

ORPE HUMAN RIGHTS ADVOCATES

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Recognition & Accreditation



To: Ms. Lauren Gallenstein
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January 10, 2023

Lauren Gallenstein
Attorney Advisor
Office of Policy / EOIR
U.S. Department of Justice

Dear Ms. Gallenstein

This letter is in response to your correspondence dated December 15, 2022.

In that letter, you requested that additional documentation be submitted to process the application submitted to the Department of Justice's Recognition and Accreditation (R&A) Program. Based on your request, we have attached the requested documentation. We have also established a memo providing responses to the questions you have asked in your last correspondence.

For clarity purpose, we have resolved to organize this memo in three parts: part I provides responses to the questions you've raised pertaining to the "Application for Recognition submitted by the Nonprofit OHRA Human Rights Advocates; part II provides responses to the raised questions related to Mr. Edward T Moises' application for full accreditation; and part III provides responses to the raised questions in regard of Ms. Zora Moses' application for partial accreditation.

A handwritten signature in blue ink, appearing to read "Edward T. Moises", with a stylized flourish extending to the right. The signature is written over a horizontal line.

Executive Director

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Part I

APPLICATION FOR THE RECOGNITION OF THE ORGANIZATION

1. Resume from the Attorney

See attachment

2. Project of hiring immigration attorneys on staff.

Response

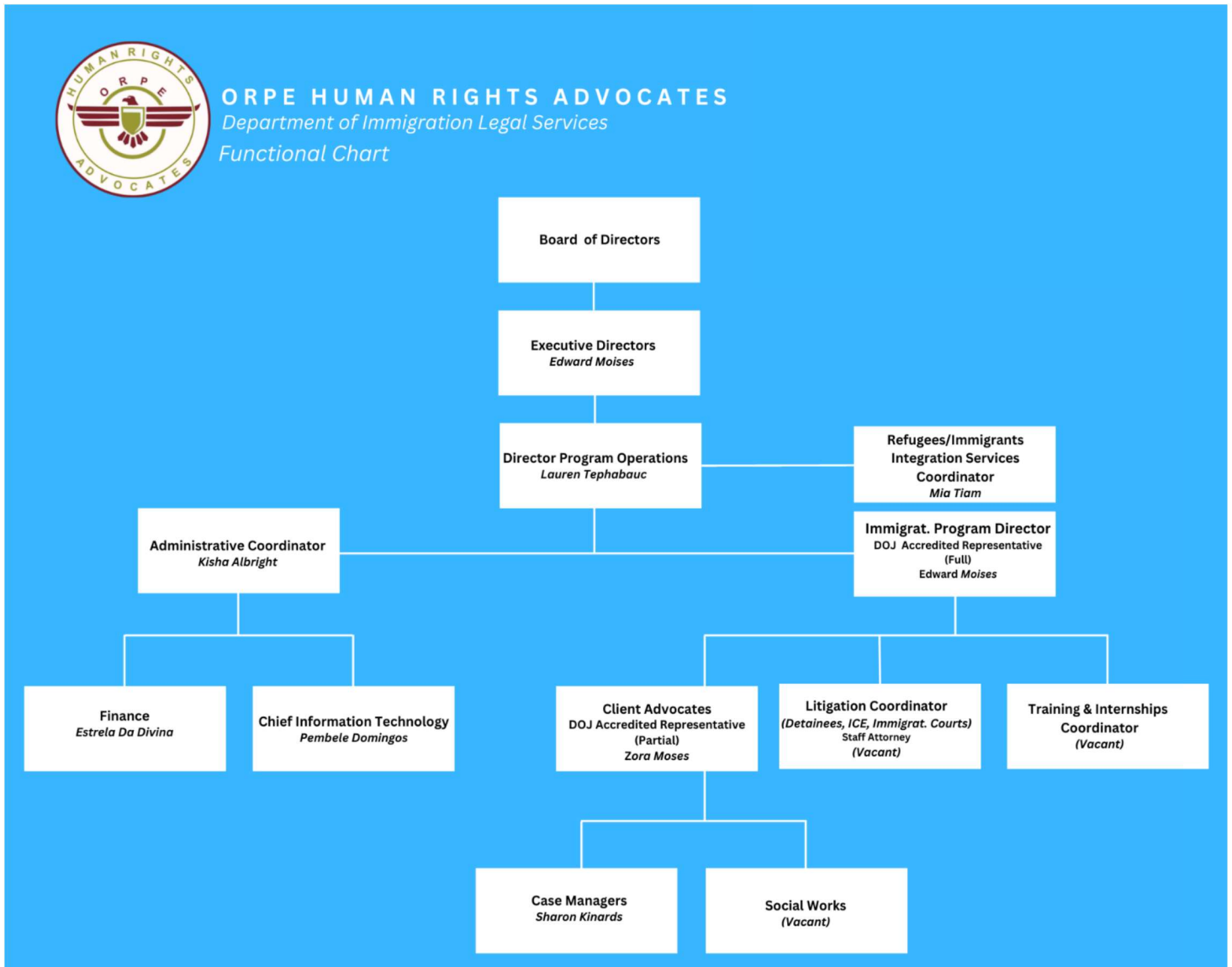
Not yet. The staffing team still working on the process. We respectfully recall that the immigration legal services to be provided by our organization are intended to only benefit low-income people who are not able to afford the services of a private attorney. The delay in hiring staff attorneys is in part caused by the fact that our organization is not yet offering such services given that the organization is not yet recognized by the DOJ. Since staff attorneys will be performing humanitarian-based duties, in other words advocating for public interest, attorneys at OHRA will not allowed to charge any fee to clients for immigration legal service offered. Similarly, our organization's ethics policy, requires all employees to refrain themselves from receiving any gift offered by any client within the scope of the services they will be providing. This rational is based on the Resolution 0037/RM of OHRA's Board of Directors that establishes the following: *"an immigration staff attorney's salary will come from an established fund that correspond to the programs that strive for social justice and programs that promote low-income individuals to become economically self-sufficient."* Therefore, while our organization may have secured funds to cover two staff attorneys' salaries for the initial months, still, there will be need for sustainability as their missions consist of advocating for causes of those who cannot afford the services of a private attorney. Here, sustainability means being able to secure grants that support programs like those promoted by our Department of Immigration Legal Aid. Those kinds of the grants require a showing that the organization possesses the recognition from the DOJ. Therefore, hiring staff attorneys may become a burden if the organization has not yet recognized by the DOJ. Staff attorney's resumes will immediately be forwarded to the EOIR soon after the process of hiring is concluded.

3. You have asked to provide additional details about how our proposed representative will be supervised and by whom. Also requested supervisor's resume.

Response:

The proposed representative will be accountable to the Legal Aid Council (LAC). The LAC is a committee inside of the Board of Directors which has disciplinary and advisory authorities. It has the authority in all matters associated with immigration legal aid and practice. It oversees over ethics' issues and the good standing of the personnel of the Department of Immigration Legal Services (DILS). The Council delegates the authority of overseeing the day-to-day operations of the Department of Immigration Legal Services to the Director of Program and Operations (DPO). Currently, the function of the Director of Programs and Operations is temporary exercised by Ms. Tephabock. Soon after hiring the staff attorney and confirming his skills in the U.S. immigration law, the staff attorney to be hired will replace the current DPO. In addition, the organization will be providing training and will appoint one of the hired staff attorneys to the position of the Immigration

Program Director (IPD). The appointed Director of Immigration Program will replace the current IPD. Technically, the current IPD is supervised by the DPO. *(See the revised Chart below).*



4. You have asked us to confirm the organization which providing the \$38,000 grant listed in our budget as “Grant from private Foundation.”

Response

This amount of \$38,000 specifically reflects to the grant program offered by “Amazon Smile” to Amazon’s approved nonprofit members within the scope of its social responsibility programs. OHRA is an approved member of Amazon Smile. Exists similar programs, often provided by corporations within the scope of their social responsibility mission.

