

2. On April 12, 2024, Britney Allen retained Respondent for representation involving her marriage petition, Form I-130, her adjustment of status, Form I-485, her work authorization, Form I-765, and expediting her J-1 two-year home residency waiver.

3. Prior to retaining Respondent, Ms. Allen had filed a J-1 two-year waiver with the Department of State without counsel.

4. At their initial meeting, Respondent advised Ms. Allen that once she was retained, she would file to expedite her J-1 waiver and enter her appearance with the Department of State.

5. On April 12, 2024, Respondent presented Ms. Allen and her husband, Mr. Delano Crooks, with a fee agreement which they both signed.

6. The fee agreement included specific steps/legal services and the corresponding attorney fees. The fee agreement stated that Respondent was charging a flat fee for the representation. The fee agreement specified the following services that Respondent would provide:

Step 1-Legal Service:	Preparation & Representation of I-130 petition by USC Spouse
	Attorney Legal Fees: \$1,700.00

Step 2-Legal Service	Adjust of Status to U.S. Permanent Resident I-485; Work Authorization-I-7656 Attorney Fees: \$1,000
Step 3-Legal Service:	Entry of Appearance & Expedite of No Objection Waiver of 2 Year Residency Requirement Attorney Fees: \$800.00

7. On April 12, 2024, Ms. Allen paid Respondent \$3,546 which was payment in full for the representation. Respondent issued a receipt for this payment referencing the Payee as Vosell Law-B&E Capital Law Group.

8. Respondent deposited the fees into her attorney trust account ending in 5130.

9. Two months later, Ms. Allen emailed Respondent inquiring about her case. Ms. Allen had reviewed the regulations and was concerned that she was not eligible to file the I-485 application until her J-1 waiver was approved.

10. The Attorney case manager at Respondent’s firm, Stacey Rogers, replied to Ms. Allen on June 17, 2024, and stated “The USCIS policy manual states that your type of waiver is the only type of waiver where USCIS allows you to file an adjustment application concurrently with [the] waiver request. I have filed many cases with the same situation successfully. Your waiver must be approved

before the adjudication of your I-485, which is why [Respondent] intends to enter her appearance on your waiver, so that this can be processed faster.”

11. On September 27, 2024, Respondent filed an I-130 family petition which was approved, and she filed an I-485 application to adjust Ms. Allen’s status which remained pending as of the date of this Specification of Charges.

12. Ms. Allen continued to check in and try to get updates on her case.

13. On November 7, 2024, Ms. Allen emailed Respondent and stated “I signed a contract and paid a service fee of \$800 specifically to expedite this process. If, for any reason, this service could not be performed, please inform me so we can take the appropriate next steps.” Ms. Allen did not receive a response to her email until she sent a follow up email a month later.

14. In Ms. Allen’s follow up email she also stated that she was having difficulties contacting Respondent’s office and that her calls appeared to be blocked.

15. On December 9, 2024, Respondent emailed Ms. Allen that expediting her J-1 waiver “is not an urgent matter” despite receiving payment in full for this specific service.

16. Respondent also stated that “our phone system only blocks callers who exceed 4 calls in a 48-hour period.”

17. On January 1, 2025, Respondent falsely represented to Ms. Allen that her firm had responded to a Request for Evidence (RFE) in her case. Respondent also falsely stated to Ms. Allen that her work authorization I-765 was filed. There had been no RFE, no response to an RFE at that time, and Respondent and her firm had not filed the I-765.

18. Ms. Allen requested that Respondent send her a copy of the RFE. Respondent did not respond to Ms. Allen.

19. Ten days later, a paralegal at the firm emailed Ms. Allen and admitted that no RFE was issued in her case.

20. On January 24, 2025, Respondent told Ms. Allen that she would wait for an RFE to be issued before entering her appearance and seeking to expedite her waiver.

21. In March 2025, Ms. Allen received an interview appointment for May 2025. Respondent requested that Ms. Allen pay additional fees for legal representation at the interview.

22. Ms. Allen did not expect additional charges for Respondent to attend the interview with her.

23. Ms. Allen declined to pay more fees. Respondent then told Ms. Allen that she should not attend alone and, unless an RFE was issued, Respondent would cancel the interview on her behalf.

24. Respondent later told Ms. Allen that she had contacted United States Citizenship and Immigration Services (USCIS) and requested that it cancel the interview and issue an RFE.

25. Respondent did not tell Ms. Allen that an attorney cannot request an RFE. RFEs are issued at the discretion of USCIS.

26. Respondent falsely told Ms. Allen that her interview was cancelled.

27. Ms. Allen contacted USCIS directly and learned that her interview was still on the calendar.

28. In April 2025, Ms. Allen terminated the representation of Respondent. Ms. Allen requested a copy of her client file, including all transcripts of calls and meetings.

29. Respondent did not provide Ms. Allen her file and told her that providing the transcripts “That is a low priority. We are a busy law firm, and we will charge you for accessing transcript and any further emails going forward.”

