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Immigration News

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Can the DOL Be this Smart?



Is it possible that the Department of Labor has figured out a way to turn back the clock to make the labor certification process a meaningful exercise?

BY: DAVID SWAIM, MANAGING PARTNER



A review of the historical developments of the labor certification application process reveals that the DOL is either very clever or coincidence has combined on a number of levels to achieve this result.

Currently, the labor certification process has become a one to three-year exercise in frustration and delay with no end in sight. Some cases, such as those filed by companies which have experienced layoffs, may be held in limbo indefinitely. New “rules” are created and enforced by Certifying Officers throughout the country without any legal basis. In short, employers have very little guidance as to what to expect in the labor certification process other than past experience, and even that has become increasingly unreliable.

This situation is all the more frustrating when compared to the labor certification process of the early 1990s. That process was well regulated, consistent and timely. Labor certifications

routinely were obtained in six months or less, and it was relatively easy for an experienced practitioner to predict the outcome and timing of a given case before it was filed. Obviously, none of these characteristics apply to the current labor certification process. The question then: what went wrong?

THE LABOR CERTIFICATION PROCESS PRIOR TO 1980

The labor certification requirement as originally enacted was relatively simple. An employer was required to prove to the Department of Labor that there were no qualified and available U.S. workers for a particular position. This process originally created very little controversy and in fact no regulatory criteria existed until 1980. In the 1970s, however, the Department of Labor began a practice which bears a

frightening resemblance to the chaotic mess which we have today.

In order to determine whether or not qualified U.S. workers were available, the Department of Labor originally utilized employment data from the State Employment Commission. For example, if an employer requested labor certification for a civil engineer, the Department of Labor would ask the State Employment Commission to review its employment data to determine whether or not there were any civil engineers looking for jobs. The fundamental flaw in this process was the fact that there was no distinction made between different types of civil engineers. This led to a series of Federal Court cases which eventually resulted in the 1980 regulations.

The Federal Court cases decided that it was unfair to employers for the

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GTE
Byron Nelson
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MAY 9TH – 12TH

INSIDE COMPASS

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New Relief



From Long-term Separation for Families of Permanent Residents

By: Ruth Lane,
Associate Attorney

Permanent Residents of the United States who have petitioned for the residency of their close family members know that they usually face years of waiting before their family can legally live with them in the United States. A new non-immigrant visa category will help solve this longstanding problem for many immigrant families. This article discusses eligibility for the new visa category and the procedures for applying either from inside the United States or at a United States consulate abroad.

In late 2000, Congress created the V nonimmigrant classification as a part of the Legal Immigration Family Equity (LIFE) Act of 2000. Congress created this classification to help improve the situation for immigrant families caused by long backlogs in the family immigration process. Prior to this new legislation, family members often could not even visit their spouse or parent in the United States, because the very fact that they were waiting on an immigrant visa had been interpreted to cast doubt on the legitimacy of their applications for visitors visas. The V visa category allows certain spouses and children of lawful permanent residents to live and work legally in the



United States while they wait for an immigrant visa to become available. Since the visa was created for their specific situation, individuals who eventually hope to become immigrants to the United States do not have to worry about questions of immigrant intent that, in the past, usually prevented them from receiving a visitor's visa.

Who is eligible?

A V nonimmigrant must be the child or spouse of a permanent resident. Children must be unmarried and under 21 years of age. The applicant must be the beneficiary on a Petition for Alien Relative, Form I-130, that was filed by December 21st, 2000 and has been pending for at least three years or has been approved, but at least three years have passed since the date of filing and an immigrant visa is still not available. An individual may also be eligible for V status if an immigrant visa is available, but the application for an immigrant visa abroad, or for adjustment of status in the United States is still pending.

Who is not eligible?

Family members of U.S. citizens are not eligible. However, once a permanent resident becomes a U.S. citizen, immigrant visas are immediately available for spouses and unmarried children under 21, so these family

members do not need V status because they can now apply for immigrant visas or adjustment of status in order to become permanent residents. An application for adjustment of status will allow the family member to remain in the United States and receive work authorization while that application is pending.

