



**Oversight Hearing
Before The New York City Council Committees on
Immigration and Consumer & Worker Protection**

**Testimony of
Commissioner Manuel Castro
NYC Mayor's Office of Immigrant Affairs (MOIA)**

April 15, 2025

I. Introduction

Thank you to Chair Aviles, Chair Menin, the Committee on Immigration, and the Committee on Consumer & Worker Protection for holding this oversight hearing and for accepting MOIA's written testimony. MOIA is committed to making immigrant New Yorkers aware of immigration services fraud and helping prevent it through legal services, public education, and interagency coordination.

MOIA remains steadfast in our responsibility to promote utilization and enhance accessibility of City services by all NYC residents, regardless of citizenship, immigration status, or language needs.¹ To fulfill our Charter-mandated mission, MOIA develops and implements policies and programs that assist immigrants and non-English speakers. During my tenure, we have increased the scale of our work with community-based and faith-based organizations. We have over 70 contracts with immigrant serving non-profits throughout the City, which play a critical role in supporting immigrant communities.

Unfortunately, immigrant and foreign-born New Yorkers are at risk of being targets of fraud. Fraudulent actors prey on immigrant communities by charging unreasonable fees and falsely claiming they can provide critical legal or housing-related services. Immigrant New Yorkers face the possibility of fraud in many aspects of everyday life, including housing and rental scams, job recruitment scams, and false information about public benefits or healthcare eligibility.

One type of fraud impacting immigrant communities is "immigration services fraud," which takes advantage of immigrants with complicated and time-sensitive immigration legal needs by pretending to be an immigration attorney, immigration judge, or even an immigration officer. Often, these actors are not actually attorneys or DOJ Accredited Representatives and thus are likely engaging in unauthorized practice of law.² In other cases, immigration services fraud may be committed by an unethical, unauthorized, or under-trained legal practitioner who may harm the immigrant's case.³ In 2004, the City Council passed legislation defining immigration assistance services and setting standards for services provided by non-attorney, for-profit immigration service providers to protect New Yorkers from fraudulent services.⁴

MOIA's approach to fraud prevention is two-pronged: spreading awareness amongst immigrant communities about the prevalence of fraudulent actors and providing immigrant communities with access to trusted, reliable legal services. MOIA has partnered extensively with City agencies and offices, non-profits, and faith-based organizations to inform immigrant communities of their rights and about the availability of City-funded services. Overall, MOIA continues to collaborate with sister City agencies and partner organizations to promote utilization and enhance accessibility of City services and information, thereby supporting the City's efforts to protect immigrant New Yorkers from fraud.

A. Legal Services & Information: MOIA Supports City Efforts to Prevent Immigrants from Experiencing Fraud by Connecting Immigrant New Yorkers to Free, Safe, and Qualified Services & Information

Without a clear pathway to connect with affordable and quality legal assistance or information,

¹ NYC CHARTER, Ch. 1 § 18.

² "Unauthorized practice of law" refers to the unlawful activity of a person pretending to be an attorney before a court or performing legal services without proper licensure. New York Consolidated Laws, Judiciary Law § 478.

³ Immigrant assistance services fraud and unauthorized practice of law may rise to the level of a criminal offense under New York law. New York Penal Law, Art. 190 §§ 190.87, 190.89 (statutes criminalizing immigration assistance services fraud); New York Education Law, Art. 130 § 6512 ("Unauthorized practice a crime").

⁴ Local Law 31 of 2004 (as amended by Local Law 63 of 2017).

New Yorkers are at a greater risk of being harmed by frauds and scams targeting immigrants. MOIA is committed to expanding and improving access to legal services for New York's immigrant communities. By connecting immigrant New Yorkers to free, safe, and qualified immigration legal services, MOIA supports City efforts to prevent immigration services fraud and connect New Yorkers to help if they have unfortunately already experienced fraud.

MOIA supports City efforts to prevent immigration services fraud and support immigrants who have experienced fraud by funding a strong network of legal services and legal information programs. Access to free, safe, and qualified immigration legal services and information is a key step toward preventing immigrant New Yorkers from being victimized by fraudulent services. MOIA's Immigration Legal Services & Support Programs, listed below, include direct immigration legal services, navigation and case management services, Know Your Rights presentations, and a dedicated legal support hotline. These programs are free-of-charge to NYC residents and staffed by qualified immigration attorneys, DOJ Accredited Representatives, and hotline counselors. Together these programs and initiatives expand and improve access to free, safe, and qualified immigration legal support for New York City's immigrant communities.

MOIA's network of immigration legal services, legal information, and support programs include:

- The **Immigration Legal Support Centers (LSCs)**, a network of 18 nonprofit immigration legal providers.⁵
- The **Rapid Response Legal Collaborative (RRLC)**, jointly funded by the New York State Office of New Americans (ONA), which provides legal assistance to immigrant New Yorkers who are detained by federal immigration enforcement or who are at imminent risk of detention or deportation.⁶
- The **Asylum Seeker Legal Assistance Network (ASLAN)**, a network of nonprofit immigration legal providers focused on serving newly arrived migrants residing both in and out of City shelters.⁷
- The **Haitian Response Initiative**, a network of legal and community-based organizations who collaborate to meet the needs of newly arrived and long-term Haitian residents of New York.⁸
- The **Immigrant Rights Workshops (IRWs)** and the **Immigrant Rights Collaborative (IRC)**, which launched in January 2025 to expand the reach of the IRWs, deliver immigrant rights presentations to shelters, faith-based organizations, schools, and other community spaces.⁹

⁵ **LSC:** African Communities Together (ACT), African Services Committee (ASC), Arab American Association of New York (AAANY), BronxWorks, Inc., CAMBA Legal Services, Inc. Caribbean Women's Health Association (CWAH), Catholic Charities Community Services (CCCS), Center for Family Life (CFL), Chhaya Community Development Corporation (Chhaya CDC), Chinese American Planning Council (CPC), Haitian Americans United for Progress (HAUP), Immigrant Justice Corps (IJC), Jacob A. Riis Neighborhood Settlement (Jacob A. Riis), Little Sisters of the Assumption (LSA), Lutheran Social Services of Metropolitan New York (LSSNY), Make the Road New York (MRNY), MinKwon Center for Community Action, Inc. New York Legal Assistance Group (NYLAG), Northern Manhattan Improvement Corporation (NMIC); Sunnyside Community Services (SCS), The Door.

⁶ **RRLC:** MRNY, NYLAG, Unlocal.

⁷ **ASLAN Partners:** ASC, Pro Se Plus Project (ACT), Catholic Migration Services (CMS), MASA, NYLAG, Unlocal), CCCS, LSSNY, and CUNY Citizenship Now!.

⁸ **HRI:** CCCS, CWAH, Diaspora Community Services (DCS), Flanbwayan Haitian Literacy Project, HAUP, Haitian American Community Coalition (HACC), Haitian Women for Haitian Refugees (HWHR), Life of Hope (LOH).

⁹ **IRW:** Arab American Family Support Center (AAFSC), CFL, Damayan, DSI International, HAUP, Jacob A. Riis, Korean Community Services, La Colmena, Laal, LOH, LSSNY, Mexican Coalition, Mixteca, Muslim Community Network (MCN), New Immigrant Community Empowerment (NICE), Project New Yorker, United Sikhs.

IRC: Center for Family Life (CFL), DSI International (DSI), Jacob A. Riis Neighborhood Settlement, Korean Community Services (KCS), Life of Hope (LOH), Lutheran Social Services of New York (LSSNY), Mexican

- The **Navigation Centers and Settlement Houses Pilot Program** also provide case management and resource navigation services to newly arrived immigrant New Yorkers.

MOIA also funds the **Immigration Legal Support Hotline**, operated in partnership with Catholic Charities Community Services (CCCS), which provides over-the-phone navigation services to immigrant New Yorkers. Hotline Counselors help callers connect to City-funded immigration legal programs or Know Your Rights information. Counselors may also answer questions about general immigration policy updates. More than 64,000 people called the MOIA Legal hotline in calendar year 2024.

