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**PRACTICE POINTER: Filing Form I-290B When Multiple Interrelated Forms Are Denied**

**July 2020**

When USCIS denies multiple forms that are all connected to the same primary benefit petition, attorneys must determine how to complete the notice of motion or appeal on Form I-290B. This situation often arises in the context of U nonimmigrant status petitions, where a principal petitioner typically files the Form I-918, I-192, and I-765 (c)(14) and may also file Form I-918A on behalf of one or more derivatives. In addition, derivatives may have their own Form I-192 and I-765. The denial of either the principal’s I-918 or I-192 will set off a chain reaction of denials for the principal’s remaining forms and all of the derivative’s forms. Each of these denials is generally based exclusively on the denial of the principal’s I-918 or I-192. In this practice pointer, we will address how many Form I-290Bs to file in this scenario, whether derivatives need to file their own Form I-290B, and pitfalls in completing the Form I-290B.

1. **What if only the I-192 or I-918 is denied on the merits?**

Oftentimes, USCIS will deny either the I-192 or I-918 on the merits and will deny the remaining forms solely based on the denial of the first form. For example, if the I-918 is denied on the merits, USCIS will deny the I-192 and I-765 based on the I-918 denial without making a separate assessment of the merits of those applications. Likewise, if the principal’s I-192 is denied on the merits, USCIS will deny the I-918 and I-765 based solely on the I-192 denial.

In these scenarios, ASISTA recommends filing one Form I-290B on the form that was denied on the merits because (a) historically, USCIS has reopened the ancillary forms (those that were not denied on the merits) *sua sponte* upon granting the Form I-290B; and (b) only the appeal or motion on the merits-based denial has an independent legal basis for filing.

1. **USCIS’s Historical Practice**

Numerous practitioners nationwide have reported that Vermont Service Center (VSC) and Nebraska Service Center (NSC) routinely reopen any ancillary forms *sua sponte* upon the grant of a motion or appeal. As long as USCIS continues this practice, filing additional I-290Bs for ancillary denials should not be necessary. However, USCIS has not formalized this practice in any publicly available document and there is no guarantee that this practice will continue.

If you only file the I-290B on the form that was denied on the merits, we recommend stating in your cover letter for the I-290B that you are requesting the *sua sponte* reopening of all ancillary forms if the I-290B is granted. You should specify the form numbers that you wish to have reopened *sua sponte*.

For example, if you file a Motion to Reopen on an I-918 that was denied on the merits, then you should indicate in your cover letter that you request the *sua sponte* reopening of the I-192, I-765, and any I-918As should the I-918 be granted. While the principal petitioner technically cannot request reopening of the derivative’s I-192, USCIS has historically reopened that as well.

1. **No Independent Basis for Filing Form I-290B for Ancillary Denial**

There are three bases for filing a Form I-290B:

* Appeal: Does not require showing new facts or evidence or legal error in underlying denial. AAO provides *de novo* review. [AAO Practice Manual, Ch. 3.4](https://www.uscis.gov/tools/practice-manual/chapter-3-appeals);
* Motion to Reconsider: Requires showing that the prior decision was incorrect based on law or DHS policy under the record as it existed at the time of the denial. 8 CFR 103.5(a)(3); and
* Motion to Reopen: Requires showing new facts. 8 CFR 103.5(a)(2).

The choice of which type of I-290B to file depends on whether an appeal is even available for the underlying form and the reason for denial. *See, e.g.*, 8 CFR 212.17(b)(3) (“There is no appeal of a decision to deny a waiver.”). However, in the case of a form that was only denied because of the denial of another form, USCIS cannot approve the ancillary form while the merits-based denial remains in place even if the petitioner files separate Form I-290B on each denial.

**i. Appeal**

In the U visa context, the denial of either the I-918 or I-918A may be appealed to the Administrative Appeals Office (AAO). 8 CFR 214.14(c)(5)(ii). While there is no need to show new facts or evidence or legal error when filing an appeal, the AAO cannot sustain an appeal of the I-918 or I-918A where the I-192 remains denied on the merits because the petitioner remains inadmissible. In cases where the petitioner does file separate I-290Bs on the merits-based denial of the I-192 and the ancillary denial of the I-918, the AAO will dismiss the appeal of the I-918 unless the I-192 has been granted. *See, e.g*., [In re: 6179147, (AAO Apr. 15, 2020)](https://www.uscis.gov/sites/default/files/err/D14%20-%20Application%20for%20U%20Nonimmigrant%20Status/Decisions_Issued_in_2020/APR152020_01D14101.pdf).