5. **You've raised a concern about the budget in the \$60,000 line item for " Detainee Defense Program, which includes representation, bonds, and other expenses." You asked us to explain who is providing representation and who oversees the program.**

Response

Often, OHRA will be seeking the help of retired, and pro bono attorneys to provide limited representation services to indigent people who cannot afford the services of a private attorney in removal proceedings. In most cases, it's not an easy task to find a retired or pro bono attorney who is willing to take a case. In the dire circumstances, OHRA can hire and pay the service fees to a private attorney to provide limited representation to a detainee indigent with a strong case and facing imminent deportation threat. Depending on the availability of fund, OHRA in an exceptional circumstance may award fund to an indigent facing extreme poverty to secure bond sets by an immigration judge or ICE officer. These kinds of actions are covered by the program that incurs expenses covered by the kind of budget like this indicated in the line item of \$60,000. Detainee defense program is expected to be overseen by a "Litigation Coordinator."

6. **You've asked if our organization currently offering consultations on immigration legal matters? If so, to explain who is conducting these consultations.**

Response

No. Currently our organization does not offer consultations on immigration legal matters. We have structure and infrastructure set up and skills ready to start serving indigent immigrants who cannot afford the services of a private attorney. We are stuck, waiting for the recognition and the accreditation from the DOJ.

Part II

FULL ACCREDITATION APPLICATION FOR MR. EDWARD T. MOISES

1. **Updated resume for Mr. Moises.**
 - *See updated resume in the attachment*
2. **Hours Numbers for each of the submitted trainings, including fundamentals course for Edward T. Moises.**

Below you will find detailed hours number for Moises' immigration law trainings. We have divided the nature of these trainings in two sections. Section A describes the numbers of hours in each module associated with Moises' training in Fundamentals of the U.S. Immigration Law. Section B describes the hours number in each module associated with each area of concentration: a) Asylum Training, and b) Removal and Relief Training.

A) Fundamentals of the U.S. Immigration Law.

Training on Fundamentals of U.S. Immigration Law provide by AILA University and Completed by Edward T. Moises (*Attached, Certificate of Completion Awarded by AILA University*).

Fundamentals Trainings Titles	Subject Covered	Date	Hours Number
Module 2: Ethics	Training focuses on ethics and professional responsibility. It addresses issues associated with Model Rule 1.1 (Competency); issues associated with Model Rule 1.3 (Diligence); issues associated with Ethical Rule 6.5 (Nonprofit and Court) and limited Legal Services Programs; and ethical issues related to the provision of Pro bono legal services. Training also focuses on Model Rules 1.6 related to the Confidentiality of information. It addresses issues associated with the responsibilities of a subordinated Lawyer (Rule 5:2), and the responsibilities of a non-lawyer assistance (Rule 5:3). Issues associated with Cyber Security and Ethics Protection Data and safeguarding property (Rule 5:15) are addressed here. Analyzed 8 CFR 1003.10; Rule on Client Trust Account Recording.	04/24/2021	4 H
Module 3: Client Management	Overview of client management; client intake technique and sample client intake form; mock client consultation; Pro Bono Consultation checklist; connecting with client in the era of immigration policy-change; working with clients with trauma; the cycle of abuse; setting expectations with clients in trauma; and building client narrative.	04/28/2021	3 H
Module 4: Law Office Management	This training addresses the issues associated with the pyramid of staffing; hiring, managing, and firing; hiring checklist; phases of staffing; attracting talents in your Firm. Mock employer; self-care in running your organization successful.	05/01/2021	3 H
Module 5: Humanitarian & Asylum	This training starts by explaining the Humanitarian Chart of Asylum. It addresses issues associated with Affirmative Asylum; Violence Against Women Act (VAWA); Forms of Relief in Removal Proceedings; identifying T-Visa Relief; mechanisms of U Visa; Special Immigrant Juvenile Status (SIJS). Training enforces complement skills through Mock Intake; hypothetical exercises for U-Visa & T-Visa; VAWA; SIJS & Asylum. Example of Brief on Political Opinion provided to student. This module provides an overview of Family-Based Immigration (Video); family-based immigration (Reading); and Visa Bulletin. The myths about Chain Migration, and Family-Sponsored Immigration is addressed. Mock Intake for Spousal Family-Based Case; Sample of Client Intake of Spousal Family-based; Preparing & Filling an Immigration Petition; Sample Letter to the USCIS; Sample I-130 Checklist; and Exercise Discussions.	05/02/2021	6 H
Module 6: Family Immigration	This training addresses the problem in family immigration. It addresses issues associated with the Form I-601A (Application for Provisional Unlawful Presence); 212 Waiver Possibility; and Form I-212 Application for Permission to Re-apply. Training offers case studies, role-play simulation exercises, discussion questionnaires.	05/08/2021	4 H
Module 7: Most Common Used Nonimmigrant Visas	Training addresses problems related to the most Common used nonimmigrant visas. Addressed issues include but not limited to B1-/B-2/ Electronic System for Travel Authorization; H-1B Special Occupation (video); Drafting a H-1B Letter; H-1B Portability Petition sample Letter; K-1 Visa for Alien Fiancé(e); U-Visa for victims of crime including domestic violence; O-Visa foreigner of outstanding	05/09/2021	4 H

	abilities; J-1 for exchange visitors including students, scholars, and trainees. Work authorized under certain circumstances.		
Module 8: Employment-Based Immigrant Visas	This training focuses on the types of work visas; extension of L-1 (L-1A, L-1B); working in the US H-1B; Form I-94. It also addresses the impact of Trump's Executive Order Buy-America ▪ Multinational Managers/Special-L-1A. Program uses Video as a method of transmitting practical experience. In addition, addresses the issues associated with the E-1 and E-2 Nonimmigrants; E-1/E-2 Treaty Trader/Investors; O and P Nonimmigrant Visas; O and P Visa video; O-1 Extraordinary Persons – video; TN NAFTA Visa; H-1B FRE. It also addresses of Handling Request for Evidence (RFEs) video; Mock Client: Managing Clients Expectations/Communicating with Clients; Employment-Based Permanent Residence (Video); Criteria Demonstrating; Category-Based Countries; PERM -Based Labor Certification Process; PERM Attorney - Audit Letter; Audit Response Self-Check List; I-140 Petition Preparation (Based on EB Preference...); Adjustment of the Status video; Dual Representation Issues; and Adjustment of Status Process: Mock Client Interview.	08/09/2021	6 H
Module 9: Adjustment of Status and Consular Processing	This training provides an overview Adjustment of Status; introduction to Consular Processing (video); immigrant Visa; Adjustment of Status Generally-video; Adjustment of Status Chart; Adjust of Status Beginning; Consular Processing in Practice; Consular Processing Flow chart; Fundamentals of Lawyering at Consular Posts; Best Practices; Consular Practice; Inadmissible Foreign National and Bars to the Residency; Travel. Mock Client Consultation: demonstrating how to advise client of the Green Card Process; Exercises: discussion questions; and role-play exercises.	05/11/2021	6 H
Module 10: Removal and Relief (Litigation Skills)	This is a litigation skill-based training offering litigation skill through role-play, mock case advocacy simulations, practical models, templates, and checklist models. It focuses on providing practical skills on issues of Removability and Inadmissibility (video); explains the Chart of Grounds of Inadmissibility and Removability; offers student with the Sample of Notice to Appear (NTA); sample of Pleadings and Application for Relief. It addresses the issues related to Bond Procedure and Timeline; Determining Bond Eligibility (Video); Motion for Bond Hearing. It provides practical Tips Mock Bond Hearing, and reenforces skills on Mock Bond Hearing Discussion. It also tackles the issues related to the Cancellation of Removal, and Relief from Removal: -video. Practical exercises on Relief form Removal: Not a former/ Current. It also provides skills on Volunteer Departure through Video, Hypothetical NTA case 1, Sample of Pleadings; Model Response to Sample Pleadings, and hypothetical NTA. It provides skills through complete Litigation checklist; Pleadings Checklist; Response to Hypothetical NTA case 2. It deepens litigation skills through the role-play based on Hypothetical NTA case 3; Checklist for Hypothetical case 3. Faculty Response to Hypothetical 3. Removal skill is also deepened by engaging student in the role of attorney through a mock case called Hypothetical 4. It also provides Checklist NTA 4, and Faculty Response to NTA 4. Student is also engaged in the acquisition litigation skills through the role-play exercise Hypothetical 5: • Checklist NTA 5 • Faculty Response to NTA 5 • Mock Court Appearance Demonstrating Trial or Courtroom Etiquette • EOIR Doc • Special Immigrant Juveniles • Discussion Questions - Removal Relief.	05/11/2021	10 H
	Document Checklist ▪ Naturalization Cover Letter ▪ Cover letter for 5 years Naturalization ▪ USCIS Civic Exam Reading ▪ Continuous		

