

ORPE HUMAN RIGHTS ADVOCATES

Restoring Human Dignity

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## Recognition & Accreditation



To: Ms. Lauren Galenstein  
Attorney Adviser  
Office of Policy/EOIR  
Department of Justice

**Office Address:**

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Suite B.  
Glen Burnie. MD 21060**

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**To: Lauren Gallenstein**  
Attorney Advisor/Office of Policy  
Executive Office for Immigration Review  
U.S. Department of Justice

Date: 11/29/2022

**From:** Debra Reece  
COO/ Orpe Human Rights Advocates

RE: Response to the missing items.

Dear Ms. Gallenstein,

We are really very thankful to you and the staff members who indirectly have worked so hard in the path of accomplishing Orpe Human Rights Advocates' humanitarian mission. You've been doing your work with commitment.

I am writing this letter in response to your letter via email received on November 10, 2022. I read that you are expecting us to provide the missing evidence related to our R&A application. Below you will find responses to those missing items.

**1. Technical Legal Support**

You will find in the attachment agreement between Orpe Human Rights Advocates and the Law Firm of IvyLaw. The letter confirms that the Law Firm of IvyLaw has endorsed the OHRA's initiative and is engaged in the provision of Technical Immigration Legal Support to Orpe Human Rights Advocates.

**2. Proposed Services**

We acknowledge that our organization understands that accredited representatives are not authorized to provide legal representation in federal court. We have limited the scope of services our organization will be providing to asylum, removal defense, family-based immigration, VAWA, and Waiver.

**3. Letters of Recommendation for Mr. Moises**

In the attachment you will find a letter of recommendation from an immigration who worked with Mr. Moises in the past. You will also find another letter of recommendation in the attachment from a retired attorney who mentored Moises during his immigration law internship at the Immigration Law firm of Ngwana.

**4. Additional Training for Mr. Moises and Ms. Moses:**

You will find in the attachment Mr. Moises' *Certificate of Training Completion in Removal Defense* and the Transcript describing the agenda of this training program. This litigation training in Removal Defense is a 9 credits and 24 hours course provided by AILA University. You also will find in the attachment Mr. Moises' *Certificate of Training Completion in Asylum*. This is also a 9 credits and 24 hours course provided by AILA University. Below you will also find description with subjects covered of additional training accomplished by Mr. Moises (A). You will also find below description with subjects covered of additional training accomplished by Ms. Moses (B).

A) Additional Training for Mr. Moises

*Related List of Recent Immigration Trainings Accomplished by Mr. Moises*

<b>Immigration Training Attended by Mr. Moises</b>				
<b>Date</b>	<b>Training Title</b>	<b>Type of Training</b>	<b>Training Provided by</b>	<b>Subjects Covered</b>
11/19/22	Asylum Practice	Asylum skill development	AILA University	This training covers the legal standards for asylum and eligibility. Deepened the skills in areas such as protected grounds and nexus; bars and alternative forms of relief; considerations for mental health, cultural competency, and vicarious trauma, asylum procedure; border issues, and post-asylum issues.
11/29/22	Removal Defense	Litigation skill development	AILA University	The training covers and provides professional skills and practical Tips for handling cases involving custody, bond, and bond appeals. Also, provides practical tips in areas such as pretrial practice and motions, criminal responsibility, waiver and relief, appeals, and appeals preparation, motion to reopen and motion to reconsider.
11/17/22	Bars and Alternative	Litigation skill development	AILA University	This training discusses the bars to asylum and withholding of removal, now referred to as “restriction on removal.” The training discusses when and how the bars apply to asylum and restriction applicants.
11/15/22	Mental Health, Cultural Competency, and Vicarious Trauma	Litigation skill development	AILA University	This training provides an overview of how mental health interacts with the representation of asylum-seekers as well as discussions on the importance of cultural competency. Training provided guidance on practical considerations of representing individuals with mental health symptoms, trauma-informed interviewing as well as recognizing and preventing vicarious trauma
11/16/22	Legal Standards for Asylum Eligibility	Skill development	AILA University	This training provides a brief history and an overview of the legal standards that must be satisfied to prevail in an asylum claim. The program serves as a useful introduction to the topic and as a preparatory checklist, dividing the required elements of a claim into five distinct elements.
11/19/22	Border Issues	Skill Development	AILA University	This training covers issues all asylum practitioners should be aware of relating to issues at the border.