The Immigration Legal Support Hotline holds phone banks periodically to respond to urgent needs in immigrant communities. For instance, in light of a surge in fraud schemes targeting immigrants, MOIA, Catholic Charities, the New York State Office of New Americans (ONA), and Univision collaborated to host an “Immigration Fraud Phone Bank” in July 2024. During a dedicated time, callers connected with the MOIA Legal Hotline to receive legal information regarding immigration, as well as guidance on reporting fraudulent immigration services and avoiding becoming a target of fraud. CCCS also hosts ONA’s New Americans Hotline, which New Yorkers can call to report fraud or scams impacting immigrant communities and to seek referrals to services.¹⁰

Starting July 1, 2025, MOIA will establish 25 Immigration Legal Support Centers and a Legal Technical Mentorship program to improve access to immigration legal services citywide.¹¹

Finally, MOIA is continuously updating our public-facing, translated legal resources and Know Your Rights material accessible via our website. In particular, our webpage “Avoid Becoming the Victim of Immigration Fraud” includes information and downloadable resources on how to avoid fraud, how to report fraud, how to access free and qualified legal services, and information on common scams.¹² MOIA’s digital resources on Fraud Prevention have been accessed 4,260 times over the past year.

B. Policy & Interagency Coordination: MOIA Collaborates with Agency, Nonprofit, and Faith-Based Partners to Strengthen Fraud Prevention & Reporting Mechanisms

MOIA works with a wide range of City agency partners and nonprofit partners to strengthen information-sharing, prevent immigration services fraud, and improve reporting mechanisms. Since 2013, MOIA has participated in the Protecting Immigrant New Yorkers (PINY) Taskforce, a network of City, State, and nonprofit organizations committed to protecting immigrant New Yorkers from immigration services fraud and unauthorized practice of immigration law. MOIA is committed to continuing its engagement with the PINY Taskforce.

Coalition, Mixteca, Muslim Community Network (MCN), New Immigrant Community Empowerment, Project New Yorker (PNY), and United Sikhs.

¹⁰ “Know Your Rights, Know Your Resources.” *New York Department of State, Office of New Americans*, <https://dos.ny.gov/office-new-americans> (last accessed April 7, 2025) (including the ONA New Americans Hotline number and additional resources).

¹¹ *Press Release*, “City Issues Request For Proposals For Immigrant Legal Support Centers.” MAYOR’S OFFICE OF IMMIGRANT AFFAIRS (Aug. 8, 2024), <https://www.nyc.gov/site/immigrants/about/press-releases/city-issues-rfp-for-immigrant-legal-support-centers.page>. Please note that City officials may not discuss details about a pending RFX. For further information, please review the publicly accessible pages on PASSPort: https://passport.cityofnewyork.us/popup.aspx/en/bpm/process_manage_extranet/24524 (Legal Support Centers RFX) and https://passport.cityofnewyork.us/popup.aspx/en/bpm/process_manage_extranet/24825 (Legal Technical Mentorship RFX).

¹² “Avoid Becoming the Victim of Immigration Fraud.” *Mayor’s Office of Immigrant Affairs*, <https://www.nyc.gov/site/immigrants/legal-resources/avoid-fraud.page> (last accessed April 4, 2025).

Interagency coordination is a pillar to strengthening fraud prevention and reporting mechanisms. MOIA holds regular meetings with sister City agencies to coordinate policies or initiatives related to immigration legal services and facilitating referrals to City-funded programs, including NYC Children (ACS), Department of Consumer & Worker Protection (DCWP), Department of Youth and Community Development (DYCD), Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV), and the Asylum Application Help Center (AAHC) operated through the Office of Asylum Seeker Operations (OASO). For example, when a fraudulent scheme surfaces that is targeting immigrant consumers or workers, MOIA coordinates with DCWP to help constituents be informed and prepared.

C. English Learning & Support Centers: MOIA Empowers New Yorkers to Navigate City Life and Services through English Language Education

MOIA welcomes all New Yorkers and supports their access to City services regardless of their language needs. However, for many aspects of life in New York City, English learning continues to be a priority for immigrant communities and remains a key workforce development strategy. Improving English language skills can also empower immigrant New Yorkers with the tools they need to better navigate services and information available to them, including being able to identify possible frauds or scams targeting people with limited or no English proficiency.

MOIA has over 60 English Learning & Support Centers across all five boroughs. The lessons take place at public library branches and community centers located in immigrant-dense neighborhoods. These centers offer free English practice materials, including Emmy-award winning educational videos, and in-person classes at beginner and intermediate levels. To bring home the lessons learned in the class materials, we are piloting short resource presentations at the end of classes by agency experts on language access rights, emergency preparedness, transportation, and other, critical resource-related topics. In 2004, we served over 5,000 English language learners.

Our curriculum aims to improve access to both English language learning and familiarity with City services. The video materials portray fictional characters living in New York City, so that students can practice English while learning important lessons about school, workers' rights, accessing health services, or making new friends, among other topics. The episode "Sonam's Mom" illustrates how to access free, safe immigration legal help in New York.¹³

By providing free access to English language learning opportunities, MOIA empowers immigrant and foreign-born New Yorkers to navigate City life, including the skills that will help them identify qualified immigration legal help and other services, and supports City efforts to protect immigrants from fraud.

D. Community Engagement & Outreach: MOIA Creates Pathways for Immigrants to Navigate and Access Safe, Qualified City Services

Sharing information and resources directly with constituents creates pathways for immigrants to navigate and access free, safe, and qualified services for immigration legal or other needs. Thus, community engagement is a pillar of MOIA's approach to preventing immigration fraud and helping immigrant New Yorkers connect with City services and programs. In 2024, the MOIA External Affairs and Outreach team made nearly 52,000 touchpoints with immigrant communities through resource fairs, tabling, Days of Action, Know-Your-Rights presentations,

¹³ "Sonam's Mom." *MOIA English Language & Support Center*, <https://wespeaknyc.cityofnewyork.us/episodes/sonams-mom/> (last accessed April 7, 2025).

and canvassing across the five boroughs. New Yorkers can also contact our office through the AskMOIA Hotline where MOIA staffers guide immigrant New Yorkers to the City's programs and services for which they may be eligible, such as housing, healthcare, public benefits, or reporting fraud to DCWP.

MOIA further builds trust with immigrant communities through immigrant media roundtables, which increase information flow to hyper-local newspapers and TV stations in communities' preferred languages. For instance, MOIA led a roundtable on May 1, 2024, to honor May Day (International Worker's Day) and discuss New York City's multilingual and comprehensive Workers' Bill of Rights.¹⁴

II. Conclusion

Finally, I wish to thank the City's public servants who have stepped up and responded to the needs of both recently arrived and long-term immigrant New Yorkers. MOIA looks forward to continued collaboration with interagency and nonprofit partners to help mitigate and respond to fraudulent immigration services and scams. Thank you again for calling this hearing. I look forward to working with the Council to continue resourcing programs that serve immigrant and foreign-born communities in New York City.

¹⁴ *Press Release*, "Mayor's Office of Immigrant Affairs Hosts an Immigrant Media Roundtable for May Day." MAYOR'S OFFICE OF IMMIGRANT AFFAIRS (May 1, 2024), <http://nyc.gov/site/immigrants/about/press-releases/moia-hosts-immigrant-media-roundtable-20240501.page>.

**Testimony of Commissioner Vilda Vera Mayuga
New York City Department of Consumer and Worker Protection**

**Before the Committees on Consumer and Worker Protection and Immigration
Hearing on Combating Immigration Services Fraud and
Introductions 205 and 980**

April 15, 2025

Introduction

Good afternoon, Chair Menin, Chair Aviles, and members of the Committees. My name is Vilda Vera Mayuga, Commissioner of the Department of Consumer and Worker Protection (DCWP). Today, I am joined by our General Counsel, Michael Tiger, and Assistant Commissioner of External Affairs, Carlos Ortiz. Thank you for the opportunity to testify on immigration services fraud and related legislation as we continue our shared mission to protect immigrant New Yorkers from harm and exploitation.

Protecting New Yorkers

DCWP is a key resource for all New Yorkers, providing fundamental consumer and worker protections, and financial empowerment programming across the five boroughs. We are dedicated to ensuring that consumers who have been exploited or deceived have a recourse, that workers have a passionate defender of their rights and that all New Yorkers have the support they need to improve their financial health. All of these protections and resources are available to New Yorkers regardless of immigration status. In the past three years, we have helped deliver more than \$1.3 billion back to New Yorkers through debt relief efforts, restitution, and financial empowerment programming.

DCWP Legal Authority

In New York City, DCWP protects immigrant consumers in several ways using our broad consumer protection powers. This includes laws and rules we enforce regarding immigration service providers, which are businesses that charge fees for any kind of immigration-related service. DCWP also licenses employment agencies, which are businesses that provide job search assistance for a fee. Lastly, we use our signature Consumer Protection Law, which applies to all businesses in New York City, to prohibit deceptive or unconscionable business practices against New Yorkers.

