

NOT FOR PUBLICATION

U.S. Department of Justice
Executive Office for Immigration Review
Board of Immigration Appeals

MATTER OF:

Honey BLAKEMAN, D2025-0271

Respondent

FILED

MAR 26 2026

ON BEHALF OF RESPONDENT: Pro se

ON BEHALF OF EOIR: Alexander Spindler, Acting Disciplinary Counsel

ON BEHALF OF DHS: Amy S. Paulick, Disciplinary Counsel

IN IN PRACTITIONER DISCIPLINARY PROCEEDINGS
Notice of Intent to Discipline Before the Board of Immigration Appeals

Before: Malphrus, Chief Appellate Immigration Judge; Creppy, Appellate Immigration Judge;
Mullane, Appellate Immigration Judge

Opinion by Creppy, Appellate Immigration Judge

CREPPY, Appellate Immigration Judge

The respondent will be suspended from practice before the Board of Immigration Appeals, the Immigration Courts, and the Department of Homeland Security (“DHS”), for a period of 1 year.

The Disciplinary Counsel for the Executive Office for Immigration Review (“EOIR”) and the Disciplinary Counsel for the Department of Homeland Security (“DHS”) initiated these disciplinary proceedings on December 15, 2025, by filing a Joint Notice of Intent to Discipline (“NID”). The Disciplinary Counsels for EOIR and DHS seek to have the respondent suspended from practice before the Board of Immigration Appeals, the Immigration Courts, and DHS, for an indefinite period of time due to her unauthorized practice of law. On January 16, 2026, Disciplinary Counsels filed a Joint Motion for Entry of a Final Order in the instant case.

The respondent was required to file a timely answer to the allegations contained in the NID but has failed to do so. *See* 8 C.F.R. § 1003.105. The respondent’s failure to file a response within the time prescribed in the NID constitutes an admission of the allegations therein, and the respondent is now precluded from requesting a hearing on the matter. 8 C.F.R. § 1003.105(d)(1).

The NID sets forth the following allegations. On April 24, 2025, the District of Columbia Court of Appeals indefinitely suspended the respondent from the practice of law on the grounds of disability pursuant to the D.C. Bar R. XI, §13(c), and that as of the date of the filing of the NID, the respondent remained in disability inactive status in the District of Columbia. After April 24, 2025, the respondent filed 56 applications for immigration benefits with the U.S. Citizenship and Immigration Services (“USCIS”). As of the filing of the NID, the respondent

remained the practitioner of record in 41 cases pending before USCIS. Finally, the NID alleges that the respondent has not notified EOIR or DHS Disciplinary Councils of her suspension order, as required by 8 C.F.R. §§ 292.3(c)(4) and 1003.103(c).

The NID charges the respondent with violating the District of Columbia Rule of Professional Conduct 5.5, which precludes a lawyer from practicing law “in a jurisdiction where doing so violates the regulation of the legal profession in that jurisdiction.” The NID also charges the respondent with the unauthorized practice of law, as she does not meet the federal regulatory definition of “attorney” in 8 C.F.R. §§ 1.2, 1001.1(f), and, thus, ineligible to represent individuals before DHS or EOIR. *See* 8 C.F.R. §§ 292.1(a)(1) (providing that an “attorney” as defined in 8 C.F.R. § 1.2, may represent applicants or petitioners before DHS), 1292.1(a)(1) (providing that “attorneys,” as defined in 8 C.F.R. § 1001.1(f), may be registered to practice before EOIR). The NID contends that it is in the public interest to impose disciplinary sanctions against the respondent as a consequence of her alleged misconduct, pursuant to 8 C.F.R. § 1003.102 (authorizing sanctions of practitioners before EOIR when in the “public interest”). *See* 8 C.F.R. § 292.3(a)(1) (authorizing sanctions of practitioners before DHS when in the “public interest”).

