



Submitted via www.regulations.gov

December 3, 2019

Ms. Samantha Deshommès
Chief, Regulatory Coordination Division, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
20 Massachusetts Avenue, N.W.
Washington, D.C. 20529-2140

**RE: Agency Information Collection Activities; Revision of a Currently Approved Collection: Affidavit of Support Under Section 213A of the Act, Form I-864; Contract Between Sponsor and Household Member, Form I-864A; Affidavit of Support Under Section 213 of the Act, I-864EZ
Docket ID USCIS-2007-0029; OMB Control Number 1615-0075**

Dear Chief Deshommès:

The Catholic Legal Immigration Network, Inc. (CLINIC) respectfully submits the following comments related to the U.S. Citizenship and Immigration Services' (USCIS) proposed changes to Forms I-864, I-864A, and I-864EZ and the respective Instructions to Form I-864 and I-864EZ.

Embracing the gospel value of welcoming the stranger, CLINIC promotes the dignity and protects the rights of immigrants in partnership with a dedicated network of immigration legal services programs. This network includes approximately 380 programs operating in 49 states and the District of Columbia. CLINIC's network employs roughly 1,400 attorneys and accredited representatives who, in turn, serve hundreds of thousands of low-income immigrants each year. Over 90 percent of CLINIC's affiliates offer family-based immigration services, including assistance with applications for adjustment of status to lawful permanent residency.

U.S. immigration policy reflects the importance of family reunification. Of the 1,183,505 foreign nationals admitted to the United States in FY2016 as lawful permanent residents (LPRs), 804,793, or 68 percent, were admitted based on family ties. Similarly, the sanctity of the family is a dominant element of Catholic social teaching and a high priority of the Catholic Church. Accordingly, CLINIC supports immigration policies and procedures that promote and facilitate family unity and welcome changes to forms and petition process that assist families access to these important immigration benefits. To this end, CLINIC and our affiliated programs work to identify and address issues that families face when seeking to remain together or reunify in the United States. CLINIC offers an extensive collection of family-based residency resources for service providers, including in-person and remote trainings, and topic-specific materials. It also has

authored the only book relating to the affidavit of support forms at issue here: *Affidavits of Support: A Practitioner's Guide*, published by the American Immigration Lawyers Association.

I. General Comments

We appreciate the opportunity to provide feedback on the proposed changes to the Affidavit of Support Forms and Instructions.

II. Specific Feedback on Form I-864, Affidavit of Support Under Section 213A of the INA

1. Information about You (Sponsor)

➤ *Page 3, Part 4, Items #15.a – 15.f*

Discussion: The form asks questions regarding the sponsor's bank account, including account holder's name, names of all joint account holders, institution name, account number, and routing number. There is no legal authority for USCIS to be gathering this private information. It is not necessary or even relevant in order to verify the sponsor's income, which is done through submission of employer's letters, wage statements, and past year's tax returns. Most sponsors would interpret these questions as an invasion of privacy and find them very intimidating. The foreseeable likely effect is to discourage sponsors and joint sponsors from executing Form I-864. If it is to obtain proof of the sponsor's income, then it serves no purpose other than to violate sponsor's privacy. The only appropriate time to collect this information is if the sponsor is using assets, specifically money in a bank account, in order to satisfy the 125 percent of poverty requirement. If that is the case, then the form and instructions already require the sponsor to include evidence of these assets through bank statements. Otherwise, this information is not relevant and should not be required of all sponsors.

Recommendation: Delete questions #15a-f, which have never been included on Form I-864 during the last 22 years and serve no legitimate purpose.

2. Previously Submitted Affidavits of Support

➤ *Page 4, Part 6, Items #1-3*

Discussion: The form changes the current question #6 on Part 5. Sponsor's Household Size, which now reads: "If you have sponsored any other persons on Form I-864 or Form I-864EZ *who are now lawful permanent residents*, enter the number here." (emphasis added). The proposed question #1 reads: "Have you submitted Form I-864 or Form I-864EZ for any individuals other than those named on this form?"