Immigration service providers are not lawyers and there are prohibitions and limits to the types of services they can provide to consumers seeking immigration-related assistance. We have also found employment agencies to similarly target immigrant communities and individuals. DCWP conducts enforcement of immigration service providers and employment agencies through field inspections and attorney-led investigations that lead to actions before the Office of Administrative Trials and Hearings or State Court.

Fraudulent immigration service providers and employment agencies remain an ongoing challenge for us due to their fly-by-night nature. Many operate out of temporary storefronts, private residences, instant messaging apps or online platforms, only to disappear after being paid by a consumer. Additionally, due to fear of government interaction, immigrant communities often hesitate to file complaints which are essential to an investigatory process. Regardless, DCWP continues to use its civil enforcement authority where and when we can to hold unscrupulous businesses accountable, to educate New Yorkers on their rights, and to encourage consumers to come to us when those rights have been exploited.

Enforcement and Education

In 2025, we have escalated efforts to better support immigrant communities in light of recent events. For example, last month I convened a roundtable of community leaders and legal advocates to discuss and identify emerging trends of consumer harm and ways to strengthen our collaboration to support New Yorkers. We have also engaged with each of the City's districts' attorneys' offices and the New York State Attorney General's office to establish sustainable partnerships that reduce duplicative efforts, improve information sharing, and better our interagency coordination.

Recently, our field enforcement team conducted proactive inspections of businesses advertising themselves as immigration service providers, as well as employment agencies. In the past two months, the team conducted over 750 inspections, resulting in almost 80 summonses. We have also stepped up our investigations, including major results against immigration service providers and employment agencies, such as \$100,000 in penalties against Horizonte de Esperanza Corp., and a trial decision of \$1.6 million, with significant consumer restitution against CMP Employment for illegal activity targeting immigrants. Lastly, under our consumer protection law, we investigated ASA College after receiving photographs of false and deceptive advertisements the for-profit school was using in New York City subways. These advertisements were clearly targeted to immigrants, with promises of assistance in obtaining certain visas if one were enrolled at the school. Our efforts resulted in a settlement agreement with ASA, ultimately putting it out of business and stopping further harm to immigrant students.

As I mentioned to the committees before, we always want to ensure that our enforcement is paired with education, so that we are empowering consumers with the information they need to protect themselves on the frontend. For example, we are currently running a digital education campaign across social media platforms to highlight and educate New Yorkers on their protections related to immigration service providers. Last week, we coordinated a citywide day of action mobilizing volunteers across the boroughs to distribute educational materials, connecting with over 5,500 New Yorkers and ensuring that they are aware of their rights under our laws. This builds on our efforts over the past three years, conducting nearly 600 immigrant-focused outreach events to 63,000 New Yorkers on the protections and services we offer, regardless of immigration status.

Introduction 205

Turning to today's legislation, Introduction 205 would require DCWP to conduct outreach, education and advertising about fraudulent schemes committed by immigration service providers and how to avoid them. The advertisement requirements include television, internet, radio, print,

subway, and LinkNYC kiosks. The legislation would also require the agency to report annually on its outreach and advertising efforts.

We support the intent of this bill and are committed to sustainable interventions to help New Yorkers avoid common fraudulent schemes. However, we have concerns with the overly burdensome advertising mandates, which would require significant new resources. We look forward to working with Council on this legislation and ensuring that New Yorkers are equipped to avoid fraudulent schemes by bad actors.

Introduction 980

Next, Introduction 980 would increase civil penalties for immigration service providers for violations of DCWP's laws and rules. We support Introduction 980 and look forward to working with all of you on this bill.

Conclusion

I would like to reiterate that DCWP's protections and resources are available to all New Yorkers, regardless of immigration status. Especially as it relates to the issues we are discussing today, we encourage anyone who has been harmed by fraud or misrepresentations to please contact our agency, so we can get to work assisting you. Thank you again for the opportunity to testify on today's bills and our essential work uplifting all New Yorkers. We look forward to our continued partnership with all of you to protect our city's residents. I welcome any questions you may have for further discussion.



JUMAANE D. WILLIAMS

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL JOINT COMMITTEES ON CONSUMER & WORKER
PROTECTION AND IMMIGRATION
APRIL 15, 2025**

Good morning,

My name is Jumaane D. Williams and I am the Public Advocate for the City of New York. Thank you very much Chairs Menin and Aviles for holding today's hearing and allowing me the opportunity to provide a statement.

These are dire times for immigrant New Yorkers. The Mayor has officially begun saluting Kristi Noem and ICE in public. While we must continue to condemn the mayor for his inability to put the safety of New Yorkers over his personal gain, we must be laser-focused on what this means for our communities. The alleged quid pro quo that the mayor seems to be demonstrating as his new platform puts all of us in danger - and none more than our newest New Yorkers.

The by-product of these decisions is an environment that allows fear and disinformation to spread like wildfire through our city. An environment such as this opens a gap in our society where scams, fraudsters, and bad faith actors can take advantage of the most vulnerable New Yorkers. These actors must be stopped, penalized, and held accountable for violations of law and decency. One such actor impersonated a number of federal law enforcement agents and demanded huge sums of money in exchange for expedited visa applications.¹ Another culprit posed as an attorney and solicited bribes from individuals seeking legal pathways towards citizenship.²

Make no mistake, these scammers are a result of the President and the Mayor's dual efforts to criminalize and obscure the legal immigration process. It is crucial that elected officials and advocates make every effort to educate our constituents on these scams and prosecute those who think they can profit from exploiting an already broken system. Every New Yorker deserves the opportunity to be a part of our great city. I will continue to stand by my colleagues and the advocates on the ground in order to protect the rights and opportunities that we are all entitled to. We will not back down in the face of corruption, exploitation, and disinformation.

Thank you.

¹ <https://documentedny.com/2025/03/21/queens-green-card-fraud-ice-tommy-weng-da-silva-eb5/>

²

<https://www.ice.gov/news/releases/new-york-woman-indicted-stealing-73k-victims-caribbean-descent-immigration-scam>



New York City Council
Committees on Immigration, & Consumer and Worker Protection
Oversight - Combating Immigration Services Fraud
Testimony of the New York Immigration Coalition
April 15, 2025

Bonjour/Bonswa. My name is Taina Wagnac, and I am the Senior Manager of State and Local Policy at the New York Immigration Coalition, an umbrella policy and advocacy organization that works statewide with over 200 immigrant-serving member and partner organizations. Thank you to Chair Avilés and Chair Menin, including members of the City Council for convening this hearing. Thank you for the opportunity to submit testimony on the pervasive and growing crisis of immigration services fraud, which continues to devastate immigrant families and individuals across our city.

Immigration services fraud is not a new issue. But what we are witnessing today are newer, more insidious forms of fraud that are exploiting gaps in public understanding, the reach of social media, and the desperation of immigrant New Yorkers searching for help. In many Latino communities, for example, we continue to see individuals posing as “notarios” or “notarios públicos”— which, in Latin American countries, typically refers to licensed attorneys with significant legal authority. Here in the United States, however, a notary public is a vastly different role with no authority to provide legal representation in immigration matters. Unscrupulous “notarios” who are not attorneys often rely on this misunderstanding to exploit immigrants and charge excessive application fees without ever submitting applications to the immigration authorities or may induce deportation by submitting applications for relief for which the immigrant is not eligible for or did not request

This linguistic and cultural misunderstanding has created fertile ground for abuse. Predatory actors falsely present themselves as qualified to offer legal services, charging families thousands of dollars—often their life savings—for immigration petitions that are never filed, or worse, filed incorrectly, placing individuals at risk of deportation. The financial and emotional toll of this fraud is staggering. Families are left with fewer options, fractured trust, and in some cases, are pushed deeper into the shadows of our society.

But the problem is evolving. Today, we are seeing a troubling shift in the nature of immigration services fraud. It is moving onto platforms like TikTok and other social media networks, where self-proclaimed “immigration experts” without legal credentials post viral videos filled with misinformation. These posts often offer guarantees of legal status, promise shortcuts through complex immigration processes, or spread fear-based narratives that drive desperate action. This is not always “services fraud” in the traditional sense—many of these actors are not charging directly for services, but rather monetizing social media attention or redirecting viewers to questionable “consultation” schemes and exploitative services. The



result is the same: immigrant New Yorkers are misled, manipulated, and in many cases, harmed.

