when the beneficiary's failure to contact the NVC for one year or longer was during retrogression. Pointing out to the NVC that the period of no contact was during retrogression can take months to resolve with the NVC.

Practice pointer: Advise your client to decide whether to wait for the NVC to resolve the fee problem or opt to repay the fee instead of waiting for the resolution, viewing it as an indirect "premium processing" fee to move the case along.

State Licensing Standards

Sometimes, licensing requirements change from the time that an applicant applies for licensure to the time that he or she enters the United States and submits the Social Security number to obtain the license. At least one state board of nursing, that of South Carolina, has increased the minimum score required on the International English Language Testing System's English proficiency exam, which has affected some foreign nurses who originally had "passing scores," only to discover after they enter the United States that the score is no longer considered passing.

Practice pointer: Advise clients to check the current requirements of the state of intended employment.

SHERRY NEAL is a partner at Hammond Law Group, LLC in Cincinnati, where she leads the firm's health care immigration practice group. The author's views do not necessarily represent the views of AILA nor do they constitute legal advice or representation.

AILA InfoNet Doc. No. 14026140. (Posted 2/26/14)

Behind the Case: *Saldana v. Holder*

NO. 12-60087 (5th Cir. Sept. 11, 2013)
ATTORNEY: Marlene A. Dougherty

by Sheeba Raj

The U.S. Court of Appeals for the Fifth Circuit finally corrected an error last September that kept Texas Chapter Member Marlene A. Dougherty's client from rightfully claiming his birthright citizenship, only after decades of having federal authorities repeatedly reject his claims based on an article in the Mexican constitution that didn't even exist. To make matters worse, the government has been erroneously applying this nonexistent provision to numerous cases since 1978.

Legitimation Under INA §309

In ruling, the court pronounced Sigifredo Saldana a U.S. citizen since birth, holding, "… Saldana acquired full filial rights vis-a-vis his father under the laws of Tamaulipas, and thus his paternity was established by legitimation under INA §309." Saldana's father, who never married his mother, had formally acknowledged Saldana by placing his name on Saldana's birth certificate. "Thus, Saldana's paternity is established by legitimation if the law of Tamaulipas placed him 'in the same legal position as a child born in wedlock,' regardless of the applicable legal label," the Fifth Circuit added, citing to In re Cabrera, 21 I&N Dec. 589, 591 (BIA 1996).

"I was losing faith in our system with all of the denials and actions of agency employees with a complete disregard for the rule of law," said Dougherty, who has represented Saldana since 2005. In fact, at a scheduled N-600 interview in Harlingen, TX, Dougherty said that while waiting to be interviewed, Immigration and Customs Enforcement officials took Saldana and "dropped him off in Mexico."

Dougherty was willing to pursue the case all the way to the U.S. Supreme Court; and that if she lost the appeal there, "I was ready to quit law as a profession."

Going for EAJA Fees, Seeking Class Action

Dougherty has petitioned for fees under the Equal Access to Justice Act, but the Office of Immigration Litigation plans to contest any enhanced fees, as well as any work done before the agency. A class action suit is also in the works. "We believe [that] the Department of Homeland Security and the Executive Office for Immigration Review should have to identify those who were deliberately and/or erroneously denied a finding of legitimacy based on the application of irrelevant and, other times, nonexistent articles of the Mexican Constitution and/or misstatement that legitimacy and paternity are different," Dougherty explained. "My faith in our system was restored, but the abusiveness of the government employees is still troublesome; my hope is that the damages claims will encourage them to be less abusive in their dealings with people."

For attorneys who have clients confronting situations akin to Saldana's, Dougherty recommends moving to reopen if the denial cites to any section of the Mexican constitution or to Matter of Reyes, 16 I&N Dec. 436 (BIA 1978), which relies on the nonexistent Article 314 of the Mexican constitution. She also notes that an alternative would be to simply refile and include a brief asserting that the civil code for each state of Mexico is the appropriate law to reference, not the Mexican constitution, while also citing to Saldana v. Holder, No. 12-60087 (5th Cir. Sept. 11, 2013).

SHEEBA RAJ is the staff legal editor and reporter for VOICE.

Living and Working in Trinidad and Tobago

by Claire D. Nilson

With some of the greatest reserves of natural resources in the Caribbean, including a multitude of minerals, liquefied natural gas, and a strong petrochemical industry, job seekers worldwide are flocking to Trinidad and Tobago (T&T) to combine beaches with business.

Because visas are only good for entry to T&T, noncitizens of T&T who want to work in the country usually need to obtain work permits. A work permit application can be submitted by the individual, a prospective employer in T&T, or an attorney licensed in T&T. There is an application fee, as well as an additional cost upon approval of the application that is calculated based on the number of months' validity of the approved permit.

If an employer wants to employ more than nine individuals on a work permit, then a group application can be made. T&T's Ministry of National Security has more information. There is also a slightly different procedure for those wishing to work in the T&T oil and gas industry.

Exceptions to Requirement of Work Permits

Noncitizens may work in T&T without a work permit for a period not exceeding 30 days in any consecutive 12 months. This allows the option of either entering the country to work on a short project or starting work while concurrently requesting a work permit.

Also, nationals of one of the Caribbean Community and Common Market (CARICOM) member states (Antigua and Barbuda, Barbados, Belize, Dominica, Grenada, Guyana, Haiti, Jamaica, Montserrat, St. Kitts and Nevis, Saint Lucia, St. Vincent and the Grenadines, Suriname and Trinidad and Tobago) may be exempt from applying for work permits in another CARICOM state if they have a Certificate of Recognition of Caribbean Community Skills Qualification (CARICOM skills certificate) and fall within a pre-approved class of people. University graduates, media representatives, athletes, musicians, artists, managers, supervisors, and other service providers may apply for a CARICOM skills certificate from the designated minister in either their home country or the country in which they want to work.