By deleting the critical phrase "who are now lawful permanent residents," the agency is requiring the sponsor to include in the household size any person for whom the sponsor "submitted" an I-864 or I-864EZ. This would include persons for whom the sponsor submitted an I-864 and subsequently withdrew it or persons for whom the sponsor submitted an I-864 and who was subsequently denied lawful permanent resident (LPR) status. In addition, proposed question #3

asks for the name “of each individual for whom you previously submitted Form I-864 or Form I-864EZ” without limiting it to those who obtained LPR status. The Instructions further clarify that the sponsor is required to “enter the total number of individuals for whom you have submitted a Form I-864 or Form I-864EZ in the past, even if the form has not yet been adjudicated or the individual you sponsored did not become a Lawful Permanent Resident.”

According to the proposed form, the sponsor would “not need to include any individual for whom [the] sponsorship has ended,” but would need to provide information regarding individuals for whom the sponsorship never began. Even the Instructions advise the sponsor that: “You may withdraw your affidavit of support at any time until a decision is issued on the applicant’s application for an immigrant visa or adjustment of status.” Nevertheless, the sponsor would have to include the number of withdrawn affidavits of support when completing future Forms I-864 and the household size would be increased by that number.

The proposed form change would result in the computation of household size that violates the regulation. That regulation, at 8 CFR § 213a.1 (definition of household size), requires the sponsor to count as part of the household size “the number of aliens the sponsor has sponsored under any other affidavit of support for whom the sponsor’s support obligation has not terminated.” To “sponsor” an alien is to execute an affidavit of support and have that person obtain LPR status based on that affidavit of support. Signing the I-864 or I-864EZ does qualify as “sponsoring” someone. The sponsor’s or household member’s contractual obligations under the affidavit of support do not begin until and unless the intending immigrant obtains LPR status. It is not binding upon execution and submission. Therefore, the sponsor may withdraw the affidavit at any point up to the time the intending immigrant is granted LPR status based on the submission of the affidavit of support. 8 CFR §§ 213a.2(e), (f). *See also* 8 CFR § 213a.1 (definition of sponsored immigrant), “sponsored immigrant means any alien who was an intending immigrant, once that person has been lawfully admitted for permanent residence, so that the affidavit of support filed for that person under this part has entered into force.”

Recommendation: Restore the phrase “who are now lawful permanent residents” after the words “Have you submitted Form I-864 or Form I-864EZ for any individual” and strike the words “other than those named on this form” in Question #1. Insert “who are now lawful permanent residents” after the words “for whom you previously submitted Form I-864 or Form I-864EZ” in Question #2. Insert “who are now lawful permanent residents” after the words “for whom you previously submitted Form I-864 or Form I-864EZ” in Question #3.

3. Sponsor’s Employment and Income

➤ *Page 6, Part 7, Item #26*

Discussion: The question asks “Credit Report Information (Optional)...I have attached a copy of a recent credit report.” Credit reports are notoriously inaccurate for measuring someone’s credit history and should play no part in determining if the sponsor’s income is at or above the required federal poverty income level for the household size. Credit reports were recently analyzed by a federal district court judge, who concluded:

Similarly, it is unclear how the credit score of a new immigrant—who, for example, may have only recently opened her first credit account and therefore has a short credit history, which would negatively impact her credit score—is indicative of her likelihood to receive 12 months of public benefits. *Make the Road, et al. vs. Cuccinelli*, No. 19 Civ. 7993 (S.D.N.Y. 2019), slip op. at p. 17.

The addition of credit reports and credit history were proposed by DHS in its regulation amending the definition of public charge, 83 Fed. Reg. 51,114 (Oct. 10, 2018), and in its final regulation, 84 Fed. Reg. 41,292 (Aug. 14, 2019). The proposed and final regulation also authorized USCIS to evaluate the “likelihood that the sponsor would actually provide the statutorily-required amount of financial support to the alien, and any other related considerations.” The agency believed it lacked the authority to weigh the sponsor’s credit worthiness absent this regulatory change. Five district courts have enjoined DHS from implementing those changes.¹ Yet, USCIS is acting as if the final regulation went into effect. Requesting that the sponsor supply a credit report—even on an optional basis and under the assumption that the agency is authorized to investigate the sponsor’s credit worthiness—would be a violation of the injunction and would invite a motion for contempt.

Recommendation: Delete Question #26.

