

COUNCIL OF THE CITY OF PHILADELPHIA
COMMITTEE ON PUBLIC SAFETY

Room 400, City Hall
Philadelphia, Pennsylvania
Tuesday, March 11, 2014
11:45 a.m.

PRESENT:

COUNCILMAN CURTIS JONES, JR., CHAIR
COUNCILWOMAN JANNIE BLACKWELL
COUNCILMAN KENYATTA JOHNSON
COUNCILMAN DENNIS O'BRIEN
COUNCILWOMAN MARIA D. QUINONES-SANCHEZ
COUNCILMAN MARK SQUILLA

RESOLUTION 130931 - Resolution authorizing the
Committee on Public Safety to hold hearings to
investigate Notario Fraud and other forms of
immigration consultant fraud in the City of
Philadelphia.

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COUNCILMAN JONES: Good afternoon, everyone. This is an opening hearing for the Committee on Public Safety to address Resolution No. 130931 dealing with notario fraud authored by Councilman Denny O'Brien.

COUNCILMAN O'BRIEN: And Maria Quinones-Sanchez.

COUNCILMAN JONES: And Maria Quinones-Sanchez, who is not on the Committee but is in the Chamber with us.

Brief marks and then I'll turn it over to the author of the resolution.

It's my understanding that immigration forms the mosaic known as the United States of America. Our nation was founded on a welcome mat that said bring us your tired, your poor, your huddled masses yearning to breathe free. This historic idea was founded in the tenets of Pennsylvania in particular, and it's interesting that in the early 1900s, immigration grew to about 120,000 in the 1900s here in Philadelphia.

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2 We are known as one of the more
3 friendly places for immigrants to
4 assimilate into America's rich culture,
5 and I hope the results of today's hearing
6 will make it one step better and continue
7 to grow the immigrant population and
8 welcome them into our society and become
9 full citizens and participants in the
10 United States of America. Thanks to
11 immigration, Philadelphia reversed its
12 trend on a shrinking population in the
13 City of Philadelphia for the first time
14 in decades.

15 So we are happy that this trend
16 is now growing the City and creating good
17 taxpayers, and we recognize that
18 Councilwoman Sanchez and Denny O'Brien as
19 the co-sponsors of this resolution, also
20 Councilman Oh whose work on immigration
21 is known to this Council.

22 And without further adieu, I
23 will turn it over to the author of this
24 resolution, starting with Denny O'Brien,
25 and hopefully we'll convince Councilwoman

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2 Sanchez to weigh in on it as well.

3 COUNCILMAN O'BRIEN: Thank you,
4 Chairman Jones, and I'd like to thank
5 Councilwoman Maria Quinones-Sanchez for
6 her help in putting this hearing together
7 and working on this very important issue.
8 I'm grateful to the Councilwoman and
9 Jennifer Kates of her staff for working
10 with me and my team to prepare today's
11 important conversation.

12 Notario fraud occurs when an
13 individual provides immigration and other
14 legal services that he or she is not
15 qualified to perform. The fraud is
16 committed by people who capitalize on a
17 victim's vulnerability and ignorance to
18 the United States legal system to offer
19 substandard, false or non-existent
20 immigration services. Often using
21 predatory advertising language and
22 fraudulent contracts, notarios hold
23 themselves out as qualified to help
24 individuals obtain lawful status or
25 assistance with financial matters, tax

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2 returns, et cetera. Many trusting and
3 unsuspecting people often pay tens of
4 thousands of dollars for what they
5 believe are the legitimate services of a
6 licensed attorney, only to fall victim to
7 notario fraud.

8 Many people who go to notarios
9 are legally in this country or on a real
10 pathway to citizenship or go to notaries
11 to complete that journey. If these
12 notaries do not file the paperwork, legal
13 permanent residents and Visa holders may
14 lose their window of time to apply for
15 citizenship. Our immigration laws do not
16 have a fraud exception, and if you miss
17 the deadline, you miss the deadline.
18 This is perhaps one of the most troubling
19 parts of this issue.

20 Today, we look at the
21 immigration scams, the unauthorized
22 practice of law, examining the impact of
23 notario fraud on Philadelphia's immigrant
24 community, the response from appropriate
25 agencies to enforce current laws, and

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2 what could be done to reduce future
3 fraud.

4 In November when I introduced
5 this resolution, I said my goal was to
6 bring stakeholders into this room and
7 have a meaningful public discussion about
8 this problem and the victims who suffer
9 and remain silent. I believe our witness
10 list, which includes some very courageous
11 and strong victims, will help us
12 accomplish that today. And if you look
13 at our lead testifiers, they are
14 identified as Victim No. 1, 2, and 3.
15 And, sadly, after these notarios steal
16 their money and, as I identified,
17 interfere with their legal pathway to
18 citizenship, they also intimidate them
19 and say, We're going to report you to
20 immigration services for deportation.
21 Sometimes they prepare illegal documents.
22 They'll just fill in applications with
23 falsified information on the guise that
24 they've already promised some of these
25 victims benefits that they may or may not

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2 be entitled to. That, in and of itself,
3 creates an illegal act that they were not
4 aware of.

5 So for all these reasons, we're
6 going to have Victim No. 1, 2, and 3.
7 And we've asked the media to be
8 sensitive, because it's very courageous
9 for them to come forward, but we don't
10 want to expose them to the real or
11 perceived fears that have made them live
12 in the shadows and be silent for all
13 these years. They are truly
14 representative of what this problem is.

15 So we ask everyone to please
16 respect their anonymity. We have an
17 interpreter who is going to take their
18 testimony and provide us with that
19 interpretation so that we can all realize
20 the importance of this issue.

21 As I've said, the witnesses
22 that we've brought together here are from
23 the Federal Trade Commission, from
24 legitimate agencies that provide
25 immigration services, the Mayor's Office,

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2 the DA's Office, the Police Department,
3 and the general counsel from the Friends
4 of the Farmworkers. So we believe that
5 this is a start. I think it's a good
6 start, but we want to take this very
7 important issue from the shadows out in
8 the public so that all of the partners
9 that we have here today will begin a new
10 and important dialogue with the
11 immigration community, which will benefit
12 all of us as a community going forward.

13 Maria.

14 COUNCILMAN JONES: Councilwoman
15 Sanchez.

16 COUNCILWOMAN SANCHEZ: Thank
17 you. Thank you, Chairman Jones and
18 colleague Denny O'Brien. I want to thank
19 you and your staff and all of the
20 stakeholders for what is an important
21 documentation of what is going on with
22 our immigrant community in the City of
23 Philadelphia. Short of comprehensive --
24 and that's why the word "comprehensive"
25 of federal immigration reform, what you

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2 see is -- what you will hear today is the
3 creation of fraud and fear tactics and
4 misinformation in a community that's
5 extremely vulnerable.

6 I want to thank the Mayor's
7 Office of Immigrant Services and our
8 Public Safety Director, because as they
9 will speak to today during this
10 testimony, any fraud or any scamming of
11 anybody is a serious issue that we all
12 need to be aware of.

13 Notario fraud is -- one of the
14 reasons why it's so effective is that
15 culturally many of us come from countries
16 where only lawyers are notaries and,
17 therefore, there is a tendency to have
18 confidence in an industry that in places
19 like Pennsylvania where you do not need
20 to be a lawyer to be a notary creates the
21 disconnect and the misinformation.

22 So today's testimony will bring
23 light to this. I think it's important to
24 document, as we work on many issues that
25 Councilman O'Brien and others, Kenny and

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2 Oh, have all been part of, which is what
3 are all the different ways that we need
4 to protect this vulnerable community that
5 we have said we want to embrace, and part
6 of embracing them is understanding the
7 impacts of what's going on in their
8 communities, and if they don't come
9 forward, we are unaware of all of the
10 different ways that they are taken
11 advantage of every single day.

12 So as Councilman O'Brien said,
13 we want to thank the folks who have come
14 forward, the witness testimony to come
15 forward and the rest of the stakeholders,
16 and this is one of many different things
17 that we need to do in this city to make
18 the City safe for everyone, safe from
19 fraud for everyone, but also very
20 welcoming to this new immigrant community
21 that we appreciate and has, because of
22 its growth, changed the tide, and
23 Philadelphia is finally growing and it's
24 because of this community. And we want
25 to say to them and we want to make sure

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2 that our public policy reflects the fact
3 that we want to embrace them in this
4 city.

5 So thank you.

6 COUNCILMAN JONES: Thank you,
7 Councilwoman, for your work on this issue
8 and this area. It's important work, and
9 again, we can't overemphasize how our
10 population in Philadelphia has reversed
11 its decline and started to grow.

12 The Chair also recognizes
13 Councilman Squilla and Councilwoman
14 Blackwell who have joined us in Chambers.

15 Are there any comments from
16 members of the Committee?

17 COUNCILWOMAN BLACKWELL: Yes.

18 COUNCILMAN JONES: Councilwoman
19 Blackwell.

20 COUNCILWOMAN BLACKWELL: Thank
21 you. I'd like to thank Councilman
22 O'Brien and certainly Councilwoman Maria
23 Quinones-Sanchez for their work in this
24 area. As you may know, we have the same
25 issues in the African and Caribbean

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2 immigrant community. In fact, we're
3 having hearings tomorrow on ICE, the ICE
4 issue as well.

5 And so we are very, very glad
6 to deal with this issue, and we're happy,
7 you know, we have a new immigration
8 office at 41st and Powelton in West
9 Philadelphia, one block from Market, and
10 that will make access a lot easier for
11 people in that area.

12 But, again, I want to thank the
13 sponsors and the Committee for
14 considering this important issue.

15 COUNCILMAN JONES: Thank you,
16 Councilwoman.

17 Councilman Squilla.

18 COUNCILMAN SQUILLA: Yes. I
19 also want to thank the people who are
20 testifying today, and as we see this
21 throughout the communities, we have it
22 also done in the Asian communities where
23 we see the same type of fraud going on.
24 And really what happens is, they really
25 prey on the people who need the most

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2 help. And the people scrounge up to get
3 enough money to pay for a service that
4 they believe is a legal service that's
5 going to help them become legitimate and
6 then at the end of the day, they find out
7 they're nowhere and they have to do the
8 same thing all over again.

9 So I want to thank Councilman
10 O'Neill and Councilman Jones, the
11 Chair --

12 COUNCILMAN O'BRIEN: O'Brien.

13 COUNCILMAN SQUILLA: O'Brien.
14 I'm sorry. Them Irish names get me
15 confused all the time.

16 COUNCILMAN O'BRIEN: Well,
17 yesterday I was called Councilwoman
18 Tasco, so...

19 COUNCILMAN SQUILLA: But this
20 is something that needs to be spoken
21 about and needs to be heard out and needs
22 to have a solution. So I'm looking
23 forward to the testimony today and
24 hopefully be able to come up with a way
25 to stop this from happening in the

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2 future.

3 Thank you.

4 COUNCILMAN JONES: Thank you,
5 Councilman.

6 Now, we're going to remember
7 that the first panel of witnesses are
8 victims of this and there is a degree of
9 anonymity that they want to maintain. So
10 they are going to hide their faces, and
11 we respectfully request the media to
12 recognize that as well. Also we're
13 probably going to limit questions.

14 COUNCILMAN O'BRIEN: No
15 questions.

16 COUNCILMAN JONES: There will
17 be no questions to the first panel and
18 allow them to add their voice to the
19 record, however.

20 So will the Clerk please read
21 the title of the resolution and then the
22 first panel.

23 THE CLERK: Resolution 130931,
24 authorizing the Committee on Public
25 Safety to hold hearings to investigate

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2 Notario Fraud and other forms of
3 immigration consultant fraud in the City
4 of Philadelphia.

5 The first panel of witnesses,
6 Victims 1, 2, and 3 and anyone else
7 reading victim testimony. Please
8 approach.

9 COUNCILMAN JONES: So some of
10 this will happen through interpreters.

11 THE CLERK: And Harry Zacharas,
12 the interpreter, please approach the
13 witness table.

14 COUNCILMAN JONES: Thank you
15 all.

16 (Witnesses approached witness
17 table.)

18 COUNCILMAN JONES: Have a seat.
19 Welcome. So there will be a microphone
20 extended to Victims 1, 2, and 3 and we
21 will, where necessary, receive their
22 testimony through interpreters.

23 Please begin your testimony.
24 Can you pull the mic closer to you, sir.

25 WAYNE (through interpreter):

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2 My name is Wayne. Thank you for letting
3 me speak today here.

4 We were told of this person
5 named --

6 THE INTERPRETER: I'm sorry.
7 I'm having a hard time hearing him.

8 COUNCILMAN JONES: Repeat.

9 WAYNE (through interpreter):
10 My name is Wayne.

11 We were recommended by a man
12 called Robert Koch. Supposedly he was an
13 immigration supervisor. He supposedly is
14 the -- he was going to fix our documents
15 fast, because he knew how to fill them
16 out. But all of that was a lie, because
17 when he made them, first he told us he
18 was going to charge us 8,000, and he said
19 we would pay in part first payment 4,000.
20 When we had our fingerprints, we would
21 have to pay the other part, which is
22 another 4,000.

23 We waited for three months and
24 the papers for the fingerprints came.
25 And when we went, we paid the other half,

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2 which we had agreed upon. And then we
3 waited for two months and nothing
4 happened. We tried to contact him, and
5 they would not answer our phone calls.
6 We tried and we tried and they never
7 answered. So we decided to go see him at
8 his office, but he wasn't there. Neither
9 was his assistant. So we couldn't find
10 him. They weren't there.

11 So we looked for a private
12 identifier, and they found the address of
13 the assistant and his. We went to see
14 the assistant and we knocked on the door
15 several times, and every time they
16 wouldn't open the door. We waited and we
17 waited, and we find them back in the
18 parking lot. And she told us that he
19 stole from her, that she wasn't at fault,
20 he was and that you're not the only one.
21 There were many more, and that we could
22 bring him to be judged.

23 We went to several places to
24 see if they can help us out. First we
25 went to the police, and there they told

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2 us that they couldn't do anything because
3 the case was not criminal. So they sent
4 us to another building. We went there.
5 It was a civil court supposedly for
6 theft, and they told us and sent us to
7 another place. So then we went to
8 another place, and they said that in that
9 place they only cover 8,000. We were
10 four, and that was 32,000. So we went to
11 a higher court, and they told us that we
12 would need a lawyer. They would provide
13 us with a lawyer because it's very
14 expensive, and that they would let us
15 know, but we were never notified.

16 Then we went and we tried to do
17 several other things, but we couldn't do
18 anything because we didn't know where to
19 go. We went to several places and we
20 couldn't get any help.

21 That's my story, and I hope you
22 could do something against him, because
23 this is a big and wealthy country and you
24 just can't do this to people. Not only
25 us, but many other people. If we don't

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2 do anything, they will continue to do it.
3 I'm hoping you can do something against
4 him. And that's my story.

5 Thank you.

6 COUNCILMAN SQUILLA: Thank you.

7 CIRO (through interpreter):

8 Good afternoon. My name is Ciro. I went
9 to the Immigration Department, and this
10 is my story.

11 Just like my friend, we went
12 with Robert Koch in the office which is
13 known as Philly/Koch Investigation
14 Services. When we went, he explained to
15 us that he is an immigration supervisor
16 and he was also a representative of the
17 Immigration.

18 We explained to him our case.
19 He said he was able to help us. He said,
20 Don't worry, I know how to fill out those
21 forms correctly, and he explained to us
22 that we had to pay \$8,000. Then he said
23 he needed \$4,000 up front and the other
24 when we get the forms to go get the
25 fingerprints. Then this happened. The

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2 forms came for us to go to the
3 Immigration Department. This is the
4 second time. We already had given him
5 4,000, and to his assistant, we gave the
6 other 4,000. And she came with us to the
7 Immigration Department to get our
8 fingerprints.