The laws relating to CARICOM skills certificates differ between the CARICOM member states. These laws are generally known as the Caribbean Community Skilled Nationals Acts. The certificate will provide immigration officials with evidence that the person who seeks to enter another member state belongs to one of the approved categories. Certificate holders move freely between all member states and enjoy the same rights and benefits as domestic workers regarding employment. Once an individual has entered into a country temporarily using the CARICOM skills certificate, the host country will typically verify the certificate and then grant him or her permanent residency of that country.

A masquerader takes part in Carnival, an annual cultural event held before Ash Wednesday in T&T.

CLAIRE D. NILSON works as an associate with ASG Immigration in London and is licensed in New York, Trinidad & Tobago, and England & Wales. The author's views do not necessarily represent the views of AILA or ASG Immigration, nor do they constitute legal advice or representation.

Answering the Call for 'Help': Asylum for Deaf Immigrants

by Hadley Bajramovic

There is a substantial amount of literature in circulation pertaining to deaf culture. According to research conducted by Professor Robert Sparrow, Ph.D., for example, deaf people have their own set of cultural norms. Sparrow, who teaches at the School of Philosophical, Historical and International Studies at Monash University in Melbourne, Australia, noted in the Journal of Political Philosophy, that "Deaf people constitute a minority culture rather than merely a group of people who share a disability." They possess "their own distinct languages, each with a unique vocabulary and grammar. Deaf people also have a shared set of experience(s), relating to the consequences of deafness in a hearing culture, a shared history and distinct set of institutions."

next ▶▷▷

What happens, then, when deaf citizens within a society are denied the opportunity to participate in their own culture? Furthermore, what recourse do they have when they are also barred from participating in, what many may opine is, the normative culture?

The result of this isolation and exclusion is a total alienation from society for the deaf immigrant. Excluded and alone, these immigrants have become easy targets of violence and discrimination. Deaf people are often marginalized and not considered worthy of an education. Many do not develop any type of language skills, including sign language. And, oftentimes, they are even cast aside by their own families. Without the ability to engage orally or aurally with the world, many deaf individuals in developing countries are often developmentally truncated. As Rachel Mayberry, Ph.D., suggests in her research published in the Handbook of Neuropsychology, "Hearing is the sensory modality through which children perceive speech—the universe of talk that ties individuals, families and societies together." According to Mayberry, one of the greatest effects of being born deaf is that it blocks the development of spoken language, both the ability to speak and the ability to comprehend.

We began working with deaf clients in June 2010 and submitted our first asylum application that same month. We did not really know what to expect; we had heard from a number of naysayers that our application was bound to fail. But as we began to amass a greater number of statements from clients that stepped through our doors, it became obvious that their stories detailed some of the most painful and heartbreaking persecution we had ever heard. We were astounded and often appalled to hear how their status as deaf individuals was the sole reason for the pervasive and unwarranted persecution they endured. Though it helped to strengthen our asylum case, we were disturbed to find that foreign governments and their officers not only failed to prosecute those responsible for these crimes, but were often the ones perpetrating them.

"The result of this isolation and exclusion is a **total alienation from society** for the deaf immigrant. Excluded and alone, these immigrants have become easy targets of violence and discrimination. ... And, oftentimes, they are even **cast aside by their own families**."

In fact, most of our legal briefs cite similar prohibitive and exclusionary strategies at both national and civic levels as causes for the abuse our clients suffered. Using Mayberry's research, we have been able to successfully defend one client's right to be exempted from the one-year deadline filing requirement. Most asylum-seekers who are deaf were unaware that they had recourse to such relief, and it has been part of our office's mission to inform deaf clients about their immigration options.

For most of these individuals, cases of sexual abuse, rape, robbery, and assault (both verbal and physical) are all too common. Unfortunately, many of these crimes have gone unpunished because of inaction on the part of law enforcement, or from fear of further persecution on the part of our clients if they step forward in an attempt to report the crime. The irreparable damage that these clients have endured as a result of the precarious situation they were in is detailed in the statements that we have included in our briefs. In those briefs, the institutional inefficiencies of foreign governments in safeguarding against the abuse of this social group have become apparent, and we have successfully shown that asylum is a viable and appropriate mode of relief.

Our strategy is that deaf citizens, particularly those from Latin America, can satisfy the four-prong test

for asylum based on a social group in Matter of Acosta, 19 I&N Dec. 211 (BIA 1985). We gathered the necessary evidence, statistics, and, most important, client testimonies in order to detail the persecution our clients had reportedly suffered. When U.S. Citizenship and Immigration Services' (USCIS) Asylum Office granted our client's application for asylum on September 26, 2013, there were shouts of exultation, a series of high-fives, and even some tears. This was no ordinary case. The notice signaled the first time that a deaf immigrant from Mexico had been granted asylum based solely on his belonging to the deaf community. The Asylum Office's decision marked the momentous and monumental culmination of several years of hard work and perseverance, both for our staff and for our deaf clients. As we prepared to inform our client of the favorable decision via an operator relay, we were reminded of the communicative barriers that our client has had to overcome all his life. This realization reconfirmed our dedication to this underserved community.

In November 2013, we received a notice from USCIS informing us that another one of our deaf clients had been granted asylum. As the stories of these underserved individuals come to light, we are confident that they will continue to garner much attention.

"According to 42 USC §12181(7)(F) and the American Disabilities Act §36.104, **attorneys fall under the category of public entities required** to provide adequate accommodation to deaf clients."

In light of these new developments, what professional responsibility do immigration attorneys owe the deaf immigrant community? According to 42 USC §12181(7)(F) and the American Disabilities Act §36.104, attorneys fall under the category of public entities required to provide adequate accommodation to deaf clients.

By setting a precedent, we hope to not only ameliorate their situation, but also to shed light on the plight of deaf immigrants, as well as educate and broaden the scope of asylum relief for other social groups who, perhaps, also have sat quietly in the shadows, waiting for someone to take action.

BACKTRACK

Asylum for Atheists

HADLEY BAJRAMOVIC is a former director of the International Scholar Center at UC Riverside, now in private practice in Moreno Valley, CA, serving local and underserved populations. The author's views do not necessarily represent the views of AILA nor do they constitute legal advice or representation.