The NYIC, our member organizations, and the communities we serve know all too well the pernicious effects of immigration services fraud. Our organization periodically releases a community-facing document for our members called the New York State Community Toolkit. In it, we consistently remind readers to be aware of immigration fraud because we know that unscrupulous immigration providers may try to scam immigrants by making false promises or giving them inaccurate information. Knowing that, in many Spanish-speaking countries, notarios can serve as legal representatives, many of these providers with notary commissions purport to offer legal help even though not all U.S. notaries are licensed legal professionals. We therefore advise readers never to seek immigration help from a notario, travel agent, tax preparer, forms preparer, or notary. The need to warn our community members of these schemes persists.

The NYIC is grateful for the city and state resources that exist to serve our communities and ensure that immigrants receive quality, free legal advice. We routinely direct community members to the Office of New Americans hotline at 1-800-566-7636, and we are especially thankful that New York City residents can call 311 and say “ActionNYC” for City-funded, free, and safe legal help. We urge the City to remain steadfast in its commitment to making this resource available for its residents.

Thank you for the opportunity to testify.

Submitted by:
Taina Wagnac
Senior Manager of State and Local Policy
New York Immigration Coalition

NORTHERN MANHATTAN IMPROVEMENT CORPORATION (NMIC)

Written Testimony

Regarding:

Fraudulent Immigration Services

SUBMITTED TO:

THE NEW YORK CITY COMMITTEE ON IMMIGRATION

April 15, 2025

NMIC was founded in 1979 to protect low-income and immigrant families in Upper Manhattan. Since then, we have expanded into adjacent Bronx neighborhoods and support 14,000 New Yorkers with a wide array of programs to address Housing, Immigration, Finance & Benefits, Education & Career, Health, and Holistic needs.

Our Legal, Organizing, & Advocacy Services (LOA), provide a range of benefits to community members including immigration services and domestic violence services. We help our clients with applications including family-based petitions, citizenship application assistance, U-visas, VAWA petitions and other culturally and linguistically competent immigration services. Nearly half a million residents in our core service area are immigrants (86% of whom are from Latin America) including about 230,000 noncitizens. Additionally, our dedicated Domestic Violence Unit offers direct services to survivors of intimate partner violence, bilingual and free of charge, including individual/group counseling, crisis intervention, trauma-focused therapy, shelter placement, relocation assistance, and case management. However, funding for NMIC's immigration, domestic violence and educational work for immigrants in vulnerable communities is facing an unprecedented crisis.

Despite efforts by the City, the State and organizations like NMIC, fraudulent immigration law practices are still rampant. These schemes target the most vulnerable members of our community and their devastating impact on victims is twofold. First, not only will a baseless or frivolous application eventually be denied by USCIS but may result in the person

being flagged for ICE detention and deportation. This leaves the applicant and their family in a worse position in terms of their status and their liberty than if nothing had been filed. And with the current federal administration promising to punish immigrants for even the smallest of infractions, we fully expect victims of immigration fraud to be targeted aggressively for removal from the United States.

Second, the perpetrators of immigration fraud charge unsuspecting clients thousands of dollars for services that are at best worthless and at worst can get them deported. This amounts to theft that on an individual level is unconscionable, especially given the very low income that many undocumented New Yorkers live on. Moreover, this is a systemic issue that is draining what little savings our communities work hard to acquire, laboring for longer hours off the books for under the minimum wage.

We at NMIC, at our own intakes and through outreach, hear direct stories of fraud all too often, and most are shockingly similar. For example:

A prospective client is promised employment authorization and a path to getting a green card. For anyone who has been surviving or supporting a family without legal status, let alone for years or decades, this is an invaluable proposition no matter the cost. The attorney or notario then prepares an application that they well know will never be approved. They rush the client through the application process, do not ask any relevant questions of the client, and have them sign without explaining what they are filing. Most frequently we see fraudulent Violence Against Women Act applications, where credible and severe evidence of abuse at the hands of a Citizen can be the basis for humanitarian status. Such targeted clients normally have no basis for applying for this, though.

The scam relies on the fact that victims become eligible for a temporary work card while the main application is pending. A victim with a totally and facially baseless application will therefore receive an employment card by default. This fools the victim into thinking there is progress on their case. After all, an employment card comes with the ability to work on the books, to get a social security number and is invaluable to improving the victim and their family's life. When the application is inevitably denied, the employment authorization is cancelled, the victim is now at risk of deportation, and their family is thousands of dollars poorer.

On behalf of NMIC and immigrant communities across New York, we strongly urge the Council to do whatever possible to strengthen reporting tools and enforcement against immigration fraud. We also encourage them to maintain and increase funding to legal service nonprofits like NMIC, so that clients can be properly advised/assisted without turning bad actors for help.

Thank you for your time and for the opportunity to testify on this matter.



April 15th, 2025

Committees on Immigration and Consumer and Worker Protection
250 Broadway
New York, NY 10007

**NYC Council Committees on Immigration and Consumer and Worker Protection
I-ARC Testimony for Hearing on "Oversight: Combatting Immigration Services
Fraud." April 15th, 2025**

Good morning, members of the New York City Council. My name is Natalia Nunez Barragan, and I am the Senior Manager of Membership and Capacity Building at Immigrant ARC ("I-ARC").

Immigrant ARC is a coalition of over 80 legal service providers delivering services across the city of New York. Our mission is to increase access to justice and legal counsel for immigrant New Yorkers by mobilizing legal service providers and addressing systemic barriers to justice.

Immigrant ARC applauds the New York City Council's work to combat immigration services fraud, whereby unscrupulous individuals who are neither licensed attorneys nor accredited representatives prey upon those needing legitimate legal services by misrepresenting the nature of the services they are qualified to provide. These "notarios" often charge steep prices for bad legal advice or fraudulent services and target those who are most vulnerable as they search for lifesaving quality legal assistance. Immigration services fraud causes harm not only to its victims (whose legal cases may have been irreparably damaged) but also to the integrity of the immigration process and the legal profession.

Today, our immigrant communities are under unprecedented attack—threats that weaken both our city and its economy. We have witnessed indiscriminate enforcement, illegal detentions, and racial profiling with arbitrary quotas mandating that the U.S. Immigration and Customs Enforcement (ICE) officers make 75 enforcement arrests per day. President Trump has ordered immigration authorities to detain individuals "to the fullest extent possible," significantly increasing the number of people held in ICE and Customs and Border Protection (CBP) facilities—facilities that government experts and federal courts have previously deemed "barbaric" and unconstitutional. This surge in detention further restricts access to attorneys, severely diminishing asylum seekers' chances of successfully fighting their cases. Every day, we see attempts to strip protections and status from those who have obtained them in recent years. In these circumstances—just as we saw under the first Trump administration—legal representatives are not just legal aid; they are lifelines for immigrant communities.

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This climate of fear comes at a time when it is increasingly difficult to find qualified legal assistance. There are not nearly enough immigration attorneys and accredited representatives to meet the need. Our under-resourced nonprofit legal services field is reeling from the Trump Administration's destabilizing cuts to federal funding for critical legal and social services that impact all immigrants including even unaccompanied children.

All of this creates conditions that are ripe for the proliferation of immigration services fraud. I-ARC members see the consequences of notario fraud first hand, when potential clients come to them already having spent their limited resources for promises of legal work that did not happen and/or damaged their legal claim for relief.

For example, The Legal Project is currently serving two clients who were previously scammed by a man named Fernando Aguilar, who pretends to be an immigration attorney. His "letterhead" shows him to be based out of Winnipeg, Canada, but his phone contact was first an office in North Dakota and has now switched to North Carolina. His scam is elaborate. He claims that there is a special program through the Colombian Embassy to get people green cards. His clients pay "USCIS" through wire transfers to Colombia. They then receive communications via email with fake USCIS/OPLA letterhead setting up virtual "consular appointments" and "biometrics appointments." All appointments are done via WhatsApp video, and third parties join the video pretending to be immigration officials. He had our clients scan their "biometrics" on their phone. The Legal Project's clients then received documents that looked genuine with U.S. Department of Homeland Security (DHS) seals and another that looked like a valid I-797.

The consequences for the victims of this fraud are dire. The first client was scammed out of \$6,000. The second client was scammed out of \$13,000 and her son was arrested and placed in ICE detention in Batavia. When she called Mr. Aguilar to see if he could represent her son in a bond hearing, he told her she had to pay him \$6,000. She did -- but he did not show up for court. Both clients have filed complaints with the New York Attorney General's Consumer Fraud division.

