

**TESTIMONY BEFORE NEW YORK CITY COUNCIL'S  
COMMITTEE ON IMMIGRATION**

**In support of Proposed Int 980-A and Resolution 931**

**Presented on June 30, 2025**

My name is Hasan Shafiqullah, and I am a Supervising Attorney in the Law Reform Unit and formerly the Attorney-in-Charge of the Immigration Law Unit (ILU) at The Legal Aid Society (LAS). Throughout our nearly 150-year history, LAS has been a tireless advocate for those least able to advocate for themselves. Over 2,300 staff members operate across all five New York City boroughs in our Civil, Criminal Defense, and Juvenile Rights Practices – guided by the fundamental principle that nobody should be denied justice because of poverty. Combining the expertise gained from representing clients across diverse areas of law with the broader public policy perspective of an advocacy group, we lift up marginalized individuals and enable them to advance themselves and their families. Part direct legal services provider, part social justice defenders, we have a unique ability to go beyond individual issues to affect change at a societal level.

Since the 1980s, LAS has maintained a citywide Immigration Law Unit (ILU) within the Civil Practice. ILU, now comprised of over 90 staff, is a recognized leader in the delivery of free, comprehensive, and high-caliber immigration legal services to low-income immigrants in New York City and surrounding counties. Staff represent immigrants before U.S. Citizenship and Immigration Services (USCIS), before immigration judges in removal proceedings, on appeals to the Board of Immigration Appeals (BIA), and in federal court on *habeas corpus* petitions and petitions for review. Over the most recent year, ILU assisted in over 8,500 individual legal matters benefiting over 21,100 New Yorkers citywide. In addition to direct legal services, we conduct outreach presentations with community members and grass-roots organizations and provide critical immigration legal information to New Yorkers through our Know Your Rights hub on our website and our dedicated legal helpline telephone bank. We also provide regular trainings to immigrant-serving advocates from community-based organizations, state and local agencies, and judicial and legislative staff. Partnerships with other non-profit organizations and coordination of a successful *pro bono* program with nearly 70 participating

law firms enable the ILU to maximize resources to meet the increasing demand for representation.

A. [Proposed Int 980-A](#)

We stand in strong support of Proposed Int. No. 980-A. This bill represents a crucial step forward in protecting our city's immigrant residents from predatory practices and ensuring they receive legitimate and competent immigration assistance.

Unscrupulous individuals, often referred to as *notarios*, have long preyed on the trust and desperation of immigrant New Yorkers.<sup>1</sup> The term *notario publico* in many Latin American countries refers to a legal professional with significant authority, akin to an attorney. However, in the United States, a “notary public” is simply someone authorized to witness signatures – they are not authorized to provide legal advice or legal services. This similarity in terms is consistently exploited to the detriment of our communities.

As we have seen with clients who have been the victims of *notario* fraud before coming to us, the consequences of *notario* fraud and the unauthorized practice of law (UPL) are dire and far-reaching. Low-income immigrant New Yorkers often pay exorbitant fees for services that are either free (such as the provision of immigration forms), incorrect, or ultimately lead to negative outcomes. Moreover, incorrectly completed applications, missed deadlines, or outright fraudulent advice can lead to delays, denials, or even deportation. This is particularly true in light of the February 28, 2025 policy by U.S. Citizenship and Immigration Services to commence removal proceedings against individuals whose immigration benefits applications are denied.<sup>2</sup> A single mistake, made by an unqualified individual, can irrevocably harm an individual's chances of obtaining legal status or reuniting with family. Also, these fraudulent practices can sow distrust within immigrant communities towards all service providers, making it harder for legitimate non-profits and attorneys to reach those who genuinely need help.

LAS supports Proposed Int. No. 980-A, which directly tackles the core issues fueling *notario* fraud and UPL through its two main provisions. First, the requirement for mandatory conspicuous notices on advertisements is critical. By requiring a clear, unequivocal statement in

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<sup>1</sup> See, e.g., Max Siegelbaum, *How Immigration Fraud Victims Get Put on Track to Deportation*, Documented, January 23, 2019, <https://documentedny.com/2019/01/23/how-immigration-fraud-victims-get-put-on-track-to-deportation/>

<sup>2</sup> USCIS PM-602-0187: *Issuance of Notices to Appear (NTAs) in Cases Involving Inadmissible and Deportable Aliens*, February 28, 2025, [https://www.uscis.gov/sites/default/files/document/policy-alerts/NTA\\_Policy\\_FINAL\\_2.28.25\\_FINAL.pdf](https://www.uscis.gov/sites/default/files/document/policy-alerts/NTA_Policy_FINAL_2.28.25_FINAL.pdf)

both English and the language of the advertisement that the service provider is *not* a licensed attorney or Department of Justice accredited representative, and *cannot* give legal advice, the bill empowers immigrants with vital information. This disclosure will help to dispel confusion surrounding the term *notario* and other misleading titles, allowing individuals to make informed decisions about whom to trust with their immigration matters. It places the responsibility squarely on the advertiser to be transparent, reducing the likelihood of misrepresentation.

Second, the increased civil penalties for violations sends a clear message that New York City will not tolerate the unauthorized practice of immigration law. For habitual offenders or those engaged in particularly harmful practices, the escalating penalties are essential to discourage repeat offenses and protect our communities.