No ICE Reimbursement, No More 48-Hour Hold, Says Miami-Dade

by Sheeba Raj

A new detainer policy has gone into effect in Miami-Dade County, representing a dramatic shift in policy, after the county's commissioner announced that the county would stop covering the cost of housing immigrant detainees, something the county previously agreed to do as part of a long-standing arrangement to honor immigration detainers issued by U.S. Immigration Customs and Enforcement (ICE).

Miami-Dade County Commissioner Sally Heyman announcing passage of the resolution, with Jonathan Fried of WeCount! to her right.

Effective January 1, 2014, citing financial and human costs, the Miami-Dade Corrections and Rehabilitation Department no longer prolongs the detention of inmates or notifies ICE of their impending release without an executed, written agreement from ICE to reimburse the county for all detainer-related expenses. Since no such agreement has been executed, the county intends to release individuals in criminal detention once bond has been posted or the charges are resolved, regardless of whether ICE has issued an immigration detainer.

Miami-Dade County's new detainer policy was several years in the making. "We all want some kind of just and humane federal immigration reform, but that's not happening," said Jonathan Fried, executive director of WeCount!, an immigrants' rights organization based in Homestead, FL. "We've realized that we need to do everything we can on whatever level we can to make people's lives more free and less oppressive, and this is one of the things that was within the control of the local government."

Fried also noted the "anti-immigrant political mood in the state of Florida" several years ago as another reason to hold back efforts to change the detainer policy in Miami-Dade County until 2013. "[W]e were fighting Arizona-style legislation in Tallahassee and our concern was not to make things worse in Tallahassee by doing a campaign locally on this issue in Miami-Dade County."

Edward Ramos attends the press conference announcing passage of the Miami-Dade resolution.

PUBLIC INTEREST FELLOW HELPS TURN TIDE IN MIAMI

Edward Ramos encourages public-interest–oriented law students to contemplate post-graduate opportunities at law firms with a strong public interest practices. "My understanding is that many fellowships are limited to work at more traditional nonprofits, but I was lucky that Yale's fellowship committee recognized that being sponsored by [Ira Kurzban's] firm offered a great opportunity for me to work on the immigration detainer issue in Miami," he said. "It's been great because since I continued on as an associate, I've been able to continue with the pro bono projects I started during my fellowship year and start new ones."

If the prospect of creating your own post-graduate immigration lawyer job excites you, consider following Ramos's tips:

- **Start seriously thinking about fellowships during the second semester of your 2L year.**
- **Participate in your law school's immigration clinic.**
- **Draw inspiration for fellowships from cases at your immigration clinic, summer internships, the news, or AILA announcements.**
- **Once you've crafted a proposal, shop it around to local organizations and firms interested in sponsoring a fellowship.** Talk to your clinical professor about prospective sponsors, and search online, too, for notices posted by various employers, PSJD, and Yale Law School. And take care in juggling the different application components and deadlines.

AILA InfoNet Doc. No. 14026140. (Posted 2/26/14)

According to a Miami Herald article, the ICE detainers are part of the controversial federal Secure Communities program, which was intended to identify noncitizens who have committed serious crimes and mark them for deportation, yet many immigrants with minor offenses have been snared. Miami-Dade has been a partner in this program since 2009.

In the article, it states that the county's cost to detain noncitizens is about $142 a day, yet the government had only agreed to pay the county about $82 a day. Unfortunately, the county has yet to be reimbursed the hundreds of thousands of dollars it claims is due from U.S. Department of Homeland Security.

As for the county's compliance with ICE detainer requests, Edward Ramos, a Yale Public Interest Fellow and associate at Kurzban Kurzban Weinger Tetzeli & Pratt P.A. in Miami, was instrumental in convincing the county to sever its relationship with ICE by providing the financial proof it needed. "No one ever stopped to look and see, you know, 'Is this something that we have to do?'" Ramos said. "So once it became clear that it wasn't something that they had to do, the policy argument really was pretty straight-forward. It was costing the county, by its own estimates, upwards of a million dollars a year, and then when you factor in all the indirect costs, which was one of the things that

"We've realized that we need to do everything we can on whatever level we can to make people's lives **more free and less oppressive.**" —Jonathan Fried

I was able to help out on [by putting] together a cost analysis, that showed that the indirect costs of the detainers are much greater." Some of those indirect costs include eroding trust between law enforcement officials and immigrants, who might find themselves in ICE custody as a result of committing a minor offense.

"They then become fearful of local police because they think that they're involved with immigration enforcement, which, unless they're part of the 287(g) program, they're not, and that perception builds," Ramos explained.

The new detainer policy stems from rigorous advocacy by a local coalition in Miami-Dade County composed of local nonprofits, universities, as well as the Kurzban firm. Attorneys who are facing compliance issues are encouraged to contact Ramos.

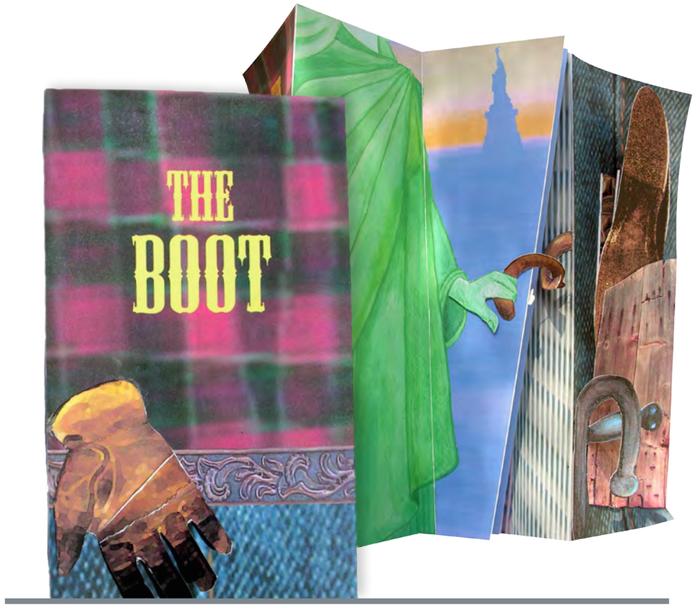
SHEEBA RAJ is the staff legal editor and reporter for VOICE.