Sons and daughters who are over 21 years of age are not eligible, so once a child turns 21, or gets married, he or she loses eligibility for V status. This new category does not help older or married children. Even if their parent becomes a U.S. citizen, they usually continue to face a long wait before they may apply for permanent residence based on their parent's petition.

What if family members are in the United States without legal status?

Individuals who are eligible for V status and are already in the United States can apply to the Immigration and Naturalization Service to change their status. The applicant must prove that he or she meets all eligibility requirements, but, unlike most applications for a change of status, the applicant does not have to prove current legal status in the United States. So, even if family members entered or remained in the United States illegally, under this law they can qualify to legalize their status and receive work authorization.

An individual who has been unlawfully present in the United States and is eligible for a V visa is not subject to the usual bars to admission based on unlawful presence. But, the changes to the law do not remove those bars when he or she later applies for permanent resident status. Therefore, it is useful to consult with an attorney before applying for V non-immigrant status or permanent resident status to clarify requirements for each individual's case. It may be wise for those who have been in the

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FORM I-9 Issues Employees and Employers Should Consider

By: Garry Davis
Associate Attorney

Everyone who accepts or provides employment in this country is required to complete Form I-9. The Immigration and Nationality Act (INA) makes it illegal for an employer to hire, recruit or refer for a fee someone not given authorization to work by the Immigration and Naturalization Service (INS). The regulations give very broad definitions for “hiring,” “employee” and “employer.” “Hiring” means commencement of employment “for wages or other remuneration.” An “employee” is anyone “who provides service or labor for an employer for wages or other remuneration,” excluding volunteers. An “employer” is anyone, including an agent of the employer, “who engages the services or labor of an employee for wages or other remuneration.” An employer can be an individual or an entity. Form I-9 is the means for an employer to protect itself from sanctions for failure to abide by the law. As with most laws, there are exceptions to the I-9 requirement. An employer who believes he or she may qualify for an exception should consult legal counsel for verification before failing to comply.

An employer may be subject to sanctions for several reasons, such as employing someone known to the employer to be unauthorized to work, continuing to employ an employee who has become unauthorized to work, and failing to comply with the employment verification system.

Form I-9 is an employer’s attestation that the employee produced documents establishing identity of the employee and verification of

employment authorization. Various documents can be used to establish both of these two points, such as a U.S. passport or a green card. Often, employers accept documents that establish identity and work authorization separately, such as a Social Security card and driver’s license. It should be noted that an employer cannot require or specify which documents an individual is to present to comply with the verification requirement, as it may be a violation of the Unfair Immigration Employment Practices section of the INA. The employer, not the employee, is liable for defects in completion of the I-9 form. However, there are potential exceptions for good faith and substantial compliance.

INS has the authority to conduct random audits of employers to verify compliance with the I-9 requirements. INS must provide three days notice to the employer prior to inspection. The fines for failure to comply with the law can be substantial, including up to \$11,000 for each employee who is unauthorized to work, and up to \$1,100 for each paperwork violation. There may also be criminal penalties for pattern and practice violations, subjecting an employer to a fine of \$3,000 and/or six months in jail.

An employee may also face consequences for I-9 violations. An employee must attest that she or he is a United States citizen, a Permanent Resident, or has other work authorization from INS. Making a false statement on the form, or supplying a document that is not theirs or was obtained fraudulently, may compromise that individual’s opportunities for immigration benefits in the future. Under the INA, an individual who has sought to obtain any benefit under the INA by fraud or

willful misrepresentation of a material fact is not admissible. The green card application asks whether the applicant has ever sought to obtain a benefit under the INA by fraud or misrepresentation of a material fact. If a green card applicant has checked a box on the I-9 that was not applicable to them, or if the applicant has provided documents to an employer that were not theirs or were obtained fraudulently, the INS may construe that act as a violation of this provision.

Similarly, the INA states that an individual who has falsely claimed to be a United States citizen for any benefit under federal or state law is inadmissible. There is no waiver for this section. There is some question as to whether someone seeking employment who falsely claims on the I-9 to be Permanent Resident or United States Citizen has violated these provisions. At least one immigration judge in Dallas is now requiring all green card applicants to provide past I-9s to ascertain how they were completed during a period of unauthorized employment. The judge’s position is if the individual checked any box on the I-9, that would constitute a violation that would require the applicant to prove eligibility for a waiver, if one is available. If the United States Citizen box was falsely checked on the I-9, this act may be found to be a false claim to U.S. citizenship, thus resulting in a permanent bar to immigration benefits.