Module 11: Citizenship and Naturalization	Physical Presence ▪ Red Flags Naturalization Citizenship ▪ Naturalization Red Flags Checklist ▪ Mock Citizenship Interview ▪ Mandamus Actions-Take Gov to Court ▪ Mandamus Actions - Video ▪ Exercise: Review of a Hypothetical Naturalization Applicant 17 Page ▪ Exercise Faculty Response ▪ Exercise 11 – Citizenship.	05/11/2021	6 H
Total Training Hours			48 H

Signature: Edward T. Moises

Date: 01/07/2023

B) Moises’ Additional Accomplished Trainings in the areas of Concentration: Asylum, and Removal Defense and Relief

The Department of Immigration Legal Services of OHRA will be concentrating its immigration legal aid’s activities in assisting low-income immigrants who cannot afford the services of private attorney. The areas of concentration are a) Asylum, and b) Removal Defense and Relief. Programs offered by the AILA University. *Certificates of Completion in the Attached.*

a) CERTIFICATE OF TRAINING COMPLETION IN ASYLUM

(Certificate of Completion Awarded to Edward T. Moises)

Asylum Trainings Titles	Subject Covered	Date	Hours Number
Module 1: Legal Standards for Asylum Eligibility	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 also known as the “Five W’s”. It provides the definitions to the concepts such as: “Persecution, and “Well-founded Fear.” It addresses the factors that should matter for an asylum case including issues such as “internal relocation,” or “credibility and corroboration,” checklist of internal relocation factors, and discussion on the legal standards and for asylum eligibility. It also addresses the difference between the two concepts “Well-founded Fear Interview,” and the “Credible Fear Interview.”	11/16/2022	4 H
Module 2: Protected Grounds and Nexus	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.	11/17/2022	4 H

Module 3: Bars and Alternative Forms of Relief	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.	11/17/2022	6 H
Module 4: Standards and Best Practice for Evidence	This training provides a in-dept strategies of dealing with issues such as time for preparing a defensive asylum claim, the burden of proof, corroborating client’s asylum, withholding of removal under Convention Against Torture Claim (CAT). It provides in-dept strategies and considerations about the types of evidence, getting into record: what is admissible? When things go sideways: avoiding and dealing with pitfalls; ethic issues: what to do when something smelling fishy; ethical issues I removal cases: Pinocchio and his advisors? Overcoming the challenges to document’s admissibility; responding to DHS’ Rebuttal Evidence.	11/19/2022	4 H
Module 5: Mental Health, Cultural Competency, and Vicarious Trauma	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.	11/15/2022	4 H
Module 6: Procedures	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.	11/19/2022	6 H
Module 7: Border Issues	This training covers issues all asylum practitioners should be aware of relating to issues at the border.	11/19/2022	4 h
Module 8: Post-Asylum Issues	Training here focuses on asylee benefits, asylee responsibilities, adjustment of status for asylee, the adjustment of status application and interviews; ethics in post-asylum representation; nuts and bolts for asylum seekers, and asylee chart of post-asylum issues.	11/17/2022	2 H
Total Course Hours			40 H

Signature: Edward J G

Date: 01/07/2023

b) CERTIFICATE OF TRAINING IN REMOVAL DEFENSE AND RELIEF

Training was provided by AILA University. Moises Accomplished the training (Certificate of Completion Awarded by AILA University)

Removal Defense and Relief Titles	Subject Covered	Date	Hours Number
<p>Module 1: Custody, Bond, and Bond Appeals</p>	<p>The training focuses on ICE Initial Bond Determination, ICE Order of Release on Own Recognizance, and Parole Advisal and Approach. It also provides practical skills on Removal procedure for family-based practitioners. It addresses the Forms of Relief in Removal Proceedings; Eligibility for Bond and mandatory detention; and the law of the bond. Samples Bond Questionnaires are addressed and provides in dept training on how to Present the Best Bond case. It also provides in dept skills on how to get Client Released from Custody: Getting Client Bond in Immigration Court. Training provides expertise on how to avoid Mandatory Detention by exploring the “Guide for California Defenders and Removal Defense Advocates and provides practical Removal skills: Throwing wrenches in the Government’s deportation machines. It teaches on how to present the Best Bond Case; checklist for documenting positive Equities in a Bond case; and Bond Appeals. Training exposes participant to the exercise of “Drafting a Motion for Bond Redetermination. It also provides participant with a sample Form I-286 and trains on how to file ICE’s Initial Custody Determination. Before graduating for this training, participant is compelled to engage in an interactive discussion centered on Custody, Bond, and Bond Appeals.</p>	<p>04/24/2021</p>	<p>8 H</p>
<p>Module 2: Analyzing the Notice to Appear (NTA)</p>	<p>This training covers major issues surrounding the NTA. It covers 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.</p>	<p>04/27/2021</p>	<p>4 H</p>
<p>Module 3: Pretrial Practice and Motions</p>	<p>Program trains on how to write 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.</p>	<p>04/28/2021</p>	<p>6 H</p>
<p>Module 4: Criminal Removability with the Categorical and Modified Categorical Approach</p>	<p>Exist a mandatory for immigration authorities to use the “categorical approach” to determine whether a criminal conviction triggers a ground of removal. The general rule is that the categorical approach is required where the Immigration and Nationality Act (INA) uses the statutory term “conviction.” Some state courts also have adopted the categorical approach. See, e.g., <i>People v Gallardo</i> (2017) 4 Cal 5th 120. Competent use of the federal categorical approach may be the single most important defense strategy available to immigrants convicted of crimes. This is especially true now that the Supreme Court has clarified how the categorical analysis functions, in four</p>	<p>05/01/2021</p>	<p>4 H</p>

	recent decisions: <i>Pereida v. Wilkinson</i> , 141 S.Ct. 754 (2021); <i>Mathis v. United States</i> , 136 S.Ct. 2243 (2016); <i>Descamps v. United States</i> , 570 U.S. 254 (2013), and <i>Moncrieffe v. Holder</i> , 569 U.S. 184 (2013). Following Mathis, the BIA expressly acknowledged that it is bound by this Supreme Court precedent regarding the application of the categorical approach in immigration cases. See Matter of <i>Chairez-Castrejon</i> , 26 I&N Dec. 819 (BIA 2016) (“Chairez III” 1). That’s why it is important for Removal Defense attorney to master the concepts of categorical and modified categorical approach.		
Module 5: Waiver and Relief: Technical Aspects Impacting Eligibility	This training provides an overview of common waivers in Removal Proceedings including fraud charges, burdens of proof, and relief from fraud/misrepresentation charges; INA §212 237 (a)(1)(H). It also provides in-dept strategies in dealing with the Cancellation of Removal for LPRs; Mock Master Hearing: Arguing Eligibility for Relief; Voluntary Departure: When the consequences of failure to depart should or should not apply; relief from removal: beyond cancellation and asylum; dealing with Discretionary from clients or opposing counsel; exercise for drafting questions for Direct Exam; sample of letter to client: Evidence required for Discretionary waiver before the IJ.	05/02/2021	6 H
Module 6: Appeals: Preparing the Record and Presenting the case for BIA and Circuit Court Review	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. Ethics Considerations: Assessing Opinions with clients after a final Order of Removal. How to File a Petition for Review.	05/08/2021	4 H
Module 7: Motion to Reopen and Motion to Reconsider	Training focuses on the difference between Motions to reopen and Motions to Reconsider. It trains on the basics of Motions to Reopen EOIR-Issued Removal Orders, by stressing that “Pretrial Preparation is the Cornerstone of a Successful Removal Defense. “You Only Thought the Case was Over: New circumstances give possibility of Reopening.” It addresses issues of Time-Barred Motion to Reopen: Tips and Tricks for success. It also addresses Time Numerical Motions; Rescinding an In Abstencia Order of Removal; Practice Alert on Matter of Laparra, and Stays of Removal case analysis. Analysis practicum: where to start; what to look for, and how to put together a strong Motion to reopen. Also, addresses issues such as “Bringing your client back: Return after removal. The ethic and wellness. Time sensitive Motions to Reopen. Exercise of Storytelling in a Motion to Reopen. Analysis of the Chart of the Motion to Reopen.	05/09/2021	8 H
Total Training Hours			40 H