### B. [Res 931](#)

LAS also strongly supports New York City Council Resolution 931, which condemns the Trump Administration for disappearing immigrants into prisons in other countries. Through the experiences of our own clients, we have seen the horrors of the federal administration attempting to remove people to El Salvador's Terrorist Confinement Center (CECOT) under the Alien Enemies Act of 1798 (AEA). We also have clients with final orders of removal and grants of withholding of removal or relief under the Convention Against Torture (CAT) who are at risk of imminent removal to third countries. The administration has already removed noncitizens to third countries such as El Salvador,<sup>3</sup> Panama<sup>4</sup> and Costa Rica,<sup>5</sup> and is exploring the possibility of such

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<sup>3</sup> Nicholas Riccardi, *Trump administration deports hundreds of migrants even as judge orders that removals be stopped*, AP News, March 16, 2025, <https://apnews.com/article/trump-venezuela-el-salvador-immigration-dd4f61999f85c4dd8bcaba7d4fc7c9af>.

<sup>4</sup> Federico Rios, *No Exit*, New York Times, February 23, 2025, <https://www.nytimes.com/2025/02/23/world/americas/panama-migrants-hotel-photo.html>; Julie Turkewitz, Farnaz Fassihi, and Annie Correal, *Locked in a Jungle Camp, Migrants Deported to Panama Face Uncertain Future*, New York Times, February 28, 2025, <https://www.nytimes.com/2025/02/28/world/americas/panama-migrants-deportees.html>.

<sup>5</sup> Annie Correal and David Bolaños, *Costa Rica Receives First Flight of Trump Deportees From Faraway Countries*, New York Times, February 20, 2025, <https://www.nytimes.com/2025/02/20/us/politics/deportation-flights-costa-rica-trump.html>; Emiliano Rodríguez Mega and James Wagner, *Costa Rica Violated Rights of 81 Migrant Children Deported by U.S., Lawsuit Says*, New York Times, April 17, 2025, <https://www.nytimes.com/2025/04/17/world/americas/costa-rica-migrants-lawsuit.html>.

removals to Libya,<sup>6</sup> Rwanda,<sup>7</sup> Angola,<sup>8</sup> Equatorial Guinea,<sup>9</sup> and South Sudan.<sup>10</sup>

On June 23, 2025, in *DHS v. D.V.D.*, 606 U.S. \_\_\_\_ (2025), the Supreme Court granted the government's request for a stay of the district court's injunctions in *D.V.D. v. DHS*, 1:25-cv-10676 (D.Mass), which means the government is now free to remove people to third countries without any due process.<sup>11</sup>

This is deeply troubling. The regulations at 28 C.F.R. 200.1 provide that even after an immigration judge has determined that a noncitizen may be deported to another country, that judge's order "shall not be executed in circumstances that would violate Article 3 of the United Nations Convention Against Torture."<sup>12</sup> Regulations also establish a process that immigrants can use to raise concerns with an immigration judge that they may be tortured if sent to a specific country.<sup>13</sup> None of this seems to have mattered to the Supreme Court.

The Court may have opened the door to torture abroad, but the administration could nonetheless choose to take the high road and not subject people to gross human rights abuses in third countries. Basic human decency requires nothing less.

We commend the New York City Council for choosing to stand on the right side of history by condemning the Trump Administration for disappearing immigrants into prisons in other countries. Resolution 931 should be adopted.

### C. Conclusion

For the foregoing reasons, we urge the City Council to pass both Proposed Int. No. 980-A and Resolution 931.

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<sup>6</sup> Eric Schmitt, Hamed Aleaziz, Maggie Haberman, and Michael Crowley, *Trump Administration Plans to Send Migrants to Libya on a Military Flight*, New York Times, May 6, 2025, <https://www.nytimes.com/2025/05/06/us/politics/trump-libya-migrants.html>.

<sup>7</sup> Igatius Ssuuna, *Rwanda confirms early talks to host deported US migrants*, AP News, May 5, 2025, <https://apnews.com/article/rwanda-us-migrants-f2daf81e53b2dab91eb70c1393a1a4fe>

<sup>8</sup> Camilo Montoya-Galvez, *U.S. seeking deportation deals with far-flung countries like Angola and Equatorial Guinea*, CBSnews.com, May 5, 2025, <https://www.cbsnews.com/news/u-s-deportation-deals-with-angola-equatorial-guinea/>.

<sup>9</sup> *Id.*

<sup>10</sup> Brandon Drenon and Kayla Epstein, *Judge says US deportations to South Sudan violate court order*, BBC, May 21, 2025, <https://www.bbc.com/news/articles/c98990v5e1eo>.

<sup>11</sup> HYPERLINK

"[https://www.supremecourt.gov/opinions/24pdf/24a1153\\_15gm.pdf](https://www.supremecourt.gov/opinions/24pdf/24a1153_15gm.pdf)"[https://www.supremecourt.gov/opinions/24pdf/24a1153\\_15gm.pdf](https://www.supremecourt.gov/opinions/24pdf/24a1153_15gm.pdf)

<sup>12</sup> 28 C.F.R. § 200.1

<sup>13</sup> 8 C.F.R. §§ 208.16 et seq. and 8 C.F.R. §§ 1208.16 et seq.

Thank you for your time and consideration. I am available to answer any questions you may have.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Hasan Shafiqullah".

Hasan Shafiqullah  
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The Legal Aid Society