4. Sponsor’s Contract, Statement, Contract Information, Certification, and Signature

➤ *Page 7, Part 9*

Discussion: In response to the question “What If I Do Not Fulfill My Obligations?,” the agency proposes to add the following sentence: “If you fail to reimburse the benefit granting agency, you may become ineligible to sponsor anyone in the future.” There is no legal basis for this statement. The statute sets forth the requirements for being a sponsor or joint sponsor. INA § 213A(f)(1)(A)–(D). The regulations further define the requirements for being a sponsor. 8 CFR §§ 213a.2(c)(1)(i)(A), (B), and (C)(1). In neither the statute nor regulations is it written that prior reimbursement of means-tested benefits received by a sponsored immigrant is a requirement for being a sponsor. If the agency would like to change the respective regulations to this effect, it should follow the procedures set forth in the Administrative Procedure Act.

USCIS’ proposed form changes would affect substantive and fundamental eligibility requirements and would create a profound change in access to LPR status. Accordingly, any proposed changes that would effectively change the current definition set forth in the regulations should go through notice and comment rulemaking under the Administrative Procedure Act as opposed to information collection.²

¹ See, *Make the Road, et al. vs. Cuccinelli*, 19 Civ. 7993 (S.D.N.Y.)(nationwide) and *New York v. DHS*, No. 19-3591(S.D.N.Y.)(nationwide); *Casa de Maryland, Inc. v. Trump*, 19-cv-2715 (D. Md)(nationwide); *Cook County, Illinois v. McAleenan*, 19-cv-6334 (N.D. Ill.) (Illinois); *City and County of San Francisco v. USCIS*, No. 19-cv-4717 (N.D. Cal.) (Plaintiff Counties); *California v. USDHS*, No. 19-cv-4975 (N.D. Cal.) (Plaintiff States and the District of Columbia); *Washington v. USDHS*, No. 19-cv-5210 (E.D. Wash.)(nationwide).

² Todd Garvey, *A Brief Overview of Rulemaking and Judicial Review*, CONGRESSIONAL RESEARCH SERVICE (March 27, 2017), <https://fas.org/sgp/crs/misc/R41546.pdf>.

Recommendation: Strike the words “If you fail to reimburse the benefit granting agency, you may become ineligible to sponsor anyone in the future.”

5. Sponsor’s Certification

➤ *Page 9, Part 9*

Discussion: In the paragraph numbered M, the agency proposes adding the following: “I acknowledge that if I fail to meet the obligations of sponsorship, I may become ineligible to sponsor anyone in the future.” This acknowledgment follows from the above new eligibility requirement for being a sponsor. Since it has no basis in the statute or regulation, the requirement for such an acknowledgment is also *ultra vires*.

Recommendation: Strike the words “M. I acknowledge that if I fail to meet the obligations of sponsorship, I may become ineligible to sponsor anyone in the future.”

6. Sponsor’s Signature

➤ *Page 9, Part 9*

Discussion: The agency is proposing to require all sponsors and joint sponsors to sign the form before a notary public in order for the form to be properly executed. In 1976, Congress enacted 28 USC § 1746 for the purpose of allowing the use of declarations signed under the penalties of perjury in lieu of affidavits in all federal proceedings and all federal forms except those listed in the statute. *Carter v. Clark*, 616 F.2d 228 (5th Cir. 1980), citing H.R. Rep. No. 94-1616, 94th Cong., 2nd Sess. 1, reprinted in 1976 U.S. Code Cong. Ad. News, 5644, 5645. That law reads as follows:

Wherever, under any law of the United States or under any rule, regulation, order, or requirement made pursuant to law, any matter is required or permitted to be supported, evidenced, established, or proved by the sworn declaration, verification, certificate, statement, oath, or affidavit, in writing of the person making the same (other than a deposition, or an oath of office, or an oath required to be taken before a specified official other than a notary public), such matter may, with like force and effect, be supported, evidenced, established, or proved by the unsworn declaration, certificate, verification, or statement, in writing of such person which is subscribed by him, as true under penalty of perjury, and dated, in substantially the following form: ... If executed within the United States, its territories, possessions, or commonwealths: “I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on (date). (Signature).”

In other words, federal law allows the sponsor to execute Form I-864 by declaring under penalty of perjury that the information provided is true and correct rather than requiring a signature before a notary.

