

### **3. INTERNAL COMPLIANCE MEMO (IMMIGRATION-SPECIFIC)**

#### **Unauthorized Practice of Law & Ethical Safeguards – Immigration Lane (Modern Law Ecosystem – Internal Use)**

##### **Purpose**

This memo documents the structural, operational, and ethical safeguards used by Modern Law Ecosystem (“MLE”) to ensure compliance with unauthorized-practice-of-law rules, attorney ethics requirements, consumer protection standards, and immigration-specific risk areas.

##### **Core Principle**

Modern Law Ecosystem does not practice law.

All legal services are provided exclusively by independent, licensed attorneys. MLE functions as a legal operations, technology, and support provider.

##### **Immigration-Specific Risk Profile (Why We Tighten the Screws Here)**

Immigration matters frequently involve:

- vulnerable consumers, language barriers, and high pressure;
- “notario” fraud patterns and misunderstandings about who is a lawyer;
- severe consequences for incorrect advice (inadmissibility, removal, bars, loss of status);
- strict deadlines and formal agency processes;
- sensitive personal data (identity, family history, biometrics-related notices, persecution narratives).

Accordingly, MLE applies heightened intake scripting, heightened disclosures, and stricter supervision/document controls in the Immigration Lane.

##### **Structural Safeguards**

1. Separate Entities and Roles
  - MLE is not a law firm.
  - Attorneys operate independent practices.
  - Engagement agreements are strictly between attorney and client.
2. No Client Legal Advice by MLE
  - MLE staff do not give legal advice.
  - Intake is limited to information gathering, document collection, and routing.
  - Any questions that can be construed as “what should I do” are routed to an attorney.

Required staff language (examples):

- “We can collect your documents and connect you to an attorney. We can’t advise you on what you should do.”
- “Only your attorney can tell you what to file, when to file, or what this notice means for your case.”

3. Marketing and Public Representation (Anti-Notario Controls)
  - Consumer-facing materials must state clearly: MLE is not a law firm and does not provide legal advice.
  - Avoid ambiguous phrases like “immigration services” without immediate clarification that legal services are provided only by independent attorneys.
  - No outcome guarantees. No promises of approval. No “we will get you papers” nonsense.

### **Operational Safeguards (Immigration Lane)**

1. Intake Boundaries and Triage

Allowed:

- collecting demographic/contact information,
- collecting notice details (dates, agencies, deadlines stated on the notice),
- collecting documents,
- routing to attorney and tracking milestones.

Not allowed:

- interpreting eligibility,
- recommending a specific filing strategy,
- advising whether to attend an interview/hearing,
- advising what to say to an officer or in court,
- advising on criminal/immigration consequences.

2. Attorney Supervision and Control

- Paralegals are assigned to attorneys, not clients.
- Paralegals act only under attorney supervision.
- Attorneys review, approve, and file all submissions.
- Attorney signs/authorizes all final legal work product.

3. Translation and Language Safeguards (Spanish → Russian → Haitian Creole)

- MLE may use AI-assisted translation for speed and organization, but it is never treated as authoritative legal analysis.
- Any translated summary is labeled “FOR ATTORNEY REVIEW / NON-LEGAL SUMMARY.”
- Where available, native-language reviewers may check translations for completeness and obvious errors.
- Attorney decides whether certified translation is required for filing or evidentiary use.

4. Confidentiality and Data Handling

- Immigration files contain highly sensitive personal data.
- Access is role-based and minimized.
- Document sharing is limited to the attorney team assigned to the matter.
- Staff training emphasizes confidentiality, especially for asylum/humanitarian narratives and family safety details.

## 5. Deadlines, Hearings, and “Urgency Flags”

- Intake systems must capture deadlines shown on notices and escalate them to the attorney.
- If a consumer reports an upcoming interview/hearing, detention, or removal proceeding, staff treat it as urgent routing—without giving advice.

### **Financial Compliance**

- Clients pay attorneys directly.
- Attorneys pay MLE separately for operational services.
- No fee splitting.
- No percentage-based compensation tied to legal fees or outcomes.
- MLE fees reflect services rendered (technology, staffing, workflow), not legal results.

### Oversight and Review

- Attorneys approve all legal content and communications intended as legal guidance.
- MLE maintains written scripts, training standards, and compliance documentation for the Immigration Lane.
- Participating attorneys are expected to comply with their jurisdiction’s ethical rules and applicable federal agency requirements.

### **Commitment**

Compliance is not optional. In immigration, sloppy boundaries aren’t “oops”—they can ruin lives and attract regulators.

MLE’s Immigration Lane is designed to withstand scrutiny by maintaining bright-line role separation, documented supervision, transparent consumer disclosures, and strict controls around language access and AI-assisted translation.