Employers and employees should seriously consider the sections dealing with employment under the INA. Failure to comply with the requirements and/or committing fraud in conforming to the requirements could have serious consequences for the employer and the employee. It is highly advisable that employers and employees confer with counsel to follow up on these issues. ■



New Laws Prove to be Beneficial to 'E' and 'L' Nonimmigrants and to 'L' Employers

By: Maggie Mills,
Associate Attorney

New Law Gives Spouses of "E" and "L" Nonimmigrants the Authority to Work in the U.S.

Spouses of certain nonimmigrant workers have been given the authority to obtain a work authorization document and procure employment in the United States. This work authorization is considered "open market" employment authorization, meaning that the spouse can work for any employer in any position.

On January 16, 2002, President Bush signed into law an extremely beneficial bill allowing spouses of intracompany transferees (L-1A and L-1B visas), treaty traders (E-1 visa) and treaty investors (E-2 visa) to work in the United States. On February 22, 2002, the Immigration & Naturalization Service (INS) issued a memo providing guidance on how to go about obtaining such employment authorization, so that those dependent spouses currently in the U.S. may begin working as soon as possible.

In order to qualify for work authorization and to obtain an Employment Authorization Document (EAD card), the nonimmigrant L or E spouse must file an application for work authorization, along with a \$120 fee; and he/she must provide evidence that he/she entered the United States legally, that his/her spouse is here in legal L or E status and is maintaining that

status, and that he/she is the legal spouse of the primary L or E nonimmigrant. If the application is successful, the spouse will be granted an EAD card.

The INS memo states that "dependent spouses of E and L nonimmigrants will be authorized employment for the period of admission and/or status of their spouses not to exceed two years." If the E or L nonimmigrant's status is extended, an application for extension of the spouse's status and work authorization may be filed along with the primary nonimmigrant's application for extension. Therefore, as long as the primary E or L nonimmigrant worker is given authorization to work in the United States, so is his/her spouse given authorization to work in the United States. Only dependent spouses are given this authorization, however, not dependent children.

This new law is, no doubt, extremely beneficial for those to whom it applies. Allowing the dependent spouse the autonomy to work and contribute to the family income is not only invaluable to the family, but also to our community. Hopefully, this legislation will act as a springboard for future legislation which will also allow spouses of workers in other nonimmigrant categories (H-1B, F-1, etc.) to have the ability to work in the U.S., creating a truly diverse American workplace. For now, we jump in with both feet and are ready to get interested E-2 and L-2 spouses working as soon as possible.

Changes in Regulations for Certain L Employers

Although the big news in the recently signed legislation is certainly work authorization for spouses of E and L nonimmigrant workers, another recently-enacted law rewards those multinational companies who have filed L-1 Blanket petitions with INS, and it provides incentives for those companies who may qualify for approval of a L-1 Blanket.

On January 16, 2002, President Bush also signed into law a bill which allows nonimmigrant workers to qualify for L-1 status in the United States if he/she has worked overseas (outside the U.S.) for at least six continuous months in the preceding three years for an employer with an affiliate, subsidiary, or branch in the United States, if the employer has filed and been approved for a L-1 blanket petition. L-1 Blanket petitions allow for intracompany transfer of employees among companies with one or more U.S. office and one or more foreign office.

This new law decreases the amount of time the worker must have worked for the company overseas from one year to six months. This is a huge incentive for companies who qualify for a L-1 Blanket but have resisted filing one for one reason or another. Now, not only are individual petitions filed under L-1 blankets typically processed faster by INS, they are available to employees who have worked for a foreign office for as little as six months. In an economy dependent on time-saving and ever-accelerating project deadlines, saving six months in transferring an employee is, no doubt, a winning proposal. ■

New Relief

Continued from page 2

United States unlawfully, and obtain V status, not to travel outside of the United States before they become permanent residents.