These examples demonstrate the kind of fraud that victims may face. Often victims of notario fraud believe they are being directed through a legitimate legal process, and are unaware of the fraud. Even when individuals suspect that something is amiss, it is easy for unscrupulous practitioners to convince their victims that they do not understand what is a very complex area of law. The consequences go beyond financial. People may lose their ability to apply for protection in the United States or may even be ordered removed an immigration court without their knowledge (*"in absentia"*).

Here are some key steps that can combat immigration services fraud:

- **Expand and promote community resources for education:** Providing consistent and accurate legal information through resources like our website [Immigrant Help NY](#), including [how to find qualified legal help and avoid scams](#), is key to empowering the community to combat fraud. In addition The ABA's Commission on Immigration has a standing "Fight Notario Fraud" project [Fight Notario Fraud](#) as does the American Immigration Lawyers Association <http://www.stopnotariofraud.org/>
- **Expand public funding for legal representation:** Since our founding, I-ARC has consistently emphasized the critical need for sustained funding for long-term immigration legal services. Access to free legal representation is essential for immigrants facing removal proceedings and seeking immigration benefits. Now is the time for New York City to step up and demonstrate its unwavering support for our immigrant communities.

(Please see Immigrant ARC's testimony before NYC Council Committee on Immigration for the Budget and Oversight Hearings on The Preliminary Budget for Fiscal Year 2026 dated March 6th, 2025 for specific recommendations.)

- Immigrant ARC is part of the **Protecting Immigrant New Yorkers (PINY)** Task Force, which was created in January 2013 to strengthen enforcement against the unauthorized practice of immigration law through enhanced coordination between the state government, New York State Attorney General's Office, District Attorneys' offices, local government consumer affairs departments and federal agencies. We invite others organizations to join and to keep this initiative alive in this moment that we need it more than ever.



Asian American Federation

Testimony to the New York City Council Committee on Immigration

April 15, 2025

Written Testimony

Thank you to Chair Alexa Avilés and the Committee on Immigration for holding this hearing and for giving us the opportunity to testify on the FY 26 Budget. I am Lucky Ho, the Senior Civic Engagement Coordinator at the Asian American Federation, where we proudly represent the collective voice of more than 70 member nonprofit organizations serving 1.5 million Asian New Yorkers.

I testify before you today to urge the New York City Council and the mayoral administration to enforce more protections for our immigrant communities against predatory and fraudulent practices committed by immigration assistance service providers. Our city has over 670,000 undocumented immigrants, all of whom are living in fear and anxiety as immigration policy changes and deportations are ramping up across the country. Of those migrants, 220,000 of those migrants are newcomers that have arrived in New York City after 2022. Predatory and opportunistic providers are targeting these immigrants during a vulnerable time by excessively charging them, placing misleading ads, or not completing or delivering work. Complaints filed with the statewide Office of New Americans immigration hotline have doubled from 21 or 58 since 2023.

I would like to share a personal anecdote. As a child raised by my immigrant family from Vietnam, I am no stranger to watching my family struggle with civic processes in America. My family naturalized in waves throughout my life and sometimes the process was delayed by the lack of accessible or in-language information or assistance. My grandmother, post-2016, decided that it was time for her to naturalize. She had quietly been pursuing the process herself, so my family and I were shocked when we found out that she had been paying an immigration services provider exorbitant amounts of money for immigration assistance that can and should be provided for free. We confronted the provider and immediately found other assistance for my grandmother. It was disheartening to witness a loved one being taken advantage of during a vulnerable time. I can only imagine what those who do not have loved ones to advocate for them have to undergo, giving up precious money and resources to predatory providers.

Immigrants everywhere deserve protections and this is a critical time to stand behind immigrant communities. I urge the New York City Council and the Mayoral administration to amend the code around outreach and to require the Department of Consumer and Worker Protection to boost awareness of immigration services fraud. The agency should be made responsible to conduct extensive outreach and provide our communities with the materials they need to stay informed. The requirement to report annually on their efforts would hold our government accountable to serving and informing immigrants. I urge you to also move to increase the civil penalties for immigration service providers that break local rules, from a minimum of \$500 to \$7,500. These providers who commit fraud against immigrants seeking services need to understand that there will be penalties for their fraudulent and predatory practices.

We at the Asian American Federation thank you for allowing us to testify and look forward to working with all of you to make sure our immigrant communities get the support they deserve. If you have any questions, I can be contacted by email at lucky.ho@aafederation.org or by phone at 929-412-1386.



Testimony

New York City Council Committee on Immigration and Committee on Consumer and Worker Protection Hearing on Oversight: Combating Immigration Services Fraud

Tuesday, April 15, 2025

**Submitted by
Hannah Strauss, Supervising Attorney
Immigration Court Helpdesk & Family Group Legal Orientation Program
Immigrant and Refugee Services
Catholic Charities Community Services, New York**

Thank you for the opportunity to provide testimony today on behalf of Catholic Charities Community Services about combating immigration services fraud in New York City. I am Hannah Strauss, Supervising Attorney of the Immigration Court Helpdesk and Family Group Legal Orientation Program. I represent Catholic Charities Community Services, Archdiocese of New York.

INTRODUCTION

Catholic Charities is proud of our decades-long tradition of welcoming New York's immigrants and refugees. Our services have a tremendous impact on communities across New York City. The scope and diversity of our services is exceptional.

Through Catholic Charities programs, migrants in New York City have access to a variety of legal services, social services, English language classes, workforce development and support, housing assistance, food support, and other services. Our legal services programs serve thousands of New York City immigrants each year through a wide variety of services, including legal representation, individual consultations, pro se application assistance, Know your Rights presentations, pro bono assignments, and information sharing. These services include warnings about fraudulent immigration practitioners and the importance of working with reputable legal practitioners.

Immigration Services Fraud Impacting New York City's Immigrant Communities

Catholic Charities' high-quality, free legal services in New York City are provided through a wide variety of programs. These include assistance for unrepresented immigrants in removal proceedings through our Immigration Court Helpdesk (ICH) and Family Group Legal Orientation

Programs (FGLOP). ICH and FGLOP are a national cooperative effort between the Department of Justice's Executive Office for Immigration Review (EOIR) and nonprofits across the country. ICH launched in 2016, and FGLOP launched in 2021. Together, ICH and FGLOP provide individualized information, advice and education about the immigration court and deportation systems and potential forms of relief to thousands of unrepresented individuals facing removal proceedings. The principal purpose of both programs is to give immigrants support, information guidance, and pro se application assistance throughout the immigration court process. Catholic Charities often is able to take cases screened at ICH and FGLOP for representation through other programs.

Since returning to in-person services after the COVID-19 pandemic, ICH and FGLOP have provided over 6500 unique services. screened 3755 individuals, filed 1354 pro se applications, provided group orientations to 633 individuals and families, and assisted 752 individuals and families through Friend of the Court services.

Because of the reach of ICH and FGLOP, those programs are a primary way Catholic Charities encounters immigration fraud issues for New York City residents, and sees the harm caused by fraudulent actors.

In addition to encountering fraud through our immigration legal services programs, Catholic Charities takes fraud complaints from residents of New York State through our Office of New Americans immigration legal hotline. We also are a member of the Protecting Immigrant New Yorkers (PINY) Task Force, which is staffed by other non-profit providers and NYC and NYS officials, all of whom work together to combat fraud.

Legal Services Provided:

- The Immigration Court Helpdesk and Family Group Legal Orientation Programs at Catholic Charities provides a range of legal services to migrants, including first-come, first-served free consultations at the three immigration courts in New York City to ensure that they can get accessible services; group presentations that provide accurate legal information to protect against immigration fraud and scams; pro se application assistance; and Friend of the Court Services where our team provides people with information and guidance before, during, and after their court hearings.
- In addition to the services that ICH and FGLOP provide, Catholic Charities provides legal representation for a wide variety of case types. Catholic Charities also houses the Office of New Americans (ONA) Hotline, which has been equipped to take fraud complaints for over a decade and to pass them on to law enforcement officials.
- Our legal services bridge a significant gap in access to legal services for migrants. Our programming is well-known in the New York immigrant community, and ICH and FGLOP staff are often the first attorneys that newly arrived immigrants speak to after arriving in New York.