9 What happened was, we were
10 rejected the first time. We spoke to him
11 on the phone and he told us that the
12 second time around we would not get
13 rejected. And we said -- we asked him
14 what would happen if we get rejected
15 again. And he said, Don't worry. If
16 that happens, I will return all your
17 money. So we had confidence. We went
18 through the whole process, and after the
19 whole story, we ended up without money
20 and without papers.

21 Unfortunately, this happens
22 every day. Many people because of fear,
23 they don't go to the police office or
24 another office because they have the fear
25 of being deported. I don't think that

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2 this is just, because we work hard for
3 that money. And even we have to look for
4 some money. We went to several lawyers
5 here. Many of them told us we could
6 probably win a case or maybe not. We
7 also went to the police station. They
8 said they would first have to investigate
9 if it was fraud or bankruptcy.
10 Unfortunately, they sent us to a
11 different building. We spoke with a
12 detective. He told us when he has time,
13 he'll go look for these people.

14 I know that many cases come
15 ahead of us, like homicide. We hired a
16 private investigator. They found for us
17 the address of the assistant and of
18 Robert Koch. We went to see the
19 assistant. We spoke with her, and she
20 said to me, I have nothing to do with it.
21 He is the one who is at fault and he has
22 a criminal record. Again, we spoke to
23 her and we spoke to the detective, and
24 the detective says, When I have time,
25 I'll go speak to her. It's been more

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2 than a year and we're still waiting for
3 an answer.

4 Unfortunately, every day there
5 are more victims. Unfortunately, all
6 this happened and the worst part of it,
7 it's not the money. It's the hope that
8 they give us. Many people have hope to
9 obtain their papers. A lot of people
10 work very hard to maintain their family.
11 I am married to a U.S. citizen, and my
12 wife says that this is not just. She
13 says that this is a very wealthy country
14 and it has a lot of laws, and I hope that
15 they do something against these people.

16 Thank you very much for your
17 time.

18 COUNCILMAN JONES: Gracias.

19 MS. DORENBOSCH: Good
20 afternoon. My name is Stephanie
21 Dorenbosch. I'm a staff attorney at
22 Friends of Farmworkers and I'm presenting
23 the testimony of the third witness.

24 THE INTERPRETER: Excuse me.
25 Do you want me to interpret her?

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2 COUNCILMAN JONES: No. I think
3 we're okay.

4 THE INTERPRETER: Thank you.

5 COUNCILMAN JONES: Thank you so
6 much, and would you please state your
7 name for the record and begin your
8 testimony on behalf of Victim 3.

9 MS. DORENBOSCH: My name is
10 Stephanie Dorenbosch. I am a staff
11 attorney at Friends of Farmworkers. I'm
12 presenting the testimony of Edwin, who
13 could not be here today.

14 My name is Edwin. Thank you
15 for listening to my story today. I could
16 not be here in person because I was
17 deported about a year ago and I am now
18 back in Guatemala, separated from my wife
19 and my two little children.

20 I lost \$15,000 because I was
21 lied to by somebody I trusted to help me
22 with my immigration status and because I
23 wanted to do the right thing. I am
24 sharing this story because I want this to
25 stop happening to other immigrants.

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2 Several years ago I went to a
3 business in North Philadelphia for help
4 applying for a tax ID number because I
5 wanted to pay my taxes. When I went to
6 my appointment, the owner of the business
7 told me that I could get a Green Card if
8 my employer sponsored me. I thought he
9 was an attorney because he was offering
10 immigration and tax services. He also
11 spoke Spanish and he told me that he had
12 helped lots of immigrants get Green
13 Cards, so I believed that he could help
14 me too.

15 I hadn't gone to his office in
16 order to apply for immigration benefits.
17 I just went there because I wanted to pay
18 my taxes, but he was very convincing and
19 talked me into it. He assured me that I
20 would qualify and that it would be no
21 problem. It sounded like great news. If
22 I could get legal immigration status, my
23 family's life would be so much better.
24 So I signed some papers that he gave me.
25 I didn't know what they said because I

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2 can't read or write in either English or
3 Spanish, but I could tell they were
4 written in English. The man just told me
5 where to sign my name.

6 A former boss from when I did
7 landscaping work wanted to sponsor me for
8 the Green Card. He thought he was
9 helping me because he liked me and
10 thought I was a good worker. Neither of
11 us had any idea that I was not eligible.

12 Over the next year, I made
13 regular payments, a few hundred dollars
14 at a time, to the man from the
15 immigration business. Whenever I asked,
16 he told me that my Green Card was in
17 process and everything was fine, so I
18 kept making payments. After about a year
19 when nothing had happened, I started to
20 get upset. I asked him why I had not
21 received anything yet. He told me to be
22 patient and that he had everything under
23 control.

24 After I pushed him one more
25 time, he told me he would get a lawyer to

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2 help me, and he arranged the meeting.
3 The lawyer told me the same thing, that
4 everything was going fine. That was the
5 only time I met with that lawyer. My
6 main contact was still the owner of the
7 immigration assistance business, and I
8 still thought that he was the one working
9 on my case. I would still call him about
10 the case and I made all of my payments to
11 him.

12 Later, I went to Friends of
13 Farmworkers about a different legal issue
14 and when I told the lawyers there about
15 my immigration case, they explained that
16 I was actually not eligible for a Green
17 Card. I would never have paid all that
18 money for something I wasn't eligible
19 for. I had worked years to save that
20 money. Fifteen thousand dollars was more
21 than half a year's salary.

22 Later, Friends of Farmworkers
23 helped me request a copy of my
24 immigration record from the government
25 and found out that this man had never

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2 filed any kind of application for me. I
3 do not understand why he charged me so
4 much money or why he kept telling me that
5 everything was going well if he never
6 even filed the application.

7 What happened to me next was a
8 nightmare. I had an accident at my new
9 job that destroyed my hands. I was high
10 up in a tree trimming branches when a
11 branch that we had just cut and tied with
12 a rope fell down. I lost my balance and
13 got my hand caught between the rope and
14 the rest of the tree. So as the branch
15 fell, the rope scraped against my wrist
16 and sliced all the way through to the
17 bone. My supervisor drove me to a
18 hospital, but just left me there. I had
19 a few surgeries to reconstruct the
20 tendons and arteries that had been
21 severed, but I got deported before the
22 treatment was finished. I can barely
23 move my hand at all and I can't grip with
24 it or pick anything up. It's nearly
25 useless.

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2 I want you to know this part of
3 the story because I have no education and
4 I have only ever worked with my hands.
5 With my injury there is barely any work
6 for me in Guatemala and I can't earn
7 enough to support myself. If I hadn't
8 lost \$15,000 on a fake Green Card, I
9 would at least have something to live on.

10 When Immigration came to my
11 house and arrested me, I did not
12 understand why. I am a good person. I'm
13 not a criminal. The worst thing that I
14 had done was come to the United States to
15 try to take care of my family. I
16 immediately suspected that the man who
17 sold me the fake Green Card had something
18 to do with it. My wife called him for
19 help when I was arrested and he told her
20 not to worry, that everything would be
21 fine, but that was another lie.

22 Now I feel like my life is
23 over. I've lost my savings, my hand, and
24 my family. I am separated from my wife
25 and my two children and I cannot find

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2 work to support them or myself. No one
3 will hire a manual laborer with only one
4 good hand. I occasionally work in the
5 fields spraying pesticides because it's
6 the only work I can do with one hand, but
7 it isn't enough.

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

14 Thank you.

15 COUNCILMAN JONES: Can I for
16 the record ask the relationship between
17 your organization and victims like this
18 so that you can put that on the record.

19 MS. DORENBOSCH: Sure. We're
20 actually -- we represent this client in
21 other matters and we have advised him
22 about his immigration status. And
23 generally speaking -- and I think Art
24 Read will speak more to this, but we see
25 victims of fraud fairly frequently and we

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2 are able to advise them. We have some
3 immigration attorneys on staff and are
4 able to advise them of what they are and
5 aren't eligible for.

6 COUNCILMAN JONES: Thank you so
7 much for your testimony and your
8 assistance in providing this for us.

9 MS. DORENBOSCH: Thank you for
10 holding this hearing today.

11 COUNCILMAN JONES: I guess we
12 have no questions for this group, so we
13 might want to bring the next panel up to
14 testify.

15 Is there one more?

16 (Witness approached witness
17 table.)

18 COUNCILMAN JONES: Thank you,
19 and can you state your name for the
20 record and --

21 MS. VIALOBA: Yes. My name is
22 Lonnie Vialoba (ph). I'm a third-year
23 law student at Villanova and I'm a
24 volunteer with the Notario Fraud Project.
25 I'm here to read testimony of a person

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2 who could not be here but provided his
3 written statement to be read today.

4 My name is Felipe and I'm here
5 today to talk about how I was a victim of
6 notario fraud. I went to Salomon
7 Multi-Services in November of 2011 for
8 immigration assistance. When we went
9 into the office and asked for the lawyer,
10 he identified himself as the lawyer. We
11 had a meeting, and he explained how we
12 could apply for immigration benefits,
13 what forms we needed to use and had us
14 fill out the forms.

15 He told us that he was also an
16 immigrant and he likes to help immigrants
17 apply for benefits. He told us that in
18 six months we would receive the
19 immigration benefit.

20 We signed a contract with him
21 that said the services were immigration
22 services. In total he told us we had to
23 pay \$13,500. We had to pay \$9,500
24 beforehand and the rest we would pay
25 after we received the immigration

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2 benefit. We agreed with this and paid
3 him 2,000 the first day and paid the
4 remaining 7,500 in several payments over
5 the next few weeks.

6 After six months we asked
7 Salomon what was going on with our
8 application. He said there had been an
9 error in the application and he had fixed
10 it. We waited several more months and we
11 still did not hear anything.

12 We started to get nervous and
13 tried calling Salomon. He started to
14 avoid our phone calls. Sometimes he
15 would answer, but he would give another
16 excuse and say the application was still
17 pending.

18 A year and a half after we
19 thought the applications were filed, we
20 found out from Immigration that they
21 never received any application.
22 Immigration told us that we should have
23 received receipt notices from
24 Immigration. We went to Salomon and
25 asked him where these notices were, and

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2 all he showed us were the applications we
3 filled out. This is when we realized
4 that he was cheating us. We started to
5 pressure him to return our documents and
6 our money. He refused to give us our
7 file because he said since we were not
8 going to work with him anymore, he would
9 not share the documents.

10 He told us that if we stopped
11 the applications and got a refund from
12 him, he would have to notify Immigration
13 that we were no longer doing our
14 application.

15 Nearly two years after we first
16 went to Salomon's office, we were still
17 waiting for our money. He is still
18 playing games with us. For instance, he
19 gave me two checks to refund my money and
20 said that I should deposit them in a few
21 weeks. I tried to, but the checks were
22 bad. The account for the checks had been
23 closed for some time. I could not
24 believe that he was still playing games
25 with us and not taking us seriously. It

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2 is unfair that he has been able to do
3 this for so long without consequences.

4 It was during this last summer
5 we looked for help to do something. We
6 found the assistance of the Villanova
7 University School of Law Farmworker Legal
8 Aid Clinic. The Clinic helped us to get
9 help also from John Grogan, a partner at
10 the law firm Langer, Grogan and Diver,
11 and Irv Ackelsberg, another lawyer at the
12 firm. We sued Salomon to get our money
13 back. John, Irv, and Vanessa have been
14 helping me and my friend.

15 We are still in the process of
16 trying to get our money back. He still
17 tried to call me even after we filed the
18 lawsuit to give excuses.

19 I want to hold him accountable
20 for what he did. I hope we can do this
21 through our lawsuit, but I know it is not
22 certain. I am very frustrated that he
23 has been able to get away with this for
24 so long. It is not just.

25 There are others that I know

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2 that the same thing happened with
3 Salomon, but they are too scared to come
4 forward or they do not believe that they
5 have been tricked.

6 I ask the Philadelphia City
7 Council to do something more to stop
8 people like Salomon from stealing money
9 from immigrants. We are here working for
10 a better future for our children. It is
11 not fair when people like Salomon are
12 able to continue stealing money from
13 hard-working people like others and
14 myself. Please do something to stop this
15 fraud.

16 Thank you.

17 COUNCILMAN JONES: Thank you
18 for providing the testimony from the
19 gentleman.

20 Who is our next person to
21 testify?

22 THE CLERK: Francis Healy,
23 Special Advisor to Police Commissioner
24 Ramsey, and Monica Vaca, Federal Trade
25 Commission.

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2 (Witnesses approached witness
3 table.)

4 COUNCILMAN JONES: Good
5 afternoon. Thank you for coming and
6 please be seated. You've been here
7 before, so state your name for the record
8 and begin your testimony, please.

9 MR. HEALY: Good afternoon,
10 Chairman Jones and other members of the
11 Committee on Public Safety. My name is
12 Francis Healy and I am the Special
13 Advisor to Police Commissioner Ramsey,
14 and I'm here to testify regarding
15 Resolution No. 130931 and the impact of
16 notario fraud and other forms of
17 immigration consultant fraud.

18 By way of background, in my
19 position I've had the opportunity to work
20 for the immigrants and the immigrant
21 advocacy groups for many years in the
22 Philadelphia Police Department. It began
23 with the drafting and implementation of
24 the Department's policy regarding
25 immigrants back in 2001. It continued

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2 with my work with the Department's
3 Limited English language, or LEP, policy
4 in 2005. And to this day I have regular
5 contact with the immigrant community and
6 the advocates through the U-Visa
7 certification process. I am the
8 certifying agent for the U-Visas, which
9 are designed to protect illegal
10 immigrants that have been the victims of
11 crimes.

12 Despite all this work and my
13 engagement with the immigrants and the
14 advocates, quite honestly, I'm aware of
15 the complaints regarding notario fraud.
16 I did a survey amongst my department, and
17 that word, that term, is honestly unknown
18 to the Police Department. Fraud, people
19 are aware of fraud, but not this type of
20 fraud specifically.

21 And, quite frankly, I found
22 this very disturbing to me personally
23 based upon all the work that I've done in
24 this area, but also as a police officer,
25 I know out there that there are criminals

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2 actively preying on a small group of
3 people based upon their ignorance and
4 fears. I find it reprehensible; however,
5 based upon my experience, not very
6 surprising.

7 I understand the reluctance of
8 some of the immigrant community to come
9 forward when they've been victimized.
10 It's often very hard in the U-Visa
11 context for the immigrants to step
12 forward when they've been the victim of a
13 violent crime. So I'm not surprised that
14 they would not report being the victim of
15 a financial crime, especially when
16 dealing with immigration matters. Some
17 may have fears about the Police
18 Department, and it's often difficult for
19 any person to disclose that they've been
20 conned in some manner. It's
21 understandable why the Police Department
22 has not been made aware of this crime,
23 but it's not acceptable.

24 So on behalf of Commissioner
25 Ramsey, let me be very clear. Swindling

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2 or stealing from immigrants, legal or
3 illegal, will not be tolerated by the
4 Police Department, but we must be made
5 aware. The Department has a proven
6 record of working with immigrant victims,
7 and we will investigate any fraud
8 perpetrated or targeted against this
9 community, without exception. Equally
10 important to these victims, the
11 immigration status of any crime victim is
12 irrelevant to the Philadelphia Police
13 Department, and there will be no contact
14 or communication with ICE regarding a
15 victim's status. Regardless of your
16 status, if you are an immigrant and you
17 are the victim of a crime, you should not
18 fear the Philadelphia Police Department.
19 We need your help to capture these
20 criminals and avoid other immigrants from
21 being victimized.

22 This concludes my testimony,
23 and I'd be happy to answer any questions.

24 COUNCILMAN JONES: Are you
25 testifying as well?

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2 MR. RESNICK: No, Councilman.

3 COUNCILMAN JONES: Before you
4 start, what I'd like to do is open it up,
5 because if I understood your testimony
6 correctly, the term "notario fraud" is
7 not a legal term that is codified under
8 the Crime Code?

9 MR. HEALY: That's correct.

10 COUNCILMAN JONES: And so this
11 is a terminology that has kind of
12 germinated out of the instances on how
13 notorious people commit this type of
14 crime.