From Artist to Lawyer: A Creative Journey

by Alina Cruz

Anecdotes abound regarding multi-generational lawyers in a family, typically involving children following in their parents' footsteps straight out of college. But Alina Cruz's professional choice happened late in life, when at the age of 48, she followed in her mother's footsteps and pursued a career in immigration law. The mid-life change came after a career spanning more than 20 years as an artist and graphic designer, not to mention at a time when her two children were enrolled in elementary school. Cruz explains in her own words:

I have been drawing ever since I could remember. In college, I first studied graphic design and then earned a bachelor's degree in advertising from the University of Florida (go Gators!). After a few years of working in my hometown of Miami, I set off to New York to pursue a career in fine art and graphic design. I started showing my work at art exhibits and freelancing as a graphic designer. When I was offered an art director position at a cruise line, I happily accepted.

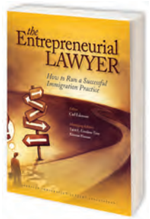


***The Boot*, authored by Cruz, is a pop-up artist book about the state of immigration in the United States. It is in the collection of the Biennes Center for Rare Books.**

As much as I loved working as an art director in New York, I missed my beloved Miami. After six years, I moved back home. I searched for freelance work and soon had a full client roster that included Disney and Warner Brothers. I continued to participate in art shows. When my second son, Lucas, started kindergarten, I eagerly accepted a full-time job as an art director to avoid the uncertainties of freelance work. Days off were scarce for new hires, though, so the job was not flexible. I soon realized that I missed my two sons, and, with my husband's blessing, I left the job to become a full-time stay-at-home mom.

I soon became involved with the parent-teacher association. Although I had never done anything remotely like this, I ended up launching a grassroots parent initiative to turn the elementary school into a K–8 school. I researched and presented my findings to the principal and the school board. I organized and oversaw surveys. I attended the monthly school board meetings to pitch the idea to various stakeholders. The public was allowed to speak at these meetings, but only for three minutes. I wrote speeches for my team so that we could speak consecutively at the meeting, address all the points, and advance a stronger argument in the limited time allotted. The three-year–long effort finally paid off.

BOOK



The Entrepreneurial Lawyer

+ LIBRARY

The first eighth grade class graduated in 2009 and my son, Nicholas, was a member of it. My second son, Lucas, graduated the following year.

As this project drew to a close, my mother, Alejandrina Cruz, announced that she was considering retiring from law practice. She lamented the fact that she would not be able to pass her business on to anyone in the family because no one had studied law. I thought about my work on the school project—the research, the negotiations, the televised arguments before the school board. It occurred to me that these activities mirrored the practice of law. And just like that, I decided to go to law school.

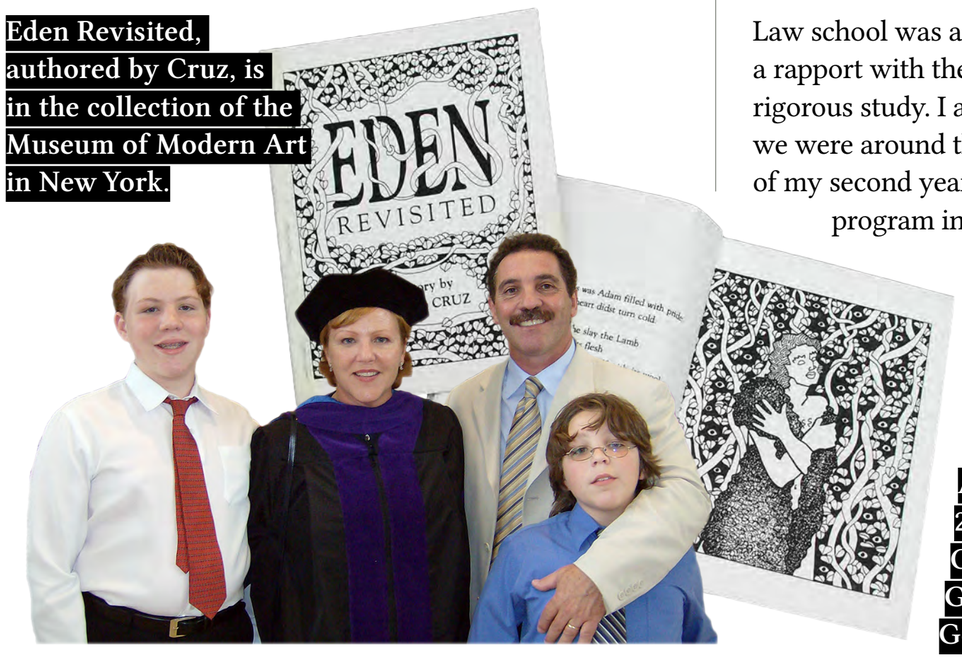
Florida International University College of Law, which was located only 10 minutes away from my home, offered me admission. Ready to be a full-time student again, I accepted it and started classes in August 2004.

Law school was a wonderful experience. I established a rapport with the students because we were mired in rigorous study. I also related to the professors because we were around the same age. During the summer of my second year, I even enjoyed a study-abroad program in Spain while my near-saint husband stayed at home with our sons.

After graduating from law school and passing the Florida bar exam, I started collaborating with my mom, who is semi-retired. She is a brilliant attorney who graduated from the University of Florida in her late 40s after raising four kids. I started CruzLaw, P.A. in January 2008, and I handle cases mostly involving family immigration, asylum, removal defense, waivers, citizenship, and naturalization.

It is interesting being an old newbie. People assume you have been an attorney forever and can become unhinged when you ask a question to which they think you should know the answer already. But ask I do. Every day, I do something I have never done before. And every case presents a new challenge. I feel happy to have helped so many people realize their dreams of being able to live peacefully in the United States.