The first Form I-864, Affidavit of Support Under Section 213A of the Act (10/06/97), required that the sponsor execute the form before a notary public. The authority for this

was 8 CFR § 213a.2(a)(1) (“An affidavit of support is executed when a sponsor signs a Form I-864 before a notary public...”). The agency subsequently amended 8 CFR § 213a.2(a)(1) to delete any reference to the affidavit of support needing to be signed before a notary public when it published the final regulation. *See* 71 Fed. Reg. 35739 (June 21, 2006). It explained this change as follows:

The Service also revised Form I-864 so that the sponsor now signs the Form “under penalty of perjury under the laws of the United States,” thus making it unnecessary to sign or acknowledge the Form I-864 before an officer authorized to administer oaths or take acknowledgements...Under 28 U.S.C 1746, however, signing before a notary is not necessary.

In other words, the Service is attempting—through the routine amendment of a form—to reinstate an oath requirement previously authorized 23 years ago through an interim regulation that it expressly eliminated 13 years ago through the promulgation of a final regulation written to comply with a federal statute. As stated above, such attempts to make regulatory change through form change are improper and inconsistent with Administrative Procedure Act requirements.

Finally, at least the interim regulation and 1999 version of the Form I-864 allowed for the signing of the affidavit of support before “a notary public or an Immigration or Consular Officer.” Eight CFR § 213a.2(a)(1)(1997). The addition of the last two options allowed for the execution of the affidavit of support by sponsors who were temporarily residing or domiciled abroad. Notary publics are only available within the United States. If such sponsors had not been able to sign the affidavit of support at an overseas Immigration office or U.S. consulate, they would have been forced to return to the United States to execute the document. Yet the current form and Instructions—which provisions the Service is not proposing to change—allow for the submission of the affidavit of support by sponsors who are domiciled abroad and who intend to reestablish domicile with the intending immigrant. See Instructions for the Affidavit of Support, page 11, Item Number 5, Country of Domicile, where the sponsor is instructed to submit proof of concrete steps to establish domicile with the intending immigrant after that person enters as an LPR. The proposed change to Form I-864 would require the sponsor in those situations to return to the United States and sign the form before a notary public, thus gutting much of the purpose of allowing the sponsor to remain abroad during this consular processing stage. In other words, the proposed change to the form still allows sponsors domiciled abroad to qualify and execute the form provided they make a special trip back to the United States for the sole purpose of signing it in front of a notary public.

Recommendation: Eliminate the notary’s jurat block and strike all language requiring the signature to be subscribed and sworn before a notary.

III. Specific Feedback on Form I-864 Instructions

1. General Instructions

➤ *Page 7, Signature*

Discussion: The form contains the statement: “Form I-864 must be notarized by a notary public. Each affidavit must be properly signed before a notary public.” Please see comments above pointing out that such a requirement violates federal law.

Recommendation: Eliminate the notary’s jurat block and strike all language requiring the signature to be subscribed and sworn before a notary.

2. Part 4, Information About You (Sponsor)

➤ *Page 12, Items #15.a - 15.f*

Discussion: The proposed form would add language concerning the sponsor’s checking or saving account. For the reasons set forth above, this information should not be required.

Recommendation: Strike this paragraph.

3. Part 6 Previously Submitted Affidavits of Support

➤ *Page 8, Part 6, Items #8-12*

Discussion: The Instructions explain how the sponsor is to enter the number of all previously submitted affidavits of support regardless of whether the person on whose behalf the I-864 obtained LPR status. The Instructions state that the sponsor is required to “enter the total number of individuals for whom you have submitted a Form I-864 or Form I-864EZ in the past, even if the form has not yet been adjudicated or the individual you sponsored did not become a Lawful Permanent Resident.” For the reasons stated above, this would result in overcounting and an inaccurate household size. It would also be in direct conflict with the regulations.

Recommendation: Delete all references to previously submitted affidavits of support that did not result in the sponsored immigrant becoming an LPR.

4. Federal Income Tax Return Information

➤ *Page 14, Item #23.a – 25. Federal Income Tax Return Information*

Discussion: The second sentence in the fourth paragraph in this section states: “A copy of the Form W-2 and Form 1099 must be submitted, even if the joint tax filer does not submit Form I-864A and his or her income will not be used to help meet the sponsor’s income requirements.” CLINIC questions the need for the joint tax filer, whose income is not being used, to include his or her W-2. The sponsor must estimate his or her “current individual annual income” for the year the I-864 is being submitted. In addition, the sponsor must submit last year’s income tax return. CLINIC does not understand why a joint tax filer, whose income is not being used, must include his or her W-2.