15 MR. HEALY: Correct.

16 COUNCILMAN JONES: Okay.

17 MR. HEALY: From what I
18 understand, attorneys in different
19 countries are the notaries in those
20 countries, and oftentimes people then
21 they come to this country as immigrants,
22 they believe that -- this is my
23 understanding -- that the notaries here
24 are somehow representing themselves as
25 lawyers and they become susceptible to

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2 become victims.

3 COUNCILMAN JONES: So, again,
4 based on certain cultures, notario
5 actually means the equivalent of an
6 attorney or a legal entity, and here it
7 is a looser definition.

8 MR. HEALY: That's my
9 understanding, sir, yes.

10 COUNCILMAN JONES: So that's
11 the beginning of kind of reeling them
12 into the service or lack thereof.

13 MR. HEALY: Correct.

14 COUNCILMAN JONES: So then at
15 that point, described by Witness 1, 2,
16 and 3, if you were just hearing of this,
17 someone came into the office, what would
18 you charge the individuals that committed
19 this act?

20 MR. HEALY: It's fraud. It's
21 simply fraud under the Crimes Code.
22 There is a crime for it, deception -- off
23 the top of my head, I can't think of the
24 actual code, but it is fraud by
25 deception. I mean, so there is plenty of

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2 codes on the books, and we would
3 investigate any crime if this came in.
4 The problem is, I think many victims of
5 this crime don't come forward. They're
6 afraid to come forward for obvious
7 reasons. They're afraid that we're going
8 to contact ICE somehow, shape or form as
9 a victim. That's just not the case. We
10 need them to come forward, and we'll
11 investigate any fraud that comes across
12 our desk. We just need to be made aware
13 of it.

14 COUNCILMAN JONES: So this
15 fraud, what would -- is it a felony?

16 MR. HEALY: I believe so, yes.

17 COUNCILMAN JONES: And does it
18 have anything to do with the amount of
19 money?

20 MR. HEALY: The grading of the
21 crime I do believe is tied to the amount
22 of money, yes.

23 COUNCILMAN JONES: What would
24 be helpful to this committee is to, in
25 your estimation, what are the charges

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2 that can be applied to this and if it's a
3 graduated offense based on the amount of
4 money received by the theft of deception.

5 So you would, based on what you
6 heard, instantly charge someone with
7 fraud with this type of occurrence?

8 MR. HEALY: Yes.

9 COUNCILMAN JONES: Okay.

10 MR. HEALY: Fraudulent
11 services. I mean, they're not providing
12 the services. They're portraying
13 themselves to put out -- yes.

14 COUNCILMAN JONES: Now, I was
15 encouraged that individuals would be
16 not -- well, held harmless. If they are
17 courageous enough to bring forth this
18 charge, they wouldn't instantly be
19 contacted by Immigration. Because when
20 we did the hearings on human trafficking,
21 one of the reasons a lot of people were
22 reluctant to go forward was, Yeah, you
23 can go forward, but you're here illegally
24 and you'll get deported, and those kinds
25 of intimidations have been deemed as a

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2 crime in and of themselves. And is there
3 any way, working with the state, that
4 that could also --

5 MR. HEALY: Let me be very
6 clear. Since 2001 when Commissioner
7 Timoney implemented our departmental
8 policy regarding immigrants and up
9 through Mayor Nutter's Executive Order,
10 the status of a victim is irrelevant to
11 the Philadelphia Police Department. We
12 could care less. We want to know if
13 you're a victim of a crime. Come
14 forward. We're not calling ICE. We're
15 not notifying ICE. ICE is not in any
16 way, shape or form in the picture when
17 you are a victim of a crime.

18 COUNCILMAN JONES: I'm
19 encouraged --

20 MR. HEALY: And that's
21 important. That's important that that
22 message gets out there, because, like I
23 said, I'm a police officer, that's my --
24 when you cut it down, I'm a cop. I want
25 to know who is victimizing these people,

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2 because they're being victimized based
3 upon their ignorance and their fears, and
4 that's reprehensible.

5 COUNCILMAN JONES: Again, I'm
6 encouraged by that fact, but what my
7 question speaks to is that when you
8 intimidate someone in this manner, that
9 you will be deported, and that that fear
10 of deportation is used, there is a
11 particular crime that people in human
12 trafficking are now associating with that
13 type of intimidation. Whether it is "we
14 will harm someone at home in your home
15 country" or whether it is "we will get
16 Immigration to deport you," it is some
17 type of intimidation that has now been
18 equated to a crime, and I don't know if
19 you're aware of that.

20 MR. HEALY: Well, it would
21 cover witness intimidation, because these
22 are the victims that will be coming
23 forward. So any intimidation for them
24 not to come forward would be a charge of,
25 to the best of my knowledge -- I'm sure

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2 the DA could probably expand upon this,
3 but be a charge of witness intimidation
4 in addition to the underlying offense,
5 yes.

6 COUNCILMAN JONES: Are there
7 questions?

8 COUNCILMAN O'BRIEN: Yes.

9 COUNCILMAN JONES: Councilman
10 O'Brien.

11 COUNCILMAN O'BRIEN: The first
12 thing that impressed me -- and I'm very
13 grateful for your clarity on the Police
14 Department's position -- was that it
15 should not matter what a person's
16 immigration status is. A crime is a
17 crime, no matter where it's committed,
18 and I again thank you for your clarity of
19 purpose.

20 In your testimony, you
21 expressed your outreach to the community.
22 Can you please describe that and how we
23 can -- how you have built trust with the
24 immigrant community and how you think we
25 can improve upon that, if possible.

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2 MR. HEALY: I'll try to do it
3 in a nutshell.

4 The first major contact we had
5 was when the Department was audited back,
6 I believe, in early 2004 or late 2003
7 regarding our LEP, which is Limited
8 English language access policy. Under
9 the Justice Department, it's a civil
10 rights violation for a government agency
11 not to have access to those who can't
12 speak English. Our policy -- we had a
13 policy in place. It was very weak at
14 that time. I worked hand in hand with
15 the Justice Department and with a lot of
16 the immigrant advocacy groups to develop
17 a policy for the Philadelphia Police
18 Department on how we handle people that
19 can't really speak English or can't
20 communicate with the police.

21 As a result of a lot of that
22 work -- and it took a great deal of
23 work -- the Philadelphia Police
24 Department's policy has been recognized
25 as the national model. It's been

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2 replicated in other places, and other
3 police departments have basically adopted
4 the same type of policy.

5 It's very comprehensive. It's
6 very thorough, and I'm, quite honestly,
7 very proud of the work we did on it. But
8 I did that with a great deal of help -- I
9 couldn't have done it by myself. I did
10 it with the help from the advocacy
11 groups, and I think the work that I did
12 with them since that period of time, I
13 gained -- I think they have a level of
14 trust with me. If I say I'm going to do
15 something, I'll do it. Like I said,
16 there's always anomalies that go on out
17 there and we understand the problems, but
18 for -- I think I have a very good
19 relationship with the advocacy groups. I
20 deal, quite honestly, very frequently
21 with many of them when it comes to the
22 U-Visas. And Commissioner Ramsey has
23 been very clear that he does not want the
24 Philadelphia Police Department to be the
25 first hurdle of an immigrant, illegal

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2 immigrant, who has been a victim of a
3 crime. So we certify. I mean, there's
4 only been a handful that I've been unable
5 to certify because the underlying crime
6 didn't meet the federal standard, but we
7 go to great lengths to make sure we
8 certify almost every U-Visa application
9 that we get that we can.

10 COUNCILMAN O'BRIEN: Since this
11 is an informational hearing, what should
12 a victim do if a crime is committed
13 against them?

14 MR. HEALY: The first thing is,
15 you need to contact us. I mean, the
16 Police Department. Call 9-1-1, have a
17 police officer come out there. We have
18 facilities and resources in place if you
19 can't speak English.

20 The biggest thing I really want
21 to communicate from this hearing is to
22 make sure that the victims of this crime
23 or any other crime who are legal or
24 illegal need to contact the police
25 without fear. I know there's a cultural

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2 barrier between us and a lot of the
3 immigrant communities from the Police
4 Department and from other countries and
5 the misconception that we have a
6 relationship with ICE. We do not. We're
7 concerned about victims in this city,
8 because we need to get the bad guys.
9 That's my job. And when I find that
10 people are being victimized, honestly,
11 it's upsetting.

12 COUNCILMAN O'BRIEN: One other
13 question, or a couple. One of the
14 complaints that's been related to us is
15 that there is a dollar threshold.
16 Victims are being told you have to hit a
17 certain threshold in order to start an
18 investigation. Can you tell us if that's
19 myth or reality.

20 MR. HEALY: I'm not all that
21 certain, to be honest with you. A fraud
22 is a fraud. Now, the classification or
23 the grading of the crime depends on the
24 value. I will look into that and I'll
25 report back. But if a fraud, regardless

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2 of the value, it doesn't mean we would
3 throw you out and not investigate it. It
4 depends on what the charge may be. The
5 charge may be -- I'm not really sure. It
6 would be a misdemeanor 1 going up to
7 maybe a felony depending on the value of
8 the stolen amount or the swindled amount.
9 So off the top of my head -- I'm not in
10 charging. I'm not operational for quite
11 some time, but I'll look into it and I'll
12 get back to you. It's written clearly in
13 the statute, I know that.

14 COUNCILMAN O'BRIEN: And
15 understanding that notario fraud is new
16 and that's why we're having these
17 hearings, and you were very candid about
18 the Police Department's position on this,
19 have you done any research in other
20 departments across the country as to
21 standards for training and, if so, can
22 you inform the Committee.

23 MR. HEALY: I have not done
24 any. My plan is after this hearing once
25 we -- in addition or moving with the

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2 Mayor's Office, I'd like to put something
3 out. Like I said, this is not a new
4 crime per se. It's a new type of crime.
5 There is plenty of statutes on the book.
6 I just need to make sure that my
7 investigative units and my responding
8 officers are aware.

9 So, quite honestly, what I was
10 planning to do was put a teletype
11 announcement out to my troops just
12 letting them know that this type of crime
13 exists, what's going on out there. It's
14 a very small niche, so not a lot of my
15 police officers or detectives will
16 probably be faced with this, but some of
17 those detective bureaus that are in high
18 population immigrant communities should
19 be made aware, and that was my plan.

20 COUNCILMAN O'BRIEN: And
21 perhaps you can consider in your perusal
22 of that issue as we recognized in the
23 discussion on arrests for small amounts
24 of marijuana that there is a separate
25 misdemeanor that's equivalent to the

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2 penalty for a summary. Perhaps one of
3 the discussion points that we should have
4 is whether there should be a penalty that
5 reflects this specific type of crime
6 since it is unique.

7 MR. HEALY: Well, that's a call
8 for someone --

9 COUNCILMAN O'BRIEN: I'm just
10 saying, we should -- in your perusal, if
11 you find that those penalties are
12 inappropriate in the charging or
13 enforcement provisions, maybe we
14 should --

15 MR. HEALY: I believe the
16 charging, quite honestly, from what I
17 recall -- the statute is well written. I
18 think that doesn't need to be adjusted.
19 I think the issue here is really relaying
20 or communicating the intimidation aspect
21 of it. The intimidation, witness
22 intimidation, is a compounding factor. I
23 mean, not only are they petrified to come
24 to the police; now they're petrified
25 because they're being given false

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2 accusations or threatened of some type of
3 police action is going to be taken
4 against them. That's witness
5 intimidation, and that's something --
6 that's an egregious crime that needs to
7 be compounded with or added to the
8 underlying crime.

9 So, I mean, I'll look at the
10 statutes and see whether or not a
11 specific category would benefit this.
12 I'm not sure. I'll look into that,
13 though.

14 COUNCILMAN O'BRIEN: Thank you
15 so much.

16 COUNCILMAN JONES: Thank you,
17 Councilman.

18 A couple other questions. So
19 if I understand this correctly, at this
20 point today, do you have any information
21 on actual complaints, the number of them
22 that you've received and followed up on?

23 MR. HEALY: The problem is
24 trying to identify this type of fraud.
25 Like I said, I'm sure people have come

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2 forward, but I can't quantify exactly
3 this type of fraud. It may come across
4 just as a fraud and be categorized as
5 such, so I couldn't distinguish it from
6 an elder abuse fraud or any other type of
7 fraud, for that matter. But it's
8 something I'm going to look into. I'll
9 look in to see how best we can track it,
10 if possible.

11 COUNCILMAN JONES: Well, we've
12 heard testimony and we'll have testimony
13 from advocacy organizations that are kind
14 of familiar with this process, and maybe
15 we can seek guidance from them on how to
16 identify these kinds of issues and, in
17 addition, come up with -- they probably
18 are familiar with known actors that
19 have -- I mean, this is probably not the
20 first time Victim 1, Victim 2 or Victim
21 3, the only people that were -- this
22 crime was committed against. So probably
23 by working with a, for lack of a better
24 word -- I hate the word "task force," but
25 at least an advisory group of folk that

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2 deal with this every day.

3 MR. HEALY: Well, let me just
4 say this. I work on a regular basis with
5 many of these advocates, and I ask them,
6 and I would ask them publicly, if they
7 have any issues that they know of, bring
8 it to my attention and I will direct it
9 to the proper detective division without
10 any doubt, and I think they can rest
11 assured that they can relay to their
12 clients that Immigration is not going to
13 be involved. So if they should have any
14 information, I'd be happy to accept it
15 and move it to the right investigative
16 body.

17 COUNCILMAN JONES: Do you know
18 if there are any licenses that are
19 required for this type of practicing of
20 immigration? I don't know --

21 MR. HEALY: I thought that
22 myself. The two issues that come to my
23 attention, number one, you have to be a
24 licensed notary, first and foremost, and
25 then you need -- this is the practice of

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2 law. So you need a law license under
3 state law. So those are the two issues
4 that I see most glaring that not only
5 would these individuals be guilty of the
6 fraud, the underlying -- there's other
7 violations they could face as well for
8 the false practice of law and such.

9 COUNCILMAN JONES: I know we
10 have at least one immigration lawyer that
11 will testify today, and I was wondering
12 if this is such a specialty that we might
13 want to further look at, at least in our
14 licensing procedure, a codification of
15 that particular service. And so for
16 those of you who are listening and can
17 add that to your testimony, whether or
18 not that is a recommendation that we
19 would have in this information-gathering
20 session.

21 Councilman.

22 COUNCILMAN O'BRIEN: Last week
23 we introduced an ordinance that calls for
24 certifications and professionalizing of
25 anyone providing immigrant services.

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2 We've given a copy to the Administration.
3 And, again, this is a new conversation,
4 so we're looking for that input.

5 But, Mr. Leader, you asked me
6 not to make comments, so I can understand
7 why you didn't know that I introduced it
8 last week, but --

9 COUNCILMAN JONES: Great minds.
10 So obviously I would be willing to hear
11 what your opinion of that kind of added
12 license would be. I know you haven't
13 looked at it maybe, but I would be
14 interested in writing seeing where you
15 would fall, would that be something that
16 would help you in pursuing individuals
17 that committed this crime.

18 MR. HEALY: Okay.

19 COUNCILMAN JONES: All right?

20 MR. HEALY: Yes.

21 COUNCILMAN JONES: Fair enough.

22 Are there any other questions
23 for this witness?

24 (No response.)

25 COUNCILMAN JONES: Thank you so

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2 much. And why don't you stick around a
3 little bit. I know we may have to call
4 you back.

5 Thank you for your patience,
6 and would you state your name and begin
7 your testimony.

8 MS. VACA: Thank you. My name
9 is Monica Vaca. I'm an Assistant
10 Director in the Division of Marketing
11 Practices at the Federal Trade
12 Commission. Good afternoon and thank you
13 to Chairman Jones, Councilman O'Brien,
14 and -- I don't see Councilwoman
15 Quinones-Sanchez, but I thank her as well
16 for inviting me here to give oral remarks
17 on the topic of immigration services
18 fraud or notario fraud. Today I'm going
19 to discuss the efforts of the Federal
20 Trade Commission, which is the nation's
21 consumer protection agency, to engage in
22 law enforcement, consumer education, and
23 policy initiatives to combat immigration
24 services scams.