Common Fraud Schemes and Factors Exacerbating Vulnerabilities to Fraud

- Through our consultations, we have assisted many people who have been the victims of immigration services fraud. Some common types of fraud our participants have experienced include:

- Fraudulent practitioners who assist with completing asylum applications and/or work permit applications for a fee and then fail to submit the application or submit an application with incomplete or incorrect information. In the case of an asylum application, incorrect information can be particularly detrimental. Often, these applications are completed by notarios, and the immigrant is unaware that the notario is not able to provide legal advice or represent them in their court proceedings.
- Complex fraud schemes where unscrupulous individuals lead the migrant to think that they have applied and been approved for a benefit when they have not. It is common for the fraudster to pose as an attorney and assist someone with filing for asylum or another immigration benefit. The migrant is then provided with fake receipt notices and attends a falsified virtual USCIS interview or court hearing. At each step in this process, the migrant provides the fake attorney with additional money. This fraud scheme often leaves the individual with a significant financial loss as well as prejudicially impacts their immigration case where they may have missed real court hearings/failed to apply for asylum within their first year in the United States, because they were the victim of deceit.
- So-called Ten-Year-Visa schemes, in which migrants are led to believe that, due to having lived in the United States for over ten years, they are eligible to apply for a visa. In reality, the notario or practitioner often submits a frivolous application for asylum or VAWA, and the migrant does not realize what has happened until USCIS denies the application, and the migrant is placed in removal proceedings.
- Attorneys and notarios who charge exorbitant fees to complete an asylum application and who allow the migrant to pay in installments, with completion of the application dependent on the installments being paid. Too often, we speak to asylum seekers who paid several hundred dollars to an Immigration Services Provider (ISP) but are then unable to provide the ISP with the remainder of the balance. The ISP then fails to return the money paid and to submit the drafted application.
- Through our consultations, we have found that migrants often become the victim of immigration services fraud because of the following:
 - Migrants are unaware and uninformed about the types of fraud to look out for, and nefarious actors often prey on migrants as they are still adapting to life in the United States. Asylum seekers must act quickly to apply for asylum within their first year in the United States, apply for work authorization, and attend court hearings. They often lack a baseline understanding of normal attorney-client interactions in the United States.
 - Migrants understandably are often desperate to move their cases forward and are pressured by immigration judges to do so. They are often unable to find free legal assistance to complete their asylum applications in a timely manner, because

nonprofit legal services providers do not have the capacity to provide assistance to all the newly arrived migrants or long-term New York City residents. This leaves immigrants increasingly vulnerable to bad actors.

- Rapid changes in government policies create uncertainty, and unrepresented migrants often lack reliable attorneys or DOJ accredited representatives to turn to for clarification. This creates informational vacuums in which bad actors are more easily able to prey on people by offering false hopes of protection and immigration relief.

Unfortunately, at a time when the factors impacting migrants' susceptibility to fraud are increasing, as immigrant communities feel more under attack and the laws and policies are rapidly changing, many free, trusted legal services providers are facing termination of federally funded programs. In fact, today is ICH and FGLOP's last day of operations, as the federal government has terminated our contracts as of tonight at midnight. This will leave us unable to advise more than 1,000 individuals and families each year about how to avoid fraud.

Catholic Charities supports the two bills under consideration today, to ensure appropriate penalties for fraudulent practitioners and reporting of fraudulent activities. Given the financial harm and legal prejudice of immigration fraud on some of our most vulnerable neighbors, it is critical that the current law reflects the seriousness of this issue. We urge the City Council to pass Int 0980-2024 and Int 0205-2024; the increased fines, if appropriately enforced, will serve as a deterrent to people who otherwise might seek to defraud immigrants.

Thank you for the opportunity to testify today and for your commitment to combatting immigration services fraud in New York City. If you have any questions about my testimony, please contact me at hannah.strauss@catholiccharitiesny.org. I look forward to working with you to advance the needs of New York City's most vulnerable populations.



Testimony of Catholic Migration Services before the Committees on Immigration and Consumer and Worker Protection

April 15, 2025

Good afternoon, Committee Chairs Aviles and Menin and members of the committees on Immigration and Consumer and Worker Protection. Thank you for the opportunity to testify regarding bills Intro 205 and 980 that were created to combat immigration services fraud. My name is Alice Davis, and I am the Deputy Director at Catholic Migration Services. Catholic Migration Services provides free legal services and information to low-income New York City residents in three main areas: immigration, workers' rights, and housing. Our agency's mission is to welcome "the stranger in our midst" by providing high quality legal services and education to empower and advance equality and social justice in New York City. For over fifty years, our immigration unit has provided both removal defense and affirmative legal assistance to immigrants in New York City. More recently, our Pro-Se Plus team, which was created three years ago, has worked with unrepresented asylum seekers with legal orientations, robust screenings, triage, and application assistance.

The immigration process is often a long, expensive, and complicated process. In recent years, the availability of quality and affordable immigration legal assistance has become scarce. As a result, many immigrants in need of immigration legal representation turn to notarios, people who falsely advertise to the immigrant community that they can help with immigration issues and other matters of law, even though they have no legal training and are not authorized to perform these services. Many notarios routinely exploit and defraud members of the immigrant community and can make an immigration situation worse by jeopardizing an immigrant's potential adjustment of status or putting someone at risk of immediate removal.

We applaud the City Council for taking measures to protect immigrant New Yorkers from fraudulent immigration providers. It is crucial now, at a time of unprecedented fear and anxiety in immigrant communities, to implement these additional protections. Although fraudulent actors have always been present, since the beginning of the new Administration, more immigrants have come to our office only after paying inexperienced notarios. We have seen instances of providers who hold themselves out as non-profit but have charged exorbitant fees to prepare an asylum application that only contain scant details of the immigrant's fear of persecution of returning to their home country, a critical component in an asylum case. On multiple occasions we have cleaned up and corrected the mistakes of notarios, including the use of incorrect applications and the submission of applications to incorrect government offices. We have regularly explained to confused, frustrated and heart broken clients that advice they had previously received was wrong. Untangling the mess made by someone else is often complex and time consuming.

Imposing higher penalties on immigration services providers that do not comply with requirements such as entering into a written contract with their clients, retaining documents or maintaining a surety will do more to hold individuals accountable for irresponsible and harmful practices that result in devastating results for immigrants. News of heftier fines will hopefully result in pressure on providers to do better, by

cleaning up and professionalizing their practices, or simply deter schemers who see an opportunity for making money from a desperate community to take the next step in opening a business. Further, the expansion of outreach and education efforts to inform immigrants about common fraudulent schemes will empower communities and help protect themselves from these abusive actors.

While notarios will always operate in communities where immigrants live and work, we can do more to discourage their proliferation and protect the communities they prey upon. Bills 205 and 980 will hold fraudulent providers accountable, publicize the acts of bad actors, and empower immigrant communities with information to avoid exploitation. We are grateful for the City Council in elevating this critical issue. Thank you again for the opportunity to testify today.

**WRITTEN TESTIMONY BEFORE NEW YORK CITY COUNCIL'S
COMMITTEES ON IMMIGRATION AND CONSUMER AND WORKER PROTECTION**

Submitted on April 18, 2025

My name is Deborah Lee, and I am the Attorney-in-Charge of the Immigration Law Unit at The Legal Aid Society (LAS). Thank you to the Committees on Immigration and Consumer and Worker Protection for the opportunity to submit testimony. With this written testimony, we also include the written testimony of our client, Cristian. We are not including his last name to protect his identity.

LAS is built on one simple but powerful belief: that no New Yorker should be denied the right to equal justice. We want to remain a beacon of hope for New Yorkers who feel neglected, regardless of who they are, where they come from, or how they identify. From our start nearly 150 years ago, our growth has mirrored that of the city we serve. Today, we are proud to be one of the largest and most influential social justice law firms in New York City and nation-wide. Our staff deliver justice in every borough, working tirelessly to defend our clients and dismantle the hidden, systemic barriers that can prevent them from thriving. As passionate advocates for individuals and families, LAS is an indispensable component of the legal, social, and economic fabric of our City.

In the past year, LAS served over 480,000 individuals and their families who benefitted from our holistic direct services through our Civil, Criminal, and Juvenile Rights Practices. Our work across these Practices together provides us with unique insights into the challenges facing marginalized communities in NYC and an unparalleled ability to effect change on a greater scale. Our Civil Practice works with low-income New Yorkers experiencing a broad range of civil legal issues that, without assistance, can escalate into situations with cascading effects that threaten their stability and keep families locked in cycles of poverty. Our specialized units cover the full spectrum of civil legal needs, including housing and homelessness; homeowner stabilization, family law and domestic violence; immigration; special education; health; community development; consumer issues; employment; government benefits and disability; taxes; and holistic services for vulnerable populations including the elderly, adults and children with disabilities, and people living with HIV/AIDS.

