SEYFARTH SHAW LLP
ATTORNEYS

Immigration Inbox: News You Can Use

U.S. Immigration:

1. Supreme Court Issues Decision in Arizona SB1070 Case - The Court found that 3 provisions of Arizona SB1070 are preempted by federal immigration law but upheld the provision that requires local police at the time of an arrest for any crime to check the immigration status of anyone they have "reasonable suspicion" to believe is in the U.S. unlawfully

2. President Announces Deferred Action, Work Authorization for Certain Children of Undocumented Persons - In a surprise move, President Barack Obama announced that certain children of undocumented persons may be granted deferred action and work authorization based on prosecutorial discretion

3. H-1B Cap Reached - H-1B numbers for FY 2013 have run out

4. India, China EB-2 Green Card Category Unavailable for Remainder of FY 2012 - The Department of State's Visa Office has announced that the EB-2 preference category is now "Unavailable" for both India and China and will remain so for the remainder of fiscal year 2012

5. Senators Urge USCIS Director Mayorkas Not To 'Undermine' L Visa Program - The senators said they were concerned that the L-1B visa program, which allows companies to transfer employees with specialized knowledge from their foreign facilities to their U.S. offices, "is harming American workers"

6. USCIS Launches Online Immigration System - Individuals can establish a *USCIS ELIS account* and apply online to extend or change their nonimmigrant status for certain visa types

7. Department of Labor (DOL) Advises on H-2B Final Rule Injunction, Procedures for H-2B Labor Certifications - DOL published a Federal Register notice on May 16, 2012, advising on the injunction the U.S. District Court for the Northern District of Florida placed on implementation of the H-2B 2012 final rule

8. USCIS Issues Precedent Decision on P-3 Performing Artist/Entertainer Nonimmigrant Visa Petition - The decision addresses the term "culturally unique" and its significance in adjudicating petitions for performing artists and entertainers

9. USCIS Centralizes Filing, Adjudication of Certain Waivers of Inadmissibility - Beginning June 4, 2012, individuals abroad who have applied for certain visas and have been found ineligible by a U.S. consular officer will be able to mail requests to waive certain grounds of inadmissibility directly to a USCIS lockbox facility

Seyfarth Immigration Compliance Center

1. ICE Issues Latest Round of I-9 Inspection Notices - On April 26, 2012, a federal judge granted a preliminary injunction, applicable nationwide, against implementing the new H-2B program rule for 60 days

2. NLRB Issues Guidance on Compliance Cases - Among other things, a respondent may not use the compliance phase as a means to fish for disabling employee conduct under IRCA

Also in this issue:

Seyfarth Immigration Events and News

U.S. Immigration

1. Supreme Court Issues Decision in Arizona SB1070 Case

Supreme Court Issues Decision in Arizona SB1070 Case – On June 25, 2012, the Supreme Court decided to strike down three out of four of the challenged provisions of Arizona's immigration enforcement law, SB1070. The Court determined, in a 5-3 ruling, that federal authority over immigration policy and laws preempted most of the provisions. The three provisions struck down by the Court included authorizing police to arrest undocumented immigrants without warrant where "probable cause" exists that they committed any public offense making them removable from the country; making it a state crime for "unauthorized immigrants" to fail to carry registration papers and other government identification; and, forbidding those not authorized for employment in the United States to apply, solicit or perform work. Read the full *opinion here*. However, it did not strike down as unconstitutional on its face one of the more controversial aspects of the law, the "papers please" provision which requires police to verify immigration status when stopping, arresting, or detaining someone. The Court ruled that since this provision has not yet been applied while an injunction was in place, it is premature to determine if the law might be unconstitutional as applied in a given case.

2. President Announces Deferred Action, Work Authorization for Certain Children of Undocumented Persons

In a surprise move, President Barack Obama announced that certain children of undocumented persons may be granted deferred action and work authorization, based on prosecutorial discretion.

Secretary of Homeland Security Janet Napolitano detailed the change in a memorandum sent on June 15, 2012, to David V. Aguilar, Acting Commissioner, U.S. Customs and Border Protection (CBP); Alejandro Mayorkas, Director, U.S. Citizenship and Immigration Services (USCIS); and John Morton, Director, U.S. Immigration and Customs Enforcement (ICE). The memo explains that additional measures are necessary to ensure that enforcement resources are not expended on "low priority cases" such as those who were brought to this country as children and lack the intent to violate the law.