25 Before I begin, though, I need

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2 to make clear that my remarks today are
3 my own and do not express the views or
4 opinions of the Commission or any
5 individual Commissioner.

6 Beginning in 2009, the FTC
7 embarked on an effort to build a
8 comprehensive federal, state, and local
9 initiative to combat immigration services
10 scams. Key partners in the immigration
11 initiative included the U.S. Department
12 of Justice, the United States Citizenship
13 and Immigration Services, Immigration and
14 Customs Enforcement, the Executive Office
15 for Immigration Review, 17 state
16 attorneys general, and nine city and
17 county law enforcement agencies. In June
18 2011, initiative partners jointly
19 announced 73 law enforcement actions and
20 significant consumer education campaigns
21 in multiple languages to give critical
22 information to immigrants about how to
23 avoid scams and to get the right help.
24 At the same time, to facilitate and
25 better coordinate future law enforcement

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2 actions, initiative partners agreed to
3 use the FTC's Consumer Sentinel online
4 database as the federal repository for
5 complaints against immigration services
6 scams.

7 So let me begin talking about
8 the FTC's law enforcement work by
9 explaining how the FTC does business.
10 The FTC is a civil law enforcement agency
11 that enforces Section 5 of the FTC Act,
12 which prohibits unfair or deceptive acts
13 and practices. The FTC is not a criminal
14 law enforcement agency. But that said,
15 when the FTC identifies an egregious case
16 of fraud, the FTC acts aggressively. We
17 file a complaint in Federal District
18 Court, along with a request for
19 extraordinary relief in the form of a
20 temporary restraining order, prohibiting
21 ongoing law violations; an asset freeze
22 of the defendants, both the corporate and
23 individual's assets; the appointment of a
24 receiver or a monitor; and immediate
25 access to the business premises with

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2 local law enforcement officials.

3 In cases where the FTC believes
4 it is absolutely necessary, such as in
5 fraud cases, the FTC seeks these remedies
6 ex parte or without notice to the
7 defendants. These remedies are
8 extraordinary, and courts only grant this
9 type of relief when the FTC can present a
10 compelling and usually a voluminous bit
11 of evidence to prove the law enforcement
12 violations -- I'm sorry; to prove the law
13 violation.

14 So today I'm going to talk
15 about two cases the FTC has brought
16 against immigration services providers,
17 and I will note that in both of them, the
18 FTC sought and obtained some of these
19 extraordinary remedies and was able to
20 get an order shutting down the deceptive
21 business practices when it filed the
22 complaint. These cases are illustrative
23 of the range of scams consumers may
24 experience, and I hope that by discussing
25 them, people will learn how to avoid

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2 fraud and to report it to the FTC.

3 In 2011, the FTC sued a company
4 called Immigration Center and various
5 related entities and their principals.
6 The FTC alleged that Immigration Center
7 set up websites to mimic official
8 government sites and then used the fake
9 sites to steer immigrants to their
10 deceptive telemarketing operation. So
11 the websites depicted American eagles,
12 the United States flag, the Statue of
13 Liberty, and they had URLs such as
14 www.uscis-ins.us and
15 www.usgovernmenthelpline.com. Of course
16 we know that USCIS stands for United
17 States Citizenship and Immigration
18 Services. And the websites directed
19 consumers to call a toll-free number that
20 an automated voice answered "Immigration
21 Center." Consumers were then transferred
22 to a live person who answered "USCIS" or
23 "U.S. Immigration Center" and identified
24 him or herself as an agent, an
25 immigration officer or a caseworker.

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2 The sites also offered
3 counseling and application forms.
4 According to the complaint, the
5 counseling was done by telemarketers who
6 did not meet the legal requirements to
7 provide immigration services.

8 Adding to the consumers'
9 confusion, the complaint alleged that the
10 defendants charged fees for application
11 forms that were the same amount as the
12 government processing fees, which led
13 consumers to believe that the fees
14 actually covered the cost of USCIS
15 processing. So consumers ended up paying
16 for applications that were never
17 processed by the USCIS for failure to pay
18 the official processing fee or in some
19 cases they were charged twice, once by
20 the defendants and once by the government
21 after the defendant forwarded their bank
22 account information to USCIS.

23 As a result of this case, the
24 defendants were permanently banned from
25 providing immigration services any time

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2 in the future.

3 Now, that case was national in
4 scope and so had the clear makings of a
5 federal case. Often we see immigration
6 services scams that take on a more
7 familiar aspect, a local storefront in an
8 immigrant community. The following story
9 is about a successful FTC law enforcement
10 action that was substantially aided by a
11 legal services organization that tipped
12 us off to law violations.

13 Legal aid organizations that
14 serve immigrant communities, such as the
15 Esperanza Center operated by the Catholic
16 Charities of Baltimore, often must assist
17 consumers whose immigration status have
18 been placed in jeopardy by unauthorized
19 immigrant service providers. For years
20 the Esperanza Center served consumers who
21 had dealt with a local immigration
22 consultant firm named Loma International
23 Business Group. Loma purportedly
24 specialized in obtaining or renewing
25 temporary protected status, or TPS

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2 status, for consumers from El Salvador
3 and Honduras who qualified to remain in
4 the United States legally. I want to
5 repeat that. For people who actually
6 qualified to remain in the United States
7 legally.

8 Their office near downtown
9 Baltimore at times displayed a sign in
10 Spanish offering the services of Attorney
11 Manuel Alban. After consumers paid the
12 defendants their fees, Alban selected,
13 prepared, and filed immigration forms
14 with USCIS. Loma's customers, many of
15 whom lacked English proficiency, trusted
16 in Alban's supposed expertise. This
17 trust was misplaced, because Mr. Alban is
18 not an attorney nor was he authorized nor
19 is he or anyone at Loma authorized to
20 deliver immigration services, and not
21 surprisingly, they made mistakes.

22 For example, a TPS renewal
23 application prepared and filed by the
24 defendants on behalf of a consumer was
25 denied by USCIS because it did not

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2 contain sufficient information. The
3 defendants billed the consumer an
4 additional fee to, quote/unquote, appeal
5 the denial, but then they failed to file
6 the appeal.

7 When the consumer requested the
8 return of his temporary protected status
9 application, the defendants told him that
10 his documents had been destroyed. One
11 Loma consumer fared even worse, landing
12 in a U.S. detention facility for almost
13 11 months because of Loma's faulty
14 immigration advice. In fact, USCIS
15 denied or rejected more than half of the
16 immigration applications filed by Loma.

17 And in addition to harming
18 consumers, Loma's unauthorized
19 immigration practice caused a significant
20 drain on the limited resources of the
21 Catholic Charities of Baltimore. The
22 Esperanza Center/Catholic Charities
23 office brought Loma to the attention of
24 the FTC and offered to assist in the
25 investigation of the company. Both its

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2 referral and its investigation assistance
3 were critical to the FTC's ability to
4 build its case against Loma. Catholic
5 Charities gave valuable background
6 information about Loma, including where
7 it was located, who managed the business,
8 how it advertised its immigration
9 services, and what company practices
10 caused substantial harm to its clients.
11 More importantly, Catholic Charities
12 helped the FTC locate consumers who were
13 willing to testify against the company.

14 This is the cornerstone of
15 every FTC case, is the testimony of
16 consumer victims.

17 Having advised and counseled
18 many of Loma's former customers, Catholic
19 Charities attorneys had developed trust
20 relationships with their clients. A
21 Catholic Charities attorney contacted
22 numerous consumers who were harmed by
23 Loma and encouraged them to assist the
24 FTC, and ultimately five clients of the
25 legal aid organization gave the FTC

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2 documents and other evidence of Loma's
3 deception and signed sworn declarations
4 describing the harm caused by the
5 company.

6 So armed with these sworn
7 declarations and other evidence uncovered
8 by the FTC's investigation, we filed a
9 federal suit in June of 2011 against Loma
10 International Business Group and its
11 owner, Manuel Alban. Again, the FTC
12 moved aggressively against the
13 defendants, filing a motion for an ex
14 parte TRO seeking immediate halt to the
15 defendants' deceptive business practices,
16 along with an asset freeze, appointment
17 of a monitor, and immediate access to the
18 defendant's business premises to locate
19 and preserve assets and business records.
20 Ultimately, the FTC tried this case, and
21 in 2013, the court ruled that the FTC had
22 proven that Manuel Alban and Loma
23 International violated the FTC Act.

24 But law enforcement is not
25 enough. In addition to taking law

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2 enforcement action, the FTC developed a
3 consumer education campaign to, number
4 one, help immigrants recognize, avoid,
5 and report immigration services scams;
6 two, locate no cost or low cost
7 immigration advice from authorized
8 providers. At the recommendation of
9 legal aid organizations, the FTC
10 translated its consumer education
11 materials not just into Spanish but also
12 into Chinese and Korean, into Haitian
13 Creole, which was a first for the FTC.
14 The campaign features radio public
15 service announcements into video and it
16 includes brochures and wallet cards
17 distributed through partnerships with
18 USCIS, the Executive Office for
19 Immigration Review, and legal aid
20 organizations around the country that
21 serve immigrant communities.

22 But we needed to go further and
23 to identify ways that consumer awareness
24 might help our law enforcement efforts.
25 So as part of the initiative, law

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2 enforcement partners agreed that the
3 FTC's Consumer Sentinel database, which
4 is a secure online database, would become
5 the centralized repository for complaints
6 about these scams. So now for the first
7 time, these complaints are centralized
8 and made easily accessible to immigration
9 initiative enforcement partners and to
10 hundreds of other law enforcement
11 agencies.

12 In addition to being a powerful
13 tool for law enforcement to identify
14 immigration services scams, the database
15 helps agencies locate consumer witnesses
16 and coordinate activities with other law
17 enforcement groups. For example, the
18 Pennsylvania Attorney General's Office is
19 a member of Sentinel and can access,
20 search Sentinel any time.

21 But this new tool only works if
22 immigration services scams are reported.
23 Immigrants may be hesitant to contact a
24 federal agency to register a complaint,
25 and to make the process more accessible,

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2 consumers can file complaints listing as
3 much or as little information as they
4 choose. In addition, the FTC strongly
5 encourages legal aid organizations that
6 serve immigrant communities to file
7 complaints on behalf of their clients.
8 This information helps law enforcement
9 agencies identify patterns of complaints
10 and, at the same time, reach out to an
11 expert like the Esperanza Center, the
12 Catholic Charities of Baltimore to learn
13 more about the scope and the nature of
14 the problem.

15 I thank you again for hearing
16 my testimony and for inviting me to speak
17 today on this very important topic.

18 COUNCILMAN JONES: Wow comes to
19 mind. This is extensive, and one of the
20 things that comes to mind is that we need
21 to be trained in identifying these kinds
22 of acts. We deal with fraud all the
23 time, but this is a particularly
24 vulnerable population that is being
25 preyed upon. And so one of the things

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2 that I would ask is, how do you help
3 local law enforcement to identify these
4 types of crimes and is there training
5 available?

6 MS. VACA: Yes. So two things.
7 First, we do invite local law
8 enforcement. Philadelphia Police
9 Department certainly is invited to join
10 the Consumer Sentinel network and gain
11 access to the database that we maintain.

12 The second thing is, we host on
13 a quarterly basis a call with our law
14 enforcement partners, local, state,
15 national organizations, to swap notes, to
16 talk about our cases in this particular
17 area, and to talk about what are some
18 successful strategies for prosecuting
19 these types of actions.

20 COUNCILMAN JONES: Would you
21 provide to this committee some of the
22 classifications of crimes that are
23 actually -- they're charging the
24 perpetrators of these frauds with. That
25 would be helpful. And also is there a

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2 monetary amount that it escalates it or
3 do you have a database that identifies
4 multiple offenders, that this person, ABC
5 Corporation is a known actor that might
6 be a Philadelphia firm that we can kind
7 of keep our eyes on?

8 MS. VACA: So our Consumer
9 Sentinel database does keep track of that
10 information when consumers put that
11 information into it. So one of the
12 fields that we ask people to identify is
13 how much money they lost in a particular
14 scam, and then anyone who is a member of
15 the Consumer Sentinel network and has
16 access to the database can search -- they
17 can do a very easy search by zip code or
18 by city to identify all of the complaints
19 filed in that particular area.

20 Another feature of that is that
21 any law enforcement agency that is
22 looking at a particular target as a
23 possible target for prosecution, that law
24 enforcement agency can place an alert on
25 our Consumer Sentinel database so that

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2 other law enforcement agencies know that
3 someone has already started to talk to
4 witnesses and is maybe keeping a file.
5 It just helps law enforcement agencies
6 coordinate activities a little bit
7 better.

8 COUNCILMAN JONES: Councilman.

9 COUNCILMAN O'BRIEN: Thank you.

10 I would echo the Chairman's
11 sentiments and thank you for your
12 aggressive, creative, and successful
13 strategies on this important issue. And
14 if I can be more specific, what does the
15 Federal Trade Commission do with those
16 complaints?

17 MS. VACA: So all of the
18 complaints that are reported into the
19 Consumer Sentinel database are available
20 for law enforcement agencies to search
21 for. Many organizations around the
22 country, including the FTC, are on the
23 hunt for targets. Sometimes an
24 individual complaint about an
25 individual -- well, often it is the case

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2 that individual complaints about an
3 individual perpetrator, there will be no
4 action on it, because we receive so many
5 complaints on so many different types of
6 items.

7 Part of what we are trying to
8 do, though, is trying to identify the
9 ways in which all aspects of the
10 government have a role here. So there
11 may be cases that are national in scope
12 or cross state lines where a federal
13 agency like the FTC might have a bigger
14 role. There are other cases where a
15 state AG's office might have a bigger
16 role, and there are other cases that are
17 for local law enforcement because they
18 happen specifically, for example, within
19 the municipal borders.

20 The point of this is that we
21 are sharing information, and by actually
22 filing a complaint, an individual makes
23 it possible or an organization, a legal
24 aid organization of any sort, makes it
25 possible for someone to know and to do

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2 something about a problem.

3 COUNCILMAN O'BRIEN: Thank you.
4 I know the Chairman touched on issues
5 surrounding training, but what can other
6 law enforcement agencies do to bring more
7 law enforcement actions?

8 MS. VACA: Well, one of the
9 things that they can do is, they can join
10 Sentinel. They can join our first
11 Tuesday calls. And all they have to do
12 is to -- they could contact me directly.
13 I will give you my e-mail address. I
14 think Miriam has it, but I'll give it to
15 you. It's mvaca@ftc.gov. They can
16 always join us there. We also host
17 webinars in partnership with USCIS that
18 we try to advertise broadly so that
19 people can know how to recognize these
20 types of scams.

21 COUNCILMAN O'BRIEN: Thank you.

22 COUNCILMAN JONES: Thank you,
23 Councilman.

24 We don't have to reinvent the
25 wheel. The wheel has been constructed.

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2 We just need to add our spoke to that
3 wheel and maybe take advantage of the
4 webinars and the conference calls on
5 that. Obviously you have a lot to deal
6 with, but this is a particular type of
7 boutique crime that we need to become
8 more sensitive to, and so here's an
9 expert in the field made available
10 through this hearing and we appreciate
11 that resource and hopefully we'll take
12 advantage of it.

13 MR. HEALY: Thank you.

14 COUNCILMAN JONES: All right.
15 If there are no other questions for this
16 witness, thank you so much for both of
17 your testimonies.

18 Will the Clerk please read the
19 next witnesses to testify.

20 COUNCILMAN CLARKE: Laurie
21 Malone, Jennifer Rodriguez, Vanessa
22 Stine.

23 (Witnesses approached witness
24 table.)

25 COUNCILMAN JONES: Thank you.

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2 Good afternoon and please be seated.

