

COUNCIL OF THE CITY OF PHILADELPHIA
COMMITTEE ON LICENSE AND INSPECTIONS

Room 400, City Hall
Philadelphia, Pennsylvania
Monday, November 17, 2014
11:12 a.m.

PRESENT:

COUNCILWOMAN MARIA D. QUINONES-SANCHEZ(CHAIR)
COUNCILWOMAN CINDY BASS (VICE)
COUNCILMAN DAVID OH
COUNCILMAN BOBBY HENON
COUNCILMAN ED NEILSON

ALSO PRESENT:

COUNCILMAN DENNIS O'BRIEN

BILLS: 140142

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2 COUNCILWOMAN QUINONES-SANCHEZ: My
3 apologies for the delay. Democracy at work.
4 The Committee on Licenses and Inspections will
5 now begin its hearing.

6 Having established a quorum with
7 Councilman Neilson to my right -- to my far
8 right, Councilman David Oh, Councilwoman Bass
9 and with us, joining us, Councilman O'Brien who
10 is the sponsor of the bill. Before we get
11 started, let me have the Clerk read the title
12 and then I will speak to what we're doing here
13 this morning.

14 Again, my apologies. Will the clerk
15 please read the title of Bill 140142.

16 THE CLERK: An Ordinance amending Title
17 9 of the Philadelphia Code, entitled "Regulation
18 of Businesses, Trades and Professions" by adding
19 definitions, duties, penalties, exceptions,
20 prohibited acts, licensing requirements and
21 other related items regarding provision of
22 immigration assistance services; under certain
23 terms and conditions.

24 COUNCILWOMAN QUINONES-SANCHEZ: Thank
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1 you again. My apologies for our delay. I'm
2 going to recognize the sponsor of the bill
3 before we move on to our Witness List.

4 Councilman Denny O'Brien.

5 COUNCILMAN O'BRIEN: Thank you,
6 Councilwoman Sanchez.

7 Philadelphia has had a rich immigrant
8 history, and our diverse immigrant community
9 continues to thrive today. Many people in
10 Philadelphia require assistance with immigration
11 matters and place a tremendous amount of trust
12 in immigration assistance service providers.
13 These providers have a duty and responsibility
14 to properly and legally serve these clients.

15 The ability to live and work in the
16 United States, to maintain stable families and
17 business relationships can hinge on the work of
18 these service providers. Given the size of
19 Philadelphia's immigrant community, such
20 providers have a significant impact on the
21 social, cultural and economic life of the City.

22 Currently in Philadelphia, we have no
23 regulation of this practice. I believe this
24 leaves people vulnerable to exploitation, fraud,
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1 financial ruin and family upheaval due to the
2 unscrupulous and illegal business practices.
3 These individuals can be deported and they never
4 get a chance to get back on a legitimate path to
5 citizenship because forms are filled out without
6 their knowledge and they're held accountable for
7 those false statements.

8 Make no mistake, these knowingly and
9 intentionally preying upon and deceiving our
10 immigrant population are committing a fraud.
11 Some have even dubbed it as the perfect crime
12 because victims are often afraid to come forward
13 due to real or perceived repercussions or a
14 simple and basic fear of the government.

15 In April of this year, Mayor Nutter
16 eloquently highlighted this problem by saying:
17 "There has been a negative impact on some
18 immigrants who will not report crimes to the
19 police, don't want to be witnesses and they
20 suffer accordingly."

21 This -- the bill we are considering
22 today will create standards for those providing
23 immigration assistance services. The intent of
24 my legislation is to give consumers requiring
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1 assistance with immigration matters clarity
2 about how services should be handled, promote
3 ethical, fair and honest business practices and
4 preserve public confidence.

5 People who require assistance with
6 immigration matters deserve to know the exact
7 scope of the work to be performed by a service
8 provider. There is a need to build in
9 assurances that they are getting proper
10 assistance and have some recourse should they be
11 wronged by an assistance provider. The
12 consequences can be steep and life altering.

13 Earlier this year, the Public Safety
14 Committee held a hearing on the issue of my
15 request. We had several courageous and brave
16 victims testify about the devastating impact of
17 this fraud. We also had a variety of
18 stakeholders amplify how this fraud is
19 perpetrated upon victims and presented viable
20 solutions to stop it. Many of those solutions
21 are in the bill before us today. Additionally,
22 it includes key component parts from both the
23 Chicago and New York City legislative models
24 that attack this fraud.

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1 Since the Bill's March 6 introduction,
2 we have had countless meetings and conversations
3 with the Managing Director and his direct
4 support staff, the Commissioner of L&I and his
5 staff, the Police Department, the District
6 Attorney's Office, the Mayor's Office of
7 Immigrant Multicultural Affairs, advocates of
8 the Administration. I wanted an open, inclusive
9 and honest process to move the bill to an even
10 better place. And I believe my team has acted
11 professionally and in good faith each and every
12 step of the way in this process, and it's
13 reflected in the bill before us today.

14 Finally, last year a public call to
15 action went out with the following words: "A
16 lot of people want to be Americans, and we need
17 to make sure that they have the full opportunity
18 to get the services they need and that they are
19 supported by cities and Mayors and City Council
20 members."

21 Those are the powerful and thoughtful
22 word of Mayor Michael Nutter as he signed an
23 Executive Order creating the City's Office of
24 Immigrant and Multicultural Affairs last year.

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1 I believe my legislation that is before us today
2 robustly embraces that call to action.

3 My legislation has teeth. My
4 legislation moves the ball forward. My
5 legislation will help people get the full
6 opportunity to get the services that they need.
7 And my legislation sends a message to all the
8 residents of Philadelphia. That message is that
9 we as a city care about those who are the most
10 vulnerable among us. And that this City, this
11 Mayor and this Council supports them.

12 To the people that are going to testify
13 today, there has been a change. The bill is not
14 going to be reported out today. We are going to
15 listen to your testimony and consider this
16 matter in the future.

17 Thank you.

18 COUNCILWOMAN QUINONES-SANCHEZ: Thank
19 you. I want to recognize Councilman Henon who
20 has joined us. And want to thank the bill
21 sponsor and all of the witnesses who are
22 testifying today. This is a serious issue, a
23 very important issue to all of us. And we thank
24 you for your time and your patience.

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1 We will not have the Administration
2 testify this morning, but we will before the end
3 of the hearing recess to a date certain. And at
4 which time, we will have the Administration. We
5 do thank again our out-of-city guests for coming
6 and testifying and providing us with good
7 information and best -- national best practices
8 on what is a very important issue.

9 With that, I am going to start with
10 Arthur Read, Esquire and Vanessa Stine. If they
11 can approach the Witness Table.

12 (Witnesses approach table.)

13 COUNCILWOMAN QUINONES-SANCHEZ: Please
14 state your name for the record and proceed with
15 your testimony.

16 MS. STINE: Vanessa Stine.

17 MR. READ: Arthur Read, General Counsel,
18 Friends of Farmworkers. We also have another of
19 our staff attorneys here if the Committee wants
20 to read a statement from a worker into the
21 record if you wish it.

22 COUNCILWOMAN QUINONES-SANCHEZ: We do
23 have their testimony. And if you want to start
24 with reading that into the record, it will
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1 become part of the record. But if you want to
2 read it, you may.

3 MS. DORENBOSCH: Thank you. Good
4 morning, my name is Stephanie Dorenbosch,
5 another staff attorney from Friends of
6 Farmworkers. And I'm presenting the testimony
7 of a victim of immigration services fraud named
8 Edwin who cannot be here because he was deported
9 back to Guatemala.

10 Letter: "My name is Edwin. Thank you
11 for listening to my story today. I cannot be
12 here in person because I was deported about a
13 year ago, and I am now back in Guatemala
14 separated from my wife and my two young
15 children. I lost \$15,000 because I was lied to
16 by someone I trusted to help me with my
17 immigration status and because I wanted to do
18 the right thing. I am sharing the story because
19 I want this to stop happening to other
20 immigrants.

21 "Several years ago, I went to a business
22 in North Philadelphia for help applying for a
23 Tax ID number because I wanted to pay my taxes.
24 When I went to my appointment, the owner of the
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1 business told me that I could get a green card
2 if my employer sponsored me. I thought he was
3 an attorney because he was offering immigration
4 and tax services. He also spoke Spanish and he
5 told me that he helped a lot of immigrants get
6 green cards. So, I believed that he could help
7 me too.

8 "I hadn't gone to his office in order to
9 apply for immigration benefits. I just went
10 there because I wanted to pay my taxes, but he
11 was very convincing and talked me into it. He
12 assured me that I would qualify and that it
13 would be no problem. It sounded like great
14 news. If I could get legal immigration status,
15 my family's life would be so much better.

16 "So, I signed some papers that he gave
17 me. I didn't know what they said because I
18 can't read or write in either English or
19 Spanish, but I could tell that they were written
20 in English. The man just told me where to sign
21 my name.

22 "A former boss from when I did
23 landscaping work wanted to sponsor me for the
24 green card. He thought he was helping me
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1 because he liked me and thought I was a good
2 worker. Neither of us had any idea that I was
3 not eligible. Over the next year, I made
4 regular payments, a few hundred dollars at a
5 time to the man from the immigration business.
6 Whenever I asked, he told me that my green card
7 was in process and that everything was fine, so
8 I kept making payments.

9 "After about a year when nothing had
10 happened, I started to get upset. I asked him
11 why I had not received anything yet. He told me
12 to be patient and that he had everything under
13 control. After I pushed him one more time, he
14 told me he would get a lawyer to help me and he
15 arranged the meeting. The lawyer told me the
16 same thing, that everything was going fine.
17 That was the only time I met with the lawyer.

18 "My main contact was still the owner of
19 the immigration assistance business and I still
20 thought that he was the one working on my case.
21 I would still call him about the case, and I
22 made all of my payments to him.

23 "Later I went to Friends of Farmworkers
24 about a different legal issue, and when I told
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1 the lawyers there about my immigration case,
2 they explained that I was actually not eligible
3 for a green card. I would never have paid all
4 that money for something I wasn't eligible for.
5 I had worked for years to save that money.
6 \$15,000 was more than half a year's salary.

7 "Later, Friends of Farmworkers helped me
8 request a copy of my immigration record from the
9 government and found out that this man had never
10 filed any kind of application for me. I do not
11 understand why he charged me so much money or
12 why he kept telling me that everything was going
13 well if he never even filed the application.
14 What happened to me next was a nightmare.

15 "I had an accident at my new job that
16 destroyed my hand. I was high up in a tree
17 trimming branches when a branch that we had just
18 cut and tied with a rope fell down. I lost my
19 balance and got my hand caught between the rope
20 and the rest of the tree. So as the branch
21 fell, the rope scraped against my wrist and
22 sliced all the way through to the bone. My
23 supervisor drove me to a hospital but just left
24 me there.

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1 "I had a few surgeries to reconstruct
2 the tendons and arteries that had been severed,
3 but I got deported before the treatment was
4 finished. I can barely move my hand at all, and
5 I can't grip with it or pick anything up. It's
6 nearly useless. I want you to know this part of
7 the story because I have no education and I have
8 only ever worked with my hands.

9 "With my injury, there is barely any
10 work for me in Guatemala and I can't earn enough
11 to support myself. If I hadn't lost \$15,000 on
12 a fake green card, I would at least have
13 something to live on. When Immigration came to
14 my house and arrested me, I did not understand
15 why. I'm a good person. I'm not a criminal.
16 The worst thing I had done was come to the
17 United States to try to take care of my family.

18 "I immediately suspected that the man
19 who sold me the fake green card had something to
20 do with it. My wife called him for help when I
21 was arrested, and he told her not to worry, that
22 everything would be fine but that was another
23 lie. Now I feel like my life is over. I've
24 lost my savings, my hand and my family. I'm

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1 separated from my wife and my two children and I
2 cannot find work to support them or myself. No
3 one will hire a manual laborer with only one
4 good hand. I occasionally work in the field
5 spraying pesticides because it's the only work I
6 can do with one hand, but it isn't enough.

7 "I am asking the members of the City
8 Council to do something to stop people like the
9 man who took everything from me. My life is
10 already over, but you can stop him from ruining
11 other immigrants lives. Thank you."

12 COUNCILWOMAN QUINONES-SANCHEZ: Thank
13 you. Other witnesses.

14 MS. STINE: Thank you so much.

15 My name is Vanessa Stine. I'm an
16 attorney in Equal Justice Works Fellow with
17 Friends of Farmworkers. I have a two-year legal
18 fellowship focused on the issue of combatting
19 immigration services fraud. And this fellowship
20 project is an expansion of the work I've already
21 done as a student through the Notario Fraud
22 Project.

23 I'd like to thank Councilmember O'Brien
24 for introducing this bill and all of his work
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1 and commitment to better protecting immigrant
2 consumers in our City. I'd also like to thank
3 City Council staff and other members of City
4 Council for your work and interest on this very
5 important issue. And finally, I'd like to thank
6 City Council, the Mayor's Office and Licensing
7 an inspection on your collaboration.

8 Regulating businesses that provide
9 immigration assistance will provide standards to
10 currently unregulated sector and thus provide
11 better protection for immigrant consumers who
12 live and seek assistance in our city.

13 Furthermore, this ordinance is forward thinking
14 and can serve as a model for other cities.

15 And finally, I want to note that with
16 the possibility that the President is going to
17 announce an Executive Action that would provide
18 immigration relief to possibly millions of
19 immigrant families, the need for stronger
20 regulations and protections in the City of
21 Philadelphia has never been greater. Because my
22 fellowship project focuses not only on assisting
23 immigrants of -- victims of immigration fraud
24 but also strengthening protections, I fully

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1 support this ordinance. It will not only better
2 protect my clients in immigrant community but
3 also provide advocates like myself another tool.

4 I'd like to highlight some of the key
5 provisions of the current draft of the ordinance
6 that I believe are critical in ensuring its
7 effectiveness.

8 First, because of the lack of
9 regulations, businesses now regularly engage in
10 the unauthorized practice of law and fail to do
11 most of the practices outlined in the ordinance.
12 There is why the requirements are so important.