Where and how do you apply for V non-immigrant status?

Change of status for applicants already in the United States – those who are in the United States and are eligible for V status – must file an Application to Change Nonimmigrant Status with the Immigration and Naturalization Service (INS). Applicants will be fingerprinted and required to submit a medical examination; they are also required to submit proof of the immigrant petition that makes them eligible for the V status. The INS might request an applicant to submit a non-binding affidavit of support.

The INS will grant V status for a maximum of two years. If the individual will still qualify for V status after this time, he or she may apply to the INS for an extension of status for an additional two-year period. However, a change or extension of status granted by the INS in the United States will not permit someone to travel to and from the United States. With a few exceptions, such as traveling to Mexico or Canada, in order to travel, the individual must have a visa issued by a consular office abroad to enter the United States.

Applying for a visa from outside the United States

Qualified family members who are outside of the United States can apply for a V visa abroad. The Department of State will verify eligibility based on a database of information provided by the National Visa Center. A V visa issued by a consular office will be valid for multiple entries into the United States over a

period of ten years. The time allowed on each entry will not exceed two years, but, if still eligible, the family member may apply to the INS for an extension of status.

Benefits of V status

People in the United States in V status are eligible to apply to the INS for employment authorization. This allows them to work legally, help support their families, and provide an additional source of income when the time comes to apply for permanent resident status and the family is required to demonstrate a minimum income level. Perhaps most importantly, however, it allows the families of legal United States residents to share in one of the main goals of United States immigration policy, the unity of immediate family members. ■

Dallas International

Bringing Cultures Together to Create a Global Dallas

Recently, Tidwell, Swaim & Associates, P.C. joined with Dallas International in its mission to create a Global Dallas. Formed in 1997 as a nonprofit organization, Dallas International is a coalition of over 1,300 civic, educational and religious leaders established as a means for bringing these groups together for the enrichment of the entire community.

The largest and most popular project of Dallas International is

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TSA Posts Successes

NOVEMBER 2001

H-1B - 16
L-1 - 12
Labor Certifications - 9
I-140 - 1
Permanent Residence - 13
I-765 - 10
I-131 - 22
I-130 - 3

JANUARY 2002

H-1B - 24
L-1 - 1
O-1 - 1
Labor Certification - 8
I-140 - 12
Priority Worker - 1
Permanent Residence - 12
I-765 - 26
I-131 - 25

DECEMBER 2001

H-1B - 18
L-1 - 5
Labor Certifications - 11
I-140s - 2
Priority Workers - 1
Permanent Residence - 15
I-765 - 13
I-131 - 16

FEBRUARY 2002

H-1B - 22
L-1 - 2
O-1 - 1
R-1 - 2
Labor Certification - 6
I-140 - 13
Priority Workers - 3
Permanent Residence - 9
I-765 - 8
I-131 - 4

Can the DOL Be This Smart?

Department of Labor to simply lump all occupations together.

These cases essentially stand for the proposition that if an employer wishes to require certain sets of skills, experience or educational background, the Department of Labor has no right to simply state that all engineers are the same, using the example above. Eventually, the Department of Labor was forced into creating a detailed, systematic program pursuant to regulation which employers could rely upon in recruiting for specific positions, taking into account the different types of skills which are required for different jobs.

THE LABOR CERTIFICATION PROCESS AFTER 1980

The regulations which we use today in the labor certification process were promulgated in 1979 and 1980. These regulations introduced the concepts which we know so well today: “unduly restrictive,” “actual minimum requires” and “tailored.” These concepts were created by the DOL in its effort to develop a system which would allow the employer to distinguish between different types of occupations and skills but at the same time require the employer to be consistent.

In order to obtain an approved labor certification, the employer was required to follow a fairly straightforward analysis. First, take the position in question, say Engineer I, and ask a very simple question: what did each of the employees in this position have in terms of education and experience at the time they were hired? Assuming there are ten people in this position and five of them had, at the time of hiring, a master’s degree and two years of experience, and five of them had a master’s degree and one year of experience, the “actual minimum requirements” for the position would be

deemed to be a master’s degree and one year of experience. In other words, the employer was required to take the lowest common denominator from all of the employees who held the position. This seemed to be a workable compromise in allowing the employer to distinguish different positions within the company but at the same time not allow the employer to “tailor” the education and experience to the labor certification applicant.