3 Pull the mic closer to you, and can you
4 state your name and begin your testimony,
5 please.

6 MS. MALONE: Thank you,
7 Councilman. My name is Laurie Malone.
8 I'm a Deputy District Attorney for the
9 Pretrial Division in the Philadelphia
10 District Attorney's Office.

11 We recognize that notario fraud
12 is a very real and disturbing problem.
13 We know that there are fake or fraudulent
14 notarios who pretend to be qualified to
15 help immigrants obtain legal status, help
16 them draft wills or other documents, or
17 purport to provide other legal advice.
18 The consequences for these victims are
19 significant and expensive. Not only has
20 the victim suffered a monetary loss, but
21 the underlying reason for seeking the
22 services of a notario has not been
23 addressed.

24 For example, their will may not
25 have been completed. The appropriate

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2 immigration papers may not have been
3 filed. They have just been given bad
4 legal advice.

5 To be sure, we know that the
6 victims of these situations are not
7 limited to immigrants, but we do know
8 that immigrants and non-native English
9 speakers are the victims here.

10 This is an important hearing.
11 We know that there are many victims out
12 there who have not reported to law
13 enforcement the crimes committed against
14 them. This is not a criticism, but a
15 statement of one of the problems that we
16 must collectively address. If cases are
17 not reported, the police cannot
18 investigate and we cannot prosecute.
19 Therein lies the salient problem.

20 We believe that a successful
21 prosecution or a series of prosecutions
22 would send an important message to those
23 who perpetrate this fraud. Therefore, we
24 need to identify ways to bring
25 appropriate cases through the justice

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2 system so that justice can be served.

3 I have personally met with
4 victims of notario fraud -- for
5 advocates. I apologize. For advocates
6 of victims for notario fraud and
7 described the process by which complaints
8 are made to the police, investigated by
9 the police, and subsequently charged by
10 the District Attorney's Office.

11 Again, we want to help, and we
12 hope that this hearing provides new ideas
13 for all of us here to address this
14 problem presented to us.

15 I must emphasize that without
16 cases, there is not a lot we can do
17 within the District Attorney's Office,
18 but I am hopeful that today's hearing we
19 will undertake a new strategy to identify
20 the perpetrators and to prosecute this
21 crime.

22 COUNCILMAN JONES: Thank you.

23 Do you have questions?

24 COUNCILMAN O'BRIEN: Yeah.

25 If there were cases, can you

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2 describe the process by which a case
3 would come to the DA's Office?

4 MS. MALONE: First and
5 foremost, the complainant must go to the
6 district where the offender or the crime
7 is located.

8 COUNCILMAN O'BRIEN: The police
9 district?

10 MS. MALONE: The police
11 district. So they must file a complaint
12 with the Police Department. Once they
13 file that complaint, the Police
14 Department investigates that crime. Once
15 they have enough for probable cause, they
16 submit an affidavit for an arrest
17 warrant. That warrant comes to the
18 District Attorney's Office Charging Unit.
19 A senior DA reviews the warrant and
20 ensures that there is enough to execute
21 the warrant, and then we return the
22 warrant back to the Police Department and
23 they arrest the defendant.

24 Once that defendant is
25 arrested, then he is processed through

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2 the normal system. He is given an
3 arraignment date and given a trial date.

4 COUNCILMAN O'BRIEN: Can you
5 see any instance where the DA's Office
6 would do their own investigation and
7 bring their own charges?

8 MS. MALONE: We have what is
9 called an Investigative Division, and
10 that division is very unique in that we
11 only investigate certain kinds of crimes;
12 for example, public corruption, crimes
13 where we would have to do wire tapping
14 and requires a DA to be involved. There
15 are situations where there are complaints
16 made to certain units within the
17 Investigative Division that if it was
18 complex in nature, that we would
19 investigate.

20 COUNCILMAN O'BRIEN: Have you
21 given any thought to the possible
22 criminal charges that could be brought
23 against a notario?

24 MS. MALONE: There are already
25 statutes in place within the Crimes Code.

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2 Under Title 18, Section 3901, there are
3 theft charges. Under the same title,
4 Title 18, Section 4101 involves forgery.
5 3901 is theft and theft by receiving
6 stolen property. And under, I believe,
7 Title 42, Section 2524, those deal with
8 the unauthorized practice of law.

9 COUNCILMAN O'BRIEN: You have
10 very well articulated the problem of
11 individuals coming forward to report
12 these cases, and that's a huge obstacle.
13 Can you identify any other obstacles that
14 they could potentially face.

15 MS. MALONE: I believe
16 Lieutenant Healy spoke to that, and one
17 of the things that I believe that we can
18 participate in is training the police
19 officers at the district to identify that
20 this is fraud, it's forgery, it's theft,
21 it's unauthorized practice of law. It's
22 not a separate crime. Notario fraud is
23 not a separate crime. The elements to
24 make out theft, elements to make out
25 forgery, bad check -- I believe one of

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2 the witnesses testified to the fact that
3 he was given a check to reimburse him,
4 and when he or she attempted to deposit
5 that check, it came back with
6 insufficient funds. That is bad checks.
7 So all these crimes are already in place
8 under our statutes.

9 COUNCILMAN O'BRIEN: As a
10 followup to that, can you tell me what
11 efforts could be made to protect the
12 victim's status?

13 MS. MALONE: I believe
14 Lieutenant Healy also spoke to that, but
15 we do not share victim data information
16 with ICE. I cannot make that more clear.
17 ICE does have access to PARS, but it's
18 very limited to offenders, to defendants.
19 They do not have access to victim
20 information. If there was misuse of that
21 limited access to the police system, then
22 that would be the basis for revoking
23 their limited access.

24 COUNCILMAN O'BRIEN: Has there
25 been any training in the DA's Office with

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2 regards to notario fraud to date, and
3 would you see an opportunity to engage
4 with the Federal Trade Commission given
5 their recent testimony?

6 MS. MALONE: That's interesting
7 because I just -- to the right of me, I
8 have assisting me Chief of Economic
9 Crimes, Lisa Caulfield, and we just
10 discussed that we may want to access that
11 database. So that was a learning process
12 for us, and I found that very helpful.

13 We have training in our office
14 that is ongoing, especially with our new
15 DAs that come in during the fall. And
16 during the first three years, they have
17 ongoing monthly training about how to
18 prosecute certain cases, and in that
19 training there's the training of how to
20 prosecute theft cases, how to prosecute
21 forgery, how to prosecute bad check
22 cases, which are all the statutes, all
23 the offenses that we would charge someone
24 who committed this crime.

25 COUNCILMAN O'BRIEN: You also

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2 identified meetings that you've had with
3 advocates. Can you perhaps amplify what
4 the DA's Office does to provide outreach
5 to the immigrant community.

6 MS. MALONE: When I was first
7 asked to meet with, I believe, members of
8 the Notario Fraud Project, a Ms. Vanessa
9 Stine and Mr. John Grogan was at the
10 meeting, and I did lay out I believe in
11 some detail as to what we would need to
12 do internally within the office to begin
13 an investigation, but I also told them
14 that any victim of this offense, first
15 and foremost, must go to the Police
16 Department and report the crime. Once
17 they report the crime, they can
18 investigate and we can take over after
19 they submit the warrant.

20 COUNCILMAN O'BRIEN: Thank you.
21 I have no more questions.

22 We've been joined by Councilman
23 Kenyatta Johnson.

24 Councilman, do you have any
25 questions?

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2 MS. MALONE: Good afternoon,
3 Councilman.

4 COUNCILMAN JOHNSON: Not yet.

5 COUNCILMAN O'BRIEN: Not yet?

6 Would you like to identify
7 yourself and present testimony.

8 MS. RODRIGUEZ: Yes. Good
9 afternoon --

10 COUNCILMAN O'BRIEN: Thank you
11 very much for your testimony.

12 MS. RODRIGUEZ: -- Councilman
13 O'Brien, Councilman Kenyatta. My name is
14 Jennifer Rodriguez and I am Executive
15 Director of the Office of Immigrant and
16 Multicultural Affairs. I am here to
17 testify regarding Resolution 130931 on
18 the impact of notario fraud and other
19 forms of immigration consultant fraud.

20 The Office of Immigrant and
21 Multicultural Affairs, which we refer to
22 by its acronym MOIMA, was established
23 approximately one year ago for the
24 purpose of ensuring the well-being of
25 immigrants and other cultural and ethnic

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2 groups in the City of Philadelphia. Our
3 goal is to ensure the successful
4 integration of these groups into the
5 City's economic, social, and civic life
6 by ensuring that immigrants can easily
7 access City resources and services, by
8 helping them maximize their contributions
9 to our economy, by ensuring that they
10 receive equal and fair treatment, and by
11 facilitating their civic engagement.

12 Among the various initiatives
13 the office carries out is the Citizenship
14 and Naturalization Campaign. There are
15 an estimated 50,000 legal permanent
16 residents in the City of Philadelphia
17 whom are eligible to become citizens, but
18 have not yet taken the necessary steps to
19 naturalize. In order to address this
20 gap --

21 COUNCILMAN O'BRIEN: Can you
22 say that number one more time.

23 MS. RODRIGUEZ: About 50,000.

24 COUNCILMAN O'BRIEN: Thank you.

25 MS. RODRIGUEZ: In order to

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2 address this gap, our office has formed a
3 working group consisting of
4 immigrant-serving organizations, which
5 have been meeting since the fall, in
6 order to identify challenges faced by
7 aspiring citizens and to develop
8 solutions that can be implemented
9 collaboratively.

10 The group has identified three
11 main challenges faced by immigrants
12 seeking to naturalize: One, the lack of
13 affordable legal services; two, the lack
14 of English proficiency, particularly
15 among seniors; and, three, the lack of
16 reliable information about quality
17 immigrant services. These gaps in the
18 marketplace provide a fertile environment
19 for notario fraud to exist.

20 Fraudulent notarios take
21 advantage of immigrants by claiming to
22 offer affordable immigration advice in
23 the client's native language and in a
24 culturally competent manner. It is
25 important to note that there are also

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2 well-meaning but uninformed notaries who
3 want to genuinely provide affordable
4 services to the community but, in doing
5 so, commit mistakes or provide poor
6 advice, thus jeopardizing the client's
7 prospect for naturalization.

8 Although our office has not
9 received any complaints about notario
10 fraud to date, we know that it is a
11 persistent, yet underreported problem
12 within the immigrant community. Many do
13 not realize that notaries are not
14 attorneys and do not have the status in
15 the United States that they have in their
16 country of origin. Immigrants also fear
17 they will be deported if they file a
18 complaint. And even if they were willing
19 to pursue legal action, they do not know
20 who to turn to.

21 We believe that working
22 collectively with immigrant-serving
23 groups, City Council, law enforcement,
24 and in partnership with other groups, we
25 can have a positive impact on this issue.

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2 The working group has identified the
3 following goals: One, to increase the
4 availability of affordable immigration
5 legal services; two, to create a
6 clearinghouse for information related to
7 immigrant services; and, three, expanding
8 a network of ESL providers.

9 On March 29th, our office is
10 partnering with the Philadelphia Chapter
11 of the Immigration Lawyers Association,
12 HIAS-PA, and many other groups for Pro
13 Bono Citizenship Day where attorneys will
14 provide free legal services to immigrants
15 that want to submit their naturalization
16 application. Two sites will be
17 conveniently located in Center City and
18 North Philadelphia. This is the first
19 time the City of Philadelphia officially
20 partners with this non-profit in the
21 annual event.

22 As part of our efforts, MOIMA
23 is committed to collaborating with City
24 Council, law enforcement, District
25 Attorney's Office, Police Department, and

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2 other City agencies to increase awareness
3 within City government about immigration
4 services fraud. We will continue to work
5 with our community partners to strengthen
6 the network of pro bono attorneys and to
7 identify resources that will help
8 immigrants access affordable, quality
9 legal services in a culturally competent
10 environment so that there is no
11 opportunity for bad actors to take
12 advantage of vulnerable populations.

13 Thank you.

14 COUNCILMAN JONES: Thank you so
15 much.

16 And for the record, Councilman
17 Kenyatta Johnson is with us.

18 Are there questions for the
19 witnesses?

20 Councilman Johnson.

21 COUNCILMAN JOHNSON: Yeah. I
22 had a question in regards to -- I guess
23 has there been reports of instances
24 taking place particularly -- I represent
25 the 2nd Councilmanic District in

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2 Southwest Philadelphia, which is a very
3 high African and Caribbean population in
4 the Southwest part of my district. Are
5 there statistics on the level of
6 responses? I mean, statistics on the
7 complaints as it relates to this
8 particular issue in that --

9 MS. RODRIGUEZ: I will say that
10 MOIMA, our office, has not received to
11 date any complaints. We have met with
12 advocate groups and we, on a word of
13 mouth, know that this is persistent, it
14 is an underreported problem, as we have
15 heard throughout today.

16 COUNCILMAN JOHNSON: Thank you
17 very much.

18 MS. RODRIGUEZ: You're welcome.

19 COUNCILMAN JONES: Thank you,
20 Councilman. We both share a large
21 immigrant population from African and
22 Caribbean countries, and I'm not -- I
23 would be surprised if they didn't face
24 the same types of issues, notario fraud
25 and other people with theft of services

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2 in effect by perpetrating that they are
3 lawyers, that they can do these kinds of
4 things. And so, I mean, I wouldn't be
5 surprised, Councilman.

6 Thank you for your testimony
7 and we appreciate your acknowledgment of
8 the issue and look forward to in future
9 years hearing how we evolve in
10 identifying these types of offenses.
11 Thank you so much.

12 MS. MALONE: Thank you.

13 COUNCILMAN JONES: Will the
14 Clerk please read the next witnesses to
15 testify.

16 THE CLERK: Vanessa Stine,
17 Philippe Weisz, Zin Jen (ph).

18 COUNCILMAN JONES: Thank you
19 all for your patience, and please come up
20 to the witness table. Good afternoon.

21 (Witnesses approached witness
22 table.)

23 COUNCILMAN JONES: Thank you so
24 much. Those testifying, will you pull
25 the mic to you, state your name for the

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2 record, and please begin your testimony.

3 MS. STINE: Good afternoon. My
4 name is Vanessa Stine, and I first want
5 to thank Councilman O'Brien for inviting
6 me to participate in this hearing and for
7 having this hearing in the first place on
8 the important issue of notario fraud.
9 I'm a third-year law student at Villanova
10 University and I'm also the Director of
11 the Notario Fraud Project.

12 Before I begin, I also want to
13 thank everyone who has testified before,
14 including the District Attorney's Office,
15 the Police, and the FTC, as well as, and
16 most importantly, the victims. I am very
17 excited about the interest in this issue
18 and in the willingness of many different
19 agencies and organizations to come
20 together and the City Council to look for
21 solutions that better protect immigrant
22 consumers.

23 I'm going to talk about three
24 things today. I'm first going to talk
25 about what notario fraud is and why it's

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2 so harmful. Then I'm going to discuss
3 the Notario Fraud Project and what we're
4 doing to reach victims. And then finally
5 I'm going to speak about why it's so
6 important for the City of Philadelphia to
7 work on this issue.

8 As we've heard from past
9 panelists, notario fraud is a form of
10 theft. Notarios capitalize on confusion
11 surrounding who can provide legal
12 assistance. And we've used the word
13 "notario fraud" a lot and it has been
14 explained, but I just want to reiterate.
15 The reason why we use this as shorthand
16 to describe immigration fraud is because
17 in many Central and South American
18 countries, a notario publico is a type of
19 lawyer and often specialized lawyer,
20 while in the U.S. the translation of
21 notario publico is a notary public, and
22 we know that that is not a lawyer but
23 simply someone who is able often to
24 verify your signature for particular
25 documents.

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2 I want to emphasize, however,
3 that notario fraud is not limited to
4 fraud committed by notario publicos. As
5 victims explain different schemes as well
6 as you've heard different scams by people
7 who have testified today, immigration
8 fraud can take many different forms. So
9 there are individuals advertising and
10 using this false cognate, but there are
11 also businesses that are operating and
12 are advertising immigration services and
13 other multi services. There's also
14 businesses that do not advertise
15 immigration assistance and yet they are
16 providing immigration assistance.