13 For instance, having a licensee
14 permanently sign a form verifying they
15 understand the requirements and their
16 limitations, the sign posting requirement that
17 provides a warning to immigrant consumers, the
18 hand bill that notifies immigrant consumers
19 about their rights and about the
20 responsibilities of the service provider and the
21 advertisement disclaimer. All of these
22 requirements are critical and are not common
23 practice right now. And because they're not
24 common practice, immigrant consumers are often

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1 confused about what a provider is and is not
2 allowed to do. It enables providers to be
3 deceitful, as Stephanie highlighted, by one
4 service provider.

5 For the licensee duties, it's important
6 to also make it clear to businesses what they
7 are and are not allowed to do. This is
8 important because some businesses may be well
9 intentioned in what they are doing. So,
10 providing clear rules and guidelines on what
11 they are and are not allowed to do, it will
12 standardize and regularize a business area so
13 that businesses are fully aware of what they can
14 do and they also protect themselves from
15 engaging in prohibited activities.

16 It also provides a strong education tool
17 for advocates like myself who are doing a lot of
18 community education and outreach. By having
19 clear guidelines, I can incorporate that into my
20 presentations and (speaks in foreign language),
21 as we call them, to immigrant consumers so that
22 they better understand what the rules are and
23 that there are a clear set of duties.

24 The Prohibited Act section makes it very
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1 clear what licensees aren't permitted to do. I
2 want to just give a few examples of how the
3 prohibited acts are unfortunately stories I hear
4 commonly now. For instance, I have spoken with
5 victims who have gone to a provider that make
6 claims that they have a special relationship
7 with the U.S. Department of Homeland Security;
8 for that reason, they can move an application
9 along faster. This person was charging
10 thousands of dollars for this false claim --
11 what was a false claim. And so, making it very
12 clear that that's prohibited will hold providers
13 who do engage in that accountable.

14 Second, we often hear about promises and
15 guarantees. Providers often tell them they are
16 100 percent sure they will get them a green card
17 in six months when that is not actually true.
18 Again, prohibiting that not only holds licensee
19 accountable but it also provides another clear
20 education piece because I already talk about
21 that in my presentations, but I again can raise
22 they are actually prohibited to be doing certain
23 activities. So if they are doing it, to please
24 come forward.

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1 Another common issue we see is service
2 providers keep money for services they never
3 actually perform. They promise to assist an
4 immigrant with an application, collect the
5 documentation and then never send it into
6 Immigration. Meanwhile, they have kept the
7 money. And the immigrant believes because
8 immigration applications take months or years to
9 process sometimes with Immigration, that the
10 application is in process when really that's a
11 lie. So prohibiting, keeping payments for
12 services not actually provided is another
13 important component.

14 Another common issue that we see is
15 providers not -- refusing to return documents to
16 a customer upon terminating the relationship.
17 So, the customer is left with nothing. They
18 don't have copies of the forms. They don't have
19 copies of their file. And the person refuses
20 because they say, well, if you're not using me
21 anymore for help, then I am not going to give
22 you any of the papers back. So, people are
23 routinely denied this. So prohibiting that and
24 requiring providers to provide copies of

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1 applications submitted is very important.

2 And then finally and most importantly,
3 the prohibition of giving legal advice is, of
4 course, critical. Businesses that are not
5 authorized to be practicing law should not be
6 engaging in the unauthorized practice of law.
7 And unfortunately, they routinely cross that
8 line. And so, making it very clear that they're
9 limited in doing activities that are not the --
10 that are not the practice of law is important.

11 I finally just want to wrap up with
12 talking a little bit about the penalties in
13 enforcement. With any ordinance, it's only
14 effective if properly utilized. Proper
15 utilization, I believe, will require the
16 collaboration of the City, law enforcement and
17 community advocates. Each of us has a role to
18 play in ensuring this ordinance is implemented
19 and utilized in a way that is both efficient and
20 effective.

21 First and foremost, we understand that
22 the ordinance will be a complaint driven -- the
23 enforcement will be complaint driven. But we do
24 believe without clear licensing requirements and
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1 regulation, that the ordinance will not be
2 effective. And that's why Licensing and
3 Inspection role is so critical. Regulating a
4 business that's currently -- regulating an area
5 of business that's currently unregulated will
6 provide a mechanism for the City to hold
7 accountable businesses that break requirements
8 and standards that are meant to protect
9 immigrant consumers.

10 And so in conclusion, you know, I really
11 believe that this ordinance is critical to
12 protecting immigrant consumers. It's also
13 critical for protecting businesses that wish
14 to -- to wish to provide some services that are
15 permitted but currently have no clear
16 guidelines. And because there are no clear
17 guidelines or regulations, businesses routinely
18 engage in unacceptable business practices; not
19 giving copies of receipts, not giving copies of
20 forms, not doing most of the things, to be
21 perfectly frank, that are outlined in the
22 ordinance.

23 And so, I believe this ordinance is very
24 much needed. And it also will be a helpful tool
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1 as we potentially have another way of
2 immigration relief. And I look forward to the
3 passage of it. And I thank you so much for your
4 time and for listening.

5 Thank you.

6 MR. READ: I'm going to -- I would like
7 to refer the Committee back to testimony from
8 March 11 before the Committee on Public Safety,
9 I believe it was. There were a number of to who
10 testified there. And I submitted extensive
11 written testimony at that point that I would ask
12 if it is not attached to the testimony that we
13 submitted, be incorporated in the record.

14 I've been practicing law for 38 years
15 and representing immigrants and migrants
16 specifically for 35 of those years. I've been
17 in my current position as general counsel
18 Friends of Farmworkers for 32 years. This is an
19 issue which has haunted the immigrant community
20 throughout my legal career and before. It's an
21 issue which I consider of sufficient importance
22 that I became a member of the Pennsylvania Bar
23 Association's Committee on Unauthorized Practice
24 of Law in 2006 specifically to try to focus that
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1 committee on rendering a formal legal opinion on
2 what constituted the unauthorized practice of
3 immigration law. And in particular,
4 unauthorized practice of law by notary publics.

5 One of the critical pieces of that
6 committee's formal opinion was that the usage of
7 the phrase "Notario Publico" was itself a
8 unauthorized practice of law. Because in much
9 of civil law countries, including Latin America,
10 Notario Publico is an attorney and, in fact, is
11 a higher level of attorney than general
12 attorney. So when immigrants see the phrase
13 Notario Publico, they believe that they are
14 getting the services of an attorney.

15 One of the opinions that we referenced
16 in the Pennsylvania Bar Association's formal
17 opinion was a Philadelphia Court of Common Pleas
18 opinion from, I believe, the 1960s involving an
19 Italian immigrant also from a civil law country
20 in which the phrase notary public was also held
21 by the Court of Common Pleas to be an authorized
22 practice of law.

23 However, what has changed since March is
24 the careful work that has been done with
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1 literally dozens of drafts over the last six
2 months by Councilman O'Brien's staff and I hope
3 in consultation with others of you. I am aware
4 and I think it is a shared concern from a number
5 of organizations that the quote "licensed" could
6 be misrepresented by the people who we think
7 it's critical to represent as authorizing them
8 to do things that we do not want them to do.
9 And I understand Councilwoman Quinones-Sanchez
10 shares that concern. I think that technical
11 issue is readily resolved.

12 The license could be incorporated as an
13 activity for which there is a registration under
14 the general commercial activity license. So, A
15 checkoff box in which the person is required to
16 certify that they will be conducting the
17 regulated activities, that they are familiar
18 with the requirements governing those
19 activities, and that their commercial activity
20 license is tied to their compliance with those
21 regulations. That could then in turn be
22 accompanied by a public registration list that
23 could be available to those of us who are
24 advocates for immigrants to determine if, in
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1 fact, this person has registered. Again, it's a
2 slightly different phrase than license. And I
3 think, frankly, the only real level significance
4 is the piece of paper that goes up on wall.

5 There would not be a piece of paper up
6 on the wall that could say I am a registered
7 immigration services provider or something else.
8 There would simply be a general commercial
9 activity license. And all of the other
10 provisions of Councilman O'Brien's bill could
11 then be carried forward. However, there has
12 been a suggestion, as I understand it from the
13 city, that L&I should not really have to play
14 any functions. That, I think, would be a
15 mistake.

16 The reality is that this issue has
17 suffered throughout from the fact that it's a
18 peripheral to the jurisdiction of every agency
19 that has authority over this. The District
20 Attorney's Office has authority. The Secretary
21 of State has authority. A number of agencies
22 have authority, but no one, and literally no
23 one, has taken it upon themselves to be able to
24 respond to concerns and undertake

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1 investigations.

2 When we had the hearings here in March,
3 we talked about the possibility that the Police
4 Department in consultation with the District
5 Attorney's Office could undertake undercover
6 activities in order to identify some of the
7 problems that are going on. But there is,
8 frankly, a different purpose, I hope, to be
9 served by this proposal than simply criminal
10 activity. And that is, there are individuals
11 who mean well, who do do services for immigrant
12 communities and do not understand the boundaries
13 that they must comply with if they're going to
14 avoid unauthorized practice of law.

15 So, one of the most important reasons
16 for this legislation and for the change in the
17 state notary law that occurred a year ago would
18 be to help teach those who do mean well what are
19 the limits of what they can do so that they can
20 effectively provide the kind of interpretation
21 and translation services that may be necessary
22 to immigrants to proceed without themselves
23 engaging in, unintentionally or intentionally,
24 the unauthorized practice of law.

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1 There are clearly those who go beyond
2 good faith to those who are preying on
3 immigrants and intentionally preying on
4 immigrants. There are some of those who have
5 been prosecuted. The ones who have been
6 prosecuted have typically been prosecuted for
7 other reasons, not because of their unauthorized
8 practice of law but because they were engaged in
9 other fraudulent and criminal activities; such
10 as, money laundering which is one of the crimes
11 that one of the notaries in Southeastern
12 Pennsylvania was convicted of on a federal
13 level.

14 It is very important that we as
15 advocates can go to an agency and say we believe
16 that it would be appropriate for you to conduct
17 an investigation of whether X, Y, Z particular
18 entity is complying with the requirements of
19 this law, is maintaining the documents that they
20 are required to maintain in order to show
21 compliance of the law. And if necessary, if
22 that investigation indicates to whatever the
23 enforcing agency, and at this point, it's likely
24 to be L&I in the absence of consumer protection
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1 agency, indicates to L&I there is something more
2 serious going on, then, yes, it is certainly
3 appropriate and necessary for L&I to bring in
4 the District Attorney's Office and the police.

5 The reality is that precisely because
6 we're talking about a community that is afraid,
7 people are very unlikely to come forward on
8 their own to police. They are very unlikely to
9 be willing to pursue a criminal prosecution
10 without some assistance and sense that they can
11 proceed. It is equally unlikely that people are
12 going to be willing in any large scale to come
13 forward and pursue civil remedies under
14 circumstances in which they, themselves, face
15 potentially much more serious consequences than
16 the person they are going after.

17 The current bill is well thought
18 through, has some very carefully designed
19 protections. And I believe the simple issue
20 that, frankly, concern members of the
21 unauthorized practice of law committee of
22 avoiding the license being misrepresented can be
23 solved by rolling it into the general activity
24 license, make a registration requirement under
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1 that license and otherwise continuing all of the
2 substantive provisions that Councilman O'Brien's
3 bill contains.

4 Thank you.

5 COUNCILWOMAN QUINONES-SANCHEZ: I'm
6 sorry. Councilman David Oh and then Councilman
7 Neilson and Henon.

8 COUNCILMAN OH: I will say that I think
9 Councilman Neilson had his light on first.

10 COUNCILMAN NEILSON: I'm okay. Go
11 ahead.

12 COUNCILWOMAN QUINONES-SANCHEZ: Oh, I'm
13 sorry.

14 COUNCILMAN NEILSON: I fight nice.

15 COUNCILWOMAN QUINONES-SANCHEZ: You are
16 closer to my peripheral vision than he is. I'm
17 sorry.

18 COUNCILMAN OH: She's got her eye on me.

19 COUNCILMAN NEILSON: It's on the record
20 now.

21 COUNCILWOMAN QUINONES-SANCHEZ: I'm
22 sorry. Go ahead. Proceed, Councilman Neilson.

23 COUNCILMAN NEILSON: Go ahead.

24 COUNCILMAN OH: Thank you very much.
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1 I will just start with some questions
2 which are exploratory on my part. The story
3 that was read into the record of Edwin
4 identified the fact that he met with a notary
5 public that he trusted and that that person
6 received money from him. And as it turns out,
7 did not file any paper, made him a promise that
8 he could get a green card and was unable to do
9 that.

10 It also, however, says that he did meet
11 with a lawyer who basically confirmed that there
12 was a filing and he could get his green card.
13 And so, we have a non-lawyer and a lawyer
14 involved in his testimony basically doing both
15 the same thing. The lawyer is supposed to be
16 governed by the disciplinary board, the ethics
17 code and things like that. And this area of
18 practice includes complaints against lawyers as
19 well as non-lawyers.

20 I think that's something that you will
21 agree with; is that correct?

22 MR. READ: Yes.

23 COUNCILMAN OH: Okay. And I think one
24 of the problems that occurs is because we can
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1 regulate good people to behave themselves and to
2 comply with various type of things. The
3 challenge that has been identified here is
4 regulating thieves and criminals and people of
5 bad intention. And you can license them or not
6 license them or do whatever. And if they want
7 to steal from people and lie to them, that's
8 what they do.

9 So, could you give some examples when
10 you talk about or can you address the issue
11 of -- particularly with the non-lawyers since
12 that's what we can deal with in this bill -- in
13 how to, one, as you said, provide better
14 education, better qualifications to those good
15 people who want to do a good service but may not
16 have a structure around which they know how to
17 provide those good services.

18 And secondly, how to deal with the
19 people who are making a living off of cheating
20 people. I will just say that I thought the idea
21 of making the title of Notario Publico not
22 something that could be done in Philadelphia, I
23 thought that was a good way based on what you're
24 saying in terms of what it means overseas.

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1 So, how -- how could that be done?

2 MR. READ: Which that? I'm sorry.

3 COUNCILMAN OH: That is to -- in
4 addition to providing some structure and
5 education to well-intentioned people who want to
6 serve this population by helping them with their
7 immigration paperwork, how can this -- how can
8 this bill effectively deal with people who are
9 intent on committing fraud?

10 MR. READ: I think the answer is that
11 the bill establishes a structure through which
12 it is possible for something like our Immigrant
13 Fraud Project of which Vanessa has taken the
14 lead on for some time to be able to say, okay,
15 L&I we have gotten several complaints relating
16 to X, Y, Z business. They have now been on
17 notice as to the requirements which they must
18 comply with to be operating lawfully. We would
19 request that you go out and determine if they
20 are meeting those requirements.