Because the respondent is deemed to have admitted the factual allegations and disciplinary charge due to default, we agree with Disciplinary Councils that it is in the public interest to sanction the respondent following her continued practice of law before DHS when she is not an “attorney,” as defined by the relevant regulations. The respondent’s failure to notify Disciplinary Councils of her suspension, likewise, warrant a sanction. 8 C.F.R. §§ 292.3(c)(4) and 1003.103(c).

The NID proposes that the respondent be indefinitely suspended from practice before the Board, the Immigration Courts, and DHS. Because the respondent has failed to file an answer, the regulations direct us to adopt the proposed sanction contained in the NID unless there are considerations that compel us to diverge from that proposal. 8 C.F.R. § 1003.105(d)(2).

While mirroring the D.C. sanction of indefinite suspension may have been appropriate in the context of a reciprocal discipline charge, the NID did not charge the respondent under this ground, and there is otherwise no indication that the respondent’s D.C. suspension was based on professional misconduct or other acts that are sanctionable under our disciplinary regulations. Moreover, next to disbarment, an indefinite suspension, which essentially operates as a temporary disbarment due to the absence of a fixed period of expiration, is the most severe sanction available in EOIR disciplinary proceedings, and thus, should be reserved for ethical or professional misconduct of commensurate gravity.¹ The respondent’s continued practice before DHS while indefinitely suspended in the District of Columbia, and her failure to inform EOIR and DHS Disciplinary Councils about the suspension as she was required, are significant omissions that undermine the integrity of the legal system and public trust, but they do not rise to the degree and severity of other cases involving the unauthorized practice of law in direct violation of the Board’s

¹ For instance, practitioners who are indefinitely suspended are, operatively, subject to the stringent requirements for reinstatement as practitioners who have been disbarred. *See* 8 C.F.R. § 1003.107(b).

order of suspension. *See, e.g., Matter of Landers*, 29 I&N Dec. 240, 247-48 (BIA 2025) (disbarring counsel who practiced law in knowing violation of the Board's disciplinary order of suspension); *Matter Gupta*, 28 I&N Dec. 653, 657 (BIA 2022) (disbarring counsel who knowingly and repeatedly disregarded Board's order of suspension).

Based on the respondent's deemed admitted unauthorized practice before DHS and violation of her duty of notification, we agree with Disciplinary Counsels to the extent they have proposed the baseline sanction of suspension, but with a fixed period of time. *See, e.g.,* 8 C.F.R. §§ 292.3(c)(4), 1003.103(c) (providing that a practitioner's violation of his or her duty to notify Disciplinary Counsels of order of suspension may result in suspension). After considering the violations established and the evidence presented, as well as the respondent's non-response, we conclude that a suspension of 1 year, with leave to seek reinstatement or early reinstatement as provided in 8 C.F.R. §§ 1003.107(a) and (b), respectively, would serve the purpose of deterring future misconduct, preserving the integrity of the legal system and protecting the public. The respondent's period of suspension will commence 15 days after the date of this order. *See* 8 C.F.R. § 1003.105(d)(2). The following orders will be entered.

ORDER: The Board hereby suspends the respondent from practice before the Board, the Immigration Courts, and the DHS, for 1 year. The suspension will commence 15 days after the date of this order. *See* 8 C.F.R. § 1003.105(d)(2).

FURTHER ORDER: The respondent shall promptly notify, in writing, any clients with cases currently pending before the Board, the Immigration Courts, or DHS that the respondent has been suspended from practicing before these bodies.

FURTHER ORDER: The respondent shall maintain records to evidence compliance with this order.

FURTHER ORDER: The respondent is instructed to notify the Board of any further disciplinary action against her.

FURTHER ORDER: The contents of the order shall be made available to the public, including at the Immigration Courts and appropriate offices of the DHS.

FURTHER ORDER: The respondent may petition this Board for reinstatement to practice before the Board, the Immigration Courts, and the DHS under 8 C.F.R. § 1003.107.

Chief Appellate Immigration Judge Garry D. Malphrus respectfully dissents without separate opinion.