Nevertheless, my first love still occupies an important place in my life. I engage in artwork and occasionally participate in shows. As always, my artwork reflects my life. My latest art book, *The Boot*, was a commentary on immigration. I feel privileged to have been able to experience such diversity in my life and I look forward to the rest of my journey.



Eden Revisited, authored by Cruz, is in the collection of the Museum of Modern Art in New York.

Alina Cruz on graduation day, 2007, flanked by her family, Nicolas Cruz Gonzalez, son (left); Manny Gonzalez, husband, with Lucas Cruz Gonzalez, son (right).

ALINA CRUZ is the owner of Cruz Law PA in Miami. She represents clients in a variety of legal matters, including complex immigration cases and deportation defense.

AILA InfoNet Doc. No. 14026140. (Posted 2/26/14)

Dual Representation in Pro Bono Clinics: What You Should Know

by Roland Robert Lenard

Immigration attorneys routinely advise and represent dual representation (DR) clients, such as a husband and wife, or an employer and employee. The DR clients share a common objective unique to immigration law. Accordingly, it would be impractical—and expensive—to have each co-client represented by separate counsel. In turn, the "pro bono" attorney with DR clients is expected to remain loyal to and share confidences with multiple clients.

If a conflict of interest occurs at any time, and it cannot be resolved by the attorney, the attorney will be permitted to withdraw from representing all DR clients according to state professional responsibility rules. These limitations on representation must be verbally explained to the DR clients in advance and then memorialized in writing to document informed consent.

Many commentators in the immigration law bar have extensively written on the ethics of continued representation for one or all DR clients when a conflict cannot be resolved. The various models commonly utilized, and their merits

TAKE THE PRO BONO PLEDGE!

The Pro Bono Pledge is an AILA-wide effort to inspire and support each other to publicly commit (or recommit) ourselves to pro bono service. We are asking all members to take the Pro Bono Pledge, and in return receive support, inspiration, and recognition from your colleagues.

and demerits, are beyond the scope of this article. Briefly, these include, but are not limited to, the "simple solution," "golden mean," and the "continuum approach."

The Joint Statement of Facts

A useful blueprint to aid the attorney in fully developing informed consent, which would also affirmatively consider the added duties in DR cases on conflict-of-interest issues (for either continued or limited representation cases), has been extant for many years and is commonly known as the "joint statement of facts" test:

1 The co-parties agree to a single, comprehensive statement of facts describing the occurrence.

2 The attorney reviews the statement of facts from the perspective of each of the parties and determines that it does not support a claim by one against the other.

3 The attorney determines that no additional facts are known by a party that might give rise to an independent basis of liability against the other.

4 The attorney advises each party as to the possible theories of recovery or defense that may be foregoing through this joint representation based on the disclosed facts.

PRO BONO SPOTLIGHT: THE CLINIC

Throughout the nation, low-income individuals who are in removal proceedings are unable to obtain quality, affordable representation. Troubled by the large number of individuals in removal proceedings who were being torn from their families because they could not pay for competent representation, Missouri-Kansas Chapter Members Rekha and Michael Sharma-Crawford launched The Clinic, a nonprofit organization in Kansas City that provides quality pro bono or discounted legal representation to this particular group. At great financial sacrifice, Rekha and Michael took a giant leap of faith in creating a nonprofit, while maintaining their busy and successful private immigration practice.

The Clinic was originally funded entirely by the Sharma-Crawfords. But once its nonprofit status was secured, donations enabled The Clinic to grow and serve more individuals in the Kansas City community. Genevra Alberti, an attorney at the Sharma-Crawfords' law firm, became the attorney for The Clinic when it opened in January 2012.

In 2012, its first year as an IRC §501(c)(3) nonprofit, The Clinic served 122 individuals from 15 different countries who, without The Clinic, would not otherwise have had legal representation in removal proceedings. Of those 122 clients, 11 were represented pro bono while the others paid a discounted fee.

When The Clinic is unable to represent individuals because of income restrictions or capacity constraints, it refers them to other qualified immigration lawyers in the Kansas City area. In addition to providing full representation, The Clinic engages in outreach in order to educate clients, their families, and the community at large. Please join the AILA National Pro Bono Service Committee in applauding the good work of Rekha, Michael, and The Clinic.

AILA InfoNet Doc. No. 14026140. (Posted 2/26/14)

AILA ANNOUNCES FALL 2013 'PRO BONO HEROES' HONOREES

- **Safe Passage Project created by Professor Lenni Benson, New York Law School**
- **Capital Area Immigrants' Rights Coalition, Washington, D.C.**
- **The Human Rights Initiative of North Texas**
- **Faegre Baker Daniels, Denver, CO**

We applaud all of those who were nominated for their exemplary pro bono efforts!

Through the Pro Bono Heroes awards, AILA recognizes individuals and organizations that embody the pro bono spirit, through promoting and contributing to pro bono work, taking on complex pro bono cases, or handling a significant number of pro bono cases. Nominate an AILA Pro Bono Hero today.

NOMINATE: Pro Bono Heroes

5 Each party agrees to forego any claim or defense against the other based on the facts known by each at the time.

6 Each party agrees that the attorney is free to disclose to the other party, at the attorney's discretion, all facts obtained by the attorney.

7 The attorney outlines potential pitfalls in multiple representations, and advises each party of the opportunity to seek the opinion of independent counsel as to the advisability of the proposed multiple representation; and each party either consults separate counsel or advises the attorney that no separate consideration is desired.

8 Each party acknowledges that facts not mentioned now, but later discovered may reveal differing interests, which, if not reconciled, may require the attorney to withdraw from the representation of both without injuring either.

9 Each party agrees that the attorney may represent both in the litigation.

The foregoing "joint statement of facts" protocol is based on ABA Informal Opinion 1441 (1979). *See also* Model Rule 1.0(e) "Informed Consent." The state in which your sponsored program/clinic is located should be consulted in advance to determine whether the protocol can be utilized, or if it requires amendment to comply with state ethics rules on conflicts of interest, particularly ABA Model Rule 1.7.

