



DE MOTT McCHESNEY
CURTRIGHT & ARMENDÁRIZ
LLP

April 22, 2015 EK551921744US

State Bar Chief Disciplinary Counsel's Office
P.O. Box 13287
Austin Texas, 78711

Re: [REDACTED] Bar Card Number: [REDACTED]

In the Matters of [REDACTED] (A[REDACTED]), his wife, [REDACTED]
[REDACTED] (alien registration number unknown), and their child [REDACTED]
[REDACTED] (alien registration number unknown).

Dear Sir or Madam:

Please accept this letter and the accompanying documents as a grievance brought by Mr. [REDACTED], his wife [REDACTED] against attorney [REDACTED]¹

Mr. [REDACTED] and his wife are victims of [REDACTED] unethical and illegal conduct. [REDACTED] and persons in his employ charge exorbitant fees to undocumented immigrants to file affirmative asylum applications with the federal government for the purpose of obtaining work authorization in connection with those applications and [REDACTED] and his office staff do so even where these persons – such as Mr. [REDACTED] and his wife – are indisputably ineligible for asylum. These asylum applications oftentimes contain false and fabricated information is the case with the [REDACTED] family's application. The typical pattern with [REDACTED] victims is that the government declines to grant asylum and then commences removal proceedings to deport the non-citizen and any non-citizen family members who were included in the asylum application. The undocumented immigrants targeted by [REDACTED] are uneducated, completely unfamiliar with the U.S. legal system, and desperate for work authorization.

¹ Other clients of the undersigned have brought separate complaints against [REDACTED] under identical circumstances. See [REDACTED] and [REDACTED] and [REDACTED] Those complaints are currently pending.

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It is the promise of work authorization that ensnares these persons in [REDACTED] scheme. No reasonable and ethical lawyer would engage in this conduct. Moreover, [REDACTED] universally fails to communicate to these persons enough information to understand that their asylum applications have a near 100% chance of failure and, in the inevitable event of failure, the government will – in the absence of an exercise of prosecutorial discretion – initiate removal proceedings to deport them.

As explained below, Mr. [REDACTED] and his wife retained [REDACTED] office to pursue work authorization. In order to obtain work authorization, [REDACTED] office filed an asylum application on their behalf and on behalf of their child despite Mr. [REDACTED] and his wife being entirely unaware that they were ineligible for asylum and entirely unaware of the risk of deportation to which [REDACTED] was subjecting them. [REDACTED] unethical conduct has put the entire [REDACTED] family (with the exception of the U.S. citizen child) at great risk of deportation.

Asylum Background

Any noncitizen who is “physically present” or “arrives” in the United States may apply for asylum.² To obtain asylum, the applicant must demonstrate either past persecution or a well-founded fear of future persecution on account of race, religion, nationality, membership in a particular social group, or political opinion.³ An individual can apply for political asylum affirmatively or defensively. If immigration officials have not apprehended the individual, he or she may affirmatively apply before the Asylum Division of U.S. Citizenship and Immigration Services (“USCIS”) asylum office⁴ within one year of entering the United States⁵ by filling out and submitting Form I-589.⁶

Affirmatively filing an asylum application is a very serious matter. It necessarily brings the alien to the immediate attention of the immigration authorities and any information provided can and will be used, in the event of denial, not only as a basis to

² 8 USC § 1158(a)(1).

³ 8 U.S.C. §§ 1101(a)(42)(A), 1158(b)(1)(B)(i).

⁴ See 8 C.F.R. § 208.2(a).

⁵ See INA 208(a)(2)(B); 8 C.F.R. § 1208.4(a)(2)(A). There is a strict one-year deadline. The only exception to this one-year deadline is where the alien can demonstrate “either the existence of changed circumstances which materially affect the applicant’s eligibility for asylum or extraordinary circumstances relating to the delay in filing an application within the [initial one year] period” 8 U.S.C. 1158(a)(2)(D).