30. On April 30, 2025, Respondent emailed Ms. Allen stating that Ms. Allen was “insecure in an unstable immigration environment” and that further

emails from Ms. Allen would “go unresponded.” Respondent still had not provided Ms. Allen her file.

31. On May 5, 2025, Ms. Allen emailed Respondent expressing her dissatisfaction with the representation. Ms. Allen also requested a full refund of the J1 waiver that had never been filed.

32. On May 6, 2025, Ms. Allen received notice that Respondent had entered her appearance with the Department of Labor. Respondent entered her appearance after she was terminated, and Ms. Allen had requested a refund.

33. On May 8, 2025, Respondent’s husband, Terry Evans emailed Ms. Allen and advised her a refund would be sent to her. But no refund was ever provided.

34. On May 15, 2025, Ms. Allen filed a disciplinary complaint against Respondent.

35. On May 22, 2025, Respondent sent Ms. Allen an invoice for work on the J-1 waiver, reflecting an hourly fee. The J-1 waiver was never completed.

36. On June 10, 2025, Disciplinary Counsel issued a subpoena for a complete client file to include financial records.

37. On July 14, 2025, Respondent provided a response but did not include any financial records. Disciplinary Counsel emailed and reiterated its request for financial records.

38. On August 13, 2025, Respondent provided by email one document in response to the financial records inquiry.

39. On September 3, 2025, Disciplinary Counsel followed up in writing on the incomplete financial records.

40. On October 6, 2025, Respondent provided three documents that were not complete financial records.

41. On September 24, 2025, USCIS denied the I-485 petition that Respondent filed on behalf of Ms. Allen. The denial notice stated the basis for the denial was the absence of the J-1 waiver approval.

42. Respondent's conduct violated the following provisions of the Executive Office for Immigration Review professional conduct rules (8 CFR § 1003.102 "Grounds"), made applicable by D.C. Rule 8.5(b)(1):

- a. § 1003.102(a)(1), in that Respondent charged a fee deemed to be grossly excessive, and

- b. § 1003.102(c), in that Respondent knowingly or with reckless disregard made a false statement of material fact or willfully misled, misinformed the client
- c. §1003.102(o) in that she failed to provide competent representation to the client;
- d. §1003.102(q)(2) in that she failed to act with reasonable promptness in her representation of the clients; and
- e. §1003.102(r)(2) and (r)(4), in that she failed to reasonably consult with the client to ensure adequate preparation of her case and compliance with applicable deadlines and failed to comply with reasonable requests for information.

43. Respondent's conduct also violated the following District of Columbia Rules of Professional Conduct:

- a. Rule 1.3(b)(2), in that Respondent intentionally prejudiced the client during the course of the professional relationship;
- b. Rule 1.15(a), in that Respondent failed to maintain complete financial records;

- c. Rule 1.16(d), in that Respondent failed to take timely steps to protect her client's interests by delivering the client file and refunding unearned fees; and

Respectfully submitted,

Hamilton P. Fox, III

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Disciplinary Counsel
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VERIFICATION

I declare under penalty of perjury under the laws of the United States of America that I verily believe the facts stated in the Specification of Charges to be true and correct.

Executed on this 4th day of December 2025.

Caroll G. Donayre

Caroll G. Donayre
Assistant Disciplinary Counsel

D. **Procedures**

(1) **Referral to Hearing Committee** – When the Board receives the Petition Instituting Formal Disciplinary Proceedings, the Board shall refer it to a Hearing Committee.

(2) **Filing Answer** – Respondent must respond to the Specification of Charges by filing an answer with the Board and by serving a copy on the Office of Disciplinary Counsel within 20 days of the date of service of this Petition, unless the time is extended by the Chair of the Hearing Committee. Permission to file an answer after the 20-day period may be granted by the Chair of the Hearing Committee if the failure to file an answer was attributable to mistake, inadvertence, surprise, or excusable neglect. If a limiting date occurs on a Saturday, Sunday, or official holiday in the District of Columbia, the time for submission will be extended to the next business day. Any motion to extend the time to file an answer, and/or any other motion filed with the Board or Hearing Committee Chair, must be served on the Office of Disciplinary Counsel at the address shown on the last page of this petition.

(3) **Content of Answer** – The answer may be a denial, a statement in exculpation, or a statement in mitigation of the alleged misconduct. Any charges not answered by Respondent may be deemed established as provided in Board Rule 7.7.

(4) **Mitigation** – Respondent has the right to present evidence in mitigation to the Hearing Committee regardless of whether the substantive allegations of the Specification of Charges are admitted or denied.

(5) **Process** – Respondent is entitled to fifteen days’ notice of the time and place of hearing, to be represented by counsel, to cross-examine witnesses, and to present evidence.

E. In addition to the procedures contained in D.C. Bar R. XI, the Board has promulgated Board Rules relating to procedures and the admission of evidence which are applicable to these procedures. A copy of these rules is being provided to Respondent with a copy of this Petition.

WHEREFORE, the Office of Disciplinary Counsel requests that the Board consider whether the conduct of Respondent violated the District of Columbia Rules of Professional Conduct, and, if so, that it impose/recommend appropriate discipline.

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