

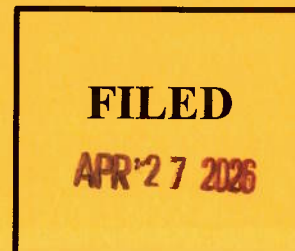
NOT FOR PUBLICATION

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

MATTER OF:

Jalal J. DALLO, D2026-0056

Respondent



ON BEHALF OF EOIR: Nathan S. Henriksen, Acting Disciplinary Counsel

ON BEHALF OF DHS: Catherine M. O'Connell, Disciplinary Counsel

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 Mullane, Appellate Immigration Judge

MULLANE, Appellate Immigration Judge

The respondent is suspended from the practice of law before the Board of Immigration Appeals, the Immigration Court, and the Department of Homeland Security ("DHS") for 45 days, effective February 4, 2026. The respondent's unopposed motion for reinstatement will be granted, effective immediately upon issuance of this order.

On January 13, 2026, the State of Michigan Attorney Discipline Board issued an order suspending the respondent from the practice of law in Michigan for 45 days, effective February 4, 2026. On February 23, 2026, the Disciplinary Counsel for the Executive Office for Immigration Review and the Disciplinary Counsel for DHS filed a Joint Notice of Intent to Discipline ("NID"), as well as a Joint Petition for Immediate Suspension, based upon the respondent's suspension. We granted the Joint Petition for Immediate Suspension on March 16, 2026.

On March 19, 2026, the respondent filed a timely answer to the charges in the NID. In his answer, the respondent admitted the allegations in the NID, did not contest the disciplinary charge, and did not request a disciplinary hearing (Respondent's Ans. at 2-3). The respondent requested that any discipline imposed to run concurrent with his suspension in Michigan (Respondent's Ans. at 4).

Based on the respondent's admissions and concessions in his answer to the NID, the reciprocal sanction proposed by Disciplinary Counsels in the NID, as amended,¹ is appropriate in light of the respondent's suspension in Michigan, and as such, the respondent is ordered suspended from practice before the Board of Immigration Appeals, the Immigration Courts, and DHS for