A significant exception arises where the I-918 was only denied due to the I-192 denial but the petitioner is contesting USCIS’s finding of inadmissibility. In that case, it would be proper to file an appeal of the I-918 because the AAO has jurisdiction to determine whether the petitioner is actually inadmissible for the indicated grounds. *See, e.g.*, [In re: 6340548, (AAO June 3, 2020)](https://www.uscis.gov/sites/default/files/err/D14%20-%20Application%20for%20U%20Nonimmigrant%20Status/Decisions_Issued_in_2020/JUN032020_01D14101.pdf). However, the AAO will not review the discretionary aspects of the I-192 denial if the petitioner remains inadmissible, so the petitioner may need to file simultaneously an I-290B motion to reopen or reconsider the discretionary denial of the I-192.

**ii. Motion to Reconsider:**

Any of the U visa forms may be the subject of a motion to reconsider. However, the petitioner must demonstrate a misapplication of law or policy. Where an ancillary form is only denied due to the merits-based denial of another form, there is no error in the denial of the ancillary form, and thus, no independent basis for a motion to reconsider.

For example, if the I-918 is denied on the merits, then USCIS must deny the I-192 because there is no underlying request for admission for which to grant the waiver of inadmissibility. The denial of the I-192, therefore, is correct.

**iii. Motion to Reopen**

A petitioner may satisfy the “new facts” requirement for a motion to reopen an ancillary denial by providing evidence that they have filed a motion or appeal of the primary denial. However, USCIS still cannot grant the motion to reopen the ancillary form if the merits-based denial remains in place.

For example, if the I-192 is denied on discretion and the I-918 is denied solely due to the I-192 denial, the petitioner may file separate Motions to Reopen the I-918 and I-192. However, if USCIS declines to reopen the I-192, then the I-918 will necessarily also remain denied because the petitioner remains inadmissible.

There is also an argument that filing a separate I-290B on at least the status-granting benefit (in the case of U visas, the Form I-918) would be more effective for avoiding the issuance of a Notice to Appear (NTA) under USCIS’s [Notice to Appear policy](https://www.uscis.gov/sites/default/files/USCIS/Laws/Memoranda/2018/2018-06-28-PM-602-0050.1-Guidance-for-Referral-of-Cases-and-Issuance-of-NTA.pdf). While USCIS has stated that it [generally will not issue an NTA unless and until the I-290B for the I-918, I-914, I-360, or I-485 has been denied](https://www.uscis.gov/sites/default/files/files/nativedocuments/USCIS_Updated_Policy_Guidance_on_Notice_to_Appear_NTA.pdf), the agency has never stated publicly that it will wait to issue an NTA until after the I-290B for the I-192 has been denied. However, ASISTA has not received confirmed reports that anyone who only filed the Form I-290B on a I-192 was placed in removal proceedings pursuant to the NTA policy while the I-290B remained pending.

In short, there are multiple options for petitioners when it comes to filing I-290Bs on ancillary applications. We recommend discussing the risks and benefits of each option with your client.

1. **What if a derivative’s application is denied solely based on the principal’s denial?**

If a principal’s I-918 is denied for any reason, any I-918As for qualifying family members will also be denied. There is no publicly available guidance from USCIS regarding whether a derivative whose benefit application was denied solely because of the principal’s denial needs to file their own I-290B, and arguably, the derivative has no independent basis to file an I-290B because their eligibility for the benefit is entirely dependent on the principal’s petition, which has been denied. However, several practitioners have reported receiving Notices to Appear for derivatives where no I-290B was filed on the I-918A denial, so some derivatives may benefit from filing an I-290B on their I-918A denial. Derivatives who have other status or who are already in removal proceedings would arguably not benefit significantly from filing their own I-290B and could instead ask USCIS to reopen their applications *sua sponte* if the principal’s case is granted.