21 The bill is intended to have the kind of
22 very specific requirements that a
23 non-professional immigrant practitioner is
24 capable of policing. Is the signage up? Are
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1 the records being maintained that are required
2 to be maintained if these services are being
3 provided? There are things which could be
4 investigated and determined just like I spent
5 many years dealing with farm labor camps in the
6 Commonwealth of Pennsylvania. We had to take
7 the Pennsylvania, then Department of
8 Environmental Resources, to Commonwealth Court.
9 And we kept them in Commonwealth Court for ten
10 years until we got them trained as to how to
11 enforce the requirements that were written into
12 the law and the regulations in a very specific
13 sense.

14 Likewise, it is possible to get an
15 agency to go in and do the kind of concrete
16 compliance investigation that would be possible
17 with this statute and determine that this person
18 is or is not complying with the statute. And if
19 not, if there is also indication that they may
20 be conducting activities that are more serious
21 than that, then referring them for criminal
22 prosecution to the District Attorney's Office
23 and the police.

24 The police are not in a good position as
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1 a practical matter to do that first level step,
2 at least unless they have already recognized
3 that this is a place that really needs serious
4 criminal law enforcement attention. And I think
5 the reality is that many of the multi-service
6 agencies, is what they call themselves in some
7 cases, sometimes it's travel agencies. It's a
8 variety of different kinds of places that do
9 this.

10 Many of them are not intentionally
11 defrauding people. They -- however, many of
12 them certainly overreach their bounds. Those
13 who are intentionally, this law will create some
14 mechanisms through which we can identify those
15 and then, in turn, have the appropriate criminal
16 law enforcement agencies pursued. And I think
17 that that dual role of the civil enforcement by
18 an inspecting agency that's capable of
19 determining if there's compliance with the
20 requirements that the bill sets forth. If there
21 are not, to be looking at whether they suggest
22 there are more serious issues that are involved
23 in terms of fraud.

24 By the way, just -- the reality is, you
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1 could drive through the City of Philadelphia and
2 do nothing more than take photographs of the
3 outside of many of the agencies that we're
4 talking about to identify places that would, at
5 least, raise some serious concerns under this
6 legislation and, frankly, under the state notary
7 statute that hasn't gone into effect and
8 probably won't for at least another year in
9 terms of the speed with which that agency is
10 moving forward.

11 The state law, just if it's unclear, has
12 already said that prospectively when the new
13 regulations go into effect, any notary in the
14 Commonwealth of Pennsylvania cannot use the
15 phrase Notario Publico without very specifically
16 including disclaimers as to the limitations on
17 what they are able to do. They cannot use that
18 in advertising. By the way, one of the latest
19 changes to this bill that I think was great was
20 including radio advertising. We mean all
21 advertising, all forms to which people are doing
22 this are critical to nail down and pursue.

23 There are people who are on TV
24 advertising. And some of those are people who
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1 are attorneys, as well. The role of an attorney
2 in assisting the unauthorized practice of law is
3 itself a disciplinary violation. And you are
4 correct that there are attorneys for whom this
5 is a concern as well, but it is typically their
6 related role with some of the people who are
7 going to have direct encounters with immigrants
8 that's part of what creates this problem.

9 Taxation is one of the issues in which
10 this issue often comes up for immigrants who are
11 trying to legalize their status, lawfully
12 comply. They are filing their taxes and they
13 want to file their taxes because they are
14 looking for that opportunity to be able to
15 regularize their status. One of the places of
16 real abuse is those people who are handling
17 those tax returns who say I got a target here.
18 And I should be clear, the problem is not at all
19 limited to any one community.

20 One of the reports of the Pennsylvania
21 Bar Association got was in Ukrainian community
22 in Philadelphia. Somebody who went for tax
23 referral and was then in turn preyed upon for
24 immigration assistance that they were
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1 incompetent to provide and didn't provide. So
2 it's multiple areas. But we need the -- both
3 the level of education but also the level of
4 being able to use the investigative process to
5 identify those who actually need criminal law
6 enforcement activity instead.

7 MS. STINE: I also would just like to
8 add something briefly. I think that this adds
9 another tool for advocates and lawyers who are
10 helping victims of immigration services fraud.
11 My project is focused on providing direct legal
12 representation to people who have been
13 defrauded. Sometimes the fear of victims is
14 filing a civil lawsuit which they can do under
15 the Unfair Trade Practices and Consumer
16 Protection Law or reporting to law enforcement
17 because they fear even though they've been
18 assured that, you know, the victims are
19 protected, that that still a very scary process.

20 So, I think that what I see this
21 ordinance doing is allowing me to when I sit
22 down and talk with a client about what their
23 options are, I can say we can also at the
24 minimum, we can report them to Licensing and
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1 Inspection about all of these violations. And
2 you know what, I have -- we -- I already made
3 four other complaints, you know, to Licensing
4 and Inspection under the same fact pattern.

5 And so, it's another way to hold these
6 businesses accountable. Some of which have done
7 a really good job of silencing victims. There
8 are a couple in particular where victims don't
9 feel comfortable. They will tell me about it,
10 and then they don't want to do anything else or
11 do any sort of action or letter asking for their
12 money back.

13 But my hope would be if you're able to
14 do the complaint and have the City investigate
15 some of the requirements that they are breaking,
16 that is a way to sort of start pushing back
17 against some businesses that have really bullied
18 people into silence.

19 COUNCILMAN OH: Okay. I would have to
20 say that as of this point in time, and I'm not
21 going to hog the mic here, but I'm certainly
22 looking for your feedback. The idea of posting
23 information as this is not a lawyer, you know,
24 those type of things that make it very clear
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1 what they cannot do, what they should, that
2 seems like a good thing to me.

3 What I'm not clear on is since many of
4 the cases that you're talking about are not, you
5 know, employer-sponsored H1Bs and things like
6 that, you are talking about undocumented folks
7 coming in, grasping at the opportunity to
8 legitimize themselves, get documented. And some
9 of that is very subjective on the part of the --
10 I understand they shouldn't be practicing law,
11 so that would help a lot if it said not giving
12 advice and things like that.

13 But even in filling out the paperwork,
14 if they want certain paperwork filled out, that
15 simply puts a foot in the door in case amnesty
16 or something else comes down the line. They
17 filed their taxes. They showed that they were
18 here. They filed a piece of paper to at least
19 document something like that.

20 The person who then does not get what
21 they want says the person who provided me the
22 service ripped me off. How will the complaint
23 once it's filed, how do you imagine that someone
24 is going to investigate that? And what is the
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1 process? They shut down the business? Pull the
2 license during this time?

3 What is the process that would, in your
4 opinion, your expertise, be effective?

5 MR. READ: Most complaint processes have
6 the potential for an agency to do something like
7 a conditional license or conditional permit.
8 So, okay, we reviewed your paperwork. We
9 determined that you did not do the following
10 things. You may only continue operating if you
11 do do them. We will expect we will be able to
12 follow up and determine that you did do
13 something, et cetera.

14 Let's take concrete circumstance that
15 Stine is talking about where what you have is
16 you have a person who has come forward and
17 provided very specific concrete information that
18 can be tested. So if we're operating in the
19 environment that this bill would anticipate, the
20 non-attorney who provided the limited services
21 that are permissible under the proposed bill,
22 would be in a position to document, yes, I
23 accepted a payment in the following amount for
24 providing the following services. I have signed
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1 copies in the file of the following contracts,
2 et cetera.

3 And I should say, one of the things that
4 was key to the Pennsylvania Bar Association's
5 opinion on this is that the fee has to be
6 appropriate to the permissible services that a
7 notary, for example, is authorized to provide.
8 So, collecting a fee of hundreds or thousands of
9 dollars for notarizing a document is clearly
10 impermissible.

11 COUNCILMAN OH: Can I interrupt for a
12 second. Just because --

13 MR. READ: Sure, please.

14 COUNCILMAN OH: One is that a
15 requirement that there be a contract, that the
16 fees not be in cash, that they not be secretive,
17 things like that. Assuming that a person has a
18 record that they receive fees, are you also then
19 going to regulate the cost per service, like, no
20 more than this met for this service? No more
21 for that?

22 MS. STINE: I think the current
23 ordinance requires a posting of the fees that
24 are charged. But I do want to go to back to the
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1 point you raised which is say someone is filing
2 paperwork to get in the door. I would actually
3 say that in itself, if you are doing that,
4 that's actually practicing law. Because if you
5 are saying this is a strategy to get your foot
6 in the door for the future, this isn't like, oh,
7 I want to apply for my cit -- I'm a legal
8 permanent resident and I need to do my
9 citizenship. I've been here 20 years. Will you
10 help me fill out the form because, you know, it
11 will be easier for me, whatever.

12 I think that that's -- that if a
13 complicated case like that if someone is filing
14 paperwork for maybe future relief, I haven't
15 seen that in my work in interviewing victims.
16 What I have seen is people saying you can apply
17 for a green card and they're not eligible. You
18 can get a work permit. They're not actually
19 eligible. So, there is a special waiver that is
20 actually not even true. We are going to apply
21 for that and then your family will have
22 residency.

23 Those are straight up things that are
24 false, not actually -- not actually sort of
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1 doing a strategy. And I would sort of purport
2 to say that I think either providers that are
3 helping to fill out forms are either doing
4 simple forms or they are being fraudulent and
5 making up the forms.

6 MR. READ: The selection of forms is one
7 of the things that the general counsel of the
8 old INS long ago described as being the practice
9 of law. So there is -- there is a great deal
10 that is involved.

11 When you describe putting foot in the --
12 the reality is you may be closing the door.
13 Many of the things that are filed that are
14 inappropriate only serve to document
15 unauthorized presence in a way that may forever
16 bar. The submission is something that is
17 fraudulent to the Immigration service, will
18 absolutely potentially act as a permanent bar.
19 It's not with -- this notion of applying for a
20 green card for work stuff, there are lots of
21 people who are taking money from people to
22 submit applications for a permanent labor
23 certification status for which the person cannot
24 qualify and for which the business may not well

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1 qualify even.

2 The regulations from the Immigration
3 Service at this point, USCIS say you the
4 employer, if you are involved in this scheme,
5 you must pay the fees not someone else. Yet
6 those fees are frequently being paid instead by
7 immigrants.

8 So, we do not need or want people who
9 think that they know how to practice law but
10 don't have the proper training and skills to do
11 that. Preying on immigrants we need people to
12 understand that if they do indeed want to assist
13 their communities, there are very limited
14 functions which they are competent to perform.
15 And for those, they should be charging only
16 appropriate fees. Not things that are, in fact,
17 fees that indicate that they are engaged in the
18 practice of law.

19 COUNCILMAN OH: All right. Thank you
20 very much.

21 COUNCILWOMAN QUINONES-SANCHEZ: Okay.
22 Councilman Neilson.

23 COUNCILMAN NEILSON: Thank you, Madam
24 Chair. Something you just spoke about is
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1 federal regulation, that much of this is covered
2 under federal regulation is what you just spoke
3 about.

4 MR. READ: To be clear, unfortunately
5 there is no federal --

6 COUNCILMAN NEILSON: Let me finish my
7 question, sir, okay. If you can, keep them a
8 little shorter because we are behind. And I
9 thank you for that, too.

10 The limited functions that were covered
11 and the education of the same that you talked is
12 under federal regulations, is this still going
13 to try and attempt to teach these regulations to
14 those people working in this field?

15 MR. READ: No.

16 COUNCILMAN NEILSON: Is that your
17 intention?

18 MR. READ: No.

19 COUNCILMAN NEILSON: We can't enforce
20 federal law here through L&I, right? Is that
21 what you're asking us to do?

22 MR. READ: The only issue we're talking
23 about here, just to be clear, is state
24 regulation of unauthorized practice of law.

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1 COUNCILMAN NEILSON: You're asking us
2 to -- so you're asking us to enforce state
3 regulation on a local level?

4 MR. READ: No. We're asking you to, as
5 the proposed ordinance does, to establish a
6 regulation scheme under which immigration,
7 whatever we want to label them -- I will call
8 them the multi-service agencies for this
9 purpose, are performing only the functions that
10 they are competent and capable of performing and
11 not reaching into functions that they are not
12 competent and capable of performing.

13 COUNCILMAN NEILSON: Currently, if
14 someone reaches into that function that you
15 believe that is incapable and you believe that
16 they be under federal law, how would you go
17 about getting them to stop doing that?

18 MR. READ: Just to be clear, when I am
19 on the Pennsylvania Bar Association Committee --

20 COUNCILMAN NEILSON: I am just trying to
21 ask you what you said. You mentioned that the
22 federal regulation that they are not upholding
23 the federal regulations. That office over
24 there, that business over there is operating and
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1 you believe that they broke federal regulations.

2 How do I stop them from doing that
3 today.

4 MR. READ: Okay. Let me be clear, the
5 United States Citizenship and Immigration
6 Services has an office that refers cases to
7 state agencies to enforce when they believe
8 there has been unauthorized practice of law.
9 They do not go out and certainly not against
10 non-attorneys and force any regulations. It is
11 the responsibility of states. And
12 unfortunately, I wish that wasn't true.

13 But it is the responsibility of states
14 and local jurisdictions to enforce those
15 limitations, especially on non-attorneys. The
16 only role that USCIS and the Immigration Service
17 undertakes -- Justice Department undertakes is
18 attorneys who exceed -- who engage in
19 disciplinary violations can be barred by them
20 from appearing before them as attorneys. But
21 that does nothing about the problem that we are
22 talking about, about the multi-service agencies
23 and notarios and others.

24 COUNCILMAN NEILSON: Thank you.
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1 The -- do we have a number of -- I know
2 you've been working on this, Vanessa, for this
3 project here. Of how many businesses in
4 Philadelphia, do we have like a basic number of
5 how many?

6 MS. STINE: I wish we did have a number.
7 I do not have a number. I have been speaking
8 with a local professor actually on the
9 possibility of doing a survey and actually
10 trying to map out businesses that offer these
11 services in Philadelphia. But I -- because
12 there is no regulatory scheme right now, there
13 is no way to sort of look it up in any ready
14 way.

