



**Federal Bar
Association**

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

FRAUD AND WILLFUL MISREPRESENTATION

Panelists:

Maria Baldini-Potermine, Maria Baldini-Potermine & Assoc., Chicago, IL
Florence Chamberlin, Kids in Need of Defense (KIND), San Francisco, CA
Anam Rahman, Calderon Seguin, Fairfax, VA



**Federal Bar
Association**



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Fraud or Willful Misrepresentation

- INA 212(a)(6)(C)(i): “Any alien who, by fraud or willfully misrepresenting a material fact, seeks to procure (or has sought to procure or has procured) a visa, other documentation, or admission to the United States or other benefit provided under this chapter [of the INA] is inadmissible.”



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Definition of Fraud

- False representation of a material fact with knowledge of its falsity with intent to deceive the other party. *Matter of G-G-*, 7 I&N Dec. 161 (BIA 1956).
- Must succeed in this deception. *See Matter of Tijam*, 22 I&N Dec. 408, 424 (BIA 1998).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Fraud Elements

1. The person **procured or sought to procure a benefit** under immigration laws;
2. The person made a **false representation**;
3. The false representation was **willfully made**;
4. The false representation was **material**;
5. The false representation was **made to a U.S. government official**;



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Fraud Elements (Cont'd)

6. The false representation was made with the **intent to deceive** a U.S. government official authorized to act upon the request; and
7. The U.S. government **official believed and acted upon the false representation by granting** the benefit.
 - a. This element is not applicable if fraud based on person having “sought to procure” who was not successful in obtaining benefit. Still must show intent to deceive.
 - b. Ex. where fraud detected and benefit denied



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Definition of Willful Misrepresentation

Willful misrepresentation of a material fact but does not require an intent to deceive nor evidence that the officer believes or acted upon the false representation. *Matter of S- and B-C-*, 9 I&N Dec. 435, 448-49 (A.G. 1961).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Willful Misrepresentation Elements

1. The person **procured, or sought to procure**, a benefit under U.S. immigration laws;
2. The person made a **false** representation;
3. The false representation was **willfully made**;
4. The false representation was **material**; and
5. The false representation was **made to a U.S. government official**.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Fraud vs. Willful Misrepresentation

- Distinct actions but share common elements
- Willful misrepresentation = lesser included offense of fraud
- Fraud has additional two elements
 - Intent to deceive
 - Official believed/acted upon false misrepresentation
- So every person inadmissible for fraud ALSO inadmissible for willful misrepresentation
- BUT a person inadmissible for willful misrepresentation is not necessarily inadmissible for fraud



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Burden of Proof

- If seeking benefit, burden to establish admissibility is on the applicant. *See Matter of Arthur*, 16 I&N Dec. 558 (BIA 1978).
- If there is evidence that the applicant obtained or sought to obtain benefit under INA by fraud or misrepresentation, applicant will have opportunity to rebut finding by showing one or more of inadmissibility elements not met
- If government is alleging deportable under INA section 237(a)(1)(a) - inadmissible at time of entry, then burden would be on government to prove inadmissibility at time of entry.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Element: Procure or Seek to Procure --

1. An immigrant or nonimmigrant visa;
2. Other documentation;
 - a. Reentry permits
 - b. Refugee travel docs
 - c. Border crossing cards
 - d. U.S. passports
3. Admission to the United States; or
4. Other benefit provided under the INA.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Element: Procure or Seek to Procure --

Other Benefit Under the INA?

- Requests for extension/change of status
- Permission to reenter U.S.
- Waiver of 2-year foreign residency requirement
- EADs/parole
- Voluntary departure / voluntary return (new!)
- Adjustment of status
- Requests for stay of removal



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Element: Willfulness

Definition of willfulness: “The element of willfulness is satisfied by a finding that the misrepresentation was deliberate and voluntary.’ The INS does not need to show intent to deceive; rather, knowledge of the falsity of the representation will suffice.” *Matter of D-R-*, 25 I&N Dec. 445, 451 n.3 (BIA 2011).

Key considerations: knowing, intentional, deliberate



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Element: Willfulness

- Silence/failure to volunteer info does not in itself constitute fraud/willful misrepresentation because on its own does not establish knowing/deliberate concealment. However, could lead to finding if clear from evidence that person knowingly/deliberately concealed info. *See Matter of G-*, 7 I&N Dec. 9 (BIA 1953).
- Refusal to answer question also does not necessarily mean willful misrepresentation



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Element: Willfulness

Minors

- No bright line rule or statutory exception for minors
- Rather must consider all factors - age, education, background, mental capacity, understanding, other circumstances
- Must argue that child did not have capacity to know that information was false so misrepresentation could not have been willful



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Element: Materiality

Test = whether it can be shown by clear, unequivocal, and convincing evidence that the concealment/misrepresentation had a natural tendency to influence the decision. *See Kungys v. United States*, 485 U.S. 759 (1988).