If filing a separate I-290B for the derivative, ASISTA recommends that the principal file the I-290B Motion to Reopen on the I-918A on behalf of the derivative. This is because:

1. Under USCIS’s NTA policy, the agency [generally will not issue an NTA as long as there is a pending I-290B](https://www.uscis.gov/sites/default/files/files/nativedocuments/USCIS_Updated_Policy_Guidance_on_Notice_to_Appear_NTA.pdf) on the “status-impacting application,” which is the I-918A, not the I-192;
2. Only the “affected party” can file the I-290B. 8 CFR 103.3(a)(2). The affected party is defined as “the person or entity with legal standing in a proceeding. It does not include the beneficiary of a visa petition.” Id. at (a)(1)(iii)(B). In the case of a U visa derivative, the derivative is the beneficiary of the I-918A petition, whereas the principal is the petitioner, and thus, the affected party;
3. Evidence of the principal’s I-290B filing can satisfy the “new facts” required for a motion to reopen. In addition, from anecdotal reports, the service centers may be more likely than the AAO to hold the derivative’s I-290B in abeyance until they have adjudicated the principal’s I-290B.

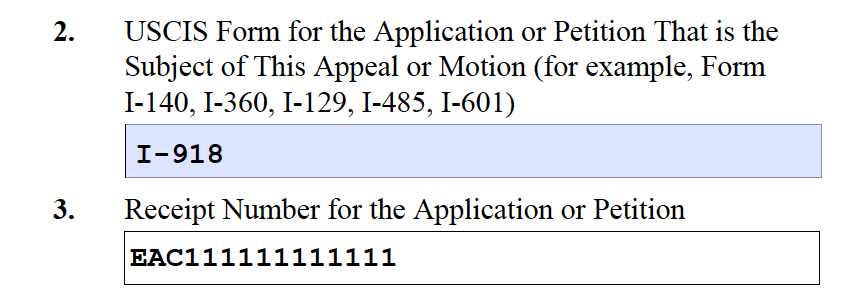
If you are only filing the I-290B on the I-918A, we recommend stating in your cover letter for the I-290B that you are requesting the *sua sponte* reopening of all ancillary forms if the I-290B is granted, including any I-192 and I-765.

1. **Completing the Form I-290B when multiple applications have been denied**

When completing Form I-290B, practitioners should only list one form number and receipt number as the subject of the appeal or motion at Page 2, Part 2, Items 2 and 3. Although USCIS previously accepted I-290Bs with multiple forms listed as the subject of the appeal/motion, and though there is no explicit prohibition against including more than one receipt number, several practitioners have reported rejections by VSC of I-290Bs containing more than one receipt number.

For that reason, ASISTA recommends only listing one form number and receipt number as the subject of the appeal or motion. If you are filing more than one I-290B, each I-290B should only list one form type and receipt number as its subject. The form type and receipt number listed should be the denial for which you are seeking review.

For example, if you are filing a motion or appeal on the I-918 denial, the form type is the I-918, and the receipt number is the one printed on the I-918 receipt notice:



If you would like to make sure USCIS understands that there are multiple I-290Bs for the same petitioner or that you are requesting the *sua sponte* reopening of ancillary forms, you can indicate that in your cover letter instead.

If USCIS has rejected your I-290B for including more than one receipt number, you should refile it and ask USCIS to deem the I-290B filed as of the date of the initial submission so that it will be timely. In addition, explain that there is no prohibition in the form itself, the form instructions, or regulations against including more than one receipt number in the Form I-290B, and therefore, the initial I-290B was properly filed. You can also argue that to the extent there was any confusion, the substance of the filing made it clear which underlying form was actually the subject of the motion or appeal. See Appendix for a sample cover letter and exhibits.

If your I-290B is now untimely due to the rejection, in addition to refiling, you should submit a case assistance request to the [USCIS Ombudsman](https://www.dhs.gov/case-assistance) and also submit a [technical assistance request to ASISTA](https://asistahelp.org/technical-assistance/).

For questions about this advisory, please contact ASISTA at [questions@asistahelp.org](mailto:questions@asistahelp.org).

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**APPENDIX**

**I-290B rejection based on inclusion of multiple receipt numbers:**

**Sample Cover Letter and Exhibits**

**DO NOT OPEN IN MAILROOM**

**FORWARD TO SUPERVISOR**

**SUPERVISORY REVIEW REQUESTED**

**\*\*\*REQUEST FOR SUPERVISORY REVIEW\*\*\***

February 3, 2020

U.S. Citizenship and Immigration Services

Vermont Service Center

75 Lower Welden Street

St. Albans, VT 05479

*Via UPS Overnight Mail*

**RE: RESUBMISSION OF TIMELY FILED FORM I-290B, MOTION TO REOPEN AND RECONSIDER**

Applicant/Petitioner:

[name and A number]

Beneficiaries:

[names and A numbers]

Dear Adjudicating Officer:

Our office represents Ms. X and her derivative beneficiaries noted above, in their immigration case. Ms. X is re-submitting her Form I-290B, Notice of Appeal or Motion, and accompanying documentation and she requests Supervisory Review due to error in incorrectly rejecting her case where she complied with the applicable regulation and instructions in the original submission of her form. The *Notice of Action* stating this rejection is included herein at Tab A.