For almost 40 years, LAS has maintained a citywide Immigration Law Unit (ILU) within the Civil Practice. ILU, now comprised of nearly 100 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), in Immigration Court removal proceedings before the Executive Office for Immigration Review (EOIR), on appeals to the Board of Immigration Appeals (BIA), and in federal court on habeas corpus petitions and petitions for review. In addition to representing clients, staff conduct outreach clinics at community-based organizations throughout New York City, intake clients at immigration detention centers, and conduct trainings in various venues throughout the city. Over the most recent year, ILU assisted in nearly 8,600 individual legal matters benefiting over 21,100 New

Yorkers citywide. In addition to providing direct legal services, ILU staff provide regular training 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 53 participating law firms enable the ILU to maximize resources to meet the increasing demand for representation.

Non-citizens across this country and in New York City are living under siege with this current federal administration, with the constant prospect of detention and deportation.¹ Our federal government can now expel non-citizens and perhaps also U.S. citizens to a country where they have no lawful status, to a prison there for an indefinite sentence, and can do this without regard for court orders to provide these people due process.²

Our government is also encouraging the dismissal of asylum claims because initially filed applications – including those by unrepresented individuals – are not deemed sufficiently legally detailed.³

And our government is using the Internal Revenue Service to hunt down immigrants and to cancel lawfully obtained Social Security Numbers to force non-citizens to live in fear and go underground.⁴

For these reasons, as well as the over 243 policy actions by this federal administration, non-citizen New Yorkers are at high risk of being a victim of immigration services fraud. Unscrupulous attorneys and non-attorneys can and will use this climate of fear to further exploit non-citizens who are desperate for any help navigating our increasingly hostile immigration legal system.

With a dearth of immigration legal service providers, non-citizens often find themselves paying for immigration legal help that they cannot afford. At Legal Aid, we have heard repeated accounts of clients who have been defrauded in order to take their money. This includes the “10 year visa” fraud scheme that were highlighted in the Council’s Committee Report for this hearing, but also other fraud schemes that originate from social media sources such as Facebook and WhatsApp.

As our client Cristian noted in his testimony, he initially came into contact with the person he thought was an immigration attorney through Facebook. He later communicated with her entirely via WhatsApp. This “attorney” provided Cristian a copy of an asylum application and receipt notice, leading Cristian to believe that she was a legitimate attorney. This person also fabricated an entire virtual Immigration Court hearing for Cristian, with the “judge” ordering Cristian to pay thousands of

¹ See <https://www.nycbar.org/reports/the-trump-administrations-early-2025-changes-to-immigration-law/?back=1>.

² See <https://www.whitehouse.gov/presidential-actions/2025/03/invoation-of-the-alien-enemies-act-regarding-the-invasion-of-the-united-states-by-tren-de-aragua/>; see also <https://www.whitehouse.gov/presidential-actions/2025/01/designating-cartels-and-other-organizations-as-foreign-terrorist-organizations-and-specially-designated-global-terrorists/>.

³ See <https://www.justice.gov/eoir/media/1396411/dl?inline>.

⁴ See <https://storage.courtlistener.com/recap/gov.uscourts.dcd.278147/gov.uscourts.dcd.278147.31.1.pdf>.

dollars at the conclusion of that hearing. Only by chance, and because of the assistance of law school students who were assisting him in other matters, did Cristian come to realize that his “attorney” may not be legitimate.

Because Cristian never met face-to-face with this “attorney,” enforcement of any local laws against Immigration Service Providers (ISPs) will be difficult. There is no brick-and-mortar office to inspect or act against. Social media and the increasing use of virtual legal services is making it harder to know who exactly is providing legal services, let alone where they are or if they are legitimate.

The Department of Consumer and Worker Protection (DCWP) and other entities involved in helping these non-citizen victims of immigration service fraud must recognize this and alter their strategies to accommodate this changing landscape of legal service provision.

Regarding Int. 205, which calls upon the Department of Consumer and Worker Protection and the Mayor’s Office of Immigrant Affairs (MOIA) to provide detailed annual reports that would be on the DCWP website, LAS is in support of this generally. While Int. 205 would also expand outreach and education efforts, LAS is concerned that more concrete steps must be taken to fully appreciate the persistent instances of immigration services fraud that occur in this City. As an initial step, LAS would advocate for mandated meetings throughout the year between MOIA, DCWP and other interested governmental entities, such as District Attorney’s Offices. These meetings and any annual report should not only discuss complaints received and general trends but should identify recommendations that each agency can take both individually but also collaboratively to assist non-citizen victims of immigration services fraud. As part of the agenda for these meetings, the entities should invite input, questions, and recommendations from the community and immigration legal service providers.

As for Int. 980, LAS agrees with the increase in civil penalties for those committing immigration service fraud. As was suggested during the hearing, LAS agrees with the idea of DCWP and MOIA making a list publicly available on their websites of those who have been penalized for committing immigration services fraud.

Finally, as the rapid increase in immigration legal policy changes will push non-citizen New Yorkers to seek help wherever they can, it is critical for the City to continue to invest in reputable immigration legal services organizations who can not only help provide community legal education but actual immigration legal assistance to these non-citizens.

LAS applauds the City Council for holding these hearings and recognizing the on-going schemes of immigration fraud committed against non-citizen New Yorkers and welcome any opportunity to collaborate regarding these issues. New York City has always cherished our immigrant backgrounds, and we know we are stronger and safer when we respect the rights of all in our community. Thank you again for this opportunity.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Deborah Lee', with a long horizontal flourish extending to the right.

Deborah Lee
Attorney-in-Charge
Immigration Law Unit
The Legal Aid Society

**TESTIMONY BEFORE NEW YORK CITY COUNCIL'S
COMMITTEES ON IMMIGRATION AND CONSUMER AND WORKER PROTECTION**

Presented on April 15, 2025

My name is Cristian. I am not using my last name so that I can protect my identity.

I am here to talk about how I was defrauded by someone who said she was an attorney.

After I came to the United States and New York City, I was desperate to find someone to help me file for asylum. I found someone on Facebook who said she was an attorney. She talked to me on WhatsApp and told me she could help me.

She later sent me instructions on how to pay her via a wire transfer. I paid her a total of \$1570.

She sent me a copy of my asylum application and said it was submitted. She later told me to appear on a video call for an Immigration Court hearing. I remember her telling me to dress formally.

I appeared for this hearing on GoogleMeet. My attorney was there virtually and the judge wore a black robe and spoke Spanish to me. At the end, the Judge told me that I had 8 days to pay a little over \$5,000. If I did not pay within this time, I would owe about \$25,000. The judge told me that I should work with my attorney to pay.

This was the first attorney I had ever worked with and I had no idea that any of this was unusual. It was only because I was working with law school students who sat with me during the hearing did I learn from them that the Immigration Court judge should not have been charging me any money and that my attorney was probably tricking me into paying this money. They also said the asylum application and the receipt notice that the attorney gave me looked fake. I do not read English so I had no idea.

I was scared when the students told me that I had been defrauded. I am not sure if this attorney was even a real attorney. This is wrong and there should be information given to immigrants about how to protect themselves from this kind of fraud. Thankfully, I am now working with an attorney at The Legal Aid Society.

Other immigrants are getting defrauded like me. And, in this time, immigrants are afraid of saying anything about their rights or how they should be treated fairly in this country.

Thank you for letting me speak.

This has been read to me in my native Spanish.

A handwritten signature in dark ink, appearing to read 'Cristian', is written over a horizontal line.

Cristian, a New York City resident and client of The Legal Aid Society

NICK GULOTTA

• Queens, NY • [linkedin.com/in/nickgulotta](https://www.linkedin.com/in/nickgulotta)

Hearing Date: April 15, 2025

Written Testimony Re: Combating Immigration Services Fraud

Thank you Chair Aviles and Chair Menin for being champions on this issue.

My name is Nick Gulotta. While I serve as Chief of Staff to Council Member Julie Won, I am here to testify in my personal capacity as someone who has worked on this issue for over a decade and as the former Director of Outreach and Organizing for the Mayor's Office of Immigrant Affairs (MOIA), where I oversaw the agency's work on Immigration Services Providers (ISP) or *notario* fraud.

As the federal government implements cruel anti-immigrant policies and eliminates critical consumer protections, New York City can step up to protect immigrants by passing Int. [980](#) and Int. [205](#). With every new executive order by the Trump Administration, New Yorkers are targeted with scams, false promises, and misleading claims. Signage, flyers, palm cards, and digital advertisements from notarios that are meant to mislead immigrants into believing that they are seeking assistance from an attorney have never been more brazenly advertised than they are today (see examples in Appendix 1).