15 I would say there is pock -- pockets
16 where -- in every immigrant community. When
17 you, you know, go to North Philadelphia and you
18 drive down the street, you are going to see
19 multiple businesses --

20 COUNCILWOMAN QUINONES-SANCHEZ: Girard
21 to the Boulevard there are about 20.

22 MS. STINE: Yeah.

23 COUNCILMAN NEILSON: Oh, they are in the
24 northeast, too. I have had complaints in my
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1 state office, that's why, previous to coming
2 here. Representative O'Brien -- listen to me,
3 almost. Councilman O'Brien and I, the Albanians
4 and Ukrainians, they are getting hit very hard.
5 And so, it is a concern.

6 The paperwork, confusing. The
7 paperwork -- is the paperwork here going to be
8 confusing that has to be filled out to actually
9 become a citizen? That's what they are
10 supposedly helping them, right, with all that
11 paperwork?

12 The complaints I got in my local office
13 was that, hey look, you know we filled out all
14 this paperwork. I spend \$20,000 and I'm still
15 in the same place. And now my 17-year-old child
16 has to quit high school because we're no longer
17 qualified to go -- they get shipped out of
18 school.

19 MS. STINE: Yeah. I mean, I would say
20 in an ideal world, I would love it for every
21 immigrant to seek legal assistance from an
22 immigration lawyer or from a non-profit service
23 provider. The reality is, is that that need for
24 especially for low income immigrants and for
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1 immigrants that can afford to pay for
2 immigration lawyers, that doesn't always happen.
3 And so, the situation we have is where
4 businesses are providing this and that people
5 are going to. I think that the question is can
6 we regulate them and create standards in a way
7 that will better protect immigrant consumers who
8 choose to go there.

9 And that certainly, yes, I would say
10 that, you know, certain forms can be more
11 complicated than others. But if an immigrant
12 customer chooses to seek services from a
13 non-lawyer service provider, that we need to
14 have protections in place so that hopefully we
15 can limit more some of the exploitation that is
16 currently occurring.

17 COUNCILMAN NEILSON: Do we have an idea
18 of how many cases of fraud have been brought up
19 in the City of Philadelphia on this issue? How
20 many cases been brought to head or brought to
21 the attention of the court system or anything
22 like that?

23 MS. STINE: Do you mean, like, for
24 criminal or --

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1 COUNCILMAN NEILSON: Well, you're
2 volunteering as a legal advocate for individuals
3 that have been victims of fraud.

4 MS. STINE: Yes. I know one case that I
5 brought as a law student with the supervision
6 and support of the former Legal Aid Clinic and
7 of John Grogan who is a lawyer who I --

8 COUNCILMAN NEILSON: You brought one
9 case up. That's one.

10 MS. STINE: We brought a civil suit.

11 COUNCILMAN NEILSON: Do we have any
12 research --

13 MS. STINE: That was the first one I was
14 aware of actually in Pennsylvania of an advocate
15 doing this. That was really the reason for my
16 fellowship project. This is an ongoing issue.
17 Nonprofit and immigration lawyers alike see
18 this. They don't know where to send their
19 clients because there is no where to send them.
20 There is no legal advocate to help them.

21 And so, the point of my project is to
22 bring more cases. But certainly with that,
23 there is a need to have a multifaceted approach
24 to addressing this issue. It's not just let's
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1 bring a bunch of civil suits or let's file a
2 bunch of criminal complaints or let's go to the
3 Attorney General Office. It's all of it. It's
4 all of it together. And that's the only way I
5 think we're going to solve this issue.

6 COUNCILMAN NEILSON: With the
7 immigration going on, some of the changes we are
8 about to see under the President's
9 administration -- and this is my last question,
10 Madam Chair -- do we think this is a little
11 premature to wait to see what we get there so we
12 can strengthen what is sent down to us from the
13 Federal Government?

14 MS. STINE: No. I believe that it's --
15 it will make no difference because there are
16 businesses now that have been engaging in this.
17 And the only reason it's even more urgent now to
18 have a regulatory scheme is because with any
19 sort of immigration reform or executive relief
20 that has been announced in the past, and we have
21 seen this -- history shows this and I am afraid
22 it's going to repeat itself -- there is just
23 more. There is just more scams. There are just
24 more people engaging in the unauthorized
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1 practice of law.

2 COUNCILMAN NEILSON: Thank you.

3 COUNCILMAN OH: Point of order.

4 MS. DORENBOSCH: Could I just say
5 something to that?

6 We actually already heard about people,
7 about immigration services providers
8 unauthorized practicing law without
9 authorization already charging people to get in
10 line for when reform does happen. So, I just
11 wanted to add that. It's already happening.

12 COUNCILWOMAN QUINONES-SANCHEZ: Chair
13 recognizes Councilman Oh.

14 COUNCILMAN OH: For point of information
15 for Councilman Neilson, that there have been
16 numerous complaints for many, many years. The
17 issue has always been enforcement. That the
18 responsible entities don't investigate. And in
19 one particular case, it took many, many, many
20 defrauded clients who continually complained
21 until the FBI and the Federal Government
22 arrested and prosecuted and convicted one of the
23 attorneys. This was on a non-attorney. But he
24 was disbarred and went to federal prison and has
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1 since come out.

2 But the problem is that person was
3 involved in, you know, hundreds of clients over
4 the years. But that amount of fraud was
5 involved before any action was taken. The last
6 I heard, he's in New York practicing law.

7 COUNCILWOMAN QUINONES-SANCHEZ: Thank
8 you. Chair, recognizes Councilman Henon.

9 COUNCILMAN HENON: Thank you, Madam
10 Chair and thank you all for coming in and
11 testifying.

12 Not to be redundant, but I just have a
13 few clarifying questions. So, the unauthorized
14 practices of law, would that be the prohibited
15 uses that this bill identifies? Activities?
16 Prohibited activities?

17 MR. READ: Yes. I mean, the intention
18 of the ordinance would be to spell out some of
19 the specific practices that would constitute the
20 unauthorized practice of law and make it
21 possible. Again, I don't want to discount -- I
22 have had clients who have gone to multiservice
23 agencies where the staff in those agencies do
24 not intend to defraud people. But they really
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1 also do not understand the limits of their own
2 competence. So, we want for those who are not
3 evil, we want those people to be in a position
4 to understand the limits of what they can do and
5 to not exceed those limits.

6 MS. STINE: And then just to piggyback
7 on that, the prohibited section also outlines
8 some things, like, that don't misrepresent that
9 you have a special connection to immigration.
10 You know, don't make promises that aren't true.
11 Don't, you know, retain all the documents and
12 provide nothing to the customer. So, the --
13 it's not just, you know, the unauthorized
14 practice of law but also some of the deceptive
15 business practice that have been unfortunately
16 common.

17 COUNCILMAN HENON: Right. Right.
18 Without a question. I would imagine there's
19 examples -- you have examples for each of those
20 prohibited activities or unauthorized practices
21 of law to, you know, I'm not going to say
22 justify it, but to show there's a reason of
23 people being exploited and misled and being
24 robbed of their, you know, abilities --
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1 MR. READ: Yes.

2 MS. STINE: Yes.

3 COUNCILMAN HENON: -- to become legal.

4 So these multiservices -- service agencies, what
5 are they -- what do they charge? Is there --

6 MS. STINE: Yeah, that's a great
7 question. I mean, I've seen lots of different
8 things. I have seen people who have been
9 charged only a couple hundred dollars to help
10 fill out a form. I have talked to people who
11 have paid 5,000/10,000 dollars for assistance.
12 So it ranges \$1,000/\$2,000. It's really a large
13 range.

14 I would say that some of the more
15 egregious cases I have seen are the ones where
16 people pay more money where they believe that
17 they were getting assistance from a qualified
18 lawyer and when, in fact, they were not. But
19 certainly --

20 MR. READ: The frauds can go on over the
21 course of years. That's actually what's
22 particularly destructive about this. You can
23 tell somebody, oh, yeah, it's being processed,
24 right? Or, yeah, that one didn't get approved.
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1 But if you do this all over again, we can get
2 you there.

3 One of the cases that we have seen in
4 the relatively recent past involved an attorney
5 in this particular case, but who took money to
6 process employment authorizations more than once
7 from a particular immigrant where none of those
8 ever had any chance of benefitting that
9 immigrant. And we're talking about I think, in
10 that particular case, \$12,000 paid in
11 installments over time repeatedly.

12 So, it's that ability to continue to
13 extract that makes this kind of crime
14 particularly pernicious in many ways.

15 COUNCILMAN HENON: As Councilman Oh had
16 said, you know, bad people are going to do bad
17 things regardless. And, you know, once we
18 regulate or try to get a hold of -- I'm going to
19 say this -- underground economy out there in a
20 big way, for a lot of things in the City of
21 Philadelphia which we found out through some of
22 the laws.

23 That's why we make codes. That's why we
24 have regulations that try to keep the honest
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1 people honest and try to regulate the safety and
2 public safety for our citizens here in the City.

3 So, I guess, you know, regulating this
4 or codifying some sort of standards would help,
5 you know, in the spirit of trying to stop the
6 exploitation of a certain, you know -- certain
7 group of folks who are looking for services.

8 MS. STINE: Yes, that's correct. And I
9 would say also that, you know, with any sort of
10 enforcement, that's also an educational piece
11 where the City can talk about this. They can do
12 a press release on it. They can -- it also acts
13 as a deterrent for other businesses.

14 Right now, you turn on the
15 Spanish-language radio, you are going to hear
16 businesses that are not lawyers advertising --
17 (speaks in foreign language), it's like come to
18 my office today. Immigration reform is coming.
19 And it's -- there is no accountability. They
20 have been doing it for years. We have -- they
21 are the same people that have been doing this
22 ten years ago. They are still doing it today
23 because they literally have never been held
24 accountable.

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1 It's critical that we start doing that,
2 and it will take time. New people will pop up.
3 If we start, sort of, pressuring people to
4 standardized and to follow the rules, that that
5 exploitation can lessen.

6 COUNCILMAN HENON: Thank you. I have no
7 further questions. Thank you.

8 COUNCILWOMAN QUINONES-SANCHEZ: Chair
9 recognizes Councilwoman Bass.

10 COUNCILWOMAN BASS: Good morning or good
11 afternoon actually now. How are you?

12 I just want to say a couple of things.
13 The first is that I agree with you. I think
14 that the idea that we will finally, finally,
15 finally hold folks accountable who have been
16 doing this for a very long time, I mean, it's
17 just outrageous that this has been able to go on
18 unchecked for such a long period of time. I
19 really want to thank you all for being here for
20 the work that you all do.

21 I did have a couple of quick points and
22 questions. The first is that, when we think
23 about immigrants and coming to this country, and
24 often you will find that people have gotten here
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1 in any number of ways. And so, when you think
2 about, you know, the struggles and the journey
3 that some folks may have taken to get here, and
4 then once they're here -- you don't know what
5 happened along that way. And so, what kind of
6 abuses or threats or intimidation may have
7 occurred en route.

8 When you think about the actual arrival
9 of that immigrant and trying to now establish a
10 life, establish, you know, moving forward and
11 wanting to become a citizen of the United States
12 of America and then being taken advantage of,
13 it's beyond disturbing. Particularly, the story
14 that you mentioned earlier in which, you know,
15 someone actually -- this gentleman came to this
16 country, you know, spent I think you said it was
17 \$15,000 that took a very long time for him to
18 save up. And, you know, what should have been
19 really something that was good and wonderful and
20 progress in his life turned out to be one of the
21 most, you know -- probably in his mind the worst
22 decision that he's ever made and has had so many
23 losses as a result of it. It's beyond
24 disturbing.

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1 And so -- but when you think about
2 immigration in Philadelphia, we know that
3 Philadelphia's growth really has been as a
4 result of immigration. And we want to continue
5 this growth. We need to as a City continue to
6 grow the population. And so, immigration,
7 obviously is a big -- it should be, can be and I
8 hope that it will be a big part of
9 Philadelphia's strategy going forward.

10 And so, I wanted to just ask about
11 additional options in terms of things that you
12 think the City of Philadelphia, tools that we
13 might have in place already but haven't fully
14 utilized. I know -- I can't remember somebody
15 mentioned earlier that we might be able to do
16 like a temporary license. You know, if there
17 are folks who were concerned about the level or
18 if they maybe, you know, little bit questionable
19 or we're not certain if we want to offer a full
20 license, maybe some sort of provisional license
21 was something that I just heard earlier.

22 And so, I was wondering if you can
23 recommend any additional resources that you
24 think the City may already have in place but
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1 we're just -- maybe we're using them for
2 something else or we haven't thought to aim them
3 in this direction. But if you had any thoughts
4 on that?

5 MR. READ: It's a big question. I would
6 not want to seem like I'm copping out, but to
7 say that it's big enough question that I'm not
8 sure this is the place to answer it.

9 COUNCILWOMAN BASS: Okay.

10 MR. READ: I do think that there are
11 some critical challenges that the Mayor's Office
12 is going to face in the next six months in terms
13 of responding to what the President does or at
14 least attempts to do in Washington. There will
15 be things in which helping people prove their
16 residency in the area over a period of time may
17 be critical.

18 One of the things I actually heard from
19 people from that office this morning was
20 thinking of things like, okay, how can the
21 City's tie to PGW, a controversial topic for
22 other reasons, how can we assist PGW in
23 providing proof that this is a person who has
24 paid a gas bill for a number of years, has lived
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1 in a residence?

2 If it is like past occasions, part of
3 what will be necessary is for people to
4 establish how many years they have been present.
5 And so, there are many, many things that social
6 services agencies and government agencies can do
7 in that.

8 You know, we are at a point where being
9 able to work with councilor officials from other
10 countries and how we can go about giving people
11 the kind of identity cards that they can use the
12 banking system instead of being stuck with
13 storing cash under mattresses, which is the kind
14 of thing I used to have clients do and then be
15 robbed because people knew they had cash under
16 the mattresses. Looking -- looking for ways to
17 help people become a part of civil society, to
18 use sort of a larger sense of terms, I think is
19 definitely something we want to do. And I agree
20 with you that my study of the statistic says
21 that Philadelphia grew in the last census
22 precisely because of that presence of
23 immigrants. And that we need that immigrant
24 community to continue to grow.

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1 COUNCILWOMAN BASS: Yes. Well, I would
2 just say that if there is any additional
3 thoughts in terms of specific things that the
4 City of Philadelphia can do, because I don't
5 believe that we have all the answers.
6 Government doesn't have all the answers.