Please note that the original submission was filed with the Nebraska Service Center (NSC), as noted herein. After Ms. X filed her Form I-290B with NSC it was forwarded to the Vermont Service Center (VSC), which rejected her Form I-290B as stated herein. Because the rejection was issued by the VSC, Ms. X is sending her request for supervisory review to the VSC, and not to the NSC, where it was originally filed.

The original I-290B submission has been included at Tab B. Please note that the first page of the cover letter to the original I-290B submission was returned to undersigned counsel in the state in which it is being resubmitted: torn and stapled to another piece of paper. In addition, the original submission contained numerically denominated and tabbed pages separating each exhibit; these tabs have been re-included for ease of reference.

Last, a new fee check has been included. A copy of the old check is also included to show that the appropriate fee was rendered at the time of submission. *See* Tab B. However, a new fee is included because the old check was stamped “FOR DEPOSIT ONLY USCIS VERMONT SERVICE CENTER.” As such, a new check has been included in case the stamp on the old check hinders cashing by the appropriate service center.

1. **REQUEST TO ACCEPT IMPROPERLY REJECTED FORM I-290B**

Two reasons were given for the rejection of Ms. X’s Form I-290B:

1. “The attached Motion/Appeal must be filed with the USCIS Office where the initial application/petition was denied.”
2. “The underlying receipt number must be indicated on the Motion to Reopen/Reconsider or I-290B Notice of Appeal or Motion. If your I-290B is submitted with more than one receipt number, your I-290B will be rejected.”

The Form I-290B was improperly rejected because (1) the Form I-290B was filed at the correct location, and (2) neither the regulation nor the form instructions provide for the rejection of a Form I-290B that identifies more than one receipt number.

1. **The Form I-290B was filed at the correct location**

On December 8, 2014, Ms. X filed an application for U nonimmigrant status, including a Form I-918 and Form I-192. On November 8, 2019, the Nebraska Service Center issued a decision denying Ms. X’s Form I-192. That same day, the Nebraska Service Center issued a decision denying Ms. X’s Form I-918 due to its denial of her Form I-192.

The decision by the Nebraska Service Center denying Form I-192 states the following regarding the filing location:

“You must send your completed Form I-290B and supporting documentation with the appropriate filing fee to:

U.S. Citizenship and Immigration Services

Nebraska Service Center

850 S Street

Lincoln, NE 68508”

The decision by the Nebraska Service Center denying Form I-918 also states this as the filing address.

Ms. X timely filed a Form I-290B with the Nebraska Service Center, as indicated by the envelope itself, which was returned with the rejection notice. *See* Tab C (Copy of the envelope containing the original submission, which was returned with the rejected submission). As noted on the envelope, Ms. X filed at the following address:

“Attn: I-290B

USCIS Nebraska Service Center

850 S St

Lincoln, NE 68508-1225”

As such, Ms. X filed her Form I-290B at the correct location and the rejection was improper.

1. **The Form I-290B complied with the regulations and form instructions**

As noted above, the second reason for rejecting Ms. X’s I-290B was:

“The underlying receipt number must be indicated on the Motion to Reopen/Reconsider or I-290B Notice of Appeal or Motion. **If your I-290B is submitted with more than one receipt number, your I-290B will be rejected.**” (Emphasis added)

The bolded sentence is not included in the form instructions for Form I-290B, nor in the relevant regulation, 8 C.F.R. § 103.5, from which the Form I-290B derives its authority.

The Form I-290B instructions regarding receipt number inclusion require that the motioning individual “Provide the receipt number for the application or petition that is the subject of your appeal or motion.” It does ***not*** state that more than one receipt number cannot be included, such as when the “subject” of the motion is an application or petition that necessarily involves more than one form.

Counsel included the receipt number for both Form I-192 and Form I-918, because the Form I-918 was denied solely due to the denial of the Form I-192. Both forms were therefore necessarily part of the application or petition which is the subject of the appeal. The USCIS website also notes that the Form I-192 is “Required Initial Evidence” for Form I-918, indicating it is part of the application for a U nonimmigrant visa and must be included for inadmissible applicants.[[1]](#footnote-1) Due to the inherently interrelated nature of the denial of these forms in the present application for U nonimmigrant status, Counsel included both form numbers because they are ultimately both the “subject” of the motion. Counsel also included proof of a newly submitted Form I-192 to be considered in the re-opened proceeding regarding Form I-918.