Before a person may be considered for an exercise of prosecutorial discretion under the memo, he or she must:

- have come to the United States under the age of 16;
- have continuously resided in the United States for at least five years preceding June 15, 2012, and have been present in the United States on June 15, 2012;
- be currently in school, have graduated from high school, have obtained a general education development certificate, or be an honorably discharged veteran of the U.S. Coast Guard or Armed Forces;
- not have been convicted of a felony, a significant misdemeanor, multiple misdemeanors, or otherwise not pose a threat to national security or public safety; and
- not be above the age of 30.

The above criteria are to be considered, the memo states, whether or not an individual is already in removal proceedings or subject to a final order of removal. "No individual should receive deferred action under this memorandum unless they first pass a background check and requests for relief pursuant to this memorandum are to be decided on a case by case basis."

The memo notes that the Department of Homeland Security "cannot provide any assurance that relief will be granted in all cases."

The memo details what ICE, CBP, and USCIS should do when encountering individuals meeting the above criteria, with specifics for various circumstances. For example, for those who are in removal proceedings but not yet subject to a final order of removal, ICE should exercise prosecutorial discretion "by deferring action for a period of two years, subject to renewal." The memo also notes that, for those granted deferred action by ICE or USCIS, USCIS will accept applications to determine whether such individuals qualify for work authorization during the period of deferred action.

The memo explains that U.S. immigration laws "are not to be blindly enforced without consideration given to the individual circumstances of each case. Nor are they designed to remove productive young people to countries where they may not have lived or even speak the language."

Several weeks ago, a letter from nearly over 90 law professors outlined options under prosecutorial discretion the President could use to provide administrative relief in these cases, such as the use of deferred action. The letter noted, "Though no statutes or regulations delineate deferred action in specific terms, the U.S. Supreme Court has made clear that decision to initiate or terminate enforcement proceedings fall squarely within the authority of the Executive."

In this election year, the controversy is likely to continue. Stay tuned.

A transcript of the President's Rose Garden announcement is available *here*. Secretary Napolitano's memo is available here. A related ICE announcement is available *here* (English) and *here* (Spanish). An ICE FAQ on the process is available *here*. The professors' letter is available here.

Seyfarth Immigration Partner Angelo Paparelli has written a blog post, "The President Has Spoken -- Can DHS Make the Immigration DREAM Come True?" – accessible below – on action items for the DHS to consider in order to implement the President's deferred-action directive.

3. H-1B Cap Reached

On June 12, 2012, U.S. Citizenship and Immigration Services (USCIS) announced that it had received enough H-1B petitions to fulfill the numerical limit for the fiscal year ending September 30, 2013. As of June 12, 2012, petitions for new employment of H-1Bs, that is, for employment of a person who is not yet in H-1B status for another employer, will not be accepted again until April 1, 2013. Those petitions received after April 1, 2013, must request employment starting October 1, 2013, so that they will be subject to next year's cap (FY 2014).

H-1B1 petitions for nationals of Chile and Singapore may still be approved due to free trade agreements with those countries, and "cap exempt" employers (such as universities and nonprofit research organizations) may continue to seek H-1B status on behalf of their employees. In addition, petitions filed on behalf of current H-1B workers who have been counted previously against the cap will not be counted toward the FY 2013 H-1B cap.

The "final receipt date" for H-1B purposes is June 11, 2012. Regulations now provide that all H-1B petitions received by USCIS on or before June 11, 2012, have been submitted "under the cap," but all H-1B petitions received by USCIS on or after June 12, 2012, will be rejected.

Contact your Seyfarth Immigration attorney about options for beneficiaries of H-1B petitions who did not make the cut-off for the cap or who are cap-exempt.

4. India, China EB-2 Green Card Category Unavailable for Remainder of FY 2012

The Department of State's Visa Office has announced that the EB-2 preference category -- reserved for foreign workers with advanced degrees or who have exceptional ability -- is now "Unavailable" for both India and China and will remain so for the remainder of fiscal year 2012.

If an I-485 Application for Adjustment of Status was filed while the person's priority date was current, it will remain pending until the priority date is current again. Because the I-485 will remain pending, the applicant can continue to apply for interim benefits, such as work authorization and advance parole, while the priority date is unavailable.