⁶ See 8 C.F.R. § 208.3(a).

commence removal proceedings but also to satisfy the government's burden of proof in such proceedings.⁷ In other words, by filing an asylum application, the average undocumented alien is giving the government everything it will need to later deport him or her in the event of denial. There are other serious considerations as well. Knowingly placing false information on the Form I-589 is subject to severe civil and criminal penalties.⁸ And knowingly filing a "frivolous application," defined as one in which "any of its material elements is deliberately fabricated" will render the applicant "permanently ineligible for any benefits" under the Immigration and Nationality Act ("INA"), 66 Stat. 163, 8 U.S.C. § 1101 *et seq.*⁹ Being permanently ineligible for benefits under the INA means, in effect, that the person can never immigrate legally.¹⁰

In the case of an affirmatively filed request for asylum, if USCIS declines to grant asylum, the case is generally referred to the immigration court for removal proceedings under the Executive Office of Immigration Review (EOIR).¹¹ The individual may then renew his or her asylum request by pursuing it "defensively" in court¹² and, at the same time, the individual may seek withholding of removal¹³ and relief under the Convention Against Torture (CAT).¹⁴ Both withholding of removal and CAT have higher burdens of proof than asylum and, unlike asylum, neither offers any path to permanent resident status.¹⁵ Worse yet, in those cases where an immigration judge denies asylum but

⁷ See 8 C.F.R. § 1208.3(c).

⁸ See e.g., 8 C.F.R. § 208.3(c); 8 U.S.C. 1324c; 18 U.S.C § 1546.

⁹ 8 C.F.R. §§ 208.3(c)(5) and 208.20.

¹⁰ See *Efe v. Ashcroft*, 293 F.3d 899, 903 (5th Cir. 2002) (stating same with regard to asylum proceeding); *Pavlov v. Holder*, 697 F.3d 616 (7th Cir. 2012) (alien's false statements on asylum application triggered permanently ineligibility for benefits under INA, including adjustment of status, whether or not those false statements are made to an immigration court).

¹¹ See 8 C.F.R. § 208.14(c).

¹² See 8 C.F.R. § 1208.2(b).

¹³ Under the withholding of removal statute, 8 U.S.C. § 1231(b)(3)(A), the government may not remove an alien to a country where his "life or freedom would be threatened ... because of the alien's race, religion, nationality, membership in a particular social group, or political opinion."

¹⁴ See The United Nations Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Convention Against Torture), Dec. 10, 1984, 1465 U.N.T.S. 85. See § 2242 of the Foreign Affairs Reform and Restructuring Act of 1998, Pub.L. No. 105-277, codified at 28 U.S.C. § 1231 (1998).

¹⁵ Under the CAT, an alien must "establish that it is more likely than not that [he] ... would be tortured if removed" to his country of origin. 8 C.F.R. § 208.16(c)(2). CAT claims differ from claims of asylum and statutory withholding of removal claims because the alleged mistreatment need not involve one of the five categories of race, religion, nationality, membership in a particular social group or political

grants withholding of removal, the decision must include an explicit order of removal.¹⁶ This is because a grant of withholding of removal does not afford the grantee any permanent right to remain in the United States.¹⁷ In fact, a grant of withholding does not even prevent the government from removing the alien to a country different than the one to which removal has been withheld.¹⁸

Asylum law allows an applicant to apply for work authorization¹⁹ by filing Form I-765.²⁰ Filing fraudulent and frivolous applications for asylum on behalf of unsuspecting immigrants for the purpose of charging them money to obtain work authorization has been happening for decades by unscrupulous persons.²¹

Department of Homeland Security (“DHS”) records for 2013, which is the latest year for which statistics are currently available, indicate that for Mexicans pursuing asylum affirmatively, USCIS granted only 209 out of 15,266 total applicants – an approval rate of less than 1.4%.²² In 2014, for Mexicans pursuing asylum defensively, EOIR granted 124 out of 8840 applicants – an approval rate of 1.4%.²³ Given the

opinion and because proof of likely torture, not simply persecution, is required. Zhang v. Gonzales, 432 F.3d 339, 344 – 45 (5th Cir. 2005).

¹⁶ Matter of I-S- & C-S-, 24 I&N Dec. 432 (BIA 2008).

¹⁷ See id.

¹⁸ 8 C.F.R. § 1208.16(f).

¹⁹ 8 U.S.C. § 1158(d)(2); 8 C.F.R. § 208.7; 8 C.F.R. § 274a.12(c)(8); 8 C.F.R. §§ 274a.13(a)(1) and (2); 8 C.F.R. § 1208.7.

²⁰ 8 C.F.R. § 208.7.