Further, the regulation 8 C.F.R. § 103.5(a)(1)(iii) states the “[f]iling requirements” for a motion to reopen and reconsider. This regulation requires that a motion must be:

1. *In writing and signed by the affected party or the attorney or representative of record, if any;*
2. *Accompanied by a nonrefundable fee as set forth in § 103.7;*
3. *Accompanied by a statement about whether or not the validity of the unfavorable decision has been or is the subject of any judicial proceeding and, if so, the court, nature, date, and status or result of the proceeding;*
4. *Addressed to the official having jurisdiction; and*

*(E) Submitted to the office maintaining the record upon which the unfavorable decision was made for forwarding to the official having jurisdiction.*

Notably, this regulation does ***not*** restrict the number of receipt numbers that can be included on a Form I-290B.

As such, a rejection that is done because an “I-290B is submitted with more than one receipt number” is *ultra vires* to the regulations and form instructions, lacks authority under law, and should not be used as a reason to reject a Form I-290B.

1. **AAO decisions indicate that rejection is not proper when considering the appeal/motion of petitions/applications that consist of intrinsically interrelated forms**

Additionally, Administrative Appeals Office (AAO) opinions have addressed the issue of the inclusion of forms and receipt numbers on a Form I-290B, when considering motions to reopen or consider whose subject is an application or petition which consist of more than one form, whose approval is intrinsically interrelated.

* In a decision issued August 23, 2010, the AAO found that “the appeal is properly filed” for Form I-140 when “the Form I-290B Notice of Appeal erroneously lists the receipt number of the beneficiary’s Form I-485 Application to Register Permanent Residence or Adjust Status… which was denied on the same date as the current petition. Counsel’s brief indicates that the appeal relates to the Form I-140 Immigrant Petition for Alien Worker*.” In re Petitioner [redacted]*, 2010 WL 6526477, \*1, Footnote 1 (August 23, 2010) (Copy of decision attached at Tab D).
* In a decision issued March 7, 2013, the AAO granted a motion to reconsider when the AAO had initially “rejected the applicant’s appeal without reaching the merits because the office lacked jurisdiction over the Form I-130, Petition for Alien Relative, which the applicant indicated was the basis of appeal on his Form I-290B.” The AAO reversed this rejection after looking at the appeal as a whole, because “[a]lthough counsel’s statement contained in the Form I-290B contests the bases for the denial of the ‘immigrant visa application,’ the substance of counsel’s statement and attached appeal brief sufficiently demonstrate that the applicant was in fact appealing the denial of his waiver application. We therefore grant the applicant’s motion to reconsider his appeal.” *In re: Applicant [redacted]*, 2013 WL 5176227, \*1, 2 (March 7, 2013) (Copy of decision attached at Tab E).
* In a decision issued April 8, 2013, the AAO accepted an appeal when the appeal stated it was of Form I-485, but listed a receipt number for a related Form I-601 waiver and included a brief relating to the Form I-601 waiver denial. The AAO cited the requirements for a motion to reconsider in 8 C.F.R. § 103.5(a)(3) and noted that “the applicant’s submission meets the requirements of a motion to reconsider.” *In re Applicant [redacted]*, 2013 WL 5537946, \*1 (April 8, 2013) (Copy of decision attached at Tab F).
* In a decision issued May 6, 2010, the AAO issued an opinion indicating that receipt numbers are included as an administrative convenience and not as a regulatory or instruction-based requirement. In that case, “the applicant indicated that he was filing a motion to reopen the Form I-765 dated November 4, 2009. The applicant, however, inadvertently listed the receipt number for the TPS application instead of the receipt number for the Form I-765. Far from treating the receipt numbers as controlling, the AAO noted that “The director erroneously annotated the Form I-290B as a motion to reopen for the Form I-821 and forwarded the matter to the AAO. Therefore, the case will be remanded and the director shall consider the applicant’s response as a motion to reopen.” *In re: Applicant [redacted]*, File Nos. [EAC 09 112 73035-I-765], [EAC 10 046 50775-motion], \*1 (May 6, 2010) (Copy of decision attached at Tab G).