When is there a tendency to influence?

1. Person would be inadmissible on true facts; or
2. Misrepresentation cuts off line of inquiry relevant to eligibility and which might have resulted in proper determination of inadmissibility



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Timely Retraction

- Timely retraction = misrepresentation eliminated as if it never happened
- Retraction must be voluntary and timely
- Must correct representation before being exposed and before conclusion of proceeding
- Doesn't count if recantation occurs after it becomes apparent disclosure of falsity is imminent. *See Matter of Namio*, 14 I&N Dec. 412 (BIA 1973).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Examples of Fraud or Willful Misrepresentation

- Criminal history (arrests, charges, convictions)
- Prior entries (ex. to avoid perm bar)
- Date of entry (ex. to qualify for TPS)
- Prior visa denials
- Use of other names
- Citizenship/nationality of other countries (ex. to obtain voluntary return as MX national)
- Use of another's or fraudulent entry docs



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Immigrant Visa Waiver: INA §212 (i)

PURPOSE: Waives the ground of inadmissibility at INA § 212(a)(6)(C)(i)

STANDARD: Must show extreme hardship to USC or LPR spouse or parent (*A child is not a qualifying relative for a waiver of fraud/misrepresentation*)

**exception for VAWA self petitioners - may show hardship to self, parent OR child*



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Extreme hardship factors include:

-Presence of USC/LPR family ties in the US; qualifying relative's family ties outside the U.S.; country conditions in the country of relocation and the qualifying relative's ties to that country; financial impact of departure; significant health conditions, especially when tied to unavailability of suitable medical care in the country of relocation. *Matter of Cervantes-Gonzalez*, 22 I & N Dec. 560, 566 (BIA 1999).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Other Factors to consider:

Economic disadvantage, loss of current employment, inability to maintain one's present standard of living, inability to pursue chosen profession, separation from family members, severing community ties, cultural readjustment...

MUST PROVE:

Extreme hardship if the qualifying relative remains in US and applicant departs **OR** if the qualifying relative has to accompany applicant to the home country



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

DISCRETION: Even if extreme hardship is established, the ‘record as a whole’ must warrant a favorable decision.

The underlying fraud can be used as an adverse factor in determining the case.

ADMINISTRATIVE/JUDICIAL REVIEW: Denial may be administratively appealed to the AAO. There is also administrative review by the IJ if the person is in removal and seeks relief. Generally there is no federal jurisdiction to review the denial of 212(i) waiver -unless agency fails to apply required factors in the case law.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

DOES NOT WAIVE:

INA §212 (a)(6)(F): Final order for document fraud in violation of INA 274C

INA §212(a)(6)(C)(ii): False claims to USC status made on or after Sept. 30, 1996 (waiver expressly covers only the first clause of §212(a)(6)(C))



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

FORM: I-601, filed in the U.S. **FEE:** \$930.00

Fee Waivers:

Available if exempt from the public charge grounds of inadmissibility in section INA §212(a)(4)

Available for ANY application or petition that is related to status as a:

- Battered spouse or Child, T, TPS, U, VAWA Self-Petitioner



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Refugee and Asylee Waivers under INA 209(c)

Refugee AOS: INA 209(a); Form I-602, no fee

Asylee AOS: INA 209(b); Form I-602, no fee

No Waiver Available:

- Controlled Substance Trafficker, INA

 - 212(a)(2)(C)

- Security and Related Grounds, INA 212(a)(3)(A),
(B), (C)



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

-- Nazi Persecution, Genocide, Torture, or
Extrajudicial Killing, INA 212(a)(3)(D), (E)
Exception for involuntary Nazi membership or
past membership

Waiver DOES cover health-related grounds and false
claims of U.S. citizenship as well as crimes not listed
above.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Standard: Humanitarian purposes, family unity,
and/or public interest.