The Visa Office includes the following information in the June Visa Bulletin:

Despite the retrogression of the China and India Employment Second preference cut-off date to August 15, 2007, demand for numbers by applicants with priority dates earlier than that date remained excessive. Such demand is primarily based on cases which had originally been filed with the U.S. Citizenship and Immigration Services (USCIS) for adjustment of status in the Employment Third preference category, and are now eligible to be upgraded to Employment Second preference status. The potential amount of such "upgrade" demand is not currently being reported, but it was evident that the continued availability of Employment Second preference numbers for countries other than China and India was being jeopardized. Therefore, it was necessary to make the China and India Employment Second preference category "Unavailable" in early April, and it will remain so for the remainder of FY 2012.

Numbers will once again be available for China and India Employment Second preference cases beginning October 1, 2012 under the FY-2013 annual numerical limitations. Every effort will be made to return the China and India Employment Second preference cut-off date to the May 1, 2010 date which had been reached in April 2012. Readers should be advised that it is impossible to accurately estimate how long that may take, but current indications are that it would definitely not occur before spring 2013.

The June bulletin is available *here*.

5. Senators Urge USCIS Director Mayorkas Not To 'Undermine' L Visa Program

Sens. Charles Grassley (R-Iowa) and Richard Durbin (D-Ill.) recently urged Alejandro Mayorkas, Director of U.S. Citizenship and Immigration Services (USCIS), not to propose changes that "would undermine the L visa program" when USCIS issues new guidance on the L-1B "specialized knowledge" standard, expected in the near future. The senators shared their thoughts in a letter sent to Director Mayorkas on March 7, 2012.

The senators said they were concerned that the L-1B visa program, which allows companies to transfer employees with specialized knowledge from their foreign facilities to their U.S. offices, "is harming American workers" because some employers, especially foreign outsourcing companies, "use L-1B visas to evade restrictions on the H-1B visa program." For example, the senators noted, the L-1 program does not have an annual cap and does not include the labor protections of the H-1B program.

In January 2011, the Department of State (DOS) issued new guidance to consular officers on adjudicating visas under the specialized knowledge category, outlining criteria including (1) the proprietary nature of the knowledge possessed by the visa applicant, (2) whether the visa applicant is "key" or normal personnel, and (3) whether the applicant possesses more skills or knowledge than an "ordinary" employee. The senators also noted that in July 2008, USCIS' Administrative Appeals Office (AAO) considered the definition of "specialized knowledge" and concluded that such employees are "an elevated class of workers within a company and not an ordinary or average employee." The senators advocated adoption of the standards and reasoning articulated in the January 2011 DOS guidance and the July 2008 AAO decision. "We are concerned that any weakening of the standard would create additional incentives for some employers to use the L-1B visa program in order to circumvent even the minimal wage and other protections for American workers in the H-1B visa program."

A USCIS spokesperson said, "USCIS is currently reviewing its L-1B policy guidance, which is comprised of a series of memoranda dating back to 1994, to assess whether that guidance assists adjudicators in applying the law in new business settings that companies face today."

Seyfarth Immigration Partner Angelo Paparelli has written a blog post (accessible below), "Rendering unto the Immigration Caesars," urging USCIS Director Mayorkas to stand firm against the pressure from Senators Grassley and Durbin and other

opponents of the L-1 visa category and offer guidance that adheres to the L-1 law and regulations which expanded eligibility for this visa.

6. USCIS Launches Online Immigration System

On May 22, 2012, U.S. Citizenship and Immigration Services (USCIS) launched the first phase of its electronic immigration benefits system, USCIS ELIS.

Individuals can establish a *USCIS ELIS account* and apply online to extend or change their nonimmigrant status for certain visa types. Eligible individuals include foreign citizens who travel to the United States temporarily to study, conduct business, receive medical treatment, or visit on vacation. USCIS ELIS will also enable USCIS officers to review and adjudicate online filings from multiple agency locations.

Following this first release, USCIS anticipates making adjustments and improvements in response to user feedback. Future releases will add form types and functions to the system, gradually expanding to cover filing and adjudication for all USCIS immigration benefits.

USCIS said the benefits of using USCIS ELIS include filing applications and paying fees online, shorter processing times, and the ability to update user profiles, receive notices, and respond to requests electronically. The system also includes tools to combat fraud and identify national security concerns.

The USCIS notice is available *here*.