As such, the AAO recognizes the need to consider the nature of the motion when the subject of that motion is a petition or application consisting of intrinsically interrelated forms, such as a necessary waiver. The AAO further recognizes the importance of considering the nature of the appeal instead of mechanically processing receipt numbers. Here, Ms. X is motioning to reopen and reconsider the denial of her Form I-192 waiver, which denial serves as the sole reason for the denial of her Form I-918, and both of which were part of the same application for U nonimmigrant status submitted on December 8, 2014.

1. **A FAILURE TO ACCEPT MS. X’S INITIAL FORM I-290B OR HER NEWLY RENDERED FORM I-290B WOULD BE ARBITRARY AND CAPRICOUS AND A DENIAL OF DUE PROCESS**
2. **Arbitrary and capricious**

An action is arbitrary and capricious if the agency “failed to examine the relevant data and articulate a satisfactory explanation for its action including a ‘rational connection between the facts found and the choice made.’” *Motor Vehicle Mfrs. Ass’n v. State Farm Mut. Auto. Ins. Co*., 463 U.S. 29, 42-43 (1983) (quoting *Burlington Truck Lines v. United States*, 371 U.S. 156, 168 (1962)). Here, two explanations were articulated for the rejection:

1. “The attached Motion/Appeal must be filed with the USCIS Office where the initial application/petition was denied.”
2. “The underlying receipt number must be indicated on the Motion to Reopen/Reconsider or I-290B Notice of Appeal or Motion. If your I-290B is submitted with more than one receipt number, your I-290B will be rejected.”

The first explanation, as noted above, references a condition that was actually satisfied. The second explanation, as described above, imposes a condition that is not stated in the relevant regulation or form instructions. As such, the initial rejection was arbitrary and capricious, and any further refusal to remedy this rejection would also be arbitrary and capricious.

1. **Violation of Due Process**

By imposing a new standard that is not explicitly stated in the regulation or instructions, the agency has violated due process. The Ninth Circuit has stated that:

“When administrative bodies promulgate rules or regulations to serve as guidelines, these guidelines should be followed. Failure to follow such guidelines tends to cause unjust discrimination and deny adequate notice contrary to fundamental concepts of fair play and due process.”

*NLRB V. Welcome-American Fertilizer Co*. 443 F.3d 19, 20 (9th Cir. 1971). It is fundamentally unfair to be informed about a rule only in the course of being informed that one has violated it. Here, Ms. X was without notice that including more than one receipt number was a basis for automatic rejection, given that such a requirement is not imposed by the relevant regulations or instructions.

In addition, the motion to reopen and reconsider contained key evidence that was to rebut the accusation that Ms. X has gang affiliation just because she has had a social relationship with an individual who had been in a gang, in the form of an evaluation by gang expert concluding that Ms. X is not affiliated with a gang. If Ms. X is prevented by a technical rejection from rebutting this allegation, her due process right to meaningfully rebut a serious and consequential accusation will be violated. *Cf. Bowman Transport v. Arkansas Best Freight Systems,* 419 U.S. 281, 288 n. 4 (1974) (“A party is entitled, of course, to know the issues on which decision will turn and to be apprised of the factual material on which the agency relies for decision so that he may rebut it. Indeed, the Due Process Clause forbids an agency to use evidence in a way that forecloses an opportunity to offer a contrary presentation.”)

As such, Ms. X asks that her Form I-290B be adjudicated on the merits in order to preserve her fundamental due process rights.

**CONCLUSION**

Ms. X respectfully asks that you accept and adjudicate her previously submitted I-290B, included in its entirety at Tab H, as properly and timely filed as of the original receipt date.

Best,

Grant Reichert

Staff Attorney

Northwest Immigrant Rights Project

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| --- | --- |
| TAB | DOCUMENT |
| A | *Notice of Action* from Vermont Service Center stating reasons for rejection |
| B | Copy of check sent with original submission |
| C | Copy of the envelope containing the original submission |
| D | *In re Petitioner [redacted]*, 2010 WL 6526477 (August 23, 2010) |
| E | *In re: Applicant [redacted]*, 2013 WL 5176227 (March 7, 2013) |
| F | *In re Applicant [redacted]*, 2013 WL 5537946, \*1 (April 8, 2013) |
| G | *In re: Applicant [redacted]*, File Nos. [EAC 09 112 73035-I-765], [EAC 10 046 50775-motion] (May 6, 2010) |
| H | Original Submission (with Exhibit Tabs reinserted) |

**\*\*see PDF version for actual exhibits\*\***

1. <https://www.uscis.gov/i-918> (see Checklist of Required Initial Evidence). [↑](#footnote-ref-1)