In re K-A-, 23 I. & N. Dec. 661, 664-67 (B.I.A. 2004).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Issues:

- Termination of refugee status: where fraud in underlying refugee application.
 - Matter of D-K-, 25 I. & N. Dec. 761, 2012 WL 1386855 (B.I.A. 2012) (holding that a refugee who has not adjusted his status to become a lawful permanent resident may be placed in removal proceedings and must be charged with the grounds of deportability).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- Termination of asylee status: INA 208(c)(2)
 - Ceases to be a “refugee” under INA 101(a)(42)(A) due to fundamental change in circumstances
 - National security risk
 - Criminal acts, including particularly serious crime and aggravated felony conviction. INA 208(b)(2)(A)(ii); 8 .F.R. §§ 1208.13(c)(2)(i)(D), 1208.24(a)(3)
 - Persecutory acts



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- Termination of asylee status:
 - Firm resettlement in a foreign country
 - May be removed to safe third country under bilateral or multilateral agreement
 - Has returned to country of nationality as actual or potential permanent resident
 - Has acquired a new nationality and enjoys the protection of his/her new nationality.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- AG **may** terminate asylee status under INA 208(c)(2) but termination is not mandatory.
 - *Matter of K-A-*, 23 I&N Dec. 661 (BIA 2004) (termination is not mandatory where asylee merits AOS and waiver under INA 209(c))
 - Grant of asylum is not an admission.
 - 212(a) grounds apply in removal proceedings.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- 212(a) grounds apply in removal proceedings for asylees versus refugees to whom 237(a) grounds apply.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- *Matter of V-X-*, 26 I&N Dec. 147 (BIA 2013) (IJ should ordinarily make a threshold determination regarding the termination of asylum status before resolving issues of removability and eligibility for relief from removal)



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- Matter of V-X-, 26 I. & N. Dec. 147 (B.I.A. 2013) (holding that where termination of asylee status occurs in conjunction with removal proceedings, the immigration judge should make the threshold determination regarding termination of asylee status before resolving removability and eligibility for relief from removal).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Resources:

Refugees: USCIS Policy Manual, Vol. 7, Chapter 3, Part L:

[https://www.uscis.gov/policymanual/
HTML/PolicyManual-Volume7-PartL-Chapter3.html](https://www.uscis.gov/policymanual/HTML/PolicyManual-Volume7-PartL-Chapter3.html)

Asylees: USCIS Policy Manual, Vol. 7, Chapter 3, Part M:

[https://www.uscis.gov/policymanual/HTML/
PolicyManual-Volume7-PartM.html](https://www.uscis.gov/policymanual/HTML/PolicyManual-Volume7-PartM.html)



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Pennsylvania State University Dickinson School of Law's Center for Immigrants' Rights, Boston University School of Law Immigrants' Rights Clinic, and the Pennsylvania Immigration Resource Center have published the “Refugee and Asylee Adjustment Toolkit: A Comprehensive Resource for Refugees and Asylees,” 2016, available at [http://pennstatelaw.psu.edu/sites/default/files/Refugee and Asylee Adjustment Toolkit.pdf](http://pennstatelaw.psu.edu/sites/default/files/Refugee%20and%20Asylee%20Adjustment%20Toolkit.pdf).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

INA 212(d)(3) Waiver

- Nonimmigrant visa applicant who is inadmissible under INA 212.
- Not available for espionage, sabotage, other unlawful activities, or activities to oppose, control, or overthrow the U.S. government; entry to or proposed activities in the U.S. can undermine United States foreign policy; torture, extrajudicial killings, or genocide, or who were Nazis who participated in persecuting others.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- Legal Standard: 3-part test
 - Any risks of harm to society if the person is granted a Hranka waiver;
 - The seriousness of the applicant's previous criminal records or immigration violations (if applicable); and
 - The nature of the person's reasons for seeking entry into the U.S.

Balance of totality of circumstances.

Matter of Hranka, 16 I&N Dec. 491 (BIA 1978)



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- For use in types of visas:
 - Nonimmigrant visas: Written request is filed with DOS
 - U visa applicants in removal proceedings: Form I-192 is filed with Immigration Court.
 - Form I-192: \$930 fee paid to USCIS or Form I-918 fee waiver application.
 - Copies of Form I-192, fee receipt or I-918 approval notice: file with Immigration Court.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

IJ has jurisdiction over INA 212(d)(3) waiver?