Signature: Edward J G

Date: 01/07/2023

3) Other Trainings and Certificates

a) Certificates from ABA

Other Trainings Attended by Edward Moises							
Date	Training Title				Type of Training	Training Provided By	Hours Number
09/18/21	Defend Asylum Together! Essentials Immigration Law for ProBono Representation				Webinar	ABA	2 H
07/14/22	Utilizing Habeas Corpus Petitions for Unaccompanied Immigrant Children				Webinar	ABA	3 H
Total Hours							5 H

Signature: Edward T. Moises

Date: 01/07/2023

b). Affidavit For Trainings and Missing Certificates of Completion

I, Edward T. Moises, attest under the penalty of perjury that I completed all the immigration trainings described below, but I am unable to provide certificates of completion for them now.

Signature: Edward T. Moises

Date: 01/07/2023

c) Additional Trainings Completed by Edward T. Moises

These are in-house trainings designed to update, improve, and provide practical skills to advocates, staff, and pro bono lawyers in immigration legal advocacy. Workshops are prepared and supervised by the Department of Immigration Legal Services of the OHRA. The main goal behind these in-house workshops is to prepare future advocates and staff of OHRA get ready for the provision of immigration legal services soon after our applications of recognition and full accreditation are approved by the DOJ. Mr. Moises has accomplished all these trainings described below.

Training Title	Type of Training	Training Provided By	Subjects Covered	No. Hours
ASYLUM				
Representing A Detained Asylum Seeker	Workshop	OHRA	Overview of Asylum; Pt-MPP Asylum Cases; Afghan Asylum; Remote Lawyering; asylum application, client declaration, and supporting evidence; Master Calendar; Country conditions research; motion in IC; working with trauma survivors; drafting asylum brief; Preparing for Individual Hearing; After the Decision.	2 H
Preparing for Individual Hearing	Workshop	OHRA	This workshop helps asylum litigator to prepare client for hearing. Workshop provides skill on preparing client and any witness to testify. Workshop includes a Mock Asylum case video that contains hearing for asylum seeker. It includes a direct and cross examination of the asylum seeker, as well as direct and cross examination of two experts, and closing argument.	2 H
	Workshop	OHRA	Those are practical TIPS adopted from the Guide from the Immigration Justice Campaign, which provides checklists so that	

	TIPS on Preparing for an Individual Hearing			the asylum litigator knows what information and documents to review with the client prior to the hearing; what to bring with you; and the types of objections the attorney should be prepared to make at the Individual Hearing.	1 H
	Direct Examination Guidance	Workshop	OHRA	Modeled from project of Catholic Charity network, Inc. Direct Examination workshop provides the asylum seeker the opportunity to tell their story to the IJ and is critical to the success of the case. This advisory training workshop discusses the basics of direct examination and provides TIPS and Strategies to Volunteers.	2 H
BOND					
	Bond	Workshop	OHRA	Many people held in immigration detention are eligible for release on bond but are not able to win release because they are not represented by counsel. This training walks asylum litigator through how to handle a bond hearing for someone held in immigration detention. The resources include recorded webinars, practice advisories, and template bond motions and other filings. It also provides skills on release from immigration detention on bond: who is eligible for bond, how to request a bond hearing, and what happens during bond hearings.	2 H
	Preparing Bond Submission	Workshop	OHRA	Training addresses the followings: required forms, filing instructions, samples, and templates for the Bond Submission to the IC. It also addresses the followings: a) Bond for New Arrivals: Motion for Custody Re-determination, Sample Bond Sponsor Letter; and Proposed Order Template; b) Bond for Client Who Have Been in the U.S.: Motion and Pre-Hearing Statement – Prior History; c) Bond for Re-Determination: Motion for Bond Re-determination, which is a motion to ask the Judge to reconsider and reduce a bond. This is only used after an immigration Judge has already held a bond hearing before.	1 H
	Representing Client in Bond Hearings	Workshop	OHRA	This workshop was based on the step-by-step guide to representing clients in bond hearings from the Immigration Legal Resource Center. It contains practical guidance on preparing for a bond hearing, as well as citations to relevant case law.	2 H
	Seeking Release from Immigration Detention	Workshop	OHRA	An overview of different options a person in detention must seek their release.	1 H
	Bond Hearing	Workshop	OHRA	This is a mock bond hearing that was conducted at New York Law School on June 12, 2017, and sponsored by the New York State Bar Association, Committee on Immigration Representation, New York State Bar Association, Commercial & Federal Litigation Section, New York State Liberty Defense Project, American Immigration Council, and American Immigrant Representation Project.	2 H
	Bond Proceedings	Workshop	OHRA	Workshop provides practical skills on Bond Proceedings. An overview of bond hearings for asylum litigator who are new to immigration practice. Two expert practitioners discuss how to request a bond hearing, the factors at issue during bond hearings, what kind of evidence to prepare and submit and how to do so, and what happens during a bond hearing	2 H
	After Bond Hearing	Workshop	OHRA	The training provides materials that prepare asylum litigator to handle different possible outcomes of the client's bond hearing. This includes case where client being released: explains what asylum litigator needs to do to help client make sure they do what they need to have their removal case moved to the relevant court. The following materials were provided: List of ICE ERO Bond Acceptance Facilities (facilities that accept bond payments); motion for Bond Hearing – Changed Circumstances (sample of	1 H

				Motion requesting a new hearing in light of “Changed Circumstances of the Respondent”); Bond Appeal Brief (Brief filed in support of an appeal of a bond denial); and sample of Pro Se Motion to Change Venue (This sample on Pro Se Motion was retrieved from the DOJ website. The goal is for asylum litigator to be able to help client submit this, along with the change of address. This Form can be found at: https://justice.gov/eoir/form-eoir-33-eoir-immigration-court-listing) for the current jurisdiction (Court) if they have a pending merits case.	
LPR CANCELLATION					
	LPR Cancellation	Workshop	OHRA	Cancellation of removal” is an increasingly important form of immigration relief. “Cancellation,” can allow green card holders and undocumented individuals who have lived in the U.S. for many years and have strong ties to the country to remain in the U.S. and either obtain or retain lawful LPR status. Two forms of cancellation of removal: one for individuals who are not lawful permanent residents, and one for lawful permanent residents. This workshop provides materials that guide litigator through the process of representing an applicant for LPR Cancellation.	2 H
	Master Calendar Hearing	Workshop	OHRA	The program advises litigator that the first several immigration court appearances in a LPR cancellation case are generally one or more “master calendar” hearings. The materials from this workshop walks litigator through what Master Calendars are, how they work, and how to prepare for them.	2 H
	Documenting the Case	Workshop	OHRA	As litigator works with the client, he/she will put together extensive evidence in support of his or her non- LPR cancellation application. The materials from this workshop guide litigator through how to document client’s case.	1 H
	Preparing Evidence and Brief	Workshop	OHRA	Litigator may file a brief in his/her client’s LPR cancellation case; the samples provided in this workshop may be useful as you draft a brief for your client’s case.	1 H
NON-LPR CANCELLATION					
	Non-LPR Cancellation	Workshop	OHRA	Training provides an overview of the eligibility requirements for Non-LPR Cancellation, including showing how to demonstrate “exceptional and extremely unusual hardship” to a qualifying relative, and how to demonstrate “good moral character.”	1 H
	Master Calendar Hearing	Workshop	OHRA	As litigator works with the client, he/she will put together extensive evidence in support of his or her non- LPR cancellation application. The materials from this workshop guide litigator through how to document client’s case.	1 H
	Documenting the Case	Workshop	OHRA	As litigator works with the client, he/she will put together extensive evidence in support of his or her LPR cancellation application. The materials from this workshop guide litigator through how to document client’s case.	1 H
	Preparing Evidence and Brief	Workshop	OHRA	Litigator may file a brief in his/her client’s non-LPR cancellation case; the samples provided in this workshop may be useful as you draft a brief for your client’s case.	1 H
	Non-LPR Cancellation Hearing	Workshop	OHRA	Training provides materials that will help litigator prepare for client’s non-LPR cancellation hearing.	1 H
CREDIBLE AND REASONABLE FEAR INTERVIEW					
		Workshop	OHRA	For many asylum seekers, the first step in the process of seeking protection in the U.S. is a “Credible Fear” or “Reasonable Fear”	