Recommendation: Strike the sentence: “A copy of the Form W-2 and Form 1099 must be submitted, even if the joint tax filer does not submit Form I-864A and his or her income will not be used to help meet the sponsor’s income requirements.”

5. Federal Income Tax Return Information

➤ *Page 15, Part 7, Item #26, Credit Report (Optional)*

Discussion: In this paragraph it states “You may provide a recent U.S. credit report if you believe doing so may help you establish your ability to maintain sufficient income” For the reasons stated above, this paragraph violates the current regulations, which do not require that the sponsor establish credit worthiness. Federal courts have already spoken to this issue.

Recommendation: Strike the language in proposed Item #26.

6. Sponsor’s Contract, Statement, Contact Information, Certification, and Signature

➤ *Page 16, Part 9*

Discussion: This paragraph includes the following language: “Form I-864 must be notarized by a notary public. Read the contract carefully, then sign and date the affidavit before a notary public.” For the reasons stated above, the USCIS cannot require that the form be notarized.

Recommendation: Strike the language in this paragraph referencing signature before a notary public.

IV. Specific Feedback on Form I-864A, Contract Between Sponsor and Household Member

1. Information About You (the Household Member)

➤ *Page 2, Part 1, Items #9.a – 9.f.*

Discussion: The proposed form would add language concerning the household member’s checking or saving account. For the reasons set forth above regarding the same questions on the I-864, this information should not be required.

Recommendation: Strike paragraph #9.a – 9.f.

2. Your (the Household Member’s) Employment and Income

➤ *Page 2, Credit Report Information (Optional), #10*

Discussion: This question has a box where the household member indicates whether he or she has attached a copy of a recent U.S. credit report. For the reasons stated above regarding this same question on the I-864, this paragraph violates the current regulations, which do not require that the household member establish credit worthiness. Federal courts have already spoken to this issue.

Recommendation: Strike the language in proposed Item #10.

3. Part 4, Sponsor’s Contract, Statement, Contact Information, Certification, and Signature

Page 4, Sponsor’s Signature, Item #31.a – 31.b

Discussion: This section requires that the sponsor sign the I-864A before a notary public. For the reasons stated above regarding the same language on the I-864, the USCIS cannot require that the form be notarized.

Recommendation: Eliminate the notary’s jurat block and strike the language in this paragraph requiring signature before a notary public.

4. Part 8, Your (the Household Member’s) Contract, Statement, Contact Information, Certification, and Signature

Page 9, Your (the Household Member’s) Signature, Item #6.a – 6.c

Discussion: This section requires that the household member sign the I-864A before a notary public. For the reasons stated above regarding the same language on the I-864, the USCIS cannot require that the form be notarized.

Recommendation: Eliminate the notary’s jurat block and strike the language in this paragraph requiring signature before a notary public.

V. Specific Feedback on Form I-864A Instructions

1. General Instructions

➤ *Page 2, Signature*

Discussion: The proposed language is: “Form I-864A must be notarized before a notary public.” For the reasons stated above regarding the same language on the I-864 and Instructions, the USCIS cannot require that the form be notarized.

Recommendation: Eliminate this sentence requiring signature before a notary public.

2. Specific Instructions

➤ *Page 3, Items #9.a – 9.f. Household Member’s Bank Account Information*

Discussion: The Instructions would add language concerning the household member’s checking or saving account. For the reasons set forth above regarding the same questions on the I-864, this information should not be required.

Recommendation: Strike paragraph #9.a – 9.f.

3. Specific Instructions; Most Recent Tax Year Total income

➤ *Page 5, Item #10. Credit Report*

Discussion: This proposed language concerns an optional copy of a recent U.S. credit report and states “You may provide a recent U.S. credit report if you believe doing so may help you to establish your ability to maintain sufficient income.” For the reasons stated above regarding this same question on the I-864, this paragraph violates the current regulations, which do not require

that the household member establish credit worthiness. Federal courts have already spoken to this issue.

Recommendation: Strike the language in proposed Item #10.

4. Specific Instructions; Your (the Household Member’s) Contract, Statement, Contact Information, Certification, and Signature

➤ *Page 5, Part 8, Items # 1.a – 6.c*

Discussion: The proposed language includes the clause “then sign and date the contract before a notary public.” For the reasons stated above regarding the same language on the I-864 Instructions, the USCIS cannot require that the form be notarized.