²¹ See Immigration Consultants Sentenced for Filing Bogus Asylum Applications, USCIS website news release (available at <http://www.uscis.gov/news/news-releases/immigration-consultants-sentenced-filing-bogus-asylum-applications>); Asylum Fraud in Chinatown: An Industry of Lies, New York Times, Feb. 22, 2014 (available at <http://www.nytimes.com/2014/02/23/nyregion/asylum-fraud-in-chinatown-industry-of-lies.html>); Anti-Fraud and Security Safeguards in the Asylum System, Human Rights First, Oct. 2010 (“Unscrupulous ‘notarios’ and attorneys take advantage of immigrants by untruthfully telling them they are eligible for certain benefits and then preparing fraudulent applications – including asylum applications – for large fees.”) (available at http://www.humanrightsfirst.org/wp-content/uploads/pdf/ANTI-FRAUD_AND_SECURITY_SAFEGUARDS_IN_THE_ASYLUM_SYSTEM.pdf).

²² See Index, pg. 29 (2013 DHS Yearbook of Immigration Statistics; Individuals Granted Asylum Affirmatively by Region and Country of Nationality: Fiscal Years 2004 to 2013) (available at <http://www.dhs.gov/yearbook-immigration-statistics-2013-refugees-and-asylees>). The undersigned could not locate statistics on the total number of Mexicans who sought asylum affirmatively in recent years.

²³ See Index, pg. 31 (EOIR 2014 Asylum Statistics available at <http://www.iustice.gov/eoir/efoia/FY2010-FY2014-Asylum-Statistics-by-Nationality.pdf>).

indisputable fact that, statistically, just about no one wins these cases, no reasonable and competent lawyer who cares one whit about his client's interests would ever agree to affirmatively apply for asylum on behalf of a Mexican or encourage such a person to do so unless that person was within the deadline (one year from arrival²⁴); had an incredibly well documented and legally well founded case; and fully understood the overwhelming risks of denial and deportation.

██████████ history of dishonesty, theft, incompetence, criminality, alcohol abuse and financial mismanagement.

██████████ has a history of dishonesty, theft, incompetence, criminality, alcohol abuse and financial mismanagement. This is not an ad hominem attack. Understanding ██████████ history is relevant and necessary to understanding his lack of credibility, his incentives to engage in the complained of conduct and, most importantly, his incapacity for complying with his legal and fiduciary obligations to his clients.

In 2003, ██████████ had a client who had been deported to Mexico. After his deportation, an employee of ██████████ took all the money (\$9,875.56) out of a bank account belonging to that client and had it put it into a check made payable to, and cashed by, ██████████ law office.²⁵ Later, when the client made a bar complaint, ██████████ had no explanation for what became of the money and falsely testified to the grievance committee that he did not know the employee who withdrew the money when, in fact, the employee was ██████████ own brother-in-law.²⁶ The power of attorney that was used to commit this fraud was itself fraudulently notarized by another employee of ██████████ and ██████████ admitted that it could only have been done at his direction.²⁷ Despite this being an apparent act of felony theft²⁸ committed against someone with whom he had a fiduciary duty, ██████████ appears to have faced no criminal prosecution. He kept his law license and was given a fully probated suspension.

²⁴ See 8 C.F.R. § 208.3(a).

²⁵ See Agreed Judgment of Fully Probated Suspension, Commission for Lawyer Discipline v. ██████████ Cause No. ██████████ Grievance Committee, State Bar of Texas District No. 06A.

²⁶ See id.

²⁷ See id.

²⁸ See Tex. Pen. Code. § 31.03(e)(4).

In 2014, he was found to have committed professional misconduct against at least five other clients.²⁹ This misconduct included, *inter alia*: failing to keep his client's reasonably informed about the status of their cases; failing to explain to his client's their cases so that they could make informed decisions regarding representation; failing to take steps to protect their interests; failing to return unearned fees; failing to surrender the file; failing to completely carry out obligations owed; failing to obtain written consent prior to using outside counsel; and failing to supervise non-attorney staff such as to ensure that their conduct was compatible with his professional obligations.³⁰

Over the years, [REDACTED] has been arrested for theft, assault, and multiple instances of driving while intoxicated.³¹ In 2002 he was sued by a non-citizen client for malpractice, fraud and breach of contract and [REDACTED] filed for bankruptcy.³²

[REDACTED] Mass Asylum Program and the False Promise of Reform

Despite the near certainty of denial for affirmative asylum applicants from Mexico, [REDACTED] is running what he calls an "Asylum Program," the goal of which is to charge as many non-citizens as possible to file for asylum regardless of personal circumstances and legal eligibility.