Credible and Reasonable Fear interview			Interview with an Asylum Officer. It is a vitally important part of the asylum process: without a positive determination from this interview, the asylum seeker will be removed from the U.S. without being able to present a claim for protection in front of an immigration judge. This workshop is provided to guide asylum litigator through how credible and reasonable fear interviews work, how to effectively prepare clients for these interviews, and how to represent clients at Credible and Reasonable Fear Interviews.	1 H
Understanding What Happens During a Credible/Reasonable Fear Interview	Workshop	OHRA	This training provides an in-depth look at how credible and reasonable fear interviews work: what questions Asylum Officers ask and in what order. It provides materials such as: samples of Notes and Worksheet from Negative Credible Fear Determination; the asylum Officer's Note from CFI Positive Determination; Mock Credible Fear Interview: in this video, Asylum officer conducts a credible Fear interview with a detained asylum seeker, whose attorney is also present. A samples transcript credible fear interview provided to participant.	3 H
The Asylum Officer Note and Summary of Credible Fear Interview.	Workshop	OHRA	The Asylum Officer's notes and summary of a credible fear interview. The format, and some of the questions, are standardized, so this is a very helpful tool to use in preparing for a credible fear interview.	1
IMMIGRATION COURT PRACTICE				
Immigration Court Practice	Workshop	OHRA	This training is an attempt to demystify the procedures and guides asylum litigator through the practical elements of immigration litigation. It also informs litigator that the first several immigration court appearances in an asylum case are generally one or more "master calendar" hearings. This workshop is intended to guide asylum litigator through what Master Calendars are, how they work, and how to prepare for them.	2 H
EOIR-E Registry	Workshop	OHRA	In order to enter an appearance on behalf of a client in immigration court, litigator must first register to practice before the immigration court by completing EOIR's E-registry process. It is a two-step process involving online registration followed by in-person verification of your identity at your local immigration court.	0.30 H
EOIR-28	Workshop	OHRA	Litigator must file this form at or before the client's first Master Calendar hearing in order to be entered as the attorney of record on the client's case.	0.30 H
Preparing for Master Hearing	Workshop	OHRA	This workshop walks litigator through what happens at master calendar hearings, and how to prepare yourself and the client for the master calendar.	1 H
Annotated Notice to Appear (NTA)	Workshop	OHRA	The Notice to Appear (NTA) is the charging document in immigration court proceedings. Pleading to the factual allegations and legal charges in the NTA happens at a Master Calendar hearing, before an individual hearing is scheduled. This annotated NTA explains the significance of the most important elements of the NTA.	0,30 H
Mock Master Calendar Hearing	Workshop	OHRA	A mock master calendar hearing in an asylum case.	2 H
MOTION TO REOPEN				
Purpose of the Motion to Reopen	Workshop	OHRA	Non-citizens with final orders of removal may move in certain circumstances to have their removal proceedings reopened in order to have a new adjudication on their removability from the U.S. Filing a Motion to Reopen is extremely important for noncitizens with final removal orders who are being held in immigration detention, because they are especially vulnerable to immediate removal from the U.S. The materials on this page will assist pro	0.30 H

				bono attorneys with every stage of filing a motion to reopen before an immigration judge or the Board of Immigration Appeals.	
	Overview of Motion to Reopen	Workshop	OHRA	<p>There are a number of bases to file motions to reopen in immigration court proceedings. These materials will orient litigator and provide a framework for understanding all the bases for motions to reopen. The following materials were addressed:</p> <ol style="list-style-type: none"> 1) Sample of Motion to Reopen in IC Flowchart <i>This flowchart outlines several bases for a Motion to Reopen along with the related costs, filing deadlines, and effect on removal proceedings. Links to sample motions, relevant statutes, and practice pointers throughout the flow chart provide additional information.</i> 2) The Basics of Motion to reopen EOIR-Issued Removal Order <i>This Practice Advisory from the American Immigration Council walks through the legal and procedural requirements for Motions to Reopen, and includes practical advice on what to file, and where, when, and how to file. Note that if you are seeking to reopen an in-absentia removal order, there is a separate Practice Advisory for those motions.</i> 	2 H
	Specific Tools that May Help for Preparing Motion to Reopen	Workshop	OHRA	<p>Once a counsel has identified under which basis, he will seek to reopen the client's proceedings, the materials provided at the workshop will provide him with targeted guidance. These materials include:</p> <ol style="list-style-type: none"> 1) Seeking Remedies for Ineffective Assistance of Counsel in Immigration Cases <i>This Practice Advisory discusses how individuals can seek a remedy for ineffective assistance of counsel in immigration court proceedings by filing a motion to reopen and provides an overview of the current law on the right to effective assistance, including the procedural and substantive requirements set forth in Matter of Lozada, 19 I&N Dec. 637 (BIA 1988).</i> 2) Rescinding on In-Absentia Order of Removal <i>This Practice Advisory explains the legal and procedural requirements for filing motions to reopen in absentia removal orders.</i> 3) A Guide to Assisting Asylum-Seekers with Absentia Removal Orders <i>A practical, hands-on guide to putting together motions to reopen in absentia removal orders.</i> 4) Motion to Reopen In Absentia Removal Orders <i>This is where to start for attorneys working on motions to reopen in absentia removal orders for families targeted in raids, this is where to start. The workshop provides an overview of the applicable law, an explanation of the overall situation of clients with these orders, and an overview of the work involved in preparation of the motions.</i> 	2 H
	Drafting Motion to Reopen	Workshop	OHRA	<p>Strengthen arguments by analyzing the pleadings, motions, supporting memoranda, filed in cases similar to your own. Workshop addresses how other attorneys have argued an issue and how it was ruled upon so litigator can effectively distinguish the case. Below you will find sample motions to reopen in several different types of cases.</p> <ol style="list-style-type: none"> 1) Sample Motion to Reopen: In Absentia for Exceptional Circumstances. 2) Sample Motion to Reopen: Timely, New Evidence. 3) Supplement to Timely, New Evidence. 	2 H

				4) Sample Motion to Reopen: Absentia, Lack of Notice.	
Assembling Motion with Accompanying Documents	Workshop	OHRA		<p>The final step in submitting a motion to reopen is assembling the motion with all its required components.</p> <ol style="list-style-type: none"> 1) Required Form: EOIR-27 <i>A sample Entry of Appearance as an Attorney Before the Board of Immigration Appeals (BIA), to be filed with a Motion to Reopen before the BIA.</i> 2) Required Form: EOIR-28 <i>Sample Entry of Appearance as an Attorney before the Immigration Court, to be filed with a Motion to Reopen before the Immigration Court.</i> 3) Proposed Order <i>Sample Proposed Order, to be filed with a Motion to Reopen before the Immigration Court.</i> 4) Certificate of Service <i>Sample Certificate of Service for a Motion to Reopen.</i> 	1 H
Motion to Reopen and Reconsider					
Motion to Reopen and Reconsider	Workshop	OHRA		<p>If the Administrative Appeals Office (AAO) issues an unfavorable decision, the appellant may file a motion to reopen the proceeding, a motion to reconsider the decision, or a combined motion to reopen and reconsider. The AAO may also reopen a proceeding or reconsider one of its prior decisions on its own motion. Unlike appeals, which ask a different authority to review and reverse a decision, motions request a review by the authority that issued the latest decision in the proceeding. Therefore, a USCIS field office has jurisdiction over motions relating to its decisions, and the AAO has jurisdiction over motions relating to its decisions. A motion to reopen is based on documentary evidence of <i>new facts</i>. Alternatively, a motion to reconsider is based on a claim of <i>incorrect application of law or policy</i> to the prior decision.</p> <p>The regulations for motions to reopen and motions to reconsider are located at 8 C.F.R. § 103.5.</p>	1 H
PAROLE AND RELEASE					
Parole and Release	Workshop	OHRA		Some noncitizens in immigration detention can request that they be paroled or released, from detention. The workshop is intended to assist pro bono litigators in drafting parole and release requests for detained noncitizens.	0.30 H
Overview of Eligibility	Workshop	OHRA		<p>Training provides materials that address an overview of which asylum seekers are eligible for parole, and how to apply for parole. These materials include:</p> <ol style="list-style-type: none"> 1) Seeking Release from Immigration Detention <i>An overview of the different options a person in detention has to seek their release.</i> 2) DHS February 28, 2021, Memo, Interim Guide (Department of Homeland Security) <i>This is the interim Guidance from the Biden administration on who is a priority for detention and deportation.</i> 3) Parole from ICE Detention: overview of Law <i>An overview of the law related to release from detention on parole, this document is intended to provide practitioners the legal framework to zealously advocate</i> 	2 H