Conflicts of Interest

The author is not aware of any per se rule that prohibits dual representation. However, you should always be cognizant of the potential for conflicts of interest in DR cases, even though the parties presently share a common goal. The chief state rule governing conflicts for multiple clients, such as DR clients, is ABA Model Rule 1.7, Conflict of Interest: Current Clients. Consult Model Rule 1.7, and its official comments, as well as your clinic state's version of this rule to ensure its adoption and any variations. Note: The state rule on conflicts of interest for DR clients always applies whether your clinic intends to offer continued or limited, one-time only representation. Your state may require a different approach or protocol for DR clients. If so, take the advice!

RECORDED
Ethical Issues for Immigration Lawyers, AC13
+ LOCKER

RECORDED
Make Pro Bono Profitable for Your Practice
+ LOCKER

ROLAND ROBERT LENARD is a member of the AILA National Pro Bono Services Committee and chair of the AILA Mid-South Chapter Pro Bono Committee. The author's views do not necessarily represent the views of AILA nor do they constitute legal advice or representation.

AILA InfoNet Doc. No. 14026140. (Posted 2/26/14)

Drawing a Line in the Sand

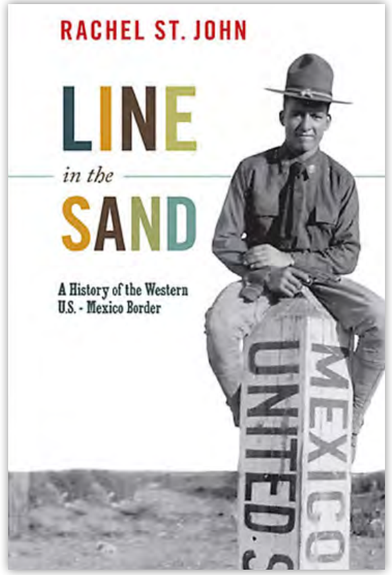
by Teresa A. Statler

Rachel St. John, an associate professor of history at New York University, has written about the dramatic creation of the U.S.-Mexican border after the end of the Mexican-American War in 1848 to its emergence as the modern border line we know today. In A Line In The Sand: A History of the Western U.S.-Mexico Border, she focuses on the geography and history of this part of North America. We learn of the Americans and Mexicans who created "the line." We also learn how "an undistinguished strip of land" became the many things it is today: an immigration checkpoint, a legal divide, a "site of transborder exchange and community formation, and a place that people call home."

A Land Contested

St. John tells us that the history of the border began in the early 19th century with a "collective act of imagination" in the minds of Americans and Mexicans who looked to maps of North America "to think about what their republics were and what they might someday become." After the Treaty of Guadalupe Hidalgo was signed in 1848, the joint Mexican-American Boundary Commission began its work to demarcate the border west of the Rio Grande, in what one American member of the commission called "a sterile waste." The land, however, had been and continued to be contested not only by the two governments, but also by the Apaches, who had always lived in the borderlands, and also by private armies of adventurers called "filibusters." Apache raiders moved back and forth across the border line, cleverly playing U.S. and Mexican forces against each other, straining relations between them and "underscoring the limits of either country's ability to control its national space."

St. John goes on to explain how capitalism was cultivated across the borderline, starting with the development of railroads. This allowed for the integration of both countries and facilitated their ability to ship copper and other mineral ores from the mines on both sides of the border to the port of Guaymas on the Gulf of California. The borderlands' labor market was segregated by race, with Mexican workers—especially those in Arizona's copper mines—paid less than their white counterparts. This resulted in labor violence and strikes in the early 20th century. The emergence of transborder ranches "was as much about land as cattle," St. John tells us,



"St. John tells us that the history of the border began in the early 19th century with a **'collective act of imagination'** in the minds of Americans and Mexicans. ..."

BOOK
Line in the Sand: A History of the Western U.S.-Mexico Border
Princeton University Press, 2012, 296 pages
+ LIBRARY

SEMINAR
NAFTA Revisited (Free!)
+ LOCKER

WHAT'S HAPPENING!

AILA mourns the passing of MI Chapter Member **WILLIAM H. DANCE**. He is remembered fondly as a World War II veteran, a father, grandfather, a husband, a friend, a law professor, and a worthy adversary.

AILA grieves over the loss of **CORNELIUS D. SCULLY III**, known to many as "Dick Scully," who passed away on Nov. 30. He worked for the Department of State from 1962 until his retirement in 1997.

TX Chapter Member **DANIEL M. KOWALSKI** will serve on the board of directors of the National Immigration Law Center.

Southern Calif. Chapter Member **MAHSA ALIASKARI** and Washington, D.C. Chapter Member **DAWN M. LURIE** joined Polsinelli as shareholders on January 13, 2014.

Ten months after establishing the Davis Law Firm, TX Chapter Member **ANNE OHLRICH** has reopened the Ohlrich Law Firm. She'll handle cases involving family– and employment-based immigration, as well as pro bono cases.

PEDERSON IMMIGRATION LAW GROUP and **MAGGIO + KATTAR, P.C.**, two boutique immigration law firms in Washington, D.C., have merged.

Northern Calif. Chapter Member **DOMINIC E. CAPECI** has relocated his office to Kearny Street in San Francisco.

with wealthy Mexican and American families integrating their land on both sides of the border into "a landscape of private property and a market in real estate." Both governments believed that putting land into private hands would help promote economic development and create policies to facilitate it. This, of course, negatively affected native peoples.

A positive result of this transborder capitalism allowed for the formation of binational associations and transborder social networks in border towns. For example, many Mexican and American children in the late 19th and early 20th centuries grew up playing and going to school together on both sides of the border. Also, some border towns, such as Tijuana, became quite popular during the 1920s when, due to Prohibition in the United States, alcohol was available there in unlimited quantities.