Recommendation: Eliminate this clause requiring signature before a notary public.

5. Address Change and Penalties

➤ *Page 7, Address Change*

Discussion: In the first paragraph, it states “A sponsor who is not a U.S. citizen must inform USCIS of his or her new address within 10 days of moving...” It goes on to state that the person must complete a Form I-865. The I-864A is used by household members, not sponsors. This requirement is limited to sponsors and is stated plainly in the statutory and regulatory provisions cited in this section: 8 USC § 1183a(d) and 8 CFR § 213a.3. Household members are very distinct from sponsors in terms of the eligibility and liability requirements. They are not subject to address change reporting requirements.

Recommendation: Strike all language pertaining to change of address requirements and penalties.

VI. Specific Feedback on Form I-864EZ Instructions

1. Sponsor’s Bank Account Information

➤ *Page 2, Part 3, Items #16.a – 16.f*

Discussion: CLINIC objects to the insertion of questions requiring the sponsor to supply his or her bank account information for the reasons stated above in reference to the I-864 and I-864A.

Recommendation: Delete this section and questions #16.a – 16.f

2. Previously Submitted Affidavits of Support

➤ *Page 3, Part 5, Items #1 – 3*

Discussion: CLINIC objects to the requirement that the sponsor must count all persons for whom he or she has ever submitted an I-864 or I-864EZ without limiting it to those who obtained LPR status on the basis of this submission, for the reasons stated above.

Recommendation: Insert the phrase “who are now lawful permanent residents” after the word “individuals” in question #1 and delete the words “other than those named on this form.”

3. Information About Your Employment

➤ *Page 4, Part 6, Item #7*

Discussion: CLINIC objects to the insertion of a question asking for the sponsor to submit a recent U.S. credit report for the reasons stated above in reference to the I-864 and I-864A.

Recommendation: Delete this question.

4. Sponsor’s Contract, Statement, Contact Information, Certification, and Signature

➤ *Page 4, Part 7, What If I Do Not Fulfill My Obligations?*

Discussion: CLINIC objects, for the reasons stated above in reference to the I-864, to the insertion of the sentence: “If you fail to reimburse the benefit granting agency, you may become ineligible to sponsor anyone in the future.”

Recommendation: Delete this sentence.

5. Sponsor’s Contract, Statement, Contact Information, Certification, and Signature

➤ *Page 6, Part 7, Sponsor’s Signature*

Discussion: CLINIC objects, for the reasons stated above in reference to the I-864 and I-864A, to the requirement that the sponsor must sign the I-864EZ before a notary public.

Recommendation: Delete this notary public’s jurat block.

VI. Specific Feedback on Form I-864EZ Instructions

1. General Instructions

➤ *Page 4, Signature and page 10, Sponsor’s Contract, Statement, Contact Information, Certification, and Signature*

Discussion: CLINIC objects, for the reasons stated above in reference to the I-864 and I-864A, to the requirement that the sponsor must sign the I-864EZ before a notary public.

Recommendation: Delete this requirement.

2. Information About You (Sponsor)

➤ *Page 8, Part 3, Item #16.a. – 16.d*

Discussion: CLINIC objects to the insertion of questions requiring the sponsor to supply his or her bank account information for the reasons stated above in reference to the I-864 and I-864A.

Recommendation: Delete this section and questions #16.a – 16.d

3. Previously Submitted Affidavits of Support

➤ *Page 8, Part 5, Item #1 – 3*

Discussion: CLINIC objects to the requirement that the sponsor must count all persons for whom he or she has ever submitted an I-864 or I-864EZ without limiting it to those who obtained LPR status on the basis of this submission for the reasons stated above.

Recommendation: Insert the phrase “who are now lawful permanent residents” after the word “individuals” in question #1 and delete the words “other than those named on this form.”

4. Information About Your Employment and Income

➤ *Page 4, Part 6, Item #7*

Discussion: CLINIC objects to the insertion of a question asking for the sponsor to submit a recent U.S. credit report for the reasons stated above in reference to the I-864 and I-864A.

Recommendation: Delete this item.

Conclusion

Thank you for the opportunity to submit these comments. We appreciate your consideration. Please do not hesitate to contact Jill Marie Bussey, CLINIC’s Advocacy Director, at jbussey@cliniclegal.org should you have any questions about our comments or require further information.

Sincerely,



Anna Gallagher
Executive Director