			<p><i>for their detained clients when requesting release on parole from ICE.</i></p> <p>4) Parole: A Brief Guide <i>This is a brief, step-by-step guide to submit a parole request from ICE.</i></p>	
Gathering Documents	Workshop	OHRA	<p>As representative prepares client’s parole application, the materials provided in this workshop will walk through what documents to look for, and how to draft any letters of support. These documents include:</p> <ol style="list-style-type: none"> 1) Parole Information Worksheet <i>Used when working with parole applicants.</i> 2) Checklist of Materials to Submit for Parole <i>A checklist of the document’s attorneys should submit in support of requests for parole from detention</i> 3) Sponsor Letter for Parole 4) <i>A sample of a letter written by a parole sponsor in support of a parole request.)</i> 	2 H
Writing and Submitting Parole Request	Workshop	OHRA	<p>Sample parole requests for detained asylum seekers at several different detention facilities. It includes the following:</p> <ol style="list-style-type: none"> 1) Template Parole Non-Medical <i>An all-inclusive template for people requesting parole or release not based on medical issue.</i> 2) Template Parole Request in Light of COVID-19 for people with Vulnerabilities <i>(Modeled from the template prepared by the National Immigration Project of the National Lawyers, this template is a request parole for clients who have medical conditions or are otherwise medically vulnerable to COVID-19. This can be used even if you have previously requested parole or bond).</i> 3) Request for ROR or OSUP <i>This is used for release for a client in specific circumstances when client has a final order of removal.</i> 4) Parole Request Letter 1 <i>A sample letter requesting parole for a client detained at the Detention Center</i> 5) Parole Request Letter 2 <i>A sample letter requesting parole for a client detained at the Elizabeth Detention Facility in Elizabeth, NJ.</i> 6) Sample Parole Package <i>A sample parole filing for a detained asylum seeker. Packet includes a list of exhibits in support of the parole request; sample G-28 for detained client; letter to ICE requesting parole; and letter of support from the client’s parole sponsor.</i> 	2 H
After Parole	Workshop	OHRA	<p>The materials to be addressed below are for clients’ use if they are released on parole or another form of release. They include:</p> <ol style="list-style-type: none"> 1) Client is being released 2) Sample Pro Se Motion to Change Venue This is from the DOJ website. Counsel can help his client submit this, along with a change of address form (that can be found at: https://www.justice.gov/eoir/form-eoir-33-eoir-immigration-court-listing) to the current court if they have a pending merits case. 3) EAD for People Formerly in MPP This is a guide that explains how and when asylum seekers formerly in the remain in Mexico program are 	0.30 H

				eligible to apply for work authorization and walks lawyers through the application process.	
BOARD OF IMMIGRATION APPEALS					
	Board of Immigration Appeals	Workshop	OHRA	This workshop walk litigator through how to represent clients in their appeals to the BIA. Note that most Immigration Judge decisions can be appealed to the Board of Immigration Appeals (BIA) at the Department of Justice.	2 H
	Form: EOIR E-registry Process	Workshop	OHRA	Completing the two-step EOIR E-registry process to obtain your EOIR ID number so you may register to practice before the immigration court. Instructions for how to complete the E-Registry process are available by viewing the resource below.	0.30 H
	Form: EOIR-27	Workshop	OHRA	A Notice of Entry of Appearance as counsel to the Board of Immigration Appeals is required.	0.30 H
BIA Appeals: Overview					
<ul style="list-style-type: none"> • BIA Practical Manual • Overview of BIA Appeals • Practicing Before the BIA 					
Filing the Notice of Appeal					
<ul style="list-style-type: none"> • Annotated Sample of the Notice of Appeal to the BIA The first step in appealing an immigration judge's decision to the Board of Immigration Appeals is the filing of an EOIR-26 Notice of Appeal with the BIA within 30 days of the immigration judge's decision. The annotated sample, along with the annotated supplement will guide litigator through how to fill out an EOIR-26. • Sample Supplement to Notice of Appeal: A sample supplement to the sample EOIR-26 above, laying out the legal issues for appeal 					1 H
Motion					
<ul style="list-style-type: none"> • Sample Motion for Extension of Time: <i>A Template Motion for an Extension of Time in which to Submit One's Brief</i> 					
Drafting the Brief					
<ul style="list-style-type: none"> • American Immigration Council Practice Advisory on Standards of Review Before the BIA (Practice Guide). <i>A practice advisory on the standards of review which the Board of Immigration Appeals employs in its review of Immigration Judge decisions.</i> 					
Sample BIA Briefs:					
<ul style="list-style-type: none"> • Sample brief: Asylum (Credible Fear; Corroboration) <i>A sample brief to the Board of Immigration Appeals on a denial of asylum.</i> • Sample BIA Brief, Asylum (Due Process, remand, administrative notice) <i>A sample brief to the Board of Immigration Appeals of a denial of asylum-seeking remand to cure due process violations.</i> • Sample BIA Brief, Asylum (nexus, past persecution, CAT) <i>A sample brief to the Board of Immigration Appeals of a denial of asylum and protection under the United Nations Convention Against Torture.</i> • Sample BIA Brief: Asylum and Withholding of Removal (nexus, internal relocation) <i>A sample brief to the Board of Immigration Appeals of a denial of asylum and protection under the United Nations Convention Against Torture.</i> • Sample BIA Brief: Asylum, Withholding of Removal and CAT (particularly serious crime) <i>A brief to the Board of Immigration Appeals on a denial of asylum, withholding of removal and protection under the United Nations Convention Against Torture addressing whether the applicant's criminal conviction constitutes a particularly serious crime.</i> • Sample BIA Brief: Interlocutory Appeal (venue) 					

A sample brief to the Board of Immigration Appeals on an interlocutory appeal of a denial of a motion for a change of venue.

- **Sample BIA Brief: Non-LPR Cancellation of Removal**

A sample brief to the Board of Immigration Appeals on a denial of an application for cancellation of removal for non-permanent residents.

- **Sample BIA Brief: Withholding of removal (DHS appeal)**

A sample brief to the Board of Immigration Appeals of the Department of Homeland Security's appeal of a grant of withholding of removal.

Total Hours

59 H

Signature: _____

Edmond J. G.

Date: 01/07/2023

4). Sign and re-submit the certificates from ABA trainings

- See signed certificates from ABA trainings in the attachment

5). Explain Mr. Moises' membership status in the ABA.