17 And the project that I've been
18 working on, the Notario Fraud Project,
19 has focused on the Spanish-speaking
20 community because that is the community
21 in which I have experience working with,
22 but as other Councilmembers have brought
23 up, this is certainly not an issue unique
24 to the Latino immigrant community and
25 scams can look differently depending on

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2 those communities.

3 What makes immigration fraud
4 especially terrible is that they exploit
5 immigrants' desire to apply for
6 immigration benefits and they falsely
7 assure them that benefits exist where
8 none does. They charge thousands of
9 dollars to file bogus applications or to
10 never actually file these applications.
11 They also prey on vulnerable immigrants
12 who often have limited English skills and
13 are unable to read a contract or the
14 application in English or they are also
15 ill-equipped to ask questions about a
16 provider's credentials.

17 Finally, fraudsters also often
18 prey on their own community, and so you
19 will find that there are immigration
20 fraudsters that are Spanish speaking that
21 are preying on the Spanish-speaking
22 community and that there are immigrant
23 fraudsters in the Asian community
24 speaking the language in which they are
25 defrauding. And this is especially

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2 hurtful because they use the trust that
3 the immigrants have with members from
4 their own community to steal money from
5 them.

6 I also want to emphasize that
7 immigration fraud happens to all
8 immigrants of all different types of
9 immigration status, as you've heard
10 today, including immigrants who are here
11 legally and who are applying for renewing
12 their benefits or applying to naturalize.
13 There are ads by fraudsters to come in
14 and help -- they'll help to naturalize
15 you for free, and these are businesses
16 where there is no lawyer present and yet
17 they are operating an immigration
18 service.

19 These consumer fraud schemes
20 devastate families. Based on interviews
21 that we've conducted here locally through
22 the Notario Fraud Project, scams have
23 ranged anywhere between \$500 to \$10,000
24 and \$15,000 in one case. For low-income
25 immigrants such as landscapers,

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2 agricultural workers, day laborers, this
3 loss is very significant and can result
4 in food insecurity, late rent payments or
5 even eviction. It also can lead to
6 permanent immigration consequences like
7 barring immigrants from applying for
8 benefits that they would have qualified
9 for in the future.

10 I have seen the consequences of
11 immigration fraud firsthand. I started
12 the Notario Fraud Project after interning
13 my first summer at Friends of Farmworkers
14 where I had encountered clients who had
15 been defrauded, and I was very upset by
16 this, and when I looked for resources on
17 where to send victims and what we could
18 do about this, I did not find an
19 organized effort here locally, and so I
20 set out with the Notario Fraud Project
21 with two goals in mind. The first was to
22 really document the issue of immigration
23 fraud by conducting interviews with
24 victims. And so that's what we've done.
25 The second is to help victims fight back

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2 against this fraud by having meetings
3 with law enforcement, with the private
4 Bar trying to figure out what are the
5 legal remedies available and how can we
6 begin to address this problem.

7 And so to date, we've
8 interviewed 24 immigrants who believed
9 that they were defrauded. We've also,
10 through a community-based approach, went
11 out to the communities and conducted
12 "know your rights" presentations on your
13 rights as consumers, and we've reached
14 over 400 immigrants to date on that.

15 We also have a hotline number
16 for victims to call, and we've also been
17 doing some -- participate in some Spanish
18 language radio as another way to try to
19 reach consumers. And really the focus
20 has been to try to reach folks who have
21 been defrauded, because sometimes they
22 don't realize that what happened to them
23 is a crime. They don't realize that
24 there may be resources out there. They
25 don't know where to go to. And so we've

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2 gone to churches, community groups, on
3 the radio, to people's homes to talk to
4 people one-on-one to learn about what
5 happened to them and to listen to them
6 and to try to find a solution for them.

7 Despite our best efforts and
8 some real success, this is a student-run
9 project and it has limited resources and
10 scope. More legal assistance is needed
11 for these victims, because right now
12 there is no local legal services
13 organization providing legal
14 representation to immigrants seeking to
15 bring civil suits against these
16 fraudsters. And you can bring a civil
17 suit using the state Consumer Protection
18 Law, but unfortunately there is a gap in
19 services right now.

20 The project has been fortunate
21 to have the support of Beth Lyon, who is
22 the Director of the Villanova Farmworker
23 Legal Aid Clinic, as well Caitlin Barry,
24 who is a Visiting Professor there, along
25 with John Grogan, who is a partner at

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2 Langer, Grogan and Diver, PC, and Irv
3 Ackelsberg, also a lawyer at this firm,
4 to bring a civil suit against a notario.
5 We are representing two victims of
6 immigration fraud and have brought this
7 suit. And while that has been an
8 important step forward, there are still
9 people waiting for legal assistance.
10 There's people that want to bring a case
11 and there's nowhere to send them. This
12 is why I am applying to try to continue
13 this project, applying for funds to
14 provide free legal assistance to
15 low-income immigrants who have been
16 defrauded after I graduate, but I know
17 that representing victims alone is not
18 going to be enough, and that's why the
19 City of Philadelphia and our community
20 partners also need to work together to
21 find a solution.

22 We've talked about how
23 Philadelphia is a diverse city with a
24 growing immigrant community, and that's
25 absolutely right. Not only do we have a

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2 growing immigrant community faster than
3 our peer cities, but we also have a very
4 diverse immigrant community, immigrants
5 coming from Mexico, China, Vietnam,
6 Korea, the Ukraine, Jamaica, just to name
7 a few.

8 It's also really important for
9 the City of Philadelphia to combat this
10 issue, because the persistence of
11 immigration fraud hurts the integrity of
12 our justice system. When immigrants are
13 defrauded and their fraudsters are not
14 held accountable, immigrants lose faith
15 in our justice system. They lose faith
16 in our laws. And this is extremely
17 harmful because immigrants may be less
18 likely to come forward in the future to
19 get the right kind of help or to report
20 another type of fraud.

21 It's also important for
22 Philadelphia to be a leader in combatting
23 immigration fraud, because over half of
24 Pennsylvania's foreign-born population
25 lives in Philadelphia or the surrounding

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2 four counties, and immigrants in these
3 surrounding counties are coming into
4 Philadelphia for legal assistance and
5 they're also being scammed. Therefore,
6 Philadelphia can have a bigger impact,
7 not only help the residents of
8 Philadelphia but also those living in the
9 surrounding counties.

10 I want to thank you again for
11 the opportunity to speak at this
12 important hearing. Holding notarios
13 accountable will require the
14 collaboration of our city, our local,
15 state, and federal law enforcement, legal
16 service organizations, community-based
17 organizations, and the private Bar. And
18 while there is still a lot of work to be
19 done on this issue, I know that
20 Philadelphia can become a leader on this
21 issue through collaboration.

22 Thank you again.

23 COUNCILMAN JONES: Thank you
24 for your testimony, and you do the legal
25 profession and Villanova proud in your

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2 efforts and putting in this time for this
3 worthwhile issue. We look forward to you
4 passing the Bar.

5 MS. STINE: I do too.

6 COUNCILMAN JONES: The next
7 witness to testify, and then we'll ask
8 questions of the panel. Don't go
9 anywhere.

10 MR. WEISZ: Good afternoon,
11 Councilman Jones. Thank you to City
12 Councilmembers and Councilman O'Brien for
13 inviting me to speak to you today on this
14 important matter. My name is Philippe
15 Weisz. I'm the Managing Attorney at the
16 Hebrew Immigrant Aid Society of
17 Pennsylvania. HIAS Pennsylvania provides
18 immigration legal services to low-income
19 immigrants in Philadelphia and the
20 surrounding counties. I've been in
21 practice for over 15 years at HIAS and
22 other non-profit agencies and have seen
23 firsthand the impact that notario fraud
24 has on the community and the havoc that
25 it causes.

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2 We've talked a lot about what
3 it is, and it is simply the unlicensed
4 practice of law. And it affects every
5 community, as you yourself mentioned. It
6 affects the Latino community. It affects
7 across nationalities regardless. And it
8 also is important to understand it's not
9 just the undocumented population that's
10 affected. We are all affected. So
11 permanent residents who are seeking to
12 apply for citizenship or naturalization
13 are affected. U.S. citizens who are
14 seeking to reunite with their loved ones
15 are affected. And, of course, immigrant
16 victims of domestic violence are
17 affected, as are undocumented immigrants.
18 They are also equally affected.

19 What are the losses? They're
20 multi-faceted. So first it's a financial
21 loss that we've talked about. And in my
22 practice, I've seen individuals who have
23 lost upward -- from \$500 upwards of
24 \$10,000. Secondly is the lost
25 opportunities. As I mentioned in my

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2 written testimony and it was discussed
3 previously, immigration is a
4 form-intensive practice, requiring the
5 precise completion of forms and also a
6 practice that is replete with deadlines.
7 And these are hard and fast deadlines.
8 If you fail to meet one of them, you
9 could lose your benefit for that status
10 forever. Let me give one example.

11 In 2000, under President
12 Clinton was signed the LIFE Act, which
13 extended what was a provision of law
14 called 245(i), enough to understand that
15 this provision of law allowed certain
16 individuals to seek residency status
17 based upon their relationship with a U.S.
18 citizen - spouse or parent or child or
19 what-have-you. That provision of law had
20 a deadline, April 30th, 2001.

21 Now, I was in practice during
22 that time, and my agents that I was
23 working with at the time worked with
24 thousands of families trying to help
25 those who are eligible to file timely,

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2 properly filed applications.

3 Unfortunately, the very next day, May
4 1st, 2001, and until today, I still see
5 individuals who could have been eligible
6 for those benefits under that, but failed
7 to because the notarios they went to
8 never filed them or filed them
9 improperly.

10 And so, thirdly -- and this was
11 also mentioned before -- was the real
12 risk of arrest and deportation, again, by
13 failing to file a timely application.
14 One of the previous speakers spoke about
15 the temporary protected status. Someone
16 who fails to file timely could seriously
17 risk arrest and deportation, only for the
18 fact that they got improper service.

19 Now, the reasons for the
20 prevalence of notario fraud are varied as
21 well. First, we have the language
22 barriers that was discussed. Second,
23 there's a lack of understanding of the
24 legal system and fear and mistrust of
25 governmental institutions and the

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2 cultural barriers. Now, this is
3 compounded by the fact of the lack of
4 availability of immigration legal
5 services to immigrants. And so taken
6 together, this is a situation in which
7 desperately needs attention.

8 And I thank you for inviting
9 me, and I look forward to your questions.
10 Thank you.

11 COUNCILMAN JONES: Thank you so
12 much.

13 And one more witness to testify
14 on this panel.

15 MR. JEN: Good afternoon,
16 Chairman Jones and members of the
17 Committee. Thank you for inviting me for
18 this hearing. My name is Zin Jen. I'm a
19 practicing attorney here in Philadelphia.
20 I've been fortunate in that I've been
21 involved in the immigration attorneys'
22 circles for the past ten years or so, and
23 through private practice, I have come in
24 contact with many victims of immigration
25 fraud.

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2 Mr. Philippe has eloquently
3 stated many of the issues revolving
4 around the victims of fraud. There's
5 many ways these scammers try to avoid
6 being involved in investigations, being
7 caught, and how they do this is that
8 attorneys are responsible for the cases.
9 We enter our appearances on the cases.
10 Our names are attached with the paperwork
11 that are filed. Notarios and many
12 preparers avoid putting their names on
13 the paperwork. Ultimately when
14 immigration fraud is discovered because
15 the paperwork itself is full of
16 fraudulent documentation, false
17 information, but when it is discovered by
18 USCIS and Immigration, the only name, the
19 only signature that is on the paperwork
20 belongs to the victim. Consequently, the
21 victim suffers long term, because they
22 now have a record of committing
23 immigration fraud with Immigration.

24 Immigration code frowns heavily
25 upon any kind of fraud in the application

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2 process. By doing so and by placing only
3 their name on these forms and being
4 associated with the fraud, the victims
5 not only are victims monetarily; they are
6 now looked at as a potential person who
7 committed fraud by immigration, and the
8 long-term consequence of that is far
9 beyond anything I think monetarily can be
10 really valued.

11 Many of the victims went
12 forward to make these applications in the
13 hope that they would become able to
14 legally work. That is one of the key
15 drives for many of my clients who has
16 come to me who are victims. They told
17 me, I did it because they promised me I
18 can then work legally, I will get a work
19 authorization document from Immigration.
20 However, what they don't know is that the
21 preparers use completely fraudulent
22 documentation, place their names on the
23 paperwork, do not place their own name on
24 the paperwork, and then send it in using
25 their information.

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2 This kind of fraud is rampant.

3 I think every practicing immigration
4 attorney has seen many, many cases. I
5 think it's something that really should
6 be stopped. However, prosecuting these
7 people will be difficult, because
8 immigrants oftentimes work under the
9 table. They're paid in cash. The
10 scammers are not going to give them
11 receipts. Many times the payments are
12 made in cash, and there's very little
13 information about who prepared the
14 documentation. So those are the
15 difficulties that will be faced in trying
16 to resolve these issues.

17 But, again, just in my years of
18 practice, I've seen many victims. Most
19 of them, again, ranging from anywhere
20 from \$500 to \$10,000. Ten thousand being
21 more the norm because it's much easier to
22 charge that when you promise them
23 something that they're desperately trying
24 to get. And many of the scammers charge
25 you a high fee under the guise of, well,

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2 it's a difficult thing to accomplish, we
3 are the only ones that can do it and,
4 therefore, you should pay the fee, and
5 many victims have paid the fees.

6 Thank you again for having me
7 here. I'm certainly happy to try to
8 answer any questions.

9 COUNCILMAN JONES: Thank you
10 all, and we do have questions.

11 I guess better communication
12 with local law enforcement. We saw a
13 perfect example of what the federal
14 government is doing by way of these types
15 of allegations.

16 Without giving names, without
17 giving names, are you aware of companies
18 that are notorious for these types of
19 violations or are they more or less
20 mop-and-pop shops that set up a shingle
21 and operate in the shadow of public
22 notice?

23 MS. STINE: I can speak a
24 little bit to that. There are names,
25 repeat offenders, if you will, that have

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2 come up constantly that are known within
3 the immigrant advocacy community where
4 there are people that have been operating
5 businesses for a number of years who have
6 defrauded many immigrants over the years.
7 And, quite frankly, sometimes that's even
8 more challenging, because if someone is
9 established in the community, it can be
10 harder to get immigrant victims to come
11 forward because they see this person as,
12 Well, they've been here for so long and
13 they are allowed to keep doing this, so
14 it must be -- there must be nothing
15 wrong. And so there certainly are repeat
16 offenders, but then there's also people
17 that set up a shingle one day and are
18 gone the next. And so there's both and
19 everything in between.

20 COUNCILMAN JONES: Anyone else?

21 MR. JEN: I have heard of quite
22 a few within the Asian community that I
23 represent primarily. Many of these
24 agencies that I've had experiences with
25 were in New York City. They open up.

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2 They're consulting agencies. They make
3 multiple applications. They charge a lot
4 of fees, and then usually close shop
5 within a short period of time. Once they
6 collect sufficient funds, we can no
7 longer contact them. That brings up
8 difficulties when we get the case and
9 you're trying to find out the history of
10 the case, because there will be no one to
11 turn to for the file.

12 COUNCILMAN JONES: One of the
13 most disturbing things you said, Mr. Zin
14 Jen, was that not only are they
15 victimizing their money taking, but then
16 they face the risk of being actually
17 fraudulent to the government, which is a
18 double blow, if you would, which is
19 amazing to me.

20 MR. JEN: Yes. I personally
21 have one or two cases where my client
22 faced difficulties obtaining relief,
23 immigration relief, because of that
24 history, because Immigration can only see
25 that they have -- my clients have

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2 committed the fraud. They cannot
3 pinpoint anyone else's involvement
4 because lack of documentation.