Although this system was certainly not perfect, it worked reasonably well until the mid 1990s. For reasons which remain unclear, the Department of Labor significantly cut its budget for the labor certification process. Despite our firm’s attempt as well as those of several members of Congress, the Department of Labor has refused to explain its budget-cutting strategy. In any event, the result was that the labor certification process became slower and slower, stretching from months into years.

At this point the Department of Labor turned to a little-used portion of the 1980 regulations called Reduction in Recruitment (RIR). For some unexplained reason, the DOL began to promote the RIR as a way for employers to avoid lengthy delays in the labor certification process. However, one of the results of the RIR process is that the employer is required to recruit on a very generic level. In other words, the fine distinctions between different positions within the company are no longer relevant. In effect, the employer is required to revert to the pre-1980 recruitment process where all engineers are the same.

The reliance on the RIR labor certification process worked reasonably well as long as there was a tremendous demand for foreign workers. This continued throughout the late 1990s and everyone seemed relatively content with the process. However, our firm as well as

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others cautioned that eventually we would have to pay a price for this type of generic recruiting.

Today, we see the results of this historical progression. RIR cases are now considered a very risky strategy in view of the downturn in the economy and the fact that many U.S. workers are now looking for jobs and U.S. employers are not hiring at the rate they were in the late 1990s. This is compounded by the Department of Labor’s refusal to move forward on labor certification cases filed by employers which have experienced layoffs. Both of these developments are the direct result of the view by the Department of Labor that all positions in a given occupation are essentially the same. In other words, we have returned full circle to the concept that all engineers are alike.

In view of our almost twenty-five years of experience dealing with the Department of Labor, it is difficult for us to conclude that the DOL has purposefully engineered this end run around its own regulations. On the other hand, it is equally clear that we have returned to the equivalent of the 1970s where the regulations are essentially meaningless, employers are required to justify what should be obvious distinctions between different types of professional skills and, perhaps most importantly, we are at the mercy of the State Employment Commission and the Department of Labor in terms of the arbitrary decisions which are made on individual cases.

It is hoped that at some point the situation will be addressed in some meaningful manner by the Department of Labor. However, that hope is very dim since this situation has been allowed to deteriorate for the last several years. Eventually, it may require Congressional action to force the Department of Labor to fix what is

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Immigration Updates

BARBARA NELSON, SENIOR PARALEGAL

MINDY WOLFSON, SENIOR PARALEGAL

The Department of Labor (DOL)

As we reported previously in *The Compass*, DOL is in the process of generating a policy memorandum regarding the recent layoff developments. A recent check with DOL revealed that DOL still has not issued a policy concerning the layoff situation. Instead, the number of cases sitting in the DOL backlog in various regions is increasing significantly. This includes cases where the employers have filed responses to requests for lay-off documentation.

Immigration & Naturalization Service (INS)

- In our last issue, we discussed the delays in processing I-140 petitions and I-485 applications at the Texas Service Center. We have been informed by the TSC that they are making a "focused effort" to reduce the backlogs in the I-140 area. In order to speed up the process, several thousand cases have been transferred to Nebraska and Vermont for processing. TSC hopes to be current with I-140 adjudication by May 2002. However, the delays with I-485 applications appear to be continuing since the progress has only shown a slight increase in the number of cases adjudicated from the last quarter of 2001.
- Because of delays in printing the recently revised Form I-539, Application to Extend/Change Nonimmigrant Status, the INS reports that it will continue to accept the 10/13/98N version of the form through March 30, 2002.
- The new INS filing fees are now in effect. The majority of applications and petitions have increased from \$15 to \$35. The new fees went into effect on February 19, 2002 for all applications or petitions.