7 And so, you know, I just want to welcome
8 that input and expertise.

9 MR. READ: Thank you.

10 COUNCILWOMAN BASS: You're welcome.
11 Thank you.

12 COUNCILWOMAN QUINONES-SANCHEZ: Before I
13 call on Councilman O'Brien for additional
14 questions, I think that the merits of this bill
15 speak for itself. I think the challenge we'll
16 always face as we try to legislate bad behavior
17 and what I consider to be some of the consumer
18 fraud issues that we have, that immigrants have
19 just become the new targets because, you know,
20 you can take their money and threaten them with
21 deportation at every time.

22 How do we manage this in a way and hold
23 the different enforcement agencies, particularly
24 law enforcement agencies, to task to prosecute
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1 this? Ultimately, it's about the prosecution of
2 these cases.

3 How many cases locally has the Bar
4 Association dealt with as it relates to notario
5 fraud? Like, when people call the bar
6 association and file complaints, is there
7 anybody tracking this right now locally?

8 MR. READ: Well, I should say to the
9 best of my knowledge, the Philadelphia Bar
10 Association hasn't set up a mechanism to do this
11 at all. That's a different discussion for a
12 different day. The Pennsylvania Bar Association
13 has had for many years Committee on Unauthorized
14 Practice of Law.

15 I would have to say it's threshold
16 problem is it has no language capacity. So if
17 you are a defrauded immigrant, you are only
18 going to get to make a complaint to that agency
19 if you've contacted somebody who, A, knows it
20 exists and has the capacity in English to
21 communicate with people there. I wish it wasn't
22 true, but that's the reality.

23 That's probably not a good gatekeeper
24 for this issue. There is a role, and I think
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1 it's a role that the City, if it goes forward
2 with this legislation, can play aggressively in
3 leveraging other agency's jurisdiction to get
4 them to take some lead roles on particular
5 egregious cases. In the right circumstances,
6 the U.S. Attorneys Office can go after some of
7 these people and has.

8 But the role here, honestly, is having
9 some agency that's willing to put in some
10 investigative resources and do some follow up on
11 stuff. And I do think that the carefully
12 thought through proposal here creates a
13 mechanism to do that. It creates a mechanism
14 where, you know, the City could then be sitting
15 with the District Attorney's Office and police
16 and say, okay, you know, we have now whittled
17 down the 500 providers who are providing these
18 kind of things into the following 30, 40 that
19 need some careful attention.

20 And we need you to really try to focus
21 law enforcement resources on those. And if you
22 need law enforcement resources beyond those you
23 have, let's talk about how do you coordinate
24 with other agencies.

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1 One of the -- I believe the FTC came to
2 the March hearings. One of the things that
3 Philadelphia doesn't participate in or didn't as
4 of March at all was a federal system for
5 recording complaints so that other enforcement
6 agencies can look at them. The FTC set up a
7 database that sounds inconsequential. But it is
8 a way in which Councilman Oh was talking about,
9 the dozens of complaints over the years that
10 people can begin to input that information and
11 then target entities for law enforcement
12 activities they need it in.

13 Philadelphia doesn't even participate in
14 that system. So, from Councilman Bass' question
15 about concrete things, yes, getting the
16 Philadelphia Police Department to participate in
17 that, getting the District Attorney's Office to
18 participate in that, would all be critical. But
19 I do think that the City of Philadelphia
20 stepping forward to take a lead on moving
21 legislation like this could make a real
22 difference. And could make a real difference in
23 having people feel there is some place that they
24 maybe can take their complaints and, at least,
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1 get some hearing for them.

2 COUNCILWOMAN QUINONES-SANCHEZ: Right.
3 Normally, when we're dealing with immigration,
4 we are trying to get the City government to
5 cooperate less so that we can protect citizens.
6 Now we are having a conversation about how to
7 protect them more, which is the irony of it.

8 I want to recognize Councilman O'Brien
9 who's been waiting patiently because he has a
10 set of questions.

11 COUNCILMAN O'BRIEN: Thank you, Madam
12 Chairperson. I want to thank you for your very
13 illuminating testimony. And Vanessa and Art,
14 currently, what would you say the level of
15 accountability is for service providers in the
16 City of Philadelphia?

17 MR. READ: It's yours. Go ahead.

18 MS. STINE: No accountability.

19 COUNCILMAN O'BRIEN: Okay. Art, you had
20 testified earlier, and I think it gets to
21 Councilwoman Bass' clarification.

22 Would you say the licensing requirement
23 is the most critical component of this
24 legislation you referred to License A or License
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1 B? But you also emphasized, and I would like
2 you to elaborate again for the record, how
3 important and key it is to have L&I as the
4 enforcement arm of this wherever the license is
5 placed?

6 MR. READ: Whatever we call it, I don't
7 think whether we call it a license requirement
8 or registration requirement matters from the
9 role of what would be critical for a city agency
10 to do. It would be great if we had a consumer
11 protection division that had the power and
12 resources to do this stuff. We don't. So, the
13 entity that I think everyone agrees is the only
14 one that has the capacity to begin to take on
15 these issues is L&I.

16 Frankly, we're not talking about a huge
17 resource expenditure here. We're talking about
18 the ability to utilize targeted inspections in
19 response to complaints to go after people who
20 need to be changed.

21 COUNCILMAN O'BRIEN: Perhaps Vanessa can
22 answer this ne. Why is it -- why is having a
23 provider sign a form which provides notice
24 regarding what he or she can and cannot do, why
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1 is that so critical?

2 MS. STINE: It's important because it
3 puts the provider on notice that they're only --
4 that they are limited in what they can do. And
5 so that how I see it as a litigation tool in the
6 future.

7 If I have a client that comes in who has
8 used a provider services and that provider's
9 been put on notice, that provider said he or she
10 would only do certain things and did a whole
11 bunch of other things. That's -- that's proof
12 in my case. That makes it stronger when I'm
13 asking for treble damages in a civil litigation
14 to show this was -- this was willful.

15 COUNCILMAN O'BRIEN: And I know we're
16 here talking about bad actors, and I know you've
17 come across in your field of immigration
18 assistance services those bad actors. But I am
19 sure you have come across some good actors who
20 run good and honest businesses.

21 Do you feel that this license
22 requirement will help those good actors?

23 MS. STINE: Yeah. I think that for --
24 for again, Art talked about this a little bit.
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1 For people trying to do the right thing and
2 trying to run an honest business, it provides
3 standards and clarity on what people can and
4 cannot do which is always important. And for a
5 small business owner, it's very important so
6 that they don't engage in activities that can
7 make them liable for things that they didn't
8 know that they would otherwise be sort of
9 working in an area that could cause risks for
10 them.

11 COUNCILMAN O'BRIEN: So just for
12 clarity, it's your belief that this ordinance
13 will benefit those good businesses and,
14 specifically, the licensing requirement will be
15 a benefit to that?

16 MS. STINE: Yes. I think that by having
17 standards and regulations, it will benefit good
18 businesses.

19 COUNCILMAN O'BRIEN: And how will this
20 bill if it's passed in its current form, serve
21 as an additional advocacy tool for you?

22 MS. STINE: It will -- the ordinance
23 would serve as an additional advocacy piece for
24 me by enabling me to present, once everything is
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1 in place, that clients and victims could then go
2 through that complaint process in and of itself.
3 Also, it could be used, as I mentioned, as a
4 litigation tool.

5 So because of these clear sets of
6 requirements, if we file civil lawsuit against
7 someone, we are able to show that the business
8 provider engaged in whatever pattern that we're
9 alleging. And the ordinance just provides
10 basically an additional support to our case.

11 MR. READ: Let me give an example from a
12 different context. I think it might help.

13 Much of my work has been in representing
14 migrant farm workers and seasonal farm workers
15 for many years. Much of the regulation, both at
16 the state and federal state, New Jersey and
17 Pennsylvania and federal level of that, has
18 focused on disclosure requirements and written
19 disclosure requirements and focused on it for
20 some very rational and particular reasons.

21 And that was, number one, there are
22 certain things that if people don't do, you can
23 document that they didn't do them. If they're
24 going to produce the disclosure that they
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1 allegedly gave and it's fraudulent, and I have
2 seen some of those that were provided that were
3 fraudulent, it's possible at times to document
4 that the disclosure itself is fraudulent.

5 The ability to get information is, in
6 fact, a powerful tool. You know, much of the
7 regulation of farm labor focuses around
8 disclosure of charges, focuses around disclosure
9 of conditions and is something that has made
10 over the 35 years that I've been representing
11 farmworkers, some real changes.

12 We have gotten to a point where the
13 agricultural employer who wants to do the right
14 thing, and there are certainly some of them for
15 whom that's true, is capable of knowing what
16 they need to do in order to do the right thing.
17 That's the kind of thing we're talking about
18 here.

19 COUNCILMAN O'BRIEN: And, Vanessa, you
20 touched on advertisement. Why is it so
21 important that advertisement be regulated?

22 And what kind of advertisements have you
23 seen in these businesses, and how will
24 regulating help that?

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1 MS. STINE: Sure. I mean, a lot of the
2 advertisements I have seen -- and one example
3 that I gave was on Spanish-language radio which
4 is it talks all about come to my office for
5 services. I have been doing this for a long
6 time. They never actually say that they're a
7 lawyer, that they're not a lawyer. But it's
8 confusing, and it's really fast and it's
9 confusing.

10 And so, requiring people to make that
11 disclosure, which I know will be done quickly,
12 but again the advertisement disclosure, the
13 disclosure for their signage, all of that sort
14 of stuff will hold people accountable and they
15 might think twice about the way they present
16 their business so that it's more honest and it
17 doesn't cause confusion for immigrants who
18 believe that they're getting assistance from a
19 qualified lawyer when, in fact, the person is
20 not.

21 MR. READ: It's also enforceable.
22 Because you can record what's said and determine
23 did it or didn't it have the disclosure it was
24 supposed to have.

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1 COUNCILMAN O'BRIEN: And in your
2 testimony, you state without the licensing
3 requirement, the ordinance will not be
4 effective. Why did you say that?

5 MS. STINE: So, the question about the
6 licensing. I think that without -- the issue
7 is, that if you don't affirmatively require
8 businesses to -- to be licensed or to register,
9 then there's no accountability because the
10 businesses aren't able -- they are not held --
11 they are not being regulated is how I would see
12 it.

13 MR. READ: There is something like
14 200,000 notaries in the Commonwealth of
15 Pennsylvania. It's an astoundingly large
16 number. Hopefully, this will make it possible
17 for the City to assemble a list of agencies that
18 are doing this. And frankly, the fare to put
19 yourself on that list is something in and of
20 itself should be significant and should be
21 significant to law enforcement.

22 But if we are able to identify, as I
23 said before, okay, we have 500 providers here.
24 And of those, there is 30 to 50 that need to be
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1 targeted, that's going to make law enforcement's
2 ability to act on this much easier than
3 otherwise.

4 COUNCILMAN O'BRIEN: Thank you.

5 COUNCILWOMAN QUINONES-SANCHEZ: Thank
6 you. Another question real quickly, then we
7 will move on. I know we have a guest from New
8 York and he's been waiting patiently.

9 In an ideal world, if we had a consumer
10 protection bureau in the City of Philadelphia,
11 what would you like to see tools there to
12 protect for this kind of activity?

13 MR. READ: I think the ordinance spells
14 out the tools we want for this kind of activity.
15 I think the distinction, in my mind, between a
16 consumer protection bureau and L&I is the degree
17 to which they're sort of -- to put it in sort of
18 marketing terms, who do they see as their
19 customer. Who are they facing towards.

20 I do think consumer protection bureaus
21 kind of by definition see themselves as focused
22 on the consumer community. So, they do have a
23 sort of focus role that's different. I don't
24 think it is impossible for L&I to play that

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1 role. But it's maybe not its natural role from
2 what they're used to playing. But that doesn't
3 mean that they can't do these functions and that
4 these same concrete tasks can't be undertaken by
5 them or by a consumer enforcement agency.

6 I do think -- again, it's the way in
7 which you seek input from the community and
8 reach out to that community. I would hope that
9 a consumer enforcement agency would proactively
10 be conducting public advocacy -- public
11 education campaigns in ways that would have the
12 public be more aware of their protections. It
13 maybe MOIMA got to take on some of those tasks
14 in the absence of that -- of that agency.

15 COUNCILWOMAN QUINONES-SANCHEZ: Yes.
16 Well, I think that one thing as, you know, as we
17 move forward with this again with the merits of
18 the situation and in light of what we hope would
19 be some sort of national positioning on this,
20 clearly all of us have a role to play in
21 education. My fear with all of this stuff is we
22 can never be proactive in terms of getting the
23 information out there enough, you know, for all
24 of us who think we say this. We're walking
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1 billboards to trying to promote and protect
2 people. Getting the information out is always
3 very, very, very difficult.

4 We thank you for the work that you do
5 and helping us with that. So, we have no
6 further questions for this -- for these
7 witnesses. Thank you again very much.

8 And we are going to move to Matthew
9 Blaisdell from the Immigration and Nationality
10 Law. My apologies. And I have a Laurie Malone.

11 COUNCILMAN OH: She is here. She
12 stepped out.

13 COUNCILWOMAN QUINONES-SANCHEZ: Okay. I
14 don't know if there is anyone else scheduled
15 after that, but thank you so much for your
16 patience. I know you traveled in this ugly
17 weather.

18 MR. BLAISDELL: Absolutely. It's an
19 important issue.

20 COUNCILWOMAN QUINONES-SANCHEZ: Yes.

21 MR. BLAISDELL: My name is Matthew
22 Blaisdell. I am an immigration attorney in New
23 York speaking in my own individual capacity
24 today although through the American Immigration
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1 Lawyer's Association. I do Chair the New York
2 Chapter on Ethics and Unauthorized Practice of
3 Law and sit on the national committee for
4 consumer advocacy regarding immigration fraud.
5 I'm also active on the issue that the New York
6 City Bar Association and the New York State Bar
7 Association. And I believe I'm probably invited
8 to speak today because at the state level, we
9 just went through this whole process that you're
10 now undertaking and, very likely, will do so on
11 the local level very shortly.

12 So firstly, I do want to commend you for
13 tackling this issue. I know it's difficult.
14 Any time you address immigration at any level of
15 government, it gets very complicated which is
16 very little ever happens. And there is very few
17 examples of a city that's done this quite well.
18 So I, again, want to extend my commendations to
19 you guys for trying this.