Response:

- Moises first became member of ABA in 2005 as a student from Temple University Beasley School of Law. Temple University Beasley School of Law is an ABA accredited Law School. Moises took the New York Bar Exam in 2007. He failed. As a foreign lawyer, Moises' ABA status changed to a foreign lawyer. He lost interest in retaking the New York Bar Exam because he discovered that the scope of his professional mission was no longer dependent on his own will. It became clear that his mission was dictated by the will of God.
- We would like to seize this occasion to clarify, as already explained in the narrative previously submitted, soon after Moises graduated from the "Jean Monnet School of Law at the *University of Paris-Sud at Sceaux*" in France, Moises practiced law under the supervision of the Attorney (Maitre Freamaux) for four years. But Moises recognizes and reaffirms that he is not a U.S. Licensed lawyer. He gave up his intent of becoming a U.S. licensed lawyer when he understood that his God-given mission has nothing to do with the practice of law in a private setting. He understood that his God-given mission is related to the defense of the causes of those who cannot assert their own fundamental rights. It is within the scope of this new path Moises co-founded this Nonprofit Organization known under the name of "**ORPE Human Rights Advocates.**" As it can be observed in this organization's activities and mission statement as described in its websites (www.orpe.org), Moises engaged his life in serving the causes of those who cannot assert their own fundamental rights. He promotes programs that empower people living in poverty to become economically self-sufficient, and programs that contribute to the relief of oppressed, and underprivileged peoples. These core values constitute the core foundations of all programs promoted by ORPE Human Rights Advocates.

6). You have asked to explain how Mr. Moises registered for and attended the AILA trainings.

- As a former Law School Student from an accredited ABA Law School (Temple University Beasley School of law), Moises was able to register immigration courses.

7). You have asked to explain why disapproval of Mr. Moises' 2018 application was not disclosed on this application.

Response:

- We are not sure if we have clearly understood your question. Instead, we suggest considering the narrative below in attempt to clarify the scope of uncertainty you've raised about the disapproval of Mr. Moises' 2018 application:
 - We assume that you are asking us to explain the reason why we did not disclose the disapproval of Mr. Moises' 2018 application on the Form EOIR I-31A. If this is the question, we have reason to believe that you may have an unrecognized version of the Form EOIR I-31A that contains inaccurate information. Because the evidence of the copy of the Form EOIR I-131A that was submitted jointly with the organization application (Form EOIR I-131) clearly indicates that the disapproval of Mr. Moises' 2018 application was disclosed on the Form EOIR I-31A, part 2 (Qualifications of Accreditation); Section A (About the Representative). We have attached a copy of the submitted Form EOIR I-31A. The Form clearly shows the term "disapproval." Our record also establishes that a copy of the disapproval letter from the Program Director, Mr. Steven Lang was attached to this application.

8). You have asked to confirm that any immigration work conducted by Mr. Moises in the United States was under the supervision of a licensed attorney.

Response:

- Sure. We have required Mr. Moises to sign the affidavit below in response to the above-raised question:

"I, Edward T. Moises, attest under the penalty of perjury that any immigration work I have conducted in the United States was under the supervision of a licensed attorney."

Signature: Edward T. Moises

Date: 01/07/2023

9). Has Mr. Moises taken a bar exam in the United States?

Response:

- Yes. Mr. Moises took the New York Bar Exam in 2007. He did not pass the bar. He failed. He gave up his intent of becoming a U.S. licensed lawyer when he understood

that his God-given mission has nothing to do with the practice of law in a private setting. Moses understood that his mission is based on serving the causes related to public interest, and the defense of the causes of those who cannot assert their own fundamental rights. It is within the scope of his new path that led him to co-found the Nonprofit “Orpe Human Rights Advocates.”

Part III

PARTIAL ACCREDITATION OF MS. ZORA MOSES

1. Updated resume of Ms. Zora Moses describing the applicant’s immigration law experience and qualifications.
 - See Ms. Moses’ resume in the attachment.

2. Hours number pertaining to each training accomplished by Ms. Zora Moses (a); and an updated and a signed affidavit for missing certificates (b).
 - a) Hours number for each training associated with the Fundamentals of U.S. Immigration Law accomplished by Ms. Zora Moses. This training was provided by AILA University (*Certificate of Completion Awarded*)

Fundamentals Trainings Titles	Subject Covered	Date	Hours Number
Module 2: Ethics	Training focuses on ethics and professional responsibility. It addresses issues associated with Model Rule 1.1 (Competency); issues associated with Model Rule 1.3 (Diligence); issues associated with Ethical Rule 6.5 (Nonprofit and Court) and limited Legal Services Programs; and ethical issues related to the provision of Pro bono legal services. Training also focuses on Model Rules 1.6 related to the Confidentiality of information. It addresses issues associated with the responsibilities of a subordinated Lawyer (Rule 5:2), and the responsibilities of a non-lawyer assistance (Rule 5:3). Issues associated with Cyber Security and Ethics Protection Data and safeguarding property (Rule 5:15) are addressed here. Analyzed 8 CFR 1003.10; Rule on Client Trust Account Recording.	04/24/2021	4 H
Module 3: Client Management	Overview of client management; client intake technique and sample client intake form; mock client consultation; Pro Bono Consultation checklist; connecting with client in the era of immigration policy-change; working with clients with trauma; the cycle of abuse; setting expectations with clients in trauma; and building client narrative.	04/28/2021	3 H

Module 4: Law Office Management	This training addresses the issues associated with the pyramid of staffing; hiring, managing, and firing; hiring checklist; phases of staffing; attracting talents in your Firm. Mock employer; self-care in running your organization successful.	05/01/2021	3 H
Module 5: Humanitarian & Asylum	This training starts by explaining the Humanitarian Chart of Asylum. It addresses issues associated with Affirmative Asylum; Violence Against Women Act (VAWA); Forms of Relief in Removal Proceedings; identifying T-Visa Relief; mechanisms of U Visa; Special Immigrant Juvenile Status (SIJS). Training enforces complement skills through Mock Intake; hypothetical exercises for U-Visa & T-Visa; VAWA; SIJS & Asylum. Example of Brief on Political Opinion provided to student. This module provides an overview of Family-Based Immigration (Video); family-based immigration (Reading); and Visa Bulletin. The myths about Chain Migration, and Family-Sponsored Immigration is addressed. Mock Intake for Spousal Family-Based Case; Sample of Client Intake of Spousal Family-based; Preparing & Filling an Immigration Petition; Sample Letter to the USCIS; Sample I-130 Checklist; and Exercise Discussions.	05/02/2021	6 H
Module 6: Family Immigration	This training addresses the problem in family immigration. It addresses issues associated with the Form I-601A (Application for Provisional Unlawful Presence); 212 Waiver Possibility; and Form I-212 Application for Permission to Re-apply. Training offers case studies, role-play simulation exercises, discussion questionnaires.	05/08/2021	4 H
Module 7: Most Common Used Nonimmigrant Visas	Training addresses problems related to the most Common used nonimmigrant visas. Addressed issues include but not limited to B1-/B-2/ Electronic System for Travel Authorization; H-1B Special Occupation (video); Drafting a H-1B Letter; H-1B Portability Petition sample Letter; K-1 Visa for Alien Fiancé(e); U-Visa for victims of crime including domestic violence; O-Visa foreigner of outstanding abilities; J-1 for exchange visitors including students, scholars, and trainees. Work authorized under certain circumstances.	05/09/2021	4 H
Module 8: Employment-Based Immigrant Visas	This training focuses on the types of work visas; extension of L-1 (L-1A, L-1B); working in the US H-1B; Form I-94. It also addresses the impact of Trump's Executive Order Buy-America ▪ Multinational Managers/Special-L-1A. Program uses Video as a method of transmitting practical experience. In addition, addresses the issues associated with the E-1 and E-2 Nonimmigrants; E-1/E-2 Treaty Trader/Investors; O and P Nonimmigrant Visas; O and P Visa video; O-1 Extraordinary Persons – video; TN NAFTA Visa; H-1B FRE. It also addresses of Handling Request for Evidence (RFEs) video; Mock Client: Managing Clients Expectations/Communicating with Clients;	08/09/2021	6 H