7. Department of Labor (DOL) Advises on H-2B Final Rule Injunction, Procedures for H-2B Labor Certifications

The Department of Labor (DOL) published a Federal Register notice on May 16, 2012, advising on the injunction the U.S. District Court for the Northern District of Florida placed on implementation of the H-2B 2012 final rule, published in February, and outlining procedures to be followed in seeking labor certification to file H-2B petitions. The notice states that employers must file H-2B labor certification applications under the 2008 H-2B rule, using those procedures and forms associated with the 2008 H-2B rule for which the Department has received an emergency extension.

The notice states that "this preliminary injunction necessarily calls into doubt the underlying authority of the Department to fulfill its responsibilities under the Immigration and Nationality Act and [Department of Homeland Security] regulations to issue the labor certifications that are a necessary predicate for the admission of H-2B workers." The Office of Foreign Labor Certification plans to post additional filing guidance on its *website*.

The Federal Register notice is available *here*.

8. USCIS Issues Precedent Decision on P-3 Performing Artist/Entertainer Nonimmigrant Visa Petition

U.S. Citizenship and Immigration Services' (USCIS) Administrative Appeals Office (AAO) issued a binding precedent decision on May 15, 2012, addressing the term "culturally unique" and its significance in adjudicating petitions for performing artists and entertainers.

The Skirball Cultural Center filed a P-3 nonimmigrant petition with USCIS' California Service Center (CSC) on behalf of a musical group from Argentina. The CSC denied the petition, holding that the cultural center failed to establish that the group's performance was "culturally unique." "[D]ue to the unusually complex and novel issue and the likelihood that the same issue could arise in future decisions," the CSC asked the AAO to review its denial.

The AAO reversed the CSC and approved the petition after its review of the entire record, which included expert written testimony and corroborating evidence on behalf of the musical group. The AAO noted that the regulatory definition of

"culturally unique" requires the agency to make a case-by-case factual determination. The decision clarified that a "culturally unique" style of art or entertainment is not limited to traditional art forms, but may include artistic expression that is deemed to be a hybrid or fusion of more than one culture or region.

The decision noted that Congress did not define the term "culturally unique" and the former Immigration and Naturalization Service (now USCIS) defined it in regulations as "a style of artistic expression, methodology, or medium which is unique to a particular country, nation, society, class, ethnicity, religion, tribe, or other group of persons."

The CSC decision denying the petition claimed that a hybrid or fusion style of music "cannot be considered culturally unique to one particular country, nation, society, class, ethnicity, religion, tribe, or other group of persons."

The AAO said that the CSC's reasoning was not supported by the record, noting:

> [T]he fact that the regulatory definition allows its application to an unspecified "group of persons" makes allowances for beneficiaries whose unique artistic expression crosses regional, ethnic, or other boundaries. While a style of artistic expression must be exclusive to an identifiable people or territory to qualify under the regulations, the idea of "culture" is not static and must allow for adaptation or transformation over time and across geographic boundaries. The term "group of persons" gives the regulatory definition a great deal of flexibility and allows for the emergence of distinct subcultures. Furthermore, the nature of the regulatory definition of "culturally unique" requires USCIS to make a case-by-case factual determination based on the agency's expertise and discretion. Of course, the petitioner bears the burden of establishing by a preponderance of the evidence that the beneficiaries' artistic expression, while drawing from diverse influences, is unique to an identifiable group of persons with a distinct culture. To determine whether the beneficiaries' artistic expression is unique, the director must examine each piece of evidence for relevance, probative value, and credibility, both individually and within the context of the entire record.

The decision is available here.

USCIS's announcements on this decision are available here.

9. USCIS Centralizes Filing, Adjudication of Certain Waivers of Inadmissibility

Beginning June 4, 2012, individuals abroad who applied for certain visas and have been found ineligible by a U.S. consular officer may mail requests to waive certain grounds of inadmissibility directly to a U.S. Citizenship and Immigration Services (USCIS) lockbox facility. This change affects where individuals abroad, who have been found inadmissible for an immigrant visa or a nonimmigrant K or V visa, must send their waiver applications.