20 The reason why people are reluctant to
21 take this on and the reason why it's a very
22 important issue as well is because it's highly
23 complex. The consequences are very dire, and
24 it's an extremely vulnerable population. I will
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1 try not to reiterate much of what's already been
2 said today, but I do want to point a few things
3 out. As the Supreme Court recently noted,
4 nothing is ever simple with immigration law as
5 is with legislation. There is many agencies
6 including through the Department of Homeland
7 Security. There's US ICE, USCIS, Customs and
8 Border Protection. You are also dealing with
9 the Department of Labor, the Department of State
10 and the Department of Justice.

11 Adding some more layers is there is
12 many, many forms involved. We will get into the
13 issue of form selection very briefly. But if
14 you just go to the USCIS.gov click on All Forms,
15 you are going to see a lot. And they are really
16 complicated and all for very different things
17 that can affect a person's legal right.

18 There is very many and very dense
19 grounds of inadmissibility governing people not
20 allowed to come here with related waivers as
21 well as grounds of removability for people --
22 governing people who are supposed to leave the
23 United States with their accompanying waivers.
24 And again, many, many forms and forms of relief

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1 within the Immigration Court, countless
2 regulations, statutes, agency manuals, agency
3 policies and abstract and very frequently
4 nonsensical legal concepts that govern every
5 single aspect of this practice.

6 So, it's complicated. It's quite
7 frequently -- we compare it to patent copyright
8 law in terms of its sophistication. And as you
9 heard today, the consequences can hardly be any
10 higher. On the one end, it's time and money.
11 We have seen clients lose tens of thousands of
12 dollars, cases that drag on, you know, well over
13 ten years.

14 At the other end, it often results in
15 banishment, permanent separation from family
16 members and removal to countries where
17 oftentimes our clients face life threatening
18 conditions, which is also why the US Supreme
19 Court has said that the ability to remain in the
20 United States is as important as any potential
21 jail sentence. Which is why now in criminal
22 proceedings, legal representation is required to
23 include immigration advice for non-citizen
24 defendants.

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1 So for these reasons, only attorneys and
2 non-lawyer representatives accredited by the
3 Department of Justice may provide legal services
4 which include any advice on a matter involving a
5 person's legal rights. Both the Code of Federal
6 Regulations and USCIS define the practice of
7 immigration law in a manner that includes the
8 selection and preparation of forms in addition
9 to any advice on any matter concerning a
10 person's immigration status such as how to
11 answer questions on these forms and what options
12 a person might have.

13 I very briefly want to touch on a
14 comment earlier or a question regarding, well,
15 if a person is well intentioned but not a
16 lawyer, when can -- what can they do? What they
17 can do is go through what we call the Vo-Leg
18 process, which is for the nonprofit organization
19 can apply for recognition through the Board of
20 Immigration Appeals underneath the Department of
21 Justice. It's not an easy process. They have
22 to have the capacity and demonstrate the ability
23 to do this effectively. But if they have the
24 resources, access to experienced immigration
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1 attorneys for mentoring purposes, they can have
2 individual members of that organization then
3 apply for accreditation.

4 They have to take a 40-hour training
5 which sometimes I give classes for. And they
6 have to get -- continue their education the same
7 way a lawyer or a doctor would be. And then
8 there is some extent limited, they might only be
9 able to practice before USCIS. But some can
10 even go before an immigration judge. So people
11 who really want to do the right thing, there is
12 a venue available.

13 Crucially, they are only able to charge
14 nominal fees. If you want to make money
15 practicing immigration law, you do have to get a
16 law license. But if you just want to help
17 people, there is a process available for that.
18 One thing this bill would do by making clear who
19 can do what is hopefully encourage people to go
20 through this process so they can do this
21 competently.

22 So to my knowledge, this is actually one
23 of the first local ordinances in the country to
24 explicitly acknowledge that under Federal Law

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1 the unauthorized practice of immigration law
2 includes recognizing a person who is not a
3 licensed lawyer or a credit representative,
4 cannot select, prepare or otherwise advise on
5 how to answer questions on forms or provide
6 advise as to what options a person would have.

7 So, by accurately defining immigration
8 fraud the way this bill does or at least the
9 version I have seen, it makes it easier to
10 educate immigrant communities. And that's
11 really the big thing, to be able to go into an
12 immigrant community and say very clearly these
13 people can do this. These people can do this.
14 And when we have done that, it's just -- it's
15 very valued. It's a tremendous sense of relief
16 because nobody knows.

17 One of the problems with the current
18 local law in New York is that it says, you know,
19 ISPs, Immigration Service Providers, cannot
20 provide legal advice but they can provide any
21 immigration assistance without defining either
22 term. So, you know, we can always go into the
23 community and say well the Code of Federal
24 Regulations says this and USC policies and old
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1 INS memos say this, but it's much better to say
2 under the local ordinance in the City of
3 Philadelphia, these guys can only translate, get
4 documents and schedule medical appointments or
5 whatever. That's much more effective and will
6 really help combat the problem. It also
7 resolves any potential conflicts with federal
8 law which govern -- which take priority over
9 state and local law in the field of education.
10 And it raises the standard of representation
11 again by encouraging well-meaning people to go
12 through the recognition process.

13 And finally, I would like to draw
14 attention to just a few innovative approaches
15 taken by the legislation that might be
16 appropriate for duplication elsewhere. Such as
17 the mandatory provision of a brochure by the
18 service provider highlighting several of the key
19 provisions. We found this to be very effective
20 in other areas especially with less
21 sophisticated communities having colorful,
22 simple brochures stating exactly what is what.

23 And the requirements that disclosure
24 signs be designed, approved and produced by a
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1 single city department which we think will
2 promote consistency between providers an
3 assurance that immigrants are getting accurate
4 information. And I believe there's also a
5 private right of action in here which is
6 something that we just worked very hard to get
7 into the New York state law. And we're pretty
8 excited about that as are, I know, other
9 jurisdictions that have a private right, as
10 well.

11 To address a few other points regarding
12 the federal scheme. Yes, the FTC can receive
13 complaints and they do so in bulk. They have
14 not been very diligent in terms of following up
15 on a lot of these, but they respond to numbers.
16 So the more they get, the more they are likely
17 to take action. And they do only look at
18 interstate cases. But that's not usually a
19 problem here. Because as we see, and if you go
20 on -- at least in New York, I go on to Craig's
21 List. I look at Legal Services in New York
22 City. I will find 18 providers from out of
23 state saying, you know, we are licensed under
24 Georgia Law to provide immigration services. We
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1 can -- just call us on the phone. And they are
2 advertising directly in New York. It happens
3 all the time. And it's -- that's something that
4 the FTC can do.

5 There is also the US Attorney's Office
6 sometimes prosecutes these cases. I have had
7 one client who was ripped off by a woman
8 pretending to be an INS agent. She is now
9 serving a sentence in New Jersey for extortion
10 and impersonation. I can't speak to the legal
11 scheme in Pennsylvania, but in New York the
12 District Attorneys do enforce the local
13 ordinance on occasion. Doesn't often result in
14 prosecutions, but they use it for charging and
15 negotiation and stipulation and they like it.

16 On one case, they did actually secure a
17 conviction under the local law, though, they
18 typically rely on statutes like scheme to
19 defraud or grand larceny or that sort of thing.
20 But there is a lot of overlap. Every once in a
21 while, Homeland Security investigations -- will
22 launch an investigation. Really all of these
23 bodies we're talking about, they go after the
24 bigger fish. The mom and pops, the little

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1 places are the real heart of the problem.
2 They're the places that can close down one day
3 and reopen across the street the next day.
4 They're the places where people have personal
5 relationships with their tax preparer or the
6 person who is acting as a broker.

7 In every community, every community
8 comes from a different scheme in their home
9 country that people will exploit over here.
10 Travel agencies in one country facilitate a lot
11 of this kind of thing. So it's different and we
12 see a lot of schemes. And one of the issues is,
13 say, somebody files an -- something -- the early
14 comments reminded me of this.

15 One of the dangers, if somebody files --
16 a well-meaning person says I think you're
17 eligible for this, that files an application.
18 If it gets denied, traditionally or at least
19 until they Attorney General change their
20 prosecutorial discretion policies, any time a
21 case was denied by USCIS, an application, say
22 they didn't have the right filing fee or failed
23 to respond to requests for evidence, that case
24 would get sent directly to ICE. That case very
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1 well might then usually got referred to
2 Immigration Courts.

3 Just filing for application can put you
4 in deportation proceedings for something that
5 you believed and maybe the person helping you
6 believed that you were eligible for, but they
7 just didn't have the competency to realize that
8 this was a mistake. Maybe something you did in
9 your past, you're out of the country too long or
10 you had an arrest for something that triggered
11 one of these grounds of inadmissibility. Next
12 thing you know, you are in deportation
13 proceedings.

14 DHS can go back to that policy any day.
15 Right now they are not pursuing those
16 aggressively, but traditionally they have.
17 That's why it's very clear and very crucial that
18 any well-meaning individual either partner with
19 an attorney, many of whom are not the most
20 scrupulous individuals. But there is a system
21 in place to file complaints and maybe file a
22 remedy in the courts to reopen a case if you
23 were provided ineffective assistance of counsel.
24 And certainly, limited circumstances. But
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1 that -- none of these remedies are available for
2 people who are not licensed attorneys or
3 accredited representatives.

4 And I think that responds to a few of
5 the things we have heard today. But one thing
6 that the state legislation has been really
7 helpful for is it really kind of brought
8 everybody together. So what we have now are the
9 FTC, Homeland Security Investigations, Fraud and
10 National Security Units from USCIS all sitting
11 down with the advocates and elected
12 representatives and the different enforcement
13 bodies at the state and local level to try to
14 come up with common, you know, intake processes,
15 referral mechanisms, different ideas. And
16 that's been very helpful in a lot of respects,
17 as well.

18 Hopefully, you know, these efforts to
19 the extent that they get everybody talking to
20 each other will prove fruitful in other areas,
21 as well.

22 COUNCILWOMAN QUINONES-SANCHEZ: Thank
23 you. I can assure you we are not New York. We
24 are ground zero for all that is wrong with
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1 immigration, so.

2 MR. BLAISDELL: That's every place.

3 COUNCILWOMAN QUINONES-SANCHEZ: Yes,
4 unfortunately. Had a question. For our
5 purposes when you say DHS, the Department of
6 Homeland Security, that's our Department of
7 Human Services here. I just want to clarify for
8 the record.

9 You mentioned ISP, Immigration Service
10 Providers. Is that defined at your state level
11 or your local level?

12 MR. BLAISDELL: Both. So, the local
13 ordinance was last passed in 2004 in the city.
14 But basically, paralleled the requirement of the
15 state law under the General Business Law. They
16 both had basically the same terms. They created
17 this legal creature, the Immigration Service
18 Provider. That still exists under the State Law
19 that was revised and probably would under a new
20 local law. The value of that is always being
21 debated.

22 But we think as long -- to the extent
23 that it does exist having -- it's absolutely
24 crucial to have the duties and scope very well
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1 defined as they are in this legislation.

2 COUNCILWOMAN QUINONES-SANCHEZ: I will
3 recognize Councilman David Oh.

4 COUNCILMAN OH: Thank you very much.
5 Thank you for your testimony. So, I think
6 probably as the Chairwoman said, I think the
7 value and merits of this effort is clear. But I
8 am going to guess the reason why this hearing is
9 bifurcated is because it is unclear exactly how
10 this is going to get enforced. And so, that is
11 kind of the interesting issue for me to explore
12 with you. Because from what you told us just
13 now, you have actually done that in the state of
14 New York.

15 MR. BLAISDELL: That's correct. And at
16 the city level.

17 COUNCILMAN OH: And in New York City.
18 When was that done?

19 MR. BLAISDELL: The state bill was
20 signed into law last June. There was an
21 existing bill, but there were a lot of problems
22 with it. What we have now is something better
23 at the state level. And at the local ordinance
24 was last done 2004. And there's a good chance
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1 that might be revisited very shortly, as well.
2 The thought of Executive Action coming out has
3 everybody in bit of a panic. Keeps some of us
4 up at night.

5 COUNCILMAN OH: Okay. So New York City
6 had a bill since 2004. The state had a bill and
7 just redid the bill June of 2013.

8 MR. BLAISDELL: Correct.

9 COUNCILWOMAN QUINONES-SANCHEZ: '14.

10 COUNCILMAN OH: This last year?

11 MR. BLAISDELL: '14. This last summer.
12 And it just went effect, I think, this month.

13 COUNCILMAN OH: Okay. Have those bills
14 been effective in addressing the core problem
15 here of fraud being perpetrated against victims
16 of immigration services?

17 MR. BLAISDELL: Well, we have a
18 different scheme in the city. There's the
19 Department of Consumer Affairs which does not
20 require a license in order to go in and do
21 investigations. They have a checklist. It's
22 called the ISP checklist. They can go in, just
23 look around, check off boxes, issue fines.

24 So, they are able to do that regardless.
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1 And we are -- the extent to which they've been
2 very effective at that is questionable. But I
3 think with the change in administration, we
4 definitely expect a more vigorous enforcement.
5 That is really often what it comes down to is
6 just the motivation of the agencies and the
7 administration and extent to which they
8 cooperate with stakeholders in the community.

9 COUNCILMAN OH: That's the City of New
10 York?

11 MR. BLAISDELL: This is at the city
12 level, correct. At the state level, this would
13 be like the Department of State. And the
14 mechanism created in the state bill is making
15 permanent an executive agency called the Office
16 for New Americans.

17 And what they do which is very
18 effective, is they partner with nonprofit
19 organization Catholic Charities to run a
20 hotline. It's advertized on public
21 transportation, subways, the buses, I think even
22 on radio. If you've been a victim of a scam or
23 immigration fraud, call this number. They have
24 the intake mechanism that they have developed
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1 through the stakeholder meetings. And they will
2 send it to the appropriate body be it the
3 Attorney General, District Attorney, FTC. They
4 don't send it directly to ICE for privacy
5 reasons, but ICE will then cooperate if DAs or
6 AGs if appropriate.

7 That's been very effective. And they
8 have gotten a lot of complaints. A lot against
9 attorneys. They don't have the capacity to deal
10 with those just yet. But they -- all the
11 agencies, CIS, have provided their feedback on
12 it on the form. And they find it to be a very
13 effective tool.