5 COUNCILMAN JONES: Councilman
6 O'Brien, do you have any questions?

7 COUNCILMAN O'BRIEN: Yeah.

8 I've just been sitting here
9 thinking about the recent Oscars, and
10 Ms. Stine, I sit here thinking about who
11 is going to play you in the movie. And I
12 mean that sincerely. I think it's
13 extraordinary, as the Chairman said, that
14 you as a student have built this
15 infrastructure that we've come to know as
16 the Notario Fraud Project, and you
17 created a mission, you have a very
18 forward-looking direction that continues
19 to grow and evolve. And your testimony
20 was compelling, as your passion is
21 evident to everyone here.

22 I would like to go to one part
23 of your written testimony that
24 identifies, one, those who represent or
25 hold themselves out as immigration

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2 specialists or notario publico. And then
3 there's the second that are running the
4 multi-service businesses and say that
5 they provide a whole listing of
6 immigration services, including taxes,
7 which is another issue. But, finally, or
8 another is, there are also those that are
9 not charging money, but through the
10 goodness of their heart, they're
11 incompetent and they provide these
12 services, which is not criminal, but it's
13 just as damaging. The end result is the
14 same.

15 But in your written testimony,
16 you look at some businesses that
17 advertise one thing. They're like a
18 travel agency. Can you amplify how that
19 fictitious storefront or enterprise
20 invites people in to this fraud dilemma.

21 MS. STINE: Sure. I'd be happy
22 to. And actually --

23 COUNCILMAN O'BRIEN: That just
24 sticks out to me, a travel agency.

25 MS. STINE: And actually Victim

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2 1 and Victim 2, the business that they
3 went to was a private securities
4 business. And so the way they found out
5 about it was through word of mouth, and
6 that's often the case.

7 Now, in the case of travel
8 agencies, I've heard that happening --
9 and you may know more about this as well,
10 but happening in the Eastern European
11 communities.

12 COUNCILMAN O'BRIEN: But you're
13 onto that. If you could amplify all
14 those ways that --

15 MS. STINE: And that's another
16 challenge, because how do you -- you can
17 maybe identify by people's storefronts
18 when they are -- if they say "immigration
19 services," which they do, in giant
20 letters, just like drive down streets in
21 North Philadelphia, South Philadelphia,
22 in Upper Darby and all these communities.
23 They're not necessarily hiding it, but
24 then some are hiding in plain sight where
25 they advertise one thing -- and part of

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2 it can be because you would go to a
3 travel agent in your home country to get
4 a Visa, and so it makes sense to do that
5 here. And so that's part of it too.
6 Sometimes they will appear to be doing
7 something else, but because of
8 assumptions based upon people's
9 experiences in another country, they go
10 to those businesses as well.

11 COUNCILMAN O'BRIEN: And if I
12 can direct this to Mr. Weisz and Mr. Zin
13 Jen. I probably know the answer of why
14 there aren't any federal funds, and that
15 is because of any number of reasons. Can
16 you make a compelling case why federal
17 funds are important for the legal
18 services to the immigrant community?

19 MR. WEISZ: Sure. I'd be happy
20 to speak to that. Unfortunately, since
21 1996, federal law prohibits federal
22 funding for provision of legal services
23 to undocumented immigrants, and that's
24 kind of -- that's what happened in
25 Philadelphia when you have the splitting

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2 up of Community Legal Services and PLA,
3 Philadelphia Legal Assistance. That
4 was -- one of the reasons is because of
5 that law. And unfortunately -- there's
6 been work ever since that time to make
7 availability the federal funds for
8 provision of legal services, which
9 there's been some movement, but not a
10 whole lot. And when we think about the
11 fact that -- I don't have the statistics
12 with me, but immigration detention is the
13 largest growing population nationwide,
14 and despite that fact, immigration
15 violations are considered civil in nature
16 and so, therefore, even though they risk
17 arrest, detention, and deportation, they
18 do not have right to legal counsel. And
19 so you have hundreds of thousands of
20 individuals who are appearing in
21 Immigration Court on a daily basis who go
22 without counsel. And so there are a very
23 limited, what's called, recognized
24 agencies in Pennsylvania to provide free
25 or low-cost immigration legal services.

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2 I mean, in Philadelphia, there's three
3 essentially -- I'm sorry; four agencies.
4 There's HIAS, Nationality Service Center,
5 Catholic Charities, and Esperanza to
6 serve the entire City essentially. And
7 then there's a couple -- there's one in
8 York, Pennsylvania and there's a couple
9 of others, but that's it.

10 And so with very limited
11 exceptions for -- there is some federal
12 funding for representing immigrant
13 victims of domestic violence, but outside
14 of that scope, there's none.

15 COUNCILMAN O'BRIEN: Would
16 anybody else like to comment?

17 MR. JEN: Just briefly, I think
18 federal funding is extremely important
19 for the immigrant community, because
20 immigration law may seem really simple on
21 the surface, but it's actually rather
22 complex. Even immigration attorneys,
23 private practitioners, over the years of
24 practice, we tend to specialize within
25 the immigration field. So for an

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2 immigrant who has no one to turn to, to
3 even go to a private attorney oftentimes
4 is a frustrating experience, because
5 they're sometimes turned away by
6 attorneys saying, Look, I do immigration
7 work, but I specialize in this specific
8 aspect of it.

9 Many undocumented immigrants
10 particularly will have very little
11 understanding of what reliefs are really
12 out there, and consultation costs could
13 add up. They could go to different
14 attorneys for one question and get no
15 answer. So some sort of federal funding
16 to help them get started in the process
17 to at least introduce them to the reliefs
18 that may be available. They can always
19 decide at that point, Look, I want
20 private representation or I want to use
21 the various services available. There
22 are more than enough immigrants out there
23 who need the federal -- and I think
24 that's important, because they're working
25 for pennies on the dollar in hard labor

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2 jobs. They may not have the funds
3 available to go and see private
4 attorneys. So those people need to have
5 assistance. Those are also probably one
6 of the larger groups that are oftentimes
7 scammed by the notario services.

8 And also to go back quickly to
9 a question you asked earlier about travel
10 agencies, my experience with clients
11 going to travel agencies is their desire
12 to be able to go home. Many immigrants
13 have been here for ten years, eight years
14 or 20 years without the ability to visit
15 home when their parents pass away, when
16 things happen back home. Because they
17 are undocumented, they cannot travel. So
18 oftentimes a travel agency in their own
19 country, as mentioned earlier, would be
20 the agency that could help you make those
21 arrangements, and I think that leads them
22 to those agencies and ask the question,
23 Look, how do I legally be able to go home
24 and visit real fast.

25 Thank you.

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2 COUNCILMAN O'BRIEN: Thank you
3 for adding the different levels to this
4 very traumatic experience. That helps
5 tremendously.

6 Very briefly, could you
7 identify necessary next steps that we may
8 consider or the state or the federal
9 level might be able to respond to?

10 COUNCILMAN JONES: If you could
11 make one recommendation, what would it
12 be?

13 MS. STINE: It's hard to just
14 make one recommendation, but --

15 COUNCILMAN O'BRIEN: He
16 qualified it. I was going to say --

17 MS. STINE: I would say I think
18 that what needs to happen is that, one,
19 there needs to be more legal assistance
20 for victims to bring civil complaints on
21 an individual basis, because that is one
22 way to start to fight back on the ground
23 level when cases may not be appropriate
24 or big enough for government agencies
25 like the FTC or the Office of the

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2 Attorney General, the Consumer Protection
3 Unit here in Pennsylvania, which also can
4 bring complaints and cases.

5 Beyond that, I would say that
6 having a reporting system that is
7 approachable for immigrants facing
8 language barriers to go and talk to law
9 enforcement about and make complaints is
10 critical, because it's hard enough for
11 people to come forward anyways and then
12 if there's language barriers or if the
13 reporting system is not in a way that is
14 efficient, it may deter people from
15 utilizing those.

16 And then I also think that a
17 good start is the ordinance that you
18 introduced last week, because it has been
19 used in other cities, and most certainly
20 it's not the only thing to do. It's
21 certainly a way to try to start
22 regulating some of these businesses in a
23 way that will put them in line with the
24 law and laws that they've been breaking.

25 COUNCILMAN O'BRIEN: Thank you,

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2 and thank you again for your compelling
3 testimony.

4 COUNCILMAN JONES: So before
5 you go -- you're going to add to that?

6 MR. WEISZ: Yeah. If I could
7 actually do three maybe. So first is
8 having this hearing just sitting here,
9 seeing the different agencies interact in
10 a way that may not be otherwise happening
11 is a great first step, and I applaud it
12 there.

13 Secondly is funding. I'd like
14 to talk not just about the federal
15 funding, but also to really -- one is the
16 Community Legal Services and PLA all
17 desperately need additional funding. In
18 order to also encourage them to represent
19 individuals where they otherwise may
20 think they cannot represent undocumented
21 immigrants, they actually can, but
22 currently the funding issue is one
23 obviously that's a serious one for them.

24 And, finally, not that this
25 issue is going to be raised tomorrow, but

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2 I feel I have to raise it today as well.

3 The Police Department spoke eloquently

4 and correctly that victims are not

5 reporting to Immigration. That's

6 correct. But that is not what is being

7 heard in the immigrant communities. And

8 so no matter how much that is said, they

9 all hear the story of my friend X, Y or Z
10 who got picked up and is now with

11 Immigration, and when you hear that,

12 game's over. And so those are -- that's

13 another really important issue.

14 COUNCILMAN O'BRIEN: Thank you.

15 COUNCILMAN JONES: We're going

16 to take what we heard today and we are

17 going to move on it. Again, I applaud my

18 colleague for bringing this issue to

19 light. Some of the things I heard was

20 that we could actually petition the Bar

21 Associations, whether it's the Hispanic

22 Bar or the Asian Bar Associations, to ask

23 them to provide lists of attorneys that

24 they know that can provide these services

25 and future attorneys as well, but also to

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2 provide this kind of legal assistance to
3 that.

4 So we're also looking at the
5 license of -- Councilman O'Brien has
6 introduced a bill to talk about a
7 specified license that will address
8 people who need to have some experience
9 at least in this.

10 And another thing that I drew
11 from it is making sure that if they don't
12 put their name on it, I mean, that's a
13 bellwether warning, if I ever heard one.
14 If they're not willing to affix their
15 name, their license to practice this,
16 then you should beware.

17 So thank you all for the
18 testimony, and we will adhere to some of
19 the recommendations. Thank you.

20 MR. WEISZ: Thank you.

21 COUNCILMAN JONES: Will the
22 Clerk please read the final panel to
23 testify.

24 THE CLERK: Will Gonzalez,
25 Arthur Read.

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2 (Witnesses approached witness
3 table.)

4 COUNCILMAN JONES: Thank you
5 both for your patience. We appreciate
6 you sticking with us. Have a seat at the
7 witness table and state your name and
8 begin your testimony.

9 MR. GONZALEZ: Buenas tardes.
10 Good afternoon. My name is Will
11 Gonzalez. Thank you for giving me the
12 opportunity to speak with you today and
13 for organizing a public hearing on such
14 an important topic. I am the Executive
15 Director of Ceiba, a coalition of Latino
16 community-based organizations in
17 Philadelphia. The members of Ceiba are
18 Concilio de Organizaciones Hispanas de
19 Filadelfia, Finanta, the Norris Square
20 Civic Association, and Nueva Esperanza.
21 I am also the President of the Hispanic
22 Bar Association of Pennsylvania.

23 The Hispanic Bar Association of
24 Pennsylvania supports what Vanessa Stine
25 and Philippe Weisz expressed earlier

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2 about the dangers that notarios pose to
3 immigrants and the community through the
4 unauthorized practice of law.

5 As Executive Director of Ceiba,
6 however, I want to make you aware of
7 another facet of notario fraud, the harm
8 that notarios do in the area of tax
9 preparation services. This harm
10 transcends the immigrant community. It
11 affects everybody who files a tax return
12 through a notario.

13 Notarios present their offices
14 as one-stop shops for various services.
15 One of the services that you often see
16 advertised by notarios is tax
17 preparation. It is a natural extension
18 of their scheme to defraud immigrants.

19 It is important for immigrants
20 to be current with their taxes. In
21 general, filing tax returns are
22 demonstrations of good moral character,
23 according to the U.S. Citizenship and
24 Immigration Services, USCIS. The USCIS
25 application for naturalization

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2 specifically asks applicants, Have you
3 ever not filed a federal, state or local
4 tax return since you became a permanent
5 resident?

6 It is important for immigrants
7 that their tax returns are filled out
8 correctly. Tax returns reflect the
9 makeup of a household, the marital status
10 of the tax filers, the family's income
11 sources, and a person's honesty in
12 claiming certain tax credits. If a tax
13 return does not jive with an application
14 for naturalization in terms of household
15 composition or the marital status of the
16 taxpayer, for example, the USCIS may
17 question the sincerity of the applicant.

18 Immigrants sometimes go to
19 notarios for tax preparation services
20 even when they know that it is wise not
21 to go to a notario for help with
22 immigrant service. For example, the
23 unauthorized immigrant who knows well
24 that there is no USCIS paperwork that a
25 notario can fill out to change

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2 immigration status in the U.S., they may
3 go to a notario in the neighborhood
4 because they need to file their taxes.
5 Yes, unauthorized immigrants are required
6 to file a tax return too even when they
7 are paid in cash.

8 The IRS created the Individual
9 Tax Identification Number so that people
10 without Social Security numbers can file
11 a tax return. Attached to the testimony
12 that I provided in written form is a copy
13 of our ITIN brochure to help you
14 understand ITINs better. ITINs are the
15 Individual Tax Identification Number.

16 A badly prepared tax return or
17 a return that requests credits for which
18 the unauthorized immigrant is not
19 eligible leads to a lot of trouble for
20 the taxpayer. For example, we have seen
21 notarios file tax returns for people with
22 ITINs in which they request the Earned
23 Income Tax Credit. The EITC can be worth
24 up to \$6,000 for families who worked in
25 2013. However, the IRS makes clear that

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2 people with ITINs are not eligible for
3 the EITC, yet some notarios try to claim
4 it for people, for unauthorized
5 immigrants. In some cases, the IRS
6 grants the EITC, sends the large refund
7 check, and a few months later realizes
8 the mistake. The IRS then requests a
9 return of the money that it sent, with
10 penalties and interest.

11 Another common problem that we
12 have seen with notario-prepared tax
13 returns for unauthorized immigrants are
14 returns that claim the Child Tax Credit
15 for children who do not live with the
16 taxpayer. Unauthorized immigrants are
17 eligible for the Child Tax Credit.
18 However, like all other taxpayers, that
19 credit is only available when the child
20 lives with the taxpayer. Notarios will
21 often improperly claim the credit on tax
22 returns on which children living in
23 Mexico are listed as dependents. A
24 qualifying child whom the taxpayer
25 supports in Mexico can be claimed as a

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2 dependent, but they cannot be claimed for
3 the Child Tax Credit.

4 A special tax treaty between
5 Mexico and the U.S. allows all taxpayers
6 to claim their dependents living in
7 Mexico. They can do so only if that
8 dependent has an ITIN or a Social
9 Security number.

10 Preparing and submitting shoddy
11 ITIN applications for dependents that
12 live in Mexico is another area where we
13 see the bad work of notarios. Preparing
14 the ITIN application requires strict
15 adherence to the IRS's application
16 guidelines. We often see ITIN
17 applications that are so poorly prepared
18 that they are laughable were it not for
19 the \$250 to \$300 preparation fees that
20 notarios charge their victims.

21 The work of notarios in
22 preparing tax returns puts them in
23 contact with U.S. citizens seeking help
24 with their taxes. I am alluding to
25 people who have no interest whatsoever in

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2 immigration matters. Notarios do damage
3 here too, as the notarios ignore IRS
4 standards of conduct and integrity for
5 private tax preparers. They do not
6 follow IRS guidelines in filling out
7 forms, and they prepare tax returns which
8 illegally claim dependents and tax
9 credits or misrepresent filing status.
10 That gets people in a lot of trouble, and
11 the tax preparation fees are usually
12 high.