Attached is a mass letter³³ (translated) that [REDACTED] sends to clients in which he congratulates his clients participating in his "Asylum Program" on their work authorization and the improvements in their lives that it has brought, exhorts them to continue to send him money, and encourages them to send "friends, neighbors, and family members or others ... that could use the same benefits ... [because] it is important to project [sic] as many families as possible."³⁴

He makes a non-existent connection between his Asylum Program and what he calls the New Immigration Reform not because there is any connection between asylum

²⁹ See Agreed Judgment of Probated Suspension, Commission for Lawyer Discipline v. [REDACTED] Cause Nos. [REDACTED] [REDACTED] [REDACTED] [REDACTED] Grievance Committee, State Bar of Texas District No. 10-2.; Agreed Judgment of Probated Suspension, Commission for Lawyer Discipline v. [REDACTED] Cause No. [REDACTED] Grievance Committee, State Bar of Texas District No. 10-1.

³⁰ See *id.*

³¹ This is according to the information available on Westlaw.com. See Tab H.

³² See Index, pg. __ (Memorandum Opinion, In Re: [REDACTED] [REDACTED] and [REDACTED] No. [REDACTED] [REDACTED] [REDACTED] (Bankr. N. D. TX. [REDACTED] [REDACTED] [REDACTED])

³³ See Index, pgs. 50 – 54.

³⁴ See *id.*

law and immigration reform but because immigration reform is something his clients understand and deeply desire:

With the New Immigration Reform that will be done this year, it is very important to [protect] as many of our people as possible. And you all can take advantage of the Asylum Program and also in the future of the New Reform. Please help me help more families as we helped you. We are extending this program to help more people. Any person who has more than 3 years in the United States, it is possible that we could help [them] today. And the information about if you qualify or not, is free, that is to say without any cost.³⁵

He implores them in about a half a dozen different ways to continue to send him money, promising them that if they “continue making ... monthly payments” on his Asylum Program, then they “will have already paid for the Immigration Reform work” but if they “are “behind on payments,” they “will not be able to make use our services.”³⁶

Needless to say, there has been no immigration reform out of Congress. No attorney can ethically promise that there will be any comprehensive immigration reform. No attorney can ethically charge legal fees towards any future hypothetical comprehensive immigration reform. And there is no connection whatsoever between present eligibility for asylum and future eligibility for any such reform.

████████████████████ and the ██████████ family

████████████████████ and his wife ██████████ have two children, ██████████ and ██████████. ██████████ is sixteen years old and ██████████ is thirteen. Mr. ██████████ his wife and ██████████ are Mexican citizens. ██████████ is a United States citizen. Mr. ██████████ his wife and ██████████ have been in the United States since January of 2005.³⁷ Mr. ██████████ and his wife are uneducated.³⁸ They were referred to ██████████ by a produce vendor that Mr. ██████████ met at the restaurant at

³⁵ See *id.*, pg. 52.

³⁶ See *id.*, pg. 53.

³⁷ See Index, pg. 1, ¶¶ 1 – 3 (affidavit).

³⁸ See *id.*, ¶ 6.

which he is employed.³⁹ The produce vendor had obtained a work permit through ██████ so he thought that Mr. ██████ might be able to do the same. Mr. ██████ met with ██████ by himself for the first time in August of 2014.⁴⁰

When Mr. ██████ arrived to the office, after speaking to the secretary up front, he spoke to ██████ for only a few minutes. It was a very brief conversation. ██████ asked about where Mr. ██████ was working, how and when had he had come into the country, and he asked about his family. He said that, with his legal entry, his number of years here, and his U.S. citizen child, he could get him a work permit. Mr. ██████ asked him if he could do the same for his wife and ██████ said that he could. He did not mention filing for asylum. ██████ did not ask Mr. ██████ whether he was afraid to go back to Mexico or anything similar.⁴¹ ██████ did not explain what asylum is or what it takes to be eligible for it. The whole meeting with ██████ lasted about 5 minutes and he assured Mr. ██████ that he would get him and his wife work permits but he did not specify a specific legal route by which he would do so. After the short conversation, ██████ had Mr. ██████ speak to an assistant whose name is believed to have been ██████.⁴²