A Transborder Separation

With the beginning of the Mexican Revolution in 1910, the first "unofficial wave" of Mexican immigration to the United States occurred. This fact, coupled with the U.S. security concerns that rose during World War I, caused transborder ties to rupture and border towns to become temporary battlefields. Both countries enacted new crossing restrictions, dispatched soldiers to patrol the line, and built fences—sometimes down the main streets of border towns, such as Nogales and Douglas/Agua Prieta.

> "*A Line in the Sand* is an interesting read, and I would recommend it as **important background material** to any immigration attorney who practices removal defense on behalf of Mexican clients."

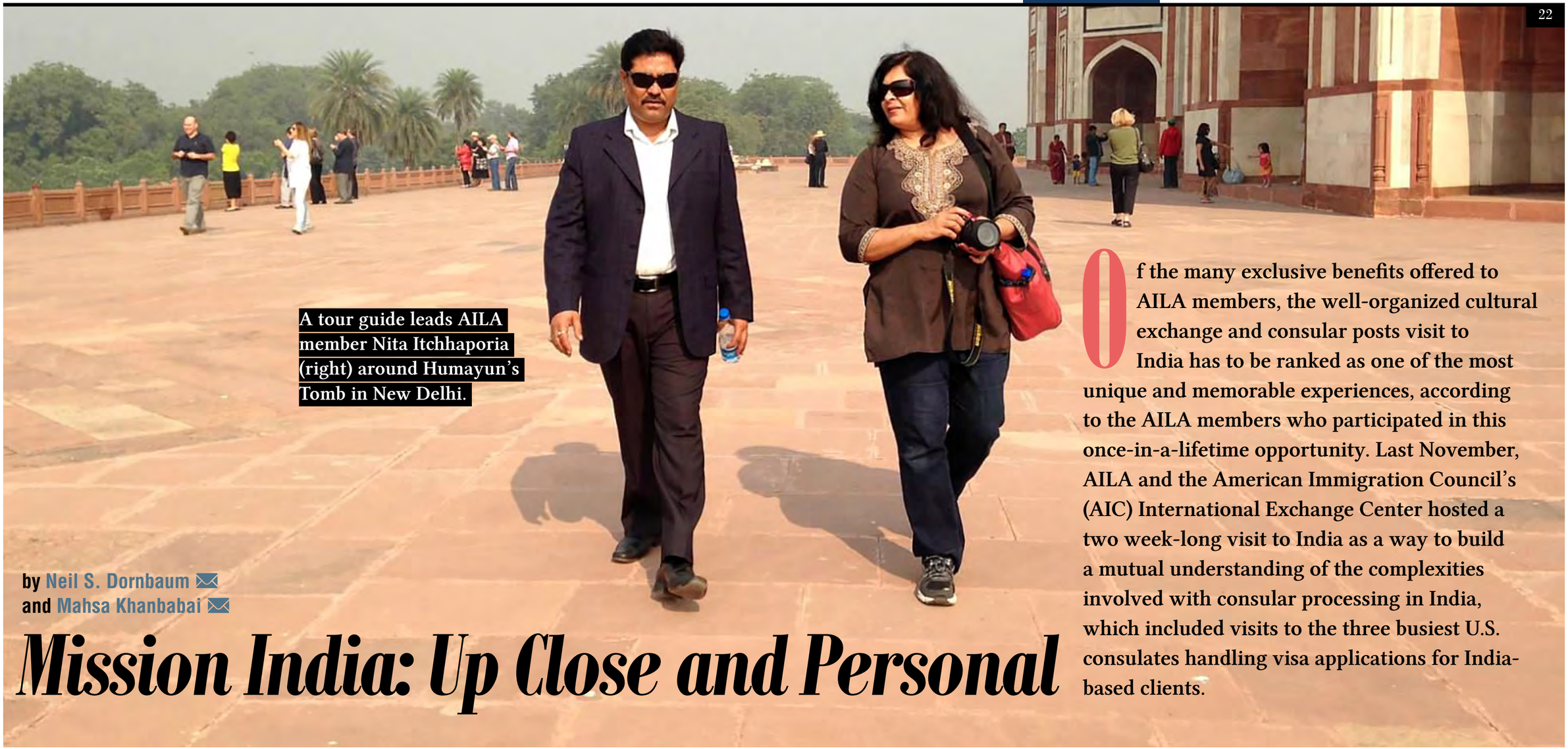
A Line in the Sand is an interesting read, and I would recommend it as important background material to any immigration attorney who practices removal defense on behalf of Mexican clients. It also features many fascinating, old photographs, including the "monuments" marking the line, several maps, and a detailed bibliography for additional reading.

BOOK

NAFTA Handbook

+ LIBRARY

TERESA A. STATLER practices deportation/removal defense, asylum, and family-based immigration law in Portland, OR.



A tour guide leads AILA member Nita Itchhaporia (right) around Humayun's Tomb in New Delhi.

by Neil S. Dornbaum
and Mahsa Khanbabai

Mission India: Up Close and Personal

Of the many exclusive benefits offered to AILA members, the well-organized cultural exchange and consular posts visit to India has to be ranked as one of the most unique and memorable experiences, according to the AILA members who participated in this once-in-a-lifetime opportunity. Last November, AILA and the American Immigration Council's (AIC) International Exchange Center hosted a two week-long visit to India as a way to build a mutual understanding of the complexities involved with consular processing in India, which included visits to the three busiest U.S. consulates handling visa applications for India-based clients.

Not only did participants experience a trip of a lifetime, but as immigration attorneys, they also had the distinct opportunity to meet face-to-face with the consular officials of Mission India who set the policies and the tone for some of the busiest posts in the U.S. Department of State. AILA members immersed themselves in the culture and old-world charm of India while learning about the unique issues and sensitivities in the various regions. In many ways, the trip was a success—the building of lasting relationships with the consular officials, the valuable insights gained, and the wisdom derived from experiencing the culture first-hand.

AILA members **NEIL DORNBAUM** and **MAHSA KHANBABAI**, who participated in AILA/AIC's sponsored trip, provide their personal accounts. Visit AILA InfoNet to read the official minutes from the consular meetings in New Delhi, Mumbai, and Chennai.