Those filing waiver applications with a USCIS lockbox will now be able to track the status of their cases online. The change affects filings for:

- Form I-601, *Application for Waiver of Grounds of Inadmissibility*
- Form I-212, *Application for Permission to Reapply for Admission into the United States After Deportation or Removal*
- Form I-290B, *Notice of Appeal or Motion (if filed after denial of a Form I-601 or Form I-212)*

Applicants who mail their waiver request forms should use the address provided in the revised *form instructions on the USCIS website*. Applicants who wish to receive an e-mail or text message when USCIS has received their waiver request may attach *Form G-1145, E-Notification of Application/Petition Acceptance* to their application.

During a limited six-month transition period, immigrant visa waiver applicants in Ciudad Juarez, Mexico, may either mail their waiver applications to the USCIS lockbox in the United States or file in person at the USCIS office in Ciudad Juarez. USCIS said it is aware of the pending caseload for applicants in Ciudad Juarez and "is taking proactive steps to work through these cases." USCIS plans to increase significantly the number of officers assigned to adjudicate the residual cases filed before June 4 and those filed during the interim six-month transition period. USCIS has already begun testing this process and has transferred applications from Ciudad Juarez to other USCIS offices in the United States.

This change is separate and distinct from the *provisional waiver* proposal published in the Federal Register on March 30, 2012.

The USCIS announcement is available *here*.

Seyfarth Immigration Compliance Center

1. ICE Blankets the Country with Notices of Inspection; More to Come at End of June

U.S. Immigration and Customs Enforcement (ICE) issued approximately 2,000 Notices of Inspection (NOIs) to employers across the country at the end of May. NOIs require employers to submit original I-9 forms, together with other business documents and information, to ICE. After review of the I-9s, ICE may take several actions, including:

1. requiring employers to terminate the employment of individuals who are found not to be authorized to work in the U.S.;
2. requiring employers to correct errors found on the I-9s;
3. issuing a Notice of Intent to Fine, which may cause an employer to pay up to $1,100 in fines for each employee whose I-9 was found to be noncompliant; and/or
4. where ICE uncovers a pattern or practice of "knowingly" hiring or continuing to employ unauthorized workers, referring the case for criminal prosecution, which may result in additional fines and/or imprisonment.

ICE has indicated that it plans to issue another 1,000 NOIs at the end of June. Employers should be reminded that there are a number of steps that they may take to avoid fines, including (among others):

- providing I-9 training to all company representatives responsible for I-9 completion
- completing a voluntary audit of the company's I-9 forms and correcting all curable errors
- implementing a strong immigration compliance policy

Employers should also consider implementing a government investigation preparedness plan so that any location contacted by ICE is immediately able to work with the appropriate team members to quickly gather, review, and (where appropriate) correct the documentation and information requested by ICE.

Recent ICE Enforcement Actions Result in $Millions in Fines, Numerous Arrests

Since October 2011, ICE has issued a record number of Notices of Inspection (NOIs), collected approximately $9 million in fines and penalties, and issued final orders requiring employers to pay an additional $6 million in fines. In 2012, three employers have been ordered to pay $2 million each; a fourth employer was ordered by a court to pay $1 million in fines. In addition to monetary penalties, more than 90 managers have been arrested and criminally charged with immigration-related violations since October 2011.

Seyfarth Shaw's Immigration Compliance Center (ICC) partners with businesses to ensure preparedness for ICE inspections and to minimize the likelihood of fines and/or criminal prosecution. Our attorneys have extensive experience representing employers throughout the ICE inspection process. Please contact *Nici Kersey*, ICC Director, or any Seyfarth Shaw attorney to discuss the ways in which we can assist you.

2. NLRB Issues Guidance on Compliance Cases

The National Labor Relations Board (NLRB) issued guidance on May 4, 2012, to regions for investigating and litigating compliance issues under *Flaum Appetizing Corp.*, 357 NLRB No. 162 (Dec. 30, 2011). The memo acknowledges that the

Supreme Court in *Hoffman Plastics Compounds, Inc. v. NLRB*, 535 U.S. 137 (2002) concluded that the Immigration Reform and Control Act of 1986 (IRCA) bars the NLRB from awarding backpay to any individual who was not legally authorized to work in the United States during the backpay period. However, the NLRB noted that an employee's work authorization status generally is irrelevant to the merits of an unfair labor practice complaint; it only becomes a triable issue at the compliance stage. Nonetheless, the NLRB memo states, a respondent "may not use the compliance phase as a means to fish for disabling employee conduct under IRCA, i.e., no legal authorization for its employees to work in the United States."