The conversation with ██████ was also brief. ██████ repeated ██████ claim that with his legal entry, his number of years here, and his U.S. citizen child, he could get them work permits. ██████ asked Mr. ██████ why he had come into the U.S. and Mr. ██████ told him that he had come to work. He asked Mr. ██████ about violence in Mexico, whether anyone in the family had been killed or hurt. Mr. ██████ told him that a cousin was killed many years ago (after they were already in the U.S.) but that no one knew who did it or why.⁴³ Mr. ██████ also told him that one time while attending a dance in ██████ approximately 18 years ago when he was about 17 years of age, Mr. ██████ was physically assaulted by some men who were police officers, sprayed with pepper spray and thrown out of the dance by them. The next day Mr. ██████ father and he went to the police delegation in ██████. His father informed the officers that his father (Mr. ██████ grandfather) were good friends with the municipal president and that he would be sure he found out about this incident. The officers then pleaded with Mr. ██████ father to not involve the municipal president. Mr. ██████ told

³⁹ See *id.*, ¶ 7.

⁴⁰ See *id.*, ¶ 7.

⁴¹ See *id.*, ¶ 8.

⁴² See *id.*, ¶ 9.

⁴³ See *id.*, ¶ 10.

█████ that this was the end of the ordeal and the officers did not bother him again.⁴⁴ Talking about that incident at the time with █████ seemed strange to Mr. █████ because he did not understand the relevance of any violence in Mexico to his need for work permits. █████ said that the process of getting a work permit would cost \$6000 and he needed \$2000 to start. At no time, during that first meeting with █████ did █████ mention applying for asylum.⁴⁵

One or two weeks later, Mr. █████ and his wife returned to █████ office. They spoke to █████ again and not █████ The \$2000 deposit was paid. They signed a contract agreement with █████ office written in English, a language they cannot read. No one read it to them in Spanish.⁴⁶ Mr. █████ wife asked █████ how he was going to get them work permits. █████ mentioned that it would be necessary to have their fingerprints taken and have an appointment of some sort in Houston. Mr. █████ wife asked him why an appointment in Houston would be needed. █████ responded by saying that a judge would need to decide whether to grant the permit or not. This was all very confusing to Mr. █████ and his wife. They asked him what would happen if the judge denied it and he said that they would appeal the decision. █████ said that the chance of failure was very small, that they had an almost 100% chance of success but that if the judge denied it, they would appeal the decision. █████ mentioned no other possible consequences. █████ never mentioned the word "asylum" nor did he mention anything about the possibility of any deportation proceeding or any risk of deportation.⁴⁷

On that date, █████ filled out what Mr. █████ and his wife later learned to be asylum applications. These forms were later sent to the government. These forms contain numerous instances of falsified information as outlined in Mr. █████ and his wife's attached declaration.⁴⁸ These falsifications relate to everything from Mr. █████ manner of entry into the U.S. to fabricated factual bases for asylum. After █████ was done asking questions, he did not read what he had written down back to Mr. █████ and his wife in Spanish.⁴⁹

Several weeks later, Mr. █████ and his wife got papers in the mail. Their daughter read the papers and it was at that time – for the first time – that Mr. █████ and his wife

⁴⁴ See *id.*, ¶ 11.

⁴⁵ See *id.*, ¶ 12.

⁴⁶ See *id.*, ¶ 13.

⁴⁷ See *id.*, ¶ 14.

⁴⁸ See *id.*, ¶¶ 16 – 21.

⁴⁹ See *id.*, ¶ 16.

learned that the appointment notice was for an asylum hearing and not for employment authorization. This confused and surprised them since neither ██████ nor ██████ had ever mentioned filing for asylum.⁵⁰

They then contacted the undersigned for a second opinion after realizing that things were not right with ██████ or his staff. They now understand that to be granted asylum as Mexican nationals is very rare; that they would not qualify for it; and that, by applying for it, ██████ put them in danger of deportation. The fact that ██████ was filing for asylum on their behalf was never made clear to them by ██████ or by any of his staff and they would never have allowed ██████ to file anything on their behalf if they had known that he was putting them at risk of deportation.⁵¹

████████ Professional Misconduct.

████████ violated, *inter alia*, Rules 1.01 (Competent and Diligent Representation), 1.03 (Communication), 1.04 (Fees), 1.15 (Declining or Terminating Representation), 2.01 (Advisor), 3.01 (Meritorious Claims and Contentions), 3.03 (Candor Toward the Tribunal), 3.10 (Advocate in Non-adjudicative Proceedings), 4.01 (Truthfulness in Statements to Others), 5.03 (Responsibilities Regarding Nonlawyer Assistants), and 5.05 (Unauthorized Practice of Law), and 7.02 (Communications Concerning a Lawyer's Services).