11/27/22	Waiver and Relief: Technical Aspect Impacting Eligibility	Skill development	AILA University	Preparing the Record and Presenting the Case for BIA and Circuit Court Review;
11/27/22	Motions to Reopen and Motions to Reconsider	Skill development	AILA University	Time-Barred Motion to Reopen: Tips and Tricks. Time Numerical motions. Rescinding an In Absencia Order of Removal. Stays of Removal
11/19/22	Asylum Procedures	Skill development	AILA University	Training covered the relevant agencies involved in the process and describes asylum procedures, from the affirmative asylum proceedings that apply before USCIS to the defensive asylum proceedings that take place before the immigration courts
11/17/22	Protected Grounds and Nexus	Skill development	AILA University	An overview on the five protected grounds – race, religion, nationality, political opinion, and membership in a particular social group (PSG). It provides tips on formulating a PSG and providing nexus as well as ethical considerations in filing a case where the facts or case law appear to be weak or unfavorable
11/29/22	Custody, Bond, and Bond Appeals	Skill development	AILA University	ICE Initial Bond Determination. ICE Order of Release on Own Recognizance. Parole Advisal and Approach. Removal procedure for family- based practitioners. Forms of Relief in Removal Proceedings. Eligibility for Bond and mandatory detention. The Law of the Bond. Sample Bond Questionnaires. How to Present the Best Bond case. Released from Custody: Getting Client Bond in immigration Court.
11/28/22	Pretrial Practice and Motions	Skill development	AILA University	Writing a Motion for Change of Venue. FOIA Authorization for Release. Logistical Motions. Writing Respondent's Motion Pleadings Declaration. Motion to Accept Untimely Filing. Discovery in Removal Proceedings. Motion as to Witness. Motion for Administrative Closure and Motion to Continue.
11/27/22	Appeals: Preparing the Record and Presenting the Case for BIA and Circuit Court Review	Skill development	AILA University	This training covers the following topics: Appealing an adverse decision in Removal. The Record of Appeal. Filing the Notice of Appeal with BIA. How to Prepare a BIA Brief: TIPS and Best Practice. Ethical Considerations: Assessing Opinions with clients after a final Order of Removal. How to File a Petition for Review.
11//28/22	Analyzing Notice to Appear (NTA)	Skill development	AILA University	This training covers major issues surrounding the NTA. It covered the followings: Case of the lack information about the client or access to

				client information. Call -In Letter. Sufficiency of the NTA, Notice, and <i>Perreira v. Sessions</i> . Alienage, Motions to Suppress. Shifting Burden of Proof. Inadmissibility and deportability. 3 aspects of the Master Hearing (Mock). NTA: Legal Challenges and Strategies. Shifting the Burdens during the Pleadings and Demonstrating Eligibility for Discretionary Relief.
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B) Additional training for Ms. Moses

*Affidavit for Training Missing a Certificate of Completion (Ms. Moses)*

I, Zora Moses, attest under the penalty of perjury that I completed the following immigration trainings, but I am unable to provide a certificate of completion for them.

<b>Immigration Trainings Attended by Ms. Moses</b>				
<b>Date</b>	<b>Training Title</b>	<b>Type of Training</b>	<b>Training provided by</b>	<b>Subjects Covered</b>
11/19/2022	Navigating Complications and Obstacles in the Affirmative Asylum Process (Seminar Recording)	Webinar	AILA University	Managing Client Expectations. Restrictions for Employment Authorization. Strategies for Expedited Interview Requests.
12/01/2021	Special Immigrant Juvenile Status	Webinar	U.S. Committee for Refugees and Immigrants	Eligibility under SIJ for children who have been subject to state juvenile court proceedings related to abuse, neglect, abandonment, or a similar basis under state law.
07/02/ 2022	Immigration Program Management Techniques and Strategies	Webinar	Catholic Legal Immigration Network, Inc	The training covered program design, case selection criteria, case management systems, fee schedules, alternative funding sources, financial controls, marketing, staff training.
08/18/2022	Affidavit of Support	Webinar	World Relief	How to File Affidavit of Support From I-134

5. **Litigation and Advocacy experience for Mr. Moises**

➤ Additional documentation of the litigation and advocacy experience:

a) *Proof of Mr. Moises' Training focused on Litigation and Advocacy*

▪ Certificate of Removal Defense Training (*See Attachment*)

This is a 9 credits and 24 hours litigation and advocacy-centered training program. The program was provided by the American Association of Immigration Lawyers University.

b) *Writing samples by Mr. Moises*

▪ Sample of Motion for Bond Redetermination (*See Attachment*)

▪ Sample of Motion to Reopen and Reconsideration (*See Attachment*).

*Sincerely,*

*Edward Moises*