In *Flaum*, the NLRB concluded that "IRCA does not require that the Board permit baseless inquiry into immigration status in every case in which reinstatement or backpay is granted." In the compliance phase, the NLRB memo says, regions should demand a full accounting of evidence upon which a respondent intends to rely to assert that employees are ineligible for backpay under *Hoffman Plastics*.

The NLRB memo also notes, among other things, that before *Flaum*, an employer was permitted to require discriminatees to complete the appropriate portion of the I-9 employment authorization verification form and submit appropriate documentation as a condition of reinstatement. "A reinstatement offer will no longer be considered valid if it is conditioned on re-verification of employment status," the NLRB memo states.

The memo is available *here*.

Seyfarth Immigration Events and News

An article co-authored by Angelo Paparelli was published in the April 25 issue of the New York Law Journal. The article, titled, "The Romney Candidacy and Presidential Citizenship," discusses the complexities of the recent Mitt Romney Mexican heritage debate and his eligibility for Mexican citizenship. In the last election, some had questioned President Barack Obama's constitutional eligibility for the presidency as a "natural-born citizen" due to his ostensible dual citizenship at birth and the divided loyalties this might cause. Now, Romney may be facing the same challenge. The article can be found *here*.

Speaking Engagements

Seyfarth Immigration Partner Angelo Paparelli spoke at a panel entitled, "**Please Make the Music Stop! Anticipating, Avoiding, & Attacking NIV RFEs,"** at the Annual Conference of the *American Immigration Lawyers Association* in Nashville TN on June 15, 2012. His talk focused on practical tips to avoid USCIS requests for additional evidence (RFEs) in work visa cases. His article for the panel was titled, *""I Hate [Bleep]ing Immigration Law" -- Whenever I Get an Unjust Request for Evidence."*

Angelo Paparelli also presented a panel discussion on June 6, 2012 in Pentagon City VA at the 40th Annual Symposium of the *American Council for International Personnel* with an accompanying slide deck entitled, *"A Bundle of Current Immigration issues Affecting the Consulting Industry and their Corporate Clients."*

Two Seyfarth lawyers, Nici Kersey (Director of *Seyfarth's Immigration Compliance Center*) and Angelo Paparelli, addressed *a national teleconference hosted by ILW.com, entitled "I-9/E-Verify For Experts*." Nici spoke on "Immigration Compliance Procedures, including: Acceptable Form I-9 Documents, Office of Special Counsel Issues, Proactively Preparing a Client, and Policies" (April 26, 2012). Angelo discussed "How to Respond to a Reactive ICE Audit: From Notice of Inspection to Mitigation to Notice of Intent to Fine" (June 14, 2012).

In addition, Angelo Paparelli has posted several new blog entries on his Nation of Immigrators public policy blog:

The President Has Spoken -- Can DHS Make the Immigration DREAM Come True?

How can DHS implement the deferred-action program for DREAMers? Angelo offers his suggestions.

L-1B Spécialité Horrifique: The Immigration War on the Consulting Industry (And Its Customers)

Angelo provides an explanation of why L-1B visas for intracompany transferees with specialized knowledge have become more difficult to obtain – even though the law and regulations have not changed since the early 90s. He also provides a link in this post to *"Access Denied,"* an in-depth report on the difficulty of obtaining L-1, B-1 and H-1B work visas that he co-authored with CLSA U – an affiliate of Credit Lyonnais Securities (Asia) – "to help fund managers understand the latest industry trends, investment theories and macro developments that impact the markets and sectors in which they invest."

Two Market-Based Proposals for Immigration Reform: Cap-and-Trade or Uncap-and-Grow?

An economics professor's recent proposal for market-based for immigration reform is replete with moral dilemmas, inequities and logistical impediments. Angelo proposes an alternative market-based reform plan based on the principles of simplicity, fairness, and economic growth.

With Hope Springing Eternally, ACUS Is Working on Immigration Again

The Administrative Conference of the United States makes a long-awaited return, and offers some practical administrative reforms which would make the immigration system more just and efficient.

Rendering unto the Immigration Caesars

Angelo takes a moment during Public Service Recognition Week to salute those dedicated public servants in the immigration sector who honor their oaths of office and strive to accomplish justice, leavened with compassion.

Immigration Inbox: News You Can Use is edited by *Angelo Paparelli*, *Jason Burritt*, and *John Quill*

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