The Department of State (DOS)

- As we reported in the last issue of *The Compass*, DOS has conducted a random review of six of the countries involved in the Visa Waiver Program. Accordingly, the DOS in conjunction with DOJ has decided to remove Argentina from the Program. This is precipitated in part by Argentina's recent economic collapse. Argentina nationals who intend to travel to the U.S. for business or pleasure are now required to obtain a nonimmigrant visa at a U.S. consulate or embassy prior to their arrival into the U.S.
- AC - Indonesia's website has not been updated lately. It says you can obtain your visa within two business days. Unfortunately, the US Embassy now has a one-month backlog between application, interview, and issuing the visa. According to the Embassy, there are no exceptions.
- For the past four months, DOS has increased the processing time for obtaining a revalidation of certain nonimmigrant visas. Historically, it took approximately four to six weeks to obtain the new visa. However, since October 2001 the backlog in processing has increased to approximately twelve weeks. DOS is doubling its efforts to catch up on this backlog and hopes to be back to normal by mid-March so that timing for cases filed after this time will take approximately four weeks from the date of receipt of the application. We receive many questions about revalidation of an H-1B visa after a change of employer. According to DOS, they are prohibited from revalidating a visa when more than 60 days remains on the current visa - even if there is a change of employer situation.
- DOS announced in January, the discontinuance of form OF-156 which is the non-immigrant visa application form. It has been replaced by form DS-156. Additionally, there is a new supplemental nonimmigrant visa application form - DS-157. All males between the ages of 16 and 45 are required to complete this supplemental form regardless of nationality or visa class. In addition, men and women who bear Chinese, Cuban, Iranian, Iraqi, Libyan, Russian, Somali, Sudanese and Vietnamese passports will now be required to complete the new DS 157 instead of the NIV 27a form.

Immigration and Naturalization Service Processing Times

California Service Center as of February, 2002

I-140 - 11/08/2001 I-485 - 01/01/2001
I-765 - 11/15/2001 I-131 - 12/21/2001

Nebraska Service Center as of February, 2002

I-140 - 12/12/2001 I-485 - 02/10/2001
I-765 - 01/14/2002 I-131 - 01/14/2002

Texas Service Center as of February, 2002

I-140 - 01/02/2001 I-485 - 03/01/2000
I-765 - 09/25/2001 I-131 - 01/22/2002

Vermont Service Center as of February, 2002

I-140 - 12/17/2001 I-485 - 04/01/2001
I-765 - 01/22/2002 I-131 - current

State Employment Security Agency / Department of Labor Processing Times

Texas SESA

Basic 03/05/2001
RIR 12/27/2001
RFE / 45 day close out
to forward to DOL -
current

Texas DOL

01/2000
05/2001 -RIR Recommended
03/2000 -RIR not recommended
07/2001 -Limited Review
01/2001 -Special Handling

Oklahoma SESA

Basic - 12/2000
RIR - 04/2001

California SESA

Basic - 04/2001
RIR - 06/2001

New York SESA

Basic - 03/1998
RIR - 03/2001

Illinois SESA

Basic - 03/2001
RIR - 11/2001

Texas DOL

same as above

California DOL

05/01/2001
10/2001

New York DOL

01/2001
Current

Illinois DOL

03/2001
11/2001

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the annual festival, which will take place this year June 18-20. For more information on the festival, visit the Dallas International's web site at www.dallasinternational.com where the organization also provides links to dozens of international and cultural websites, monthly and weekly cultural calendars for different events throughout North Texas, lists of classes offered in foreign languages and cultural arts, and statistical information on North Texas International demographics.

We have added Dallas International as a link on our website, www.tsalaw.com, and we encourage you to explore how this amazing organization is working to make awareness of a Global Dallas a reality. ■

FESTIVAL

June 18 - 20



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essentially a broken system. Ultimately, it is a return to the rule of law which will provide the best benefits for employers and their employees in the labor certification process. The Department of Labor must be forced to follow its own regulations, must be prevented from creating ad hoc rules at its whim and eliminate arbitrary and capricious decision making. That will take courageous employers and employees. In the meantime, we will be forced to navigate through uncertain waters trying to anticipate the next, unexpected change in the weather. ■

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The Law Firm of
Tidwell, Swaim & Associates, P.C.
Banner Place
12770 Coit Road, Suite 700
Dallas, TX., 75251-1321
Phone: 972-385-7900
Fax: 972-385-8029
Web Address: www.tsalaw.com

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