14 COUNCILMAN OH: Let me ask you this
15 question. And I understand this and especially
16 the notices and that type of thing. But
17 typically at least to the general public, one of
18 the reasons why these things haven't been
19 effective is because unauthorized practice like
20 unauthorized practice of medicine, the person
21 wasn't qualified to do the job. And so, you
22 would send them to someone who was qualified.

23 In immigration law, any lawyer can
24 practice immigration law.

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1 MR. BLAISDELL: Correct.

2 COUNCILMAN OH: And so, many of the
3 complaints within the community include lawyers
4 who are practicing a case for the first time and
5 also don't really know what they're doing and
6 have made mistakes. Although innocently, let's
7 say, but they just really didn't understand what
8 they were getting into.

9 And how is that dealt with? Has that
10 been a problem? Has it not been a problem?

11 MR. BLAISDELL: It's always a problem
12 especially given how complicated this stuff is.
13 A lot of people, you know, they practice in
14 other areas of law, say, landlord tenant or they
15 do divorces or whatever and they think they can
16 just step into this and do the same thing on a
17 part-time basis. Most of us that do immigration
18 do only immigration because you learn something
19 new every day and it's a headache.

20 Competency is a real issue. That would
21 be -- New York State doesn't regulate the Bar
22 Association the same way it is in other states.
23 So, these issues have to be addressed solely by
24 the grievance committee for that particular
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1 jurisdiction. They often, I think, can do a
2 better job of monitoring bad lawyers. But the
3 mechanism does -- it is in place. Some of the
4 grievance departments do have an advisory panel
5 of immigration lawyers who they consult with
6 regularly. Like, is this a real practice. You
7 know, what are the issues with this.

8 We work with -- same way we do this with
9 District Attorney's offices, as well. They have
10 certain lawyers they call up. Is this a scam?
11 Why are people filing these, you know, this
12 I-360 petition for special immigrant. And why
13 are we seeing all these case at one time for it.
14 This doesn't make any sense.

15 So, having those bodies available has
16 been very helpful.

17 COUNCILMAN OH: It would seem that
18 because a lawyer has gone to law school and they
19 have had to pass the bar and their whole life
20 depends on their practice, that they would not
21 jeopardize their license. So, you know, that
22 they would be better at providing services than
23 someone who just opens a service out there in
24 the public.

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1 MR. BLAISDELL: Yeah. Really almost
2 have to do your homework. I mean, there is no
3 better answer than to just, you know, spend the
4 time to find out who the reliable attorneys are
5 and make sure that communities know that if you
6 feel like you've been taken advantage of a
7 lawyer, there is a mechanism in place. There is
8 a place to report it. And then, I guess,
9 provide the pressure on the disciplinary
10 committees to process those complaints.

11 COUNCILMAN OH: Okay. My final question
12 to you based on your expertise and experience,
13 there is the Bar Association. There is the
14 courts. There is the Immigration Service.
15 There is all these prosecutors and law
16 enforcement. Typically, people complain about
17 fraud and they're not -- there hasn't been a lot
18 of action done over the years. Here, the City
19 is being asked to create this process to now do
20 what the Bar and others have not done.

21 What makes it likely and more possible
22 that a city-run entity like L&I will be
23 effective in responses as opposed to all these
24 other entities that have not been effective in
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1 the past?

2 MR. BLAISDELL: My guess is, it may be a
3 learning process. Some of these issues are
4 tricky. Some of them are easy going in with a
5 checklist and just marking things off. Some of
6 it like are they giving legal advice may be a
7 little more complicated. It's motivation is
8 what makes it effective.

9 Just having people at -- in these
10 agencies who take it seriously and communities
11 who make sure that they continue to take it
12 seriously and just being active. Letting the
13 communities know that a lot of this is on them
14 and the stakeholders and other nonprofit
15 organizations to help encourage people to file
16 complaints.

17 And this is one reason I think this
18 hotline is -- that we've established is really
19 great. Because it's not -- the Department of
20 Consumer Affairs in New York has their own
21 mechanism, but this run partly by the advocacy
22 organizations has been far more effective
23 because they have the motivation. Once they are
24 involved in the process, they have an intake

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1 they can follow up on it. It's really everybody
2 kind of being motivated by the issue and working
3 together and keeping pressure on each other to
4 do our jobs.

5 COUNCILMAN OH: I'm sorry. Now I do
6 have one more question.

7 Is there a policy from the New York City
8 governmental entity that if someone steps
9 forward and says, listen, I'm undocumented. I
10 paid 15,000. I got ripped off, that's the
11 person, that they are not reported by that New
12 York agency or are they reported to --

13 MR. BLAISDELL: No. Nobody -- I haven't
14 heard of that happening, and they go to great
15 pains to explain that they don't do that.
16 Actually, the District Attorney's Offices for
17 each Manhattan and Brooklyn now have an
18 Immigrant Fraud Unit that spends half their time
19 doing public education and half the time
20 prosecuting cases involving immigration fraud
21 involving some of those statutes I mentioned
22 earlier.

23 They are very activist in that regard.
24 The State Attorney General's Office has a
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1 hotline, I think, with several languages as well
2 as an online mechanism and people devoted
3 strictly to that. There is the comfort level
4 of, you know, having a go-to person at each
5 enforcement agency that, you know, will take
6 care of you. Because -- and they know. If they
7 ever referred someone to immigration
8 enforcement, they would lose all credibility and
9 they wouldn't be able to do their job very well
10 and they would get all sorts of flack from the
11 community.

12 COUNCILMAN OH: Thank you very much.

13 MR. BLAISDELL: Absolutely.

14 COUNCILWOMAN QUINONES-SANCHEZ: Thank
15 you. Councilman Neilson.

16 COUNCILMAN NEILSON: Thank you, Madam
17 Chair. In 2004, New York City passed
18 regulations on this kind of type of practice.
19 Did they license those businesses as we are in
20 this legislation?

21 MR. BLAISDELL: They did not. Again,
22 because we have a different scheme in New York
23 where Consumer Affairs does not need a license.
24 They can still do sweeps --

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1 COUNCILMAN NEILSON: I'm sorry to cut
2 you off. It's under Consumer Affairs. They do
3 sweeps of these businesses to make certain that
4 their compliant. As any other business, a lot
5 of times, say I open a business and everybody
6 else at the table here is my employee. Is there
7 anything to regulate those individuals? Because
8 the license holder many times isn't that person,
9 as we know, sitting at that table.

10 MR. BLAISDELL: Well, I can't speak to
11 the scheme in Philadelphia. But certainly
12 you're not required to have -- our DCA doesn't
13 require a license in order to issue fines in
14 order to enforce the local law. You still have
15 all the signage requirements, the contract
16 requirements. You can't give legal advice, all
17 of that sort of thing. DCA can still enforce
18 that regardless of a license or registration.

19 COUNCILMAN NEILSON: So, they come into
20 my place of business and I'm not there and they
21 see Councilman Oh giving this kind of advice.
22 Who gets fined? Me or the Councilman himself?
23 Me as the business owner or the employee?

24 MR. BLAISDELL: Anyone. One of the
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1 schemes we see is a lot of these places,
2 multiservices, will actually hire attorneys
3 which is an unethical practice, at least in New
4 York State. That is the facilitation of the
5 unauthorized practice of law. They've been
6 doing that more aggressively now given the job
7 market for graduating law graduates who are
8 desperate for work and less sophisticated about
9 these type of schemes.

10 They will respond to an ad for, you
11 know, need an asylum attorney. Turns out they
12 are working for maybe a snake or a notario or a
13 human smuggler and they have no idea. It does
14 get difficult sometimes for enforcement to know
15 exactly what's going on, which is one of the
16 reasons we try to actively work with our
17 agencies to make sure that they are able to
18 recognize these schemes.

19 Anybody in any business could be fined
20 by the DCA no matter who happen to be sitting
21 there, who has a license or not.

22 COUNCILMAN NEILSON: You mentioned in
23 your testimony also that there is an IPS
24 Checklist that you -- is made available to the
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1 employees. Can you please furnish us with a
2 copy --

3 MR. BLAISDELL: Sure.

4 COUNCILMAN NEILSON: -- so we can
5 distribute and see a little bit and see how it's
6 done. Also, there is no sense in reinventing
7 the wheel. I would say if you can get it to
8 Councilman O'Brien, maybe he can take a look at
9 that.

10 MR. BLAISDELL: Absolutely. They have a
11 complaint mechanism that's available online as
12 well, two different sources actually. You can
13 file a complaint by calling 311 or going -- I
14 think there might be an equivalent to that in
15 Philadelphia.

16 COUNCILMAN NEILSON: We have a 311.

17 MR. BLAISDELL: Yeah. It's the same
18 thing. They can call or do an online complaint
19 through that or through the Department of
20 Consumer Affairs website.

21 COUNCILMAN NEILSON: How does New York's
22 311 -- another hearing. The -- okay. I thank
23 you today for your testimony and traveling far
24 for us and your patience. I am sure you've
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1 heard it a couple times from all of us, couldn't
2 get started on time, but thank you so much for
3 hanging in. Appreciate it.

4 MR. BLAISDELL: Thank you so much for
5 considering the legislation. An effective tool
6 for combatting this will measurably improve the
7 lives of a lot of residents in the City of
8 Philadelphia. It will keep families together.
9 May even save lives for some of our clients who
10 are going back to very dangerous places and may
11 actually be eligible for, say, a green card.
12 But the wrong advice can send them the other
13 direction. This absolutely crucial and it's a
14 tough issue.

15 COUNCILMAN NEILSON: And it should be
16 noted for the record that Councilman O'Brien and
17 his staff have worked really hard on this.
18 Although we get to vote it out of committee
19 today, it was actually him and his staff who put
20 this all together for our office to hear. And I
21 want to thank him for that publicly.

22 COUNCILWOMAN QUINONES-SANCHEZ: Thank
23 you. Before I recognize Councilman O'Brien, I
24 just wanted to have Laurie Malone come through.
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1 I think that would be our last testimony.

2 Is there another hearing going on that I
3 have to clear the room? Okay. Please don't
4 leave. Councilman O'Brien had a --

5 COUNCILMAN NEILSON: You good? He's
6 good, let it go.

7 COUNCILWOMAN QUINONES-SANCHEZ: Okay.
8 Ms. Malone. No. No.

9 COUNCILMAN O'BRIEN: I just have one
10 point of clarification. And that is, the reason
11 that we didn't put lawyers in this legislation
12 is because they are governed under the
13 Pennsylvania Supreme Court and we didn't want to
14 step on their turf.

15 The second issue is I think we heard
16 extensive ceremony -- or testimony from
17 Mr. Blaisdell and from Art and Vanessa on
18 enforcement. That's basically the only reason
19 we're here. As point of clarification, the
20 bifurcation of this hearing was not because of
21 enforcement. It was for other reasons, which
22 I've been asked not to speak to so I won't.

23 So, I did want to ask Mr. Blaisdell one
24 question. That is, have you recommended any
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1 provision of our bill to the City Council of New
2 York?

3 MR. BLAISDELL: Yeah. I like the
4 brochures. That is going to be a little tough
5 for our DCA to do because they don't require a
6 license. They can go in and do inspections and
7 fines, but they needed the license in order to
8 require the brochure. But they love the
9 brochure. It's been very effective in recent
10 disability law that they passed. And it's --
11 particularly, in working with immigrant
12 communities. As opposed to, you know, just
13 having everything in a contract which even, you
14 know, sophisticated lawyers don't often read
15 their own contracts when they buy stuff. So,
16 it's having that brochure, I think, is crucial
17 especially with this population.

18 And also the signs. It also makes it
19 easier to educate communities. Look for this
20 particular sign rather than just allowing them
21 to develop their own materials. It's my
22 understanding that it's, I think, this case it
23 would be created by the city in multiple
24 languages. So again, that makes education

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1 efforts much easier and also makes it a lot
2 easier for enforcement. So, we may very well
3 investigate that as we go for a local law in New
4 York, as well.

5 COUNCILWOMAN QUINONES-SANCHEZ: Thank
6 you.

7 COUNCILMAN NEILSON: One more thing if I
8 can.

9 COUNCILWOMAN QUINONES-SANCHEZ: Sure.
10 Councilman Neilson.

11 COUNCILMAN NEILSON: Everybody that came
12 up to that desk today talked about education.
13 What is New York City doing to educate the
14 workers that deal with this issue?

15 MR. BLAISDELL: Our Mayor's Office of
16 Immigrant Affairs is very active. Especially,
17 you know, we just had a new administration come
18 in both in the Mayor's Office and City Council.
19 And again, everybody coming together to talk
20 about these things. We have had the border
21 crisis that kind of brought everybody together.
22 Executive Action is going to do the same thing.

23 It's just devoting resources and
24 relationships with nonprofit organizations.

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1 Citizenship now is a big one in New York. Legal
2 aide, you know, Catholic charities and various
3 immigrant advocacy coalitions, developing
4 relationships with both enforcement, say the
5 District Attorney's Office and with the Mayor's
6 Office and finding innovative ways to get into
7 the schools, into the churches, on the, you
8 know, ethnic news programs and radio programs.

9 And it's just, as a matter of practice,
10 those relationships have kind of developed over
11 the years. As soon as something happens,
12 everybody knows who to talk to.

13 COUNCILMAN NEILSON: Thank you.

14 COUNCILWOMAN QUINONES-SANCHEZ: Thank
15 you. If we can have Ms. Malone who is our last
16 scheduled -- you had --

17 COUNCILMAN O'BRIEN: Yeah. I just
18 wanted to add one follow-up thing to Councilman
19 Neilson's testimony and just recognize Vanessa.
20 Because I understand the Notario Fraud Project
21 is currently working with the Police Department
22 in training up their community relations
23 officers and their detectives. And that they're
24 working on training materials that will be used.

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1 And these materials will be approved by the
2 Police Department.

3 But it's also important to recognize
4 that that training has to take place before any
5 educational outreach takes place. But I would
6 like to recognize your efforts in trying to
7 accomplish that. And through that, I believe
8 the District Attorney's Office is going to come
9 up with a list of charges that will further.