13 The fraudulent machinations of
14 notarios also affect honest taxpayers who
15 have never heard of notarios in their
16 life. The filing of tax returns fraught
17 with deceitful requests for refunds are
18 fodder for opponents of the Earned Income
19 Tax Credit, the Child Tax Credit, and tax
20 cuts for low- to moderate-income working
21 people. Every year people seeking to cut
22 these important tax credits for low-wage
23 workers bandy about cases of fraud in
24 Washington, but cast the blame on
25 taxpayers instead of the notarios who are

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2 one of the main culprits in perpetrating
3 tax preparation fraud.

4 Some people say that clients
5 should know better and that they may be
6 accessories to the fraudulent tax return
7 preparation by notarios. That is an easy
8 characterization, as it ignores the
9 complexities of the tax laws and
10 regulations and how intimidating it is
11 for the average person to prepare a tax
12 return. It also ignores the professional
13 responsibility that paid preparers are
14 required to have. In many cases,
15 taxpayers do not know that the
16 notario-prepared tax return they paid for
17 is not prepared correctly. The sad thing
18 is that by the time the client finds out
19 about the problem, the notario may have
20 disappeared from the community.

21 The bottom line is this:
22 Notarios are not just a threat to matters
23 relating to immigration; they do damage
24 to people seeking help with their taxes,
25 and this also affects U.S. citizens.

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2 We support City Council's
3 resolution to investigate notario fraud
4 and other forms of immigration consultant
5 fraud in the City of Philadelphia. We
6 also encourage City Council to continue
7 to work with law enforcement to help them
8 to devote more attention to notario
9 fraud. We respectfully request that you
10 include the IRS's Criminal Investigation
11 Unit in your efforts to engage law
12 enforcement in this area and to
13 coordinate their resources to go after
14 notario fraud.

15 Thank you very much for your
16 attention to this matter.

17 COUNCILMAN JONES: Thank you
18 for your testimony.

19 We have another witness to
20 testify. Please state your name and
21 begin your testimony, please.

22 MR. READ: My name is Arthur
23 Read. I'm general counsel for an
24 organization called Friends of
25 Farmworkers, which is at the moment

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2 located about a block from here. I've
3 been practicing law for 37 years and
4 representing immigrants for at least 35
5 of those 37 years and have extensive
6 experience with consumer fraud issues
7 faced by immigrant communities, not only
8 in this state but in New York and New
9 Jersey where I've also practiced. I've
10 been here since 1981, but practiced in
11 those area states as well.

12 First, I'd just like to pick up
13 on Will's last point and thank Will for
14 bringing it up, because I think it's
15 important also to realize the tax
16 preparation interchange of the
17 multi-service agency -- let's call them
18 that for the moment -- with the immigrant
19 community is often one of the gateways
20 into the immigration representation as
21 well. The kinds of questions that will
22 be asked, even in incompetent preparation
23 of taxes, are likely to result in
24 identification of potential immigration
25 issues involving someone coming in for

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2 tax preparation, and it is not unusual
3 then for that tax preparer to, in turn,
4 suggest that they may be in a position to
5 help with other problems related to
6 immigration as well.

7 At times, that takes the form
8 of referrals to or alleged referrals to
9 attorneys and kickback arrangements
10 between non-attorneys and attorneys in
11 relation to this, some of which gets into
12 a different issue and an important one of
13 sort of the relationship between, I will
14 simply say, less-than-competent attorneys
15 involved in this who at times are allied
16 with the unauthorized practice of law.

17 I should note just as a purely
18 legal matter that an attorney who assists
19 the unauthorized practice of law is in
20 fact committing a violation, an ethical
21 violation, that's a disciplinary action
22 against that attorney as well.

23 The bottom line, though -- and
24 I've given you fairly extensive written
25 testimony talking about the various legal

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2 approaches towards this. I think given
3 that we're at least an hour past when the
4 Committee anticipated being here, let me
5 focus on some pretty concrete suggestions
6 about what would be useful to do.

7 Number one, I have been raising
8 this specific issue for close to ten
9 years within the City of Philadelphia
10 with the District Attorney's Office, with
11 the Attorney General's Office, with the
12 Department of State, and with the FTC.
13 We're part of why the FTC came to
14 Pennsylvania originally to talk about
15 this a number of years ago.

16 It is distressing to hear from
17 the police that they have not yet been
18 able to recognize and categorize any
19 complaints that they've received that
20 relate to this issue, and I think it goes
21 to the fundamental problem. And the
22 fundamental problem is that the nature of
23 the immigration fraud, notario fraud
24 problem requires a more comprehensive
25 approach. I think the District

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2 Attorney's Office, working with the
3 Police, could set up a more appropriate
4 procedure for identifying who would be
5 investigative targets. The reality is
6 that the victims of immigration fraud may
7 themselves not be the most effective
8 witnesses and that a police investigation
9 that involved use of undercover sources
10 or otherwise might in fact be a much more
11 appropriate way to tackle the serious
12 problems involved in major problems.

13 Our biggest problem is that
14 this is a subset of the jurisdiction of a
15 series of state and federal agencies,
16 none of which have prioritized this as a
17 critical issue, at least within
18 Pennsylvania, to take on.

19 The Attorney General's Office
20 does not have its Civil Division and its
21 Criminal Division talk with each other
22 about this issue. We have 67 different
23 District Attorneys in the Commonwealth of
24 Pennsylvania, and there is a role which
25 the District Attorney's Association could

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2 play statewide. There's a role which the
3 Attorney General's Office could play
4 statewide. But it's also important for
5 those of us who represent immigrants to
6 realize that there are Attorney
7 Generals -- I'm sorry; District Attorneys
8 in the Commonwealth of Pennsylvania who
9 would be much more likely to prosecute
10 the immigrants coming forward who are
11 victims of immigration fraud than they
12 would the people who are preying on them.
13 And so in many counties in this
14 Commonwealth, it is very unwise to send a
15 victim of immigration fraud to local
16 police or to a District Attorney, because
17 the reality is that you will only be
18 compounding the problems that they're
19 facing.

20 So I think that there is a
21 critical role which the City could play
22 in trying to step forward and play a role
23 of brokering some of the different
24 jurisdiction between different agencies
25 and playing a role in realizing that

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2 sending people to a particular detective
3 precinct in a particular place without
4 this being coded in a way in which it's
5 going to be handled appropriately is not
6 going to be the effective way to deal
7 with it.

8 There are those of us who have
9 identified by name abusers for ten years.
10 They have been identified to different
11 state and federal agencies, and no one
12 has taken on that issue.

13 There is an important role that
14 could be played by the federal government
15 here too, and I think, again, that's
16 something where the City could assist in
17 trying to identify the kinds of
18 circumstances under which there might be
19 federal investigative resources that are
20 also appropriately brought to bear.

21 Some of the tax preparers that
22 Will has talked about have also been
23 involved in money laundering schemes
24 involving Western Union and a series of
25 other things involving international

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2 transfers of funds. At least one of them
3 was indicted by the U.S. Attorney's
4 Office here, who was also one of the ones
5 who was preying on immigrant communities
6 in Chester County around some of the
7 immigration issues as well.

8 My suggestion would be that we
9 need a task force that looks at these
10 issues in a comprehensive way, looks at
11 them -- as Vanessa alluded to earlier,
12 many of the practitioners of this are
13 doing this on a basis beyond the City of
14 Philadelphia. So we have a regional
15 problem to deal with. The people who are
16 engaged in immigration fraud may find it
17 helpful to be based in Philadelphia, may
18 do some of their practices in
19 Philadelphia, but they are drawing upon a
20 larger immigrant community, Montgomery
21 County, Chester County, Berks County, as
22 well as agencies locally that may be
23 preying on those communities. But it's
24 important to realize that for a lot of
25 reasons, including the presence of the

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2 USCIS immigration offices in
3 Philadelphia, this is a central point for
4 much of the potential for fraud of those
5 communities.

6 One other issue of consequence.
7 I do think the Mayor's Office could be
8 helpful in this, and, that is, this is
9 not, absolutely is not, just a Latino
10 issue. This is an issue that crosses the
11 multiple immigrant communities and looks
12 different in different immigrant
13 communities. One of the cases that was
14 recently referred to the Pennsylvania Bar
15 Unauthorized Practice of Law Committee
16 involved a Ukrainian immigrant from
17 Philadelphia who went to seek assistance
18 in tax preparation and was in fact
19 instead then along the line also given
20 some unauthorized practice of law by a
21 notary public that led to nothing, took
22 their money but didn't do what it is they
23 said that they were going to do, with
24 consequences for that individual. So it
25 is important to approach this in a

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2 comprehensive way.

3 I would turn to, Councilman
4 O'Brien, your legislation. I think there
5 are a number of excellent ideas in there.
6 I think that there are some ways in which
7 it would be useful to look at some other
8 issues relating to advertising, related
9 to signage. Some years ago when people
10 used the Yellow Pages more, I actually
11 literally just went through the number of
12 places that mentioned immigration
13 services in the Yellow Pages, and they
14 were considerable within the City of
15 Philadelphia. My office used to be
16 located at 9th and Cherry in
17 Philadelphia, and a place opened up on
18 that block that says "immigration
19 services," and there's no attorney
20 associated with that office.

21 So I think that one of the
22 things that could also be appropriately
23 looked at is signage. I would say that
24 there are -- that the principal focus in
25 reality of the legislation will probably

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2 be to help those that I think at least
3 one of the prior witnesses had
4 identified, those who don't intend to do
5 ill, but do so without realizing what
6 they're doing. It probably will not
7 address the most serious actors, because
8 the most serious actors are not likely to
9 come in compliance with this any more
10 than they will come in compliance with
11 the other things they're not doing.
12 Nonetheless, it's a tool, and it's a tool
13 that could be very useful if used in a
14 coordinated and comprehensive way with
15 other legal approaches towards remedying
16 the problems of those communities.

17 So, again, bottom line would be
18 better coordination, some serious funding
19 for the language access in an outreach
20 context. We are talking about 50
21 languages using the court system in
22 Philadelphia. I haven't heard anyone
23 talking about outreach anywhere
24 approaching that number of languages in
25 any way, and yet we have to realize that

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2 there are many immigrant communities that
3 we will not reach if we don't have the
4 accessibility of language services to
5 help those individuals.

6 I'd be happy to answer more
7 questions, but it is late.

8 COUNCILMAN O'BRIEN: Thank you.
9 Thank you very much.

10 And, Mr. Gonzalez, thank you
11 for your articulation of the issue
12 involving tax returns. It really puts a
13 face on those who are trying to find a
14 legal pathway to citizenship, and then
15 your added testimony to that, that that's
16 where they become victimized because they
17 trust the tax preparer and then they're
18 kind of seduced into accessing and paying
19 for other immigration services that are
20 less than standard.

21 I'd like to go through that
22 checklist, if I can. The unauthorized
23 practice of law is an issue that probably
24 could be brought before the Pennsylvania
25 Supreme Court Disciplinary Board, but it

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2 also --

3 MR. READ: Well, no. The
4 unauthorized practice of law -- the only
5 issue that the Supreme Court can deal
6 with is for a person who is licensed as
7 an attorney in Pennsylvania. And
8 actually one of the complexities of this
9 issue is because the practice of
10 immigration law is federal, many of the
11 attorneys who practice immigration law
12 legally in Pennsylvania are not licensed
13 by the Commonwealth of Pennsylvania.
14 They are instead licensed in other
15 jurisdictions.

16 One of the other interesting
17 aspects of this issue from the consumer
18 perspective of simply can I look up
19 whether this person is an attorney or
20 not, if you simply look on the
21 Pennsylvania Supreme Court website, you
22 will not find some of the people who are
23 licensed attorneys, because they're
24 licensed in other states. A different
25 problem and complex one. But the

1 3/11/14 - PUBLIC SAFETY - RES. 130931
2 Pennsylvania Supreme Court has no
3 authority over the notary, the person who
4 is not an attorney.

5 COUNCILMAN O'BRIEN: Right. I
6 understand that. How about the sharing
7 of fees?

8 MR. READ: Absolutely. If it
9 is possible to establish the role of the
10 attorney in the sharing of fees, the
11 referral, the fronting, all of those
12 kinds of things are absolutely things in
13 which there are disciplinary actions
14 against attorneys as well.

15 COUNCILMAN O'BRIEN: Okay. In
16 my previous life, I was Chairman of the
17 Judiciary Committee in Harrisburg and
18 have a relationship with the Pennsylvania
19 District Attorney's Association and the
20 Attorney General's Office. Perhaps you
21 can help us fashion an agenda that we may
22 be able to submit to them for
23 consideration in one of their committees
24 and one of their quarterly meetings.

25 MR. READ: I think that would

1 3/11/14 - PUBLIC SAFETY - RES. 130931
2 be an excellent idea, one that we've been
3 trying to work on for a while. I would
4 also add the role of the Department of
5 State in that process.

6 COUNCILMAN O'BRIEN: Yes.

7 MR. READ: As you are aware or
8 I know your staff is aware, we did
9 successfully get the Pennsylvania
10 Legislature to amend the notary law last
11 October. Unfortunately, and your staffer
12 was correct, it appears that the
13 legislation will not go into effect until
14 sometime in 2015 because of the way in
15 which the law was written in the
16 regulation process before it goes into
17 effect. But, again, from the point of
18 view of at least the lawful notary, the
19 person who accidentally does this, spells
20 out much more clearly exactly what the
21 Pennsylvania Bar said in our opinion on
22 unauthorized practice of law. Holding
23 yourself out as being competent to
24 provide any advice in relation to
25 immigration law, calling yourself a

1 3/11/14 - PUBLIC SAFETY - RES. 130931
2 notario publico are each acts that
3 involve the unauthorized practice of law
4 themselves, and this makes it very clear
5 to somebody who wants to be in compliance
6 that you must clearly disclaim that you
7 are an attorney, that you have those
8 competents, and you must limit what it is
9 you do. Again, the legislation that you
10 talked about potentially is very helpful
11 in that regard as well. The posting of
12 fees, for example, was one of the things
13 I think that was in your legislation.
14 The status that the immigration service
15 recognizes for practice of law is if you
16 charge other than a nominal fee. So if
17 you charge \$5 to notarize a document and
18 you want \$500 to notarize an immigration
19 document, something else is at work there
20 than the mere practice of being a notary,
21 and those are the kinds of things that,
22 again, at least in terms of controlling
23 some of the marginally -- the people who
24 are not intending to rip people off or
25 don't at least want to be documented as

1 3/11/14 - PUBLIC SAFETY - RES. 130931
2 intending to rip people off, it will be
3 helpful to have some of that kind of
4 information. And, again, if the
5 penalties are strict enough, it may be
6 something that could prevent people from
7 deciding to take on these issues.

8 COUNCILMAN O'BRIEN: Thank you.
9 Again, I would like to thank you for your
10 testimony. The ordinance that we've
11 introduced will necessitate a further
12 hearing and delineation of those
13 important issues that you've alluded to.

14 I would like to give a
15 shout-out to Miriam Enriquez for all the
16 hard work that she's done in coordinating
17 this effort. I know she's probably
18 hiding her face behind me at this moment,
19 but this is a formidable issue that she
20 has taken and passionately advocated for,
21 and I want to thank all of you for your
22 compelling testimony.

23 Thank you.

24 MR. READ: Thank you.

25 COUNCILMAN O'BRIEN: Are there

1 3/11/14 - PUBLIC SAFETY - RES. 130931
2 any other individuals seeking
3 recognition?

4 (No response.)

5 COUNCILMAN O'BRIEN: Seeing
6 none, this committee hearing is
7 adjourned.

8 Thank you.

9 (Committee on Public Safety
10 concluded at 2:10 p.m.)

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CERTIFICATE

I HEREBY CERTIFY that the
proceedings, evidence and objections are
contained fully and accurately in the
stenographic notes taken by me upon the
foregoing matter, and that this is a true and
correct transcript of same.

MICHELE L. MURPHY
RPR-Notary Public

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