

Proposal to the President of the United States and the United States Congress

Cowdrey

As a Matter of National Security

Proposed Federal Policy: Domestic Operations Requirement for United States Immigration Law Firms

Purpose

The purpose of this proposal is to encourage Congress to enact legislation requiring that all legal services relating to United States immigration law be performed exclusively within the territorial jurisdiction of the United States. The proposal is offered as a national security, public integrity, cybersecurity, and American workforce protection measure intended to strengthen confidence in the administration of federal immigration law.

Proposed Legislative Findings

Congress finds that the regulation and administration of United States immigration law are core federal responsibilities directly affecting national sovereignty, border security, public safety, and national security. Immigration law governs admission, lawful status, naturalization, asylum, refugee protection, removal proceedings, and other matters arising under federal law.

Congress further finds that immigration law firms routinely collect, maintain, process, and transmit highly sensitive personal information, including passports, birth certificates, financial records, employment histories, biometric information, and communications with federal agencies. Protecting this information from unauthorized access, cybersecurity threats, identity theft, espionage, and foreign exploitation constitutes an important governmental interest.

Congress further finds that immigration fraud, document fraud, identity fraud, visa fraud, and related criminal offenses have been prosecuted under existing federal law and that safeguarding the integrity of the immigration system is a continuing governmental responsibility. Congress therefore determines that additional measures designed to strengthen accountability, transparency, and domestic oversight merit legislative consideration.

Congress further finds that maintaining the operational infrastructure supporting the practice of United States immigration law within the territorial jurisdiction of the United States promotes accountability, strengthens domestic oversight, reduces cybersecurity risks, and supports employment opportunities for the American legal workforce.

Congress further finds that because immigration law is uniquely federal in nature, Congress has a substantial interest in ensuring that businesses engaged in the practice of United States immigration law remain subject to effective domestic oversight and regulatory accountability.

Proposed Rule

No law firm, legal entity, or affiliated business providing legal representation in matters arising under the immigration laws of the United States shall own, operate, maintain, or utilize an office located outside the territorial jurisdiction of the United States for the purpose of providing, supporting, or facilitating United States immigration legal services.

All legal services, administrative functions, case management, document preparation, client communications, litigation support, records management, data processing, and other support activities relating to United States immigration matters shall be conducted exclusively within the territorial jurisdiction of the United States under the supervision of attorneys authorized to practice law within the United States.

No client records, case files, confidential information, or immigration related data pertaining to matters arising under the immigration laws of the United States shall be stored, processed, transmitted, or accessed outside the territorial jurisdiction of the United States unless expressly authorized by federal law.

National Security Interests

This proposal is intended to advance the following governmental interests:

- Protect sensitive immigration records and confidential client information.
- Reduce cybersecurity risks affecting immigration related data.
- Reduce opportunities for unauthorized foreign access to sensitive immigration information.
- Strengthen domestic oversight and accountability within the practice of United States immigration law.
- Preserve the integrity of the federal immigration system.
- Promote public confidence in the administration of federal immigration law.
- Support employment opportunities for American legal professionals and legal support personnel.
- Strengthen domestic operational resilience for businesses participating in the administration of federal immigration law.

Congressional Authority

Congress is requested to consider this proposal pursuant to its constitutional authority over immigration and naturalization, foreign commerce, and the enactment of laws necessary and proper for the administration of the federal immigration system.

Request to the President

The President is respectfully requested to support legislation advancing these objectives and, where lawful, to direct the appropriate executive agencies to review existing regulations, procurement policies, cybersecurity standards, and federal oversight mechanisms relating to the handling of United States immigration matters by private entities.

Conclusion

The administration of United States immigration law is a uniquely federal function that directly affects national sovereignty, public confidence, and the security of sensitive personal information. The undersigned respectfully requests that the President and Congress consider legislation establishing a domestic operations requirement for entities engaged in the practice of United States immigration law in order to strengthen accountability, reinforce cybersecurity

protections, support the American workforce, and preserve the integrity of the federal immigration system.

Subject: Domestic Operations Requirement for U.S. Immigration Law Firms

Dear Mr. President,

I respectfully request that your Administration consider supporting legislation requiring that all legal services relating to United States immigration law be performed exclusively within the territorial jurisdiction of the United States.

Because immigration law is a uniquely federal function directly affecting national sovereignty and national security, I believe Congress should evaluate whether immigration legal services, client records, case management, and related support activities should remain entirely within the United States. Such legislation could strengthen cybersecurity, protect sensitive immigration information, improve domestic oversight and accountability, promote public confidence in the immigration system, and support employment opportunities for the American legal workforce.

I respectfully ask that your Administration review this proposal and, if appropriate, work with Congress to determine whether a domestic operations requirement for U.S. immigration law firms would advance the national interests of the United States.

Thank you for your consideration and for your service to our Nation.

Respectfully,

D. Cowdrey