████████ failed to make reasonable efforts to ensure that the conduct of his non-attorney employees was compatible with his professional obligations as a lawyer. Both ██████ and non-attorney employees misrepresented to Mr. and Mrs. ██████ that they were eligible for work authorization and failed to explain to them their intention to file for asylum on their behalf. Both ██████ and non-attorney employees failed in their duty to explain to Mr. ██████ and his wife the legal requirements for asylum eligibility and the extraordinary legal risks involved in applying for it so that they could make an informed decision regarding representation. ██████ non-attorney employee filled out the asylum application with information that did not even come from Mr. ██████ or his wife. With knowledge of that course of conduct, ██████ ordered, encouraged, or permitted it and failed to take reasonable remedial action to avoid or mitigate the consequences of it. ██████ signed and submitted the asylum application to the federal

⁵⁰ See *id.*, ¶ 22.

⁵¹ See *id.*, ¶¶ 23 – 24.

government with knowledge that his clients were never eligible for the requested relief and that it contained material misrepresentations. ██████ accepted the legal representation of Mr. ██████ and his wife and charged them for his conduct even though they were ineligible for asylum to begin with and had zero chance of success.

A lawyer must act with competence, commitment and dedication to the interest of the client and with zeal in advocacy upon the client's behalf. Rather than acting with competence, commitment and dedication to his client's interest, ██████ for a fee, engaged in conduct that put his clients at direct risk of deportation and very serious civil penalties.

Over and above his violations of the Texas ethics rules governing attorney conduct, ██████ conduct is worthy of civil and criminal penalties. ██████ signed the Form I-589 in this case as the preparer despite the fact that he did not prepare the form. See e.g., Index, pg. 21. When the preparer of the Form I-589 is someone other than the non-citizen him or herself, that preparer must, by signed declaration, swear that the application is "based on all information of which I have knowledge, or which was provided to me by the applicant, and that the completed application was read to the applicant in his or her native language ... before he or she signed the application in my presence." The preparer makes this declaration attesting to his "aware[ness] that the knowing placement of false information on the Form I-589 may also subject me to civil penalties under 8 U.S.C. § 1324C and/or criminal penalties under 18 U.S.C. 1546(a)." See e.g., Index, pg. 21. As previously explained, the Form I-589 in this case is full of both false information and information that was not provided to ██████ (or anyone else in his office) by Mr. ██████ or his wife. The form was not signed in ██████ presence. And at no time was the completed I-589 read to Mr. ██████ and his wife in Spanish in ██████ presence or in the presence of anyone else in his office, all in violation of ██████ sworn declaration.

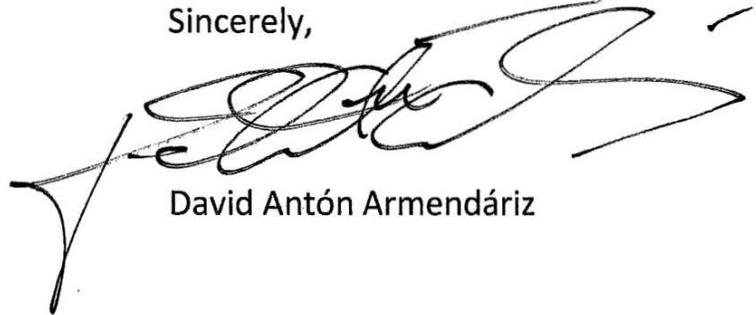
Conclusion

Mr. and Mrs. ██████ and their child are but a few examples of how ██████ is wreaking havoc on innumerable lives by taking advantage of people's ignorance of the law and financial desperation for work authorization. He is putting them at high risk for not only deportation proceedings but also civil and criminal penalties and his victims are generally ignorant of his malfeasance until it too late to do anything about it. ██████ is hoping that your office consider his actions simply a matter of strategy, that you look at this case as just another immigration case that is too complicated to investigate. It is

not. It is a case of clear and simple fraud. It is a case of an attorney acting out of greed and indifference to the damage caused to others.

██████████ is currently within a period of probated license suspension. Mr. and Mrs. ██████████ and their children request that an evidentiary hearing be held and that ██████████ be compelled to divulge how many persons he has put through his fraudulent Asylum Program. They further request that ██████████ probation and license be revoked and that he be required to disgorge all fees paid and reimburse all legal fees incurred as a result of his malfeasance.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Antón Armendáriz', written over a horizontal line. The signature is stylized and cursive.

David Antón Armendáriz

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