- YES: *L.D.G. v. Holder*, 744 F.3d 1022 (7th Cir. 2014); *Baez-Sanchez v. Sessions*, 872 F.3d 854 (7th Cir. 2017); *Meridor v. U.S. Attorney General*, 891 F.3d 1302 (11th Cir. 2018).
- NO: *Matter of Khan*, 26 I. & N. Dec. 797 (BIA 2016); *Sunday v. Attorney General United States of America*, 832 F.3d 211 (3d Cir. 2016).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

T VISA WAIVER

INA 212 (d) (13) Permits the AG discretion to waive health related and public charge grounds and any other ground of inadmissibility (except security and related, int'l. child abduction, former USC who renounces) if the activities were *caused by or incident to* a severe form of trafficking.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

U VISAS

INA 212 (d)(14) - Provides that all grounds of inadmissibility can be waived **by DHS** if it is in the '**public or national interest**' -- (*except for* INA 212 (a)(3)(E) (Nazis, genocide, torture, extrajudicial killings))

- If criminal grounds - USCIS will consider the number and severity of the offenses
- "Extraordinary Circumstances" - for violent or dangerous crimes or inadmissibility for security or related grounds under INA 212(a)(3)
- No Appeal;
- *L.D.G. v. Holder* Decision-U visa applicant who requires a waiver of inadmissibility can apply to both USCIS and an IJ. He or she may obtain an INA § 212(d)(14) or INA § 212(d)(3)(A) waiver from USCIS or an INA § 212(d)(3)(A) waiver from an IJ



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

INA § 212(d)(3)

- Broad discretionary waiver by the Attorney General
- *Matter of Hranka*, 16 I & N Dec. 491 (BIA 1978) factors:
 - Risk of harm to society if the applicant is admitted
 - Seriousness of immigration violations or criminal violations
 - Reasons for wanting to enter the US

Foreign Affairs Manual: ‘The law does not require that such action be limited to humanitarian or other exceptional cases. While the exercise of discretion and good judgment is essential, officials may recommend for any legitimate purpose...’



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Practice Pointers

- Identify all possible grounds of inadmissibility:
File (FOIA) with USCIS, CBP, Dept. of State, etc.
Criminal background checks
Include explanations for inadmissibilities in declaration
and the I-192 supplement
If before the IJ seek on the record statement from ACC
that no other grounds apply; If fee waiver requested
obtain IJ order



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Practice Pointers cont'd.

Juveniles:

- Request ORR file for juveniles
- Is the client really inadmissible? Juvenile delinquency adjudications are not convictions
- Capacity to commit bad act
- Duress



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

INA 212(d)(11): Smuggling Waiver

Definition of smuggler: “Any person who knowingly has encouraged, induced, assisted, abetted, or aided any other alien to enter or try to enter the United States in violation of law is inadmissible.” INA 212(a)(6)(E)(i); INA 237(a)(1)(E)(i).

- Exception for Family Unity applicants: act took place before 5/5/1988 and applicant was physically present in US on 5/5/1998. INA 212(a)(6)(E)(ii).



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Affirmative and Knowing Act are required. Mere presence during an act of smuggling should not be enough.

INA 212(d)(11): Waiver is available only for smuggling one's:

- Parent, spouse, son, or daughter.
 - Relationship must have existed at the time of the smuggling.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- Who can apply:
 - Lawful permanent resident who proceeded abroad voluntarily, is not under removal order, and is otherwise admissible.
 - Applicant for an immigrant visa as immediate relative or immigrant under INA 203(a) (not (a)(4))
 - Applicant for adjustment of status as immediate relative or immigrant under INA 203(a) (not (a)(4))



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- Legal Standard: Humanitarian purposes, family unity, or public interest.
- Form I-601: \$930 filing fee.
 - If intending immigrant or applicant for adjustment of status based on a family-visa petition, think twice about requesting a fee waiver and public charge ground of inadmissibility.



Federal Bar
Association



Federal Bar
Association

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

- Resources:

- Immigrant Legal Resource Center, "Alien Smuggling: What it is and how it can affect immigrants," Jul. 2017, available at https://www.ilrc.org/sites/default/files/resources/alien_smuggling_practice_advisory-20170718.pdf
- Public Counsel and CLINIC, "Working with Child Clients and Their Family Members in Light of the Trump Administration's Focus on 'Smugglers,'" 2017, available at <https://cliniclegal.org/sites/default/files/resources/defending-vulnerable-populations/Working-with-Child-Clients-and-Their-Family-Members-in-Light-of-the-Trump-Administrations-Focus-on-Smugglers.pdf>



Federal Bar
Association



**Federal Bar
Association**

IMMIGRATION LAW CONFERENCE

May 17–18, 2019

AT&T Conference Center • Austin, TX

Q&A



**Federal Bar
Association**