The current civil penalty for an ISP for "improper advertisements" or "engaging in prohibited conduct" is a mere \$3,500 for a first violation. This amounts to a slap on the wrist. The going rate for a single asylum application can be as high as \$5,000 on Roosevelt Avenue in Queens. Int. 980 from Council Member Won seeks to double the Department of Consumer and Worker Protection's (DCWP) current penalty schedule, raising the minimum penalty to \$7,500 for a first violation and going up to \$20,000 for repeat violations. This is a critical step to make examples of bad actors and deter them from taking advantage of New Yorkers.

In my previous work at MOIA, I was responsible for writing the agency's section of the report to the Council on ISP fraud outreach as required by Local Law 63 of 2017. Council Member Hanif's [Int. 205](#) expands and makes essential and well-considered updates to LL63. Paid advertisements are essential for raising awareness about this issue. But it is also necessary that MOIA and DCWP conduct meaningful ISP fraud-specific outreach. All-inclusive outreach tactics such as including a message about ISP fraud in a 30 minute Know Your Rights presentation or on a flyer with a list of resources, while important, are not a replacement for a dedicated outreach campaign.

Effective outreach to community members looks like using ISP fraud-specific messaging and going to the same places that community members are targeted by notarios—with pamphlets left

at Herbalife cafes, business cards next to cash registers at culturally-specific grocery stores, flyers in for profit OSHA classrooms, street corners, lamp posts, and on Facebook and chat apps.

Recommendations:

In addition to passing these bills I recommend the following five steps be taken to meaningfully address this issue:

1. DCWP should take a proactive approach to inspections of ISPs. Historically, the city has had a complaint-driven approach to investigating notario fraud where we hope community members will come forward after they have been scammed. However, the reality is that the Administrative Code and the chances one has of receiving justice does not incentivize this. The evidence of deceptive business practices are already in plain view in our communities. DCWP should be required to conduct a minimum number of annual educational visits and inspections of ISPs. Similar proactive investigations can also be required for digital advertisements over Facebook, WhatsApp, and WeChat.
2. DCWP must be funded to have sufficient inspectors and attorneys to quickly pursue investigations. The ability and the speed at which DCWP can investigate, will lead to a higher chance of bad actors not “disappearing.” It will also incentivize individuals to come forward if the agency is able to effectively investigate complaints in a timely manner. In addition, it is essential that funding for a dedicated paid-advertising campaign as required by Int. 205.
3. Notario fraud is a complex topic to conduct effective public education about. In addition to the technical aspects of the issue, scams often prey on people’s cultural affinities and emotional vulnerabilities. To this end, DCWP and MOIA should consider using the model of a [Public Artists in Residence](#) to leverage the arts to connect to immigrant New Yorkers culturally and emotionally.
4. DCWP should adopt a “Worst Landlords Watchlist” approach to this issue where it publishes the names of ISPs and their violations on the DCWP website to warn New Yorkers about bad actors. This list should include their violations and should be updated on an ongoing basis. Additionally, examples of their promotional material should be shared to raise awareness of their predatory practices (see Appendix 2 for example).

In closing, I would like to recognize the extremely hard work of DCWP staff, particularly of Deputy Commissioner Ortiz and his team who works tremendously hard and have been mission aligned partners on this issue.

Thank you for the opportunity to submit written testimony.

NICK GULOTTA

• Queens, NY • [linkedin.com/in/nickgulotta](https://www.linkedin.com/in/nickgulotta)



Appendix 1:

**DO YOU NEED
IMMIGRATION
SERVICE?**

- Apply for citizenship.
- Residency.
- Petition for family members.
- Apply for asylum.
- Employment authorization
and many more services

 **(347) 997-1486**





**NUEVOS
TPS VENEZOLANOS
Permisos Trabajo
ASILOS**

Asesoría en Todo tipo de Tramites a **LATINOS**
CELULARES—WhatsApp:(929) 3723768
(929) 3488667
Correo electrónico: serjus001@hotmail.com

LUIS FELIPE ACUTILAN ARAN
Teléfono: (929) 3488667 - (929) 3723768
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HORIZONTE DE ESPERANZA ORG.

**ASILOS
INMIGRACION**

**REPRESENTANTES AUTORIZADOS ANTE CORTE Y
USCIS, ASILOS, PERMISOS DE TRABAJO, VISAS JU-
VENILES, CAMBIOS DE CORTE**

**8402 Roosevelt Av
Local 1U**

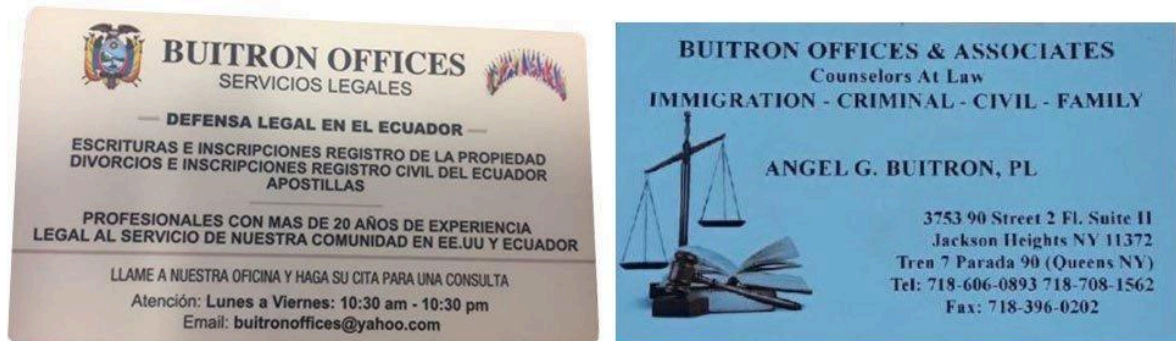
CELULARES—WhatsApp:(929) 3723768
(929) 3488667
Correo electrónico: serjus001@hotmail.com

Example of advertisements from ISP that violate requirements that apply to Immigration Services Providers.

Appendix 2:

SCAM ALERT! Beware of Predatory Immigration Services

Examples of business cards Buitron Offices & Associates used to **trick** immigrant New Yorkers into believing they were lawyers.



Example of PSA from the Department of Consumer and Worker Protection in 2019.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Carlos Ortiz

Address: Assistant Commissioner of External Affairs

I represent: NYC DCWP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Michael Tiger

Address: General Counsel

I represent: NYC DCWP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Vilda Vera Mayuga

Address: Commissioner

I represent: NYC DCWP

Address: _____

▶ Please complete this card and return to the Sergeant-at-Arms ◀

THE COUNCIL
THE CITY OF NEW YORK

11

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Fraud hearing

Date: 4-15-25

(PLEASE PRINT)

Name: Marc Valente

Address: [redacted] Bklyn 11232

I represent: NMIC

Address: 45 Wadsworth Ave NY NY 10039

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 0980-2024 Res. No. 0205-2024

☒ in favor ☐ in opposition

Date: 4/15/2025

(PLEASE PRINT)

Name: Hannah Strauss

Address: 80 Maiden Lane, Floor 13, New York, NY 10038

I represent: Catholic Charities Community Service

Address: same as above

THE COUNCIL
THE CITY OF NEW YORK

3

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Natalia Alvarez Barragan

Address: _____

I represent: Immigrant ARC

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Dan Perez

Address: _____

I represent: (Mixteca) - Community Org Panel

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 908 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Nick Gulotta

Address: Jackson Heights, NY

I represent: Individual

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

8

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Hidalgo

Address: _____

I represent: NICE - Com Org Panel

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Madeline

Address: _____

I represent: La Colmena - Com Org Panel

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

6

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Luisana

Address: _____

I represent: La Colmena - Com. Org Panel

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Amavila - Community Member Mixteca

Address: _____

I represent: (Mixteca) - Com Org Panel

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 4/15/2015

(PLEASE PRINT)

Name: Deborah Lee + Cristan

Address: The Legal Aid Society

I represent: _____

Address: 49 Thomas St 5th Fl, NYC 10013

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 4/16/2015

(PLEASE PRINT)

Name: Christopher Leon Johnson

Address: _____

I represent: self

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 4/15/2025

(PLEASE PRINT)

Name: Sharon Brown

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 4/15/2025

(PLEASE PRINT)

Name: _____

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms