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Considerations for Criminal Defense Attorneys When Representing Defendants with Immigration Issues

by Bailey Farrin and Barbara Lagemann

A criminal defendant's immigration status should matter to his criminal defense attorney. Pursuant to *Padilla v. Kentucky*, 559 U.S. 356 (2010), when a plea carries risk of deportation, an attorney owes a noncitizen defendant a U.S. Constitution Sixth Amendment duty to advise him correctly. In *State of North Carolina v. Nkiam*, 778 S.E.2d 863 (2015), the N.C. Appeals Court applied *Padilla* further and determined that an attorney must advise with specific consequences, if those consequences are clear. In this case in particular, the Defendant could show Ineffective Assistance of Counsel since his attorney advised him that he likely would not be deported, when it was clear that he would have been. Keeping this obligation in mind, this article outlines best practices for a criminal defense attorney when representing a noncitizen defendant.

Consequences of Criminal Plea or Conviction for Noncitizen Defendant

A state and/or federal plea and conviction, even an *admission* to a crime without a conviction in many cases, may affect a noncitizen in many ways in the immigration context, including, but not limited to the following:

- a. Inadmissibility. Admissibility is defined in 8 U.S.C.A. § 1101(13)(A) and can lead to removal, mandatory detention and other consequences.
- b. Deportability. 8 U.S.C.A. §1227 sets forth classes of deportable aliens. Deportability can lead to removal and mandatory detention.
- c. An Aggravated Felony¹ conviction. A conviction for an aggravated felony can lead to deportability, inadmissibility, removability, and mandatory detention.
- d. A Crime of Moral Turpitude conviction.
- e. The triggering of Removal Proceedings.²
- f. Ineligibility for voluntary departure.
- g. Ineligibility for most forms of relief in Removal Proceedings.
- h. Ineligibility for affirmatively filed applications (adjustment of status, naturalization, asylum, and consular processing from outside the United States)
- i. Subject to up to 20 years in prison after illegally reentering the United States after removal.

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With these dire consequences at stake, it's important to follow the steps below.

Steps to Representing a Noncitizen Defendant

Step One: Determine the Defendant's Immigration Status

In an initial consultation, an effective, inoffensive way to ask for status is, "Where were you born?" Alternatively, you can use a questionnaire to get this question answered. Visit www.ncaj.com/docDownload/763993 for a sample questionnaire. Some common immigration statuses are U.S. citizen,³ Lawful Permanent Resident,⁴ Refugee/asylee,⁵ DACA,⁶ Temporary Protected Status,⁷ temporary visas like tourist or student visas,⁸ and having no status.⁹ Additionally, some immigrants may have another status, or may have been permitted to remain in the country by prosecutorial discretion.¹⁰ Only U.S. citizens are completely protected from deportation after a criminal conviction.

Step Two: Find out if Immigration and Customs Enforcement ("ICE") Detained your Client in Jail after a Local Arrest

For this step, it is important to know your local jail procedure. First, call the jail to see if ICE has placed an immigration detainer (often called an "ICE hold") on your client. If there is no hold, you should advise your client that he may bond out ASAP and that his quick release before detention lessens the risk that the jailor will notify Department of Homeland Security ("DHS") or ICE of his arrest. If there is a hold, advise your client to retain an immigration attorney ASAP before posting a criminal bond in state court.

Be sure to coordinate with the client's immigration attorney to learn the best possible outcomes for your client and the risks of immigration consequences. Also, you may be able to coordinate the best weekday for him/her to be bonded out or disposed of the case; this may better the client's chances in immigration court. It is also important to be mindful that the immigration attorney may need time to prepare for his or her case.

Once a defendant with an ICE hold is released on bond, ICE will detain him and send him to Charlotte, South Carolina or Georgia. Local law enforcement does not have to honor ICE detainers (federal requests, not orders). See 8 CFR §287.7(d), "Temporary detention at Department request. Upon a determination by the Department to issue a detainer for an alien not otherwise detained by a criminal justice agency, such agency shall maintain custody of the alien for a period not to exceed 48 hours, excluding Saturdays, Sundays, and holidays in order to permit assumption of custody by the Department."

ICE has 287(g) agreements with law enforcement agencies in 5 counties in North Carolina (Cabarrus, Gaston, Henderson, Mecklenburg, and Wake) and 4 counties in South

Carolina (Charleston, Horry, Lexington and York).¹¹ In these counties, your client will almost certainly have an ICE hold if they're undocumented.

Durham County's sheriff seems to be honoring them but without requiring the 48 hours limitation. Wake County's sheriff surely honors them, as well as an additional 24 hours more to transfer an ICE detainee to one of the 32 beds held for them in the county jail. Please note that these wait periods do not include holidays or weekends.

Please check your local jail for its identification requirements for jail visitation. Durham County jail accepts identifications by FaithAction House for jail visits (but Orange County jail does not).

It is also highly recommended that you consult with an immigration attorney, review your crimmigration library,¹² know what ICE locator resources are available to you,¹³ and contact the consulate of your client's country of origin with your client's identity and jail location so that the consulate can contact the client.

Step Three: Determine the Defendant's Criminal Record

To best represent your client, you also need to determine what is in the Defendant's criminal record. This determination MUST include all criminal charges and activity (especially drug related activity) and all dismissals, deferred prosecutions AND expungements. In fact, remember to check for all charges and resolutions in ALL states, and capture all dates of offenses and dates of resolution. You are looking for all contact with immigration and local law enforcement, ever.

Today the N.C. court computers contain all N.C. criminal cases from all counties since 1983. Often I will look up a Hispanic client's name with the last two names (father's surname first, mother's surname last) as written on his photo identification, last two names inverted (mother's surname first, father's surname last), last two names separated by a space and last two names separated by hyphens. I look for names with similar birthdates. In the initial interview I often ask a client if his name was misspelled on a citation or if he ever used a different name. If he did, I would ask, why did he get a license in another name and did he ever receive a citation with a different name? (The North Carolina DMV now has photograph recognition software which can match up one photo with two license numbers and possibly subject your client to a fraud charge.)

What QUALIFIES as a Conviction?

See 8 U.S.C.A. §1101(48)(A). In plain terms, two requirements for a conviction for immigration purposes exist:

- Each element must be proven beyond a reasonable doubt or there must be an admission or confession by the defendant

AND

- The defendant was subjected to some form of punishment, such as unsupervised or supervised probation, treatment alternatives to street crime (TASC), drug education school (DES), house arrest with electronic monitoring, community service, anger management and substance abuse programs.

For example, are the following convictions for immigration purposes?

1. Prayer for Judgment Continued? Yes.¹⁴
2. N.C. Gen. Stat. § 90-96? Yes.¹⁵
3. Drug Education School to enter a voluntary dismissal? Generally, no.¹⁶
4. Formal Deferred Prosecution, pursuant to N.C. Gen. Stat. § 15A-1341(a1) and AOC-CR-610? Generally, yes.¹⁷
5. Informal Deferred Prosecution? No.¹⁸
6. Juvenile Adjudication? Probably not.¹⁹
7. Expungement? Yes.²⁰
8. Appealed judgment? Not clear.²¹
9. Alford plea? Yes.²²
10. Vacated Convictions/Motions for Appropriate Relief? Not a conviction under certain circumstances.²³

Step Four: Determine your Client's Priorities

It's important to recognize that immigration consequences, including deportation, may not be your client's priority. Some clients want to get out of jail ASAP, avoid a conviction that triggers deportation, preserve the ability to ask an immigration judge to get/keep lawful status and stay in the United States or preserve eligibility to obtain future immigration benefits (lawful permanent resident status or citizenship, e.g.).

Step Five: Determine Consequences for Each Crime Charged and Fashion the Best Available Result

This step requires that the results correspond with you client's priorities and should involve working with an immigration attorney.

Aggravated Felonies, 8 U.S.C. § 1101(a)(43)

Aggravated felony convictions result in the worst of all possible consequences. This conviction:

- Makes your client inadmissible and deportable;
- Puts your client in mandatory detention without release until his case is resolved;

- Bars most forms of relief in immigration court;
- Creates a Permanent bar to becoming a U.S. citizen;
- Creates a Permanent bar to entering the U.S. lawfully;
- Bars voluntary departure;
- Makes bond unlikely while in removal proceedings;
- Has a 20-year maximum punishment if later convicted of the federal charge of illegal reentry.

Some convictions become aggravated felonies if one year or more sentence is imposed. For Aggravated Felonies triggered by a one-year term of incarceration, think about your client's waiving presentence credits and/or waiving future conduct credits to reduce the term.

Some convictions become aggravated felonies if the alleged loss exceeds \$10,000. For Aggravated Felonies Triggered by a \$10,000 Financial Interest, keep restitution under \$10,000; contest any allegation in complaint involving \$10,000 or more; have a client pay a portion of the loss voluntarily pre-sentence to reduce restitution; and make a written plea agreement or oral stipulation that the loss to victim is less than \$10,000.

Crime Involving Moral Turpitude

Crimes of Moral Turpitude are not statutorily defined but lots of case law interpret the term. Please see the petty offense exception to crimes of moral turpitude: INA § 212(a)(2)(A)(ii)(11), 8 U.S.C.A. § 1182(a)(2)(A)(ii)(II).

Admission to Drug Offense

Only offenses of possession of marijuana at 30 grams or less avoid deportability. For an LPR, this distinction could make a big difference. However, if your client is undocumented, he will be given a Notice to Appear (an "NTA") and put into proceedings on another ground of removal.

See 8 U.S.C.A. § 1227(a)(2)(B)(i) for the petty offense exception: "Any alien who at any time after admission has been convicted of a violation of (or a conspiracy or attempt to violate) any law or regulation of a State, the United States, or a foreign country relating to a controlled substance (as defined in section 802 of Title 21), other than a single offense involving possession for one's own use of 30 grams or less of marijuana, is deportable." Also see *Matter of Jennifer Adassa Davey*, 26 I&N Dec 37 (BIA 2012). In order to qualify for the 30 grams or less of marijuana possession exception to deportation, you would need to put something on the record and preferably also in the charging documents that the amount of marijuana charged and convicted is less than 30 grams since N.C. Gen. Stat. § 90-95(c)(4) provides a range of punishment depending on the grams possessed from well below 30 grams to well above that amount.

Gun Offense Conviction

Try to keep the criminal conviction record clear of any reference to a firearm. A simple assault conviction can work better for a noncitizen than a conviction for assault with a firearm. This type of offense may carry risks of removal, as well as loss of status.

Domestic Violence Conviction

Try to keep the criminal charging documents and conviction record clear of any language that admits a qualifying relationship. This type of offense may carry risks of removal, as well as loss of status.

Child Abuse Conviction

This type of criminal conviction is likely viewed as a crime of moral turpitude (see above). In many cases, the State will be willing to offer a deferral, but it is important to make that deferral an informal one, so it does not carry an admission.

Conviction for Restraining Order Violation

This charge is also a domestic violence case (see above). Some judges will look at the charging documents to determine whether it was a non-violent violation. However, there may still be a significant risk of removal depending on the client's legal status.

Driving While Impaired (DWI) Convictions

Any immigrant client with no status or temporary status will be deportable with a DWI conviction. In fact, driving violation charges and DWIs tend to be what gets undocumented people into proceedings the most. Even a legal permanent resident could have his or her status negatively affected if there have been multiple DWIs on his or her record. It is important that all clients with this charge understand the need to fight, and pre-complete the Courts' requirements in order to avoid supervision or jail time if the conviction cannot be avoided.

One DWI conviction without an accident causing serious injury, without a passenger under the age of 18 or without other grossly aggravating factors has not been considered a crime of moral turpitude for immigration purposes because it lacks the required intent.

Conviction for Money Laundering, Gambling and/or Prostitution

Many of these types of crimes will be considered crimes of moral turpitude (see above).

Conviction for Fraud, an Element of which is the Intent to Defraud

For any type of status, ICE is concerned with a conviction that carries an element of fraud. It is important to read all of

the applicable statutes when working on a fraud case so you may choose the most vague statute that does not show a specific intention to defraud someone in order to be prepared for discussions with the State. Many counties offer informal deferrals or a misdemeanor conviction instead of a felony that carries an element of fraud, with cases such as identity theft or obtaining property by false pretenses. Still, speak to the client's immigration attorney before any final resolution.

Beware of admissions to an officer of the U.S. Department of Homeland Security of the essential elements of a crime, even without a conviction.

And understand the categorical approach analysis. See this unpublished Board of Immigration Appeals case at <https://www.scribd.com/document/216811151/Eduardo-Gomez-Jurado-A090-764-102-BIA-Mar-28-2014>, in which the Board of Immigration Appeals applied the categorical approach to determine that North Carolina's assault on a female statute—N.C. Gen. Stat. § 14-33(c)(2)—is not a crime of moral turpitude.

Avoid a conviction resulting in inadmissibility. If you cannot, the client should not leave the United States without consulting with an immigration attorney.

Step Six: Advise your Client

You must advise your client accurately and clearly; "You might be deported" is not sufficient. With clear consequences under immigration law, you must be specific. With unclear consequences under immigration law, a generic warning might be permissible.

Advise noncitizens that they will be ordered deported (applicable to those undocumented without relief, deportable LPRs with no waiver available, or those with a prior deportation order). Try to avoid jail time and supervised probation for removable noncitizens because parole and jail officials have discretion to refer clients to ICE. Additionally, ICE reviews the local jail and supervised probation rosters several times a year in many counties. Please check local practice. Remember to warn clients facing deportation of federal criminal penalties for illegal reentry.

Miscellaneous Traffic Ticket and DMV Issues for Noncitizens

A person without a social security number cannot obtain a North Carolina driver's license. To effectively negotiate a no operator's license ticket, the attorney should provide to the district attorney a copy of the defendant's photo identification, such as a passport and not the Mexican matricula consular. Some local law enforcement agencies²⁴ accept local identifications issued by FaithAction²⁵ as alternatives to passports which admit foreign citizenship. An undocumented person without a license carrying a FaithAction ID will still receive a no operator's license ticket if he is stopped

while driving, but he no longer needs to admit foreign citizenship with his passport.

You can only order a DMV record online if the person has a social security number. You can order a record from the sheriff's office without a social security number, but such a record may be useless if the defendant's last name is misspelled or the order of last names is inverted. The N.C. state court computers available to the public now show all cases throughout the state, making it possible to search for all variations of a defendant's name: with each last name first, separated by a blank space and separated by a hyphen with similar dates of birth. In addition, the DMV will honor requests in the main office in Raleigh²⁶ whether by mail or in person, regardless of whether your client has a social security number. The DMV will also note the absence of a record where there has not been a customer number assigned to the driver. Often, the records of immigrants will need to be merged to show a full history, since the Courts or the DMV may have not entered the name correctly or accommodated for two last names. It is important to be mindful of this to avoid any unnecessary suspensions of your client's driving privilege.

For clients with driving while revoked charges, we make a plan to unwind the traffic problems on his record so that his charges are disposed of in chronological order starting with the first problem to the last. After all cases are disposed in the various counties, we contact DMV to confirm that everything resolved has been updated in their system. Finally, the client must be advised to pay the DMV restoration fee.

If the dismissal of a no operator's license charge is not possible, we have settled for a conviction for driving with an expired license, an infraction, not a criminal conviction. Depending on the county, the district attorney may also agree to a reduction to a city code violation or a nonmoving violation such as failure to notify DMV of an address change. ♦

1. 8 U.S.C.A. §1101(43).

2. The Trump Administration's Executive Order: Enhancing Public Safety in the Interior of the United States, dated January 25, 2017, eliminated all removal priorities. All "removable aliens" charged, convicted or having committed acts which constitute crimes without being charged are priorities. www.whitehouse.gov/the-press-office/2017/01/25/presidential-executive-order-enhancing-public-safety-interior-united.

3. A U.S. citizen cannot be deported, determined to be inadmissible or removed, nor lawfully detained. To be a U.S. citizen, one must qualify in one of the following ways:

- Must have been born in the U.S., USVI, Guam, Puerto Rico, or the Northern Mariana Islands
- Acquired citizenship through a parent
- Derived citizenship from a parent

Naturalized (born outside of the United States and fulfilling the requirements established by Congress in the Immigration and Nationality Act (INA)).

4. A legal permanent resident can be deported, determined inadmissible or removed and is detainable.

5. Refugees and Asylees can be deported, determined inadmissible or removed, and are detainable.

6. DACA is not a legal status per se, but rather is a grant of "deferred action," whereby the person is granted work authorization and told that, absent bad actions on their part, they will not be deported. It is included in this list as one of the more common "statuses" you might come across.

7. Those with Temporary Protected Status (TPS) can be deported, determined inadmissible or removed, and are detainable. Although TPS itself is statutory, the decision of whom to grant TPS to, and for how long, is made by the executive/Department of Homeland Security.

8. Those with temporary status are those with student visas or work visas and can be deported, determined inadmissible or removed, and are detainable.

9. Those without status are deportable, inadmissible, removable and detainable.

10. This could include holders of U-Visas (victims of crime), VAWA visas (victims of domestic violence by a US citizen or LPR spouse, parent, or child over 21), T Visas (victims of trafficking), beneficiaries of deferred action (discretionary benefit granted by DHS), stays of removal (given to someone who has a deportation order but whom ICE chooses not to remove at this time), and more. Those listed are some of the most common.

11. North Carolina has the highest number of 287(g) jurisdictions after Texas.

12. Necessary Resources include: 1) UNC School of Government Publication: Immigration Consequences of a Criminal Conviction in North Carolina, Sejal Zota and John Rubin, newly updated, <http://defendermanuals.sog.unc.edu/immigration/contents-and-preface> and 2) Immigration Consequences of Criminal Activity Fifth Edition, Mary E. Kramer, published by the American Immigration Lawyers Association.

13. If you know your client's alien ("A") number or if you have the name of his country of birth and birthdate, you can look up his location on the ICE detainee locator website <https://www.ice.gov/how-do-i/detainee-locator>. ICE will communicate with you if ICE has received a G-28 immigration form, signed by your client and listing you as attorney of record. www.uscis.gov/g-28.

Counsel can stay current on removal proceedings-whether the notice to appear was filed, the next hearing date, even the name of the assigned judge-by dialing Executive Office for Immigration Review's automated system at (800) 898-7180.

14. In order for a court to have the power to pronounce judgment or enter a prayer for judgment continued (PJC), a defendant has to have been found guilty or to have entered a guilty plea. *State v. Griffin*, 246 N.C. 680, 682 (1957).

15. The deferral will constitute a conviction for immigration purposes because N.C. Gen. Stat. § 90-96 requires that the defendant plead or be found guilty and that the court impose conditions.

16. The punishment or restraint must be imposed by the court for the disposition to qualify as a conviction for immigration purposes. Thus, an agreement with a prosecutor to attend a drug treatment program or anger management is not a conviction. N.C. Gen. Stat. § 15A-1341(a2) and (a5). However, counsel should be aware that the mere admission of drug addiction or abuse may make certain individuals subject to deportability.

17. Counsel should be wary of box # 9 of form AOC-CR-610 (December 2016) which states that "The admission of responsibility given by me and any stipulation of facts shall be used against me and admitted into evidence without objection in the State's prosecution against me for this offense should prosecution become necessary . . ." In appropriate cases, strike box #9 or leave the box unchecked. But see *Boggala v. Sessions*, 866 F.3d 563 (2017).

18. A pre-plea diversion arrangement or informal deferred prosecution, in which no plea is entered or admission made but some form of pretrial probation or community service is completed at the district attorney's direction, will probably not be considered a conviction for immigration purposes.

19. Re: juvenile adjudications not being convictions, see *Matter of Devison*, 22 I&N Dec. 1362 (BIA 2000) and *Matter of Ramirez-Rivero*, 18

I&N Dec. 135 (BIA 1981). However, be cautious that juvenile cases can be transferred to Superior Court pursuant to N.C. Gen. Stat. 7B-2200. Defense counsel should ordinarily resist a transfer of a juvenile case to superior court because of other possible immigration issues such as with discretionary benefits, including adjustment to status, inadmissibility or deportability based simply on bad acts or status, and possible denial of special immigrant juvenile status (“SIJS”).

20. See *IN RE Mauro ROLDAN-Santoyo*, 22 I. & N. Dec. 512 (1999), reversed on other grounds. Pursuant to the statutory definition of “conviction,” no effect is to be given in immigration to a state action which purports to expunge, dismiss, cancel, vacate, discharge, or otherwise remove a guilty plea or other record of guilt or conviction by operation of a state rehabilitative statute. Therefore, if a noncitizen obtains an expungement for employment purposes, for example, he should obtain 2 or 3 certified copies of the pleading and disposition before entry of the expungement and the disappearance of the file from the court records. Otherwise, an expungement makes it very difficult for a defendant to provide records necessary to get/keep legal status and ICE may assume the absence of a record indicates a conviction.

21. Traditionally, a conviction is deemed effective for immigration purposes only when the judgment of conviction was final after all appeals are resolved. However, this rule is in flux.

22. In an Alford plea, the defendant asserts his or her innocence, but admits that sufficient evidence exists with which the prosecution could likely convince a judge or jury to find the defendant guilty. See *Abimbola v. Ashcroft*, 378 F.3d 173, 180–81 (2004).

23. There is no conviction for immigration purposes if a motion for appropriate relief was granted because of Ineffective Assistance of Counsel. But a conviction for immigration purposes arises if the sole purpose for the conviction was to avoid negative immigration consequences. See *Pickering v. Gonzales*, 465 F.3d 263 (2006).

24. Police: Greensboro, Winston-Salem, Charlotte, Burlington, Elon, Mebane, Gibsonville, Graham, Asheboro, Durham, Chapel Hill, Hillsborough, Carrboro, Henderson, Roanoke Rapids, Robbins and High Point; County Sheriff: Forsyth, Moore, Orange, and Durham. <https://greensboro.quepasanticias.com/noticias/ciudad/local/mas-de-20-agencias-de-policia-y-sheriff-aceptan-id-de-faithaction>.

25. FaithAction International House is a certified 501(c)(3) non-profit organization. FaithAction.org and the associated logo are trademarks of FaithAction International House. 705 N. Greene Street, Greensboro, NC 27401 (336)-379-0037.

26. 1100 New Bern Ave, Raleigh, NC 27697.

CLE CALENDAR

JANUARY – FEBRUARY 2018

January 2018

11 LIVE WEBINAR

SeminarWeb Nat’l Series

Framing the Tough Trucking Liability Case
1.25 CLE Hours

16 LIVE WEBINAR

Collaborative Divorce Series

Collaborative, The Big Picture: An Overview of the Collaborative Divorce Process
1.5 CLE Hours

18 SIDEBAR SOCIAL

with a Side of CLE

Attorney-Client Privilege, Confidentiality, and the Work Product Doctrine: Traps for the Inattentive Litigator
Milltown, Carrboro
1.0 Ethics Hour

19 LIVE

Seeking Racial Justice in Your Case, Court, and Community
NC Advocates for Justice HQ, Raleigh
6.0 CLE Hours
Also available via Live Webcast!

30 LIVE WEBINAR

Collaborative Divorce Series

Collaborative Divorce: The Lawyer’s Role
1.0 CLE Hour

FEBRUARY 2018

2 LIVE

Employment Law Program
NC Advocates for Justice HQ, Raleigh
6.0 CLE Hours (tentative)

8 LIVE WEBINAR

Challenging Prosecution by Presentment

1.5 CLE Hours

9 LIVE

Tools for Your Toolkit: Litigating Family Law Case
NC Advocates for Justice HQ, Raleigh
6.0 CLE Hours
Also available via Live Webcast!

13 LIVE WEBINAR

Collaborative Divorce Series

Financial Neutrals: Bringing Trust and Transparency to the Collaborative Process
1.5 CLE Hours

16 LIVE

Auto Trials: Tips on Getting Your Case to the Courtroom and What to Do Once You Get There
NC Advocates for Justice HQ, Raleigh
6.0 CLE Hours (tentative)
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20 LIVE WEBINAR

Immigration Series

U Visas and T Visas: An Introduction and Overview
1.0 CLE Hour

21 LIVE

Ethics Hot Issues 2018
NC Advocates for Justice HQ, Raleigh
3.0 CLE Hours (incl. 2.0 ethics and 1.0 substance abuse)
Also available via Live Webcast!

23 LIVE

Defending DWI: Strategies for Success
NC Advocates for Justice HQ, Raleigh
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23 LIVE

Disbursements 2018
Triad TBD
6.0 CLE hours (tentative)
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27 LIVE WEBINAR

Collaborative Divorce Series

Collaborative Divorce: The Role of a Coach and Child Specialist
1.0 CLE Hour