NEW DELHI

NEIL DORNBAUM: Experiencing India easily lends itself to seeing the country through a painter's eye. From the moment we arrived in New Delhi, the colors, sounds, and mass of humanity ambushed our senses. The constant honking, the smog that hung over the city, and police checkpoints that guarded the gates to the hotels belied the elegance and calm hidden behind the walls of the stately hotels. The swatch of vivid color from the unique Indian saris that the women and teens wore stood out among all the hustle and bustle and gave us time to behold and humanize a place where great wealth and poverty intimately co-exist.

MAHSA KHANBABAI: Before heading off to Agra to visit the Taj Mahal and the Agra Fort, we had a day to explore the city [of New Delhi] on our own. A few of us visited the National Museum and the Lodhi Gardens, which were a rickshaw-ride away. One had to have a certain sense of naiveté to ride about in one, as the traffic system seems to have a set of rules that most non-Indians wouldn't understand. As for the Lodhi Gardens, it is a large park with beautiful old tombs and mosques, and at sunset, I felt as if I were transported back to the 18th century.

NEIL DORNBAUM: Our stay included visits to the U.S. embassy, which handles more than 1,000 nonimmigrant applicants daily. The number of applicants handled by the five Indian posts is staggering. In FY2012, Indian nationals received more than 59 percent of all H-1B visas, and more than 38 percent of all L-1 visas issued worldwide.

LOOKBOOK
See highlights of the group's journey around India, including New Delhi, Chennai, Goa, and Mumbai.

CHENNAI

MAHSA KHANBABAI: We flew from Delhi to Chennai, a very dense city by the seaside. We only spent two days there, which included a short bus tour that took us by a scenic expansive beach, and a stop at a

Hindu temple with a break for fresh coconut juice! Our down time was spent shopping some more and bargaining over scarves at the shops across the street. We feasted on some delicious Indian food at a reception hosted by fellow AILA member Rajnish Sharma. By the end of the trip, however, several of us yearned for some good ol' burgers and fries!

NEIL DORNBAUM: The consular presence in the city of Chennai dates back to 1794, when William Abbott was appointed U.S. consular agent for South India. As of 2013, there were 43 foreign representations in Chennai, including consulates general, deputy high commissions, and honorary consulates. The American consulate in Chennai is one of the top adjudication posts in the world and is ranked number one in processing employment-based visas.

MUMBAI

NEIL DORNBAUM: Our last stop was Mumbai, the commercial and entertainment capital of India. The most populous city in India is marked by high-rises overlooking the water that in some ways calls to mind the skylines of Miami. We enjoyed a wonderful reception hosted by AILA member Poorvi Chothani at the Willingdon Sports Club, an old imperial British club. The manicured lawns and white-gloved waiters

transported us back to the time of colonial rule in India.

NEIL DORNBAUM: The next morning, we visited the American consulate in Mumbai, which is only 2 years old. We had almost three hours to tour the facility and meet the consular officers to discuss procedures at the post.

MAHSA KHANBABAI: The Elephanta Caves were a highlight of this trip, with ancient carvings in the caves of the small island. There were beautiful statues of Shiva and other gods, as well as hundreds of stalls where vendors hawked all sorts of beautiful Indian trinkets. The Taj Hotel in Mumbai had a fantastic afternoon tea with both Indian and British crumpets—a must-stop for foodies! The streets surrounding the Taj were saturated with people and shops with almost anything a tourist would want.

NEIL DORNBAUM: An exciting and well-planned trip with a fantastic group of like-minded AILA members from across the United States was the hallmark of this adventure. We had enough time to see India from a professional and personal perspective.

MAHSA KHANBABAI: Some of the most memorable parts of the trip involved encounters with the locals. While visiting the law library of the Supreme Court of India, we chatted with the Indian attorneys. At a Hindu temple, a young sister and brother were following us around, eager to interact with us, yet shy at the same time. And at a tomb, children on a field trip excitedly practiced their English, asking us, "How are you?" I can't wait for AILA's next consular trip, and neither can my husband!

INFONET

Read notes from the AILA group's meetings with DOS Mission India.

NEIL S. DORNBAUM is a member of Dornbaum & Peregoy, LLC in Newark, NJ. He has been an active AILA member for more than 25 years. **MAHSA KHANBABAI** runs her own practice in Brockton, MA, and specializes in immigration issues relating to physicians and dentists. She has been an active AILA member for more than 15 years.

AILA InfoNet Doc. No. 14026140. (Posted 2/26/14)

CONTACT US:

To the Editor

Write for Voice

Advertise with Us

Reprint Requests

AILA Agora

EDITORIAL

EXECUTIVE EDITOR Tatia L. Gordon-Troy
EDITOR-IN-CHIEF Crystal Williams
LEGAL EDITOR, REPORTER Sheeba Raj
GRAPHIC DESIGNER Bradley Amburn
GRAPHIC DESIGNER Robert Bequeaith

CONTRIBUTORS
Hadley Bajramovic, Alina Cruz, Neil S. Dornbaum, Mahsa Khanbabai, Mary E. Kramer, Roland Robert Lenard, Sherry Neal, Claire D. Nilson, Teresa A. Statler

PHOTO CREDITS
Pages 1, 9: Bradley Amburn; **Page 3:** Illustration by Bradley Amburn; **Page 12:** Courtesy of Jonathan Fried; **Page 13:** Courtesy of Edward Ramos; **Pages 22-24:** Betsy Lawrence; **Stock Imagery:** Shutterstock and Thinkstock.

AMERICAN IMMIGRATION LAWYERS ASSOCIATION

ABOUT

VOICE (ISSN: 2157–4138), published online 11 times annually, is the official member magazine of:

American Immigration Lawyers Association
1331 G Street NW, Suite 300
Washington, D.C. 20005
Phone: 202-507-7600

AILA NATIONAL OFFICERS

@AILANATIONAL