	Employment-Based Permanent Residence (Video); Criteria Demonstrating ▪ Category-Based Countries; PERM -Based Labor Certification Process; PERM Attorney - Audit Letter; Audit Response Self-Check List; I-140 Petition Preparation (Based on EB Preference...); Adjustment of the Status video; Dual Representation Issues; and Adjustment of Status Process: Mock Client Interview.		
Module 9: Adjustment of Status and Consular Processing	This training provides an overview Adjustment of Status; introduction to Consular Processing (video); immigrant Visa; Adjustment of Status Generally-video; Adjustment of Status Chart; Adjust of Status Beginning; Consular Processing in Practice; Consular Processing Flow chart; Fundamentals of Lawyering at Consular Posts; Best Practices; Consular Practice; Inadmissible Foreign National and Bars to the Residency; Travel. Mock Client Consultation: demonstrating how to advise client of the Green Card Process; Exercises: discussion questions; and role-play exercises.	05/11/2021	6 H
Module 10: Removal and Relief (Litigation Skills)	This is a litigation skill-based training offering litigation skill through role-play, mock case advocacy simulations, practical models, templates, and checklist models. It focuses on providing practical skills on issues of Removability and Inadmissibility (video); explains the Chart of Grounds of Inadmissibility and Removability; offers student with the Sample of Notice to Appear (NTA); sample of Pleadings and Application for Relief. It addresses the issues related to Bond Procedure and Timeline; Determining Bond Eligibility (Video); Motion for Bond Hearing. It provides practical Tips Mock Bond Hearing, and reenforces skills on Mock Bond Hearing Discussion. It also tackles the issues related to the Cancellation of Removal, and Relief from Removal: -video. Practical exercises on Relief form Removal: Not a former/ Current. It also provides skills on Volunteer Departure through Video, Hypothetical NTA case 1, Sample of Pleadings; Model Response to Sample Pleadings, and hypothetical NTA. It provides skills through complete Litigation checklist; Pleadings Checklist; Response to Hypothetical NTA case 2. It deepens litigation skills through the role-play based on Hypothetical NTA case 3; Checklist for Hypothetical case 3. Faculty Response to Hypothetical 3. Removal skill is also deepened by engaging student in the role of attorney through a mock case called Hypothetical 4. It also provides Checklist NTA 4, and Faculty Response to NTA 4. Student is also engaged in the acquisition litigation skills through the role-play exercise Hypothetical 5 • Checklist NTA 5 • Faculty Response to NTA 5 • Mock Court Appearance Demonstrating Trial or Courtroom Etiquette • EOIR Doc • Special Immigrant Juveniles • Discussion Questions - Removal Relief.	05/11/2021	10 H

Module 11: Citizenship and Naturalization	Document Checklist ▪ Naturalization Cover Letter ▪ Cover letter for 5 years Naturalization ▪ USCIS Civic Exam Reading ▪ Continuous Physical Presence ▪ Red Flags Naturalization Citizenship ▪ Naturalization Red Flags Checklist ▪ Mock Citizenship Interview ▪ Mandamus Actions-Take Gov to Court ▪ Mandamus Actions - Video ▪ Exercise: Review of a Hypothetical Naturalization Applicant 17 Page ▪ Exercise Faculty Response ▪ Exercise 11 – Citizenship.	05/11/2021	6 H
Total Training Hours			48 H

Signature: 

Date: 01/07/2023

b) Updated and Signed Training Affidavit

I, Zora Moses, attest under the penalty of perjury that I completed all the immigration trainings described below, but I am unable to provide certificates of completion for them now.

Signature: 

Date: 1/07/2023

3) Additional Trainings Accomplished by Ms. Moses

These are in-house training programs designed to update, improve, and provide practical skills to advocates, staff, and pro bono lawyers in immigration legal advocacy. Workshops are prepared and supervised by the Department of Immigration Legal Services of the OHRA. The main goal behind these in-house workshops is to prepare future advocates and staff of OHRA get ready for the provision of immigration legal services soon after our applications of recognition and partial accreditation are approved by the DOJ. Ms. Moses has accomplished all the trainings below.

Training Title	Type of Training	Provided By	Subjects Covered	H
Preparing your Client for Adjustment of Status Interview with USCIS	Workshop	OHRA	Workshop provides skill on preparatory meeting, review the client's application review, original docs verification, and addressing concerns the client may have, putting together information and make sure that the information is correct; and Name change document. Workshop discusses the supportive and protective role of representative for client interests should any problems arise. Unlikely to say anything unless there is confusion about a particular question/answer that the representative can clear up. Assisting client clarify EWI, INA 212(a); addressing with client issues related to the Form I-601, and INA §212(a)(2); INA §212(a)(6), and health-related inadmissibility per INA §212(a)(I).	3 H
Learning How to Complete the Application for Naturalization (Form I-400)	Workshop	OHRA	The course addresses the following issues: an overview of the Form I-400; the requirements for naturalization; completing each part of the form and prepare the naturalization application for mailing; and steps in the naturalization process. It also addresses issues such as: preparing for interview. This is an interactive course that incorporates text, images, audio, and video. The course gives opportunity to participant to check his or her progress through quizzes and a final test.	3 H
	Workshop		Training focused on Asylum Merits Interview with USCIS, processing after a positive credible fear determination. Procedure of conducting of a credible fear interview by the USCIS asylum officer; determination of	3 H

Questions and Answers for Credible Fear Screening for Individuals seeking Asylum		OHRA	credible fear of persecution or torture; Credible fear interview while in detention; asylum merits interview after a finding of credible fear; withholding of removal or protection under the CAT based on record before the USCIS; defensive asylum process; Notice of Appeal before IJ; request for review of the determination by an IJ.	
Reasonable Fear Screenings	Workshop	OHRA	The training focuses on the analysis of the Section 238 (b) and 241(a)(5) of the INA; Case referred before Asylum Officer for determination of reasonable fear after an Order of Removal under 241 (b) and 241(a)(5) based on fear of return to the country to which the removal was ordered.	3 H
Dealing with U Nonimmigrant Status (U-Visa)	Workshop	OHRA	Workshop focused on U Nonimmigrant eligibility; qualifying criminal activities; applying waiver on the Form I-192, Application for Advanced Permission to Enter as a Nonimmigrant; U visa extensions; filing for qualifying family members; and applying for Green Card.	3 H
Dealing with Victims of Human Trafficking Case (T-Visa)	Workshop	OHRA	Eligibility criteria for T-Visa status. Applying for T Nonimmigrant Status; EAD; After obtention of Nonimmigrant status; exception and exemption to the requirement of assist or cooperate with law enforcement.	3 H
Temporary Protected Status (TPS) and Deferred Enforced Departure (DED)	Workshop	OHRA	Eligible Ukrainian nationals qualified to apply TPS. How to fill up the Form I-821. Timeframe of filling TPS for Ukrainians (18-month: between April 19, 2022, and October 19, 2023). Completing TPS online application. Requesting for an employment authorization.	2 H
New TPS Designation for Afghanistan and Ukraine	Workshop	OHRA	TPS Eligibility and Application Process. Current USCIS processing times for TPS (approximately 180 days). TPS requirements and application process. Simultaneously apply for another immigration status and granted TPS for Afghan and Ukrainian nationals. This includes those who have been granted parole, have pending asylum applications or hold a nonimmigrant status, such as F-1 or B-2. Consideration of the impact of using a TPS-based employment authorization to work on the underlying status.	1 H
Form I-134	Workshop	OHRA	How to file the Form I-134; explain about what the form can do to a client: change nonimmigrant status, extend nonimmigrant stay, humanitarian parole.	1 H
New Relief Options for Ukrainians: EAD for Ukrainians Parolees	Workshop	OHRA	Effective Nov. 21, 22, certain Afghan and Ukrainian Parolees are Employment Authorized Incident to Parole, which means that they do not need to wait for USCIS to approve their Form I-765, before they can work in the U.S. The workshop analyzes the eligibility and qualifications.	1 H
Assessing the Frequently Asked Questions About Uniting for Ukraine.	Workshop	OHRA	The workshop focuses on general questions about uniting for Ukraine; questions relating to supporters; and to beneficiaries; Online Filing of Form I-134A, Declaration of Financial Support; Travel authorization questions; Medical Screening and Vaccinations; and EAD questions.	1 H
Consideration of Deferred Action for Childhood Arrivals (DACA)	Workshop	OHRA	Training addresses DACA application. Eligibility for first time or renew the existing period of DACA if it is expiring. Analysis of July 16, 2021, from the U.S. District Court for the Southern District of Texas, which was affirmed by the U.S. Court of Appeals for the Fifth Circuit, and on Oct. 14, 2022, was extended by the district court to the DACA final rule, remains in effect, which DHS prohibited from granting initial DACA requests and related employment authorization under the final rule.	2 H
Total Hours				26 H

Signature: 

Date: 1/07/2023