U.S. Department of Justice
Executive Office for Immigration Review
Office of Legal Access Programs

Recognition and Accreditation Program

October 27, 2017

ORPE Human Rights Advocates
300 E. Lombard Street, Suite 840
Baltimore, MD 21202

U.S. Citizenship and Immigration Services
Baltimore District Office
3701 Koppers Street
Baltimore, MD 21227

Disapproval of Application for Recognition – ORPE Human Rights Advocates

Dear ORPE Human Rights Advocates,

The Office of Legal Access Programs (OLAP) has received your application for recognition of an organization under 8 C.F.R. § 1292.11. The application seeks recognition for a principal office in Baltimore, MD. We note that the USCIS District Director has submitted a recommendation that the application be approved. However, upon review of the application and the supporting documentation, OLAP has determined that the application should be disapproved.

An organization seeking approval of recognition must demonstrate that it has at least one individual who is qualified to be an accredited representative. *See* 8 C.F.R. § 1292.11(a)(3). In order to be eligible for accreditation, an organization must demonstrate that the individual has the requisite character and fitness, which includes an examination of prior acts involving dishonesty, fraud, deceit, or misrepresentation. 8 C.F.R. § 1292.12(a)(1). The proposed representative for this organization is Edward Tusamba Moises. However, the materials submitted to OLAP raise significant questions about whether Mr. Moises meets the character and fitness requirements for accreditation. *See* 8 C.F.R. § 1292.12(a)(1).

Your website (www.hrorpe.org) describes Mr. Moises as a "[t]rained lawyer (trial advocacy) from Beasley School of Law at Temple University, post-graduate in European Law from Universite Paris XI, PhD in International Relations and Diplomacy from the School of International Relations of Paris." Moreover, your cover letter states the following: "Our Immigration Legal Department Supervisor, Mr. Edward Tusamba Moises has sufficient litigation knowledge, knowledge and experience with immigration law and procedures. He is a well-trained lawyer who hold a Master of Laws degree from Beasley School of Law at Temple University…" (Page 3). Nevertheless, our records do not show that Mr. Moises is or ever has been a licensed attorney in the United States, yet it appears that he is holding himself out to be a licensed attorney. Furthermore, while we are specifically concerned that Mr. Moises has been holding himself out as a licensed attorney, we also note that he has not completed a formal fundamentals course in immigration law to qualify for accreditation. *See* 8 C.F.R. §1292.12(c).

Finally, the application materials do not include all of the documentation required for recognition listed in the regulations at 8 C.F.R. §§ 1292.11 and 1292.12. For example, the organization has not submitted a budget specifically for the immigration legal services program. *See* 8 C.F.R. § 1292.11(c). Please refer to the regulations, which list the requirements and the supporting documentation that you must provide with your application for recognition. In addition, you can visit our webpage at https://www.justice.gov/eoir/recognition-and-accreditation-program, where you will find more information about the recognition/accreditation process, as well as links to the required forms and Frequently Asked Questions. After reviewing these resources online, if you still have unaddressed questions, please reach out to us via email at R-A-Info@usdoj.gov.

Under the circumstances we do not find that the organization has met the requirements for recognition. Accordingly, the application is disapproved.

Sincerely,

Steven Lang
Program Director
Office of Legal Access Programs