10 COUNCILWOMAN QUINONES-SANCHEZ: Thank
11 you. Ms. Malone. Thank you for your patience.

12 MS. MALONE: Of course. I'm used to
13 this. I sit in courthouse all day long.

14 COUNCILWOMAN QUINONES-SANCHEZ: Hope
15 we're a little bit more entertaining.

16 MS. MALONE: Good afternoon, Members of
17 the License and Inspection Committee. Thank you
18 for allowing me the opportunity to speak in
19 support of Bill 140142. My name is Laurie
20 Malone. And I'm Deputy District Attorney of the
21 Pretrial Division in the District Attorney's
22 Office.

23 I testified back in February when we had
24 a similar hearing on notario fraud. And I
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1 wanted to reiterate that the District Attorney's
2 Office finds that this issue is a real and
3 disturbing problem. We know that there are
4 people out there who provide immigration
5 assistance and pretend to be qualified to help
6 immigrants obtain legal status. They help them
7 draft wills or other documents and purport to
8 provide legal advice.

9 The consequences for victims are
10 significant and expensive. Not only has the
11 victim suffered a loss of money, but the
12 underlying reason for seeking the services of
13 these providers has not been addressed. This
14 means that a will was not completed or bad legal
15 advice was given or appropriate immigration
16 papers were not filed. Victims are not limited
17 to immigrants. But we do know that immigrants
18 are non-native English speakers are often the
19 victims of this fraud.

20 We know that there are many victims out
21 there who are not reporting to law enforcement
22 the crimes committed against them. This is not
23 a criticism but a statement of one of the
24 problems that we must collectively address. If
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1 cases are not reported, the police cannot
2 investigate and we cannot prosecute. There in
3 lies the salient problem. We believe that a
4 successful prosecution or a series of
5 prosecutions would send an important message to
6 those who perpetrate this type of insidious
7 fraud.

8 Therefore, we need to identify ways of
9 bringing appropriate cases to the criminal
10 justice system so that justice can be served.
11 Bill 140142 can only help in this effort.
12 Having an ordinance that outlines what can and
13 cannot be done by Immigration Service Providers
14 is crucial. Although civil in nature, many
15 provisions of the bill will help to successfully
16 bring charges and prosecute those who choose to
17 take advantage of this vulnerable community.

18 Specifically, the requirement that a
19 written contract be provided as well receipts
20 serves as a paper trail that will aid
21 investigators and prosecutors in building a
22 case.

23 I want to commend Councilman O'Brien for
24 being so inclusive in this process. The
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1 District Attorney's Office has been included in
2 meetings about this problem and about the bill's
3 response. I have, again, had the opportunity to
4 meet with advocates for the victims of
5 immigration services fraud and describe the
6 process by which complaints are made to the
7 police, investigated by the police and charged
8 by the District Attorney's Office.

9 Again, we want to help. Without cases,
10 there is not a lot we can do. I am hopeful that
11 through the passage of this bill, through the
12 education of the community, victims will feel
13 more comfortable coming forward to law
14 enforcement and reporting bad actors.

15 It's time that Philadelphia responds to
16 this problem. The DA's Office wants to send a
17 message that it's ready and willing to help.
18 And with the passage of this legislation, City
19 Council will send the same message. And
20 together as a City, we can begin to end this
21 terrible problem.

22 COUNCILWOMAN QUINONES-SANCHEZ: Thank
23 you, Ms. Malone. I'm going to recognize
24 Councilman O'Brien.

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1 Before I do that, has there been any
2 cases of some of this fraudulent behavior that
3 you have -- the DA's Office has been able to
4 prosecute?

5 MS. MALONE: We have not had any that
6 have come through the system. However, several
7 cases have been referred. We've looked at them.
8 We sat down with the potential complainants and
9 have provided advice as to what they need to do
10 next before the case can be prosecutable.

11 COUNCILWOMAN QUINONES-SANCHEZ: What are
12 some of the challenges with prosecuting the
13 cases?

14 MS. MALONE: The main challenge is that
15 we don't have a paper trail. We don't have a
16 full understanding of what was communicated
17 between the service provider and the immigrant
18 seeking that particular service. If there is a
19 clear understanding of what the service provider
20 is supposed to provide and for what amount, then
21 we would be able to ascertain if there was, in
22 fact, fraud. Did they purport to provide the
23 service and did they fail to provide the service
24 and what money was handed over.

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1 Unfortunately, I think the language
2 barrier is a huge issue. So, we really need
3 someone to walk these individuals through the
4 system. And I think there are several members
5 here of the community who are willing to do
6 that. And they've been very aggressive. And
7 aggressive in a positive way and brought these
8 cases to us.

9 Unfortunately, they can only do so much.
10 They can't create the case. They bring
11 complainants to us. Once we look at the
12 complaint, we have to determine whether there is
13 a prosecutable case. And oftentimes, it's the
14 lack of a paper trail.

15 COUNCILWOMAN QUINONES-SANCHEZ: Okay.
16 Thank you. I have Councilman O'Brien and
17 Councilman Oh.

18 COUNCILMAN O'BRIEN: Thank you. Can the
19 District Attorney's Office set up a protocol of
20 contacting L&I after an arrest to let them know
21 of any bad actors that are providing services?

22 MS. MALONE: We currently don't have one
23 in place, Councilman. But what we have
24 established is something that I am basically
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1 just starting to laying the foundation. Behind
2 you is ADA Caroline Cruz. She's been designated
3 informally as the liaison for immigration
4 issues. And once we set up this official
5 protocol and we identify a case through the
6 Police Department and the other agencies, I will
7 have her walk them through that process. And
8 she can also identify a point person in License
9 and Inspection and we can establish that
10 connection.

11 COUNCILMAN O'BRIEN: Just as a
12 clarification. You can prosecute these cases,
13 but the paper trail is very important in
14 helping?

15 MS. MALONE: It's extremely important.
16 Yes. We can prosecute these cases without a
17 paper trail. But I will tell you that it's very
18 hard to prove a case beyond a reasonable doubt
19 within our system without a paper trail.

20 COUNCILMAN O'BRIEN: Thank you.

21 COUNCILWOMAN QUINONES-SANCHEZ: Um,
22 Councilman David Oh.

23 COUNCILMAN OH: Yes. So, I did hear
24 that there is a liaison for immigration fraud in
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1 the Philadelphia District Attorney's Office.

2 MS. MALONE: There is Ms. Caroline Cruz
3 who I just several months ago met up with. And
4 through Miriam Enriquez from Councilman
5 O'Brien's office, was able to establish the
6 beginnings of a liaison relationship between
7 this office and what other -- any other offices
8 that might become involved in this informal task
9 force. And I say it's informal. Maybe some day
10 it will become a very formal task force where
11 all the agencies can meet on a monthly basis or
12 a quarterly basis and identify the issues.

13 COUNCILMAN OH: So, you can tell me that
14 you're not in position to answer this because it
15 may be something for the DA to answer. But what
16 are your thoughts on the -- what was identified
17 that New York's District Attorney's Offices all
18 have a Immigration Fraud Unit of some sorts
19 there?

20 MS. MALONE: I would like to defer that
21 to the DA. But I certainly think that part of
22 the answer is budgetary.

23 COUNCILMAN OH: Right.

24 MS. MALONE: We have approximately 300
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1 DAs. With those 300 DAs, we have to prosecute
2 50,000 cases every year. Every year about
3 25,000 are felony cases; 25,000 are
4 misdemeanors. And we have young DAs who are in
5 the courtroom five days a week prosecuting
6 anywhere close to 25 to 30 cases on a given day
7 in a misdemeanor room and maybe half that amount
8 in a felony room. I'm sure a big answer to that
9 will be budgetary.

10 COUNCILMAN OH: It's a good point and
11 well taken. Thank you.

12 The next thing that I'd like to touch on
13 is the issue of the prosecutions. You were
14 talking about paper trail. And so, it's clearly
15 challenging. This legislation appears to, at
16 least, begin to put things visible to people
17 that you are required to have a contract, this
18 person cannot make certain statements, here is
19 what they can't do. But so many times the
20 relationship between the defrauded person and
21 the person who did the defrauding is based on a
22 level of trust, language culture and cash and,
23 you know, promises made that are not
24 particularly above board but the person may have
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1 been dealing with a series of things that were
2 not above board in the culture or place that
3 they came from. You know, it makes for very
4 little to go on when it comes to the he said/she
5 said.

6 What in this legislation would
7 universally be helpful in establishing a paper
8 trail or, at least, notifying people that
9 certain things should be in place such as a
10 contract, a written fee schedule, signed
11 agreements, that type of thing?

12 MS. MALONE: Well, I thought that in
13 terms of dealing with a community one on one,
14 the signs and having clear indication of what
15 this particular multiservice agency provides and
16 also indicating that they are not lawyers. I
17 think those things were very important. But one
18 of the things that I noted in that bill was that
19 there was a three-day period to withdraw.

20 So at that point, it would be nice if
21 someone were able to give some sort of counsel,
22 legal counsel to these individuals, before they
23 executed on that contract. So, the three-day
24 delay provision was a good piece of information
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1 or an additional regulation that I thought might
2 be helpful to community. So maybe, that person
3 who went in to seek that service isn't fully
4 aware of the way the system works, but they go
5 home and talk to a neighbor. They go home and
6 talk to someone else who they might feel
7 comfortable reaching out to where there is a
8 relationship. And that person can say, you know
9 what, you're missing a lot of things in this
10 contract. Maybe you ought to go see someone
11 else. This person is not going to provide the
12 services that you need.

13 It allows the individual who might not
14 be savvy and who might not understand how the
15 system works to reach out to someone other than
16 the person that was sitting before them in the
17 multiservice agency.

18 COUNCILMAN OH: All right. Thank you
19 very much.

20 COUNCILWOMAN QUINONES-SANCHEZ: Thank
21 you. Councilman O'Brien, your light is on. I
22 have a question. Because once we start
23 formalizing contracts, if I hear you correctly
24 with that three-day period, is there a
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1 recommended language that you would see in a
2 contract? I mean, I don't want to regulate a
3 contract. I am just concerned that, with all
4 due respect to the lawyers in the room, I am
5 married to one. You know, the wordsmithing of a
6 contract, the dos and the don'ts, I'm a little
7 concerned about now because what you'll get is
8 other folks coming up with something that can
9 give them a way out and say that's not what.

10 MS. MALONE: I also tried to stay away
11 from civil law, and contracts is largely civil
12 law. And certainly, I'm not in a position to
13 give advice as to how the contract should be
14 written. But as long as there is a three-day
15 provision to withdraw from the contract, I would
16 think that most people, even the lawyers, I
17 guess, could interpret that in a million
18 different ways even though it's clear on its
19 face what it would mean. Most people would
20 interpret that as a three-day delay so that they
21 can get all their ducks in order and really
22 understand what they mean, what they have to do
23 as part of a contract.

24 Like I said, I don't -- I certainly
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1 wouldn't give advice as to how that should be
2 written in the contract. I am certain that they
3 are much more capable of doing that than I am.

4 COUNCILWOMAN QUINONES-SANCHEZ: I'm
5 happy to see the DA's Office obviously deputize
6 in whatever way Caroline Cruz -- doesn't have
7 money attached to, Caroline. It's just more
8 work you are putting on your plate.

9 MS. MALONE: It's more work. And you
10 should -- I think it's important to note that
11 she is assigned to the Public Nuisance Task
12 Force in our office, and she is personally
13 invested in this. And when I reached out to
14 her, she didn't think of it as additional work.
15 This is something that she has a personal
16 interest in. It's always nice to hear.

17 COUNCILWOMAN QUINONES-SANCHEZ: For us
18 what we would like to see, and I am sure the
19 discussion will happen in the budget process for
20 the DA's Office is to really articulate to us,
21 you know, the defining of what that role is. We
22 also don't want to set up false expectations
23 what we can and cannot do. I think if we are
24 committed to passing any law, not only do we
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1 want to give it teeth to the Sponsor's point,
2 but we also want to give the resources necessary
3 so that we're not setting up false expectations
4 but at least trying to be as proactive as we can
5 with a complaint-driven process, which is an
6 oxymoron in and of itself.

7 Thank you. Any other questions?

8 COUNCILMAN O'BRIEN: Yeah. We have some
9 furtherance of your question, Madam Chair.

10 We have some language in their that
11 deals with contract. But I would like to direct
12 the members' attention to the New York City
13 Department of Consumer Affairs' website. They
14 have samples of contracts up there. And perhaps
15 something that MOIMA can consider as we move
16 this process forward. That's very helpful.

17 COUNCILWOMAN QUINONES-SANCHEZ: Okay.
18 Well, thank you. With that, that ends the
19 testimony.

20 I am going to recess the Public Meeting.
21 Oh, wait, we need one more person. We are going
22 to take a two-minute break so we can actually
23 close out this process and wait for Councilwoman
24 Bass. I forgot.

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1 (Public Meeting recessed.)

2 (Brief break taken.)

3 (Public Meeting commenced.)

4 COUNCILWOMAN QUINONES-SANCHEZ: My
5 apologies. We will now go into the Public
6 Meeting on the Committee of Licenses and
7 Inspections to accept a motion regarding Bill
8 140142.

9 Chair recognizes Councilmember Oh.

10 COUNCILMAN OH: Thank you, Madam Chair.

11 I move that the Public Hearing and
12 Meeting on Bill No. 140142 stand in recess until
13 Wednesday, December 3, 2014 at 12 noon.

14 COUNCILMAN NEILSON: Second.

15 COUNCILWOMAN QUINONES-SANCHEZ: It has
16 been moved and properly second that the Public
17 Hearing and Meeting of this Committee on Bill
18 140142 be recessed date certain of Wednesday,
19 December 3 at twelve o'clock.

20 All those in favor?

21 - - -

22 (Chorus of Ayes)

23 - - -

24 COUNCILWOMAN QUINONES-SANCHEZ: Any
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1 opposition?

2 Hearing none, the Public Meeting and
3 Hearing of Bill 140142 will stand in recess
4 until December 3.

5 This concludes our business for today.

6 Thank you, everyone, again for your patience.

7 (Public Meeting and Hearing was recessed
8 at 1:27 p.m.)

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C E R T I F I C A T I O N

I, hereby certify that the
proceedings and evidence noted are
contained fully and accurately in the
stenographic notes taken by me in the
foregoing matter, and that this is a
correct transcript of the same.

ANGELA M. KING, RPR
Court Reporter - Notary Public

(The foregoing certification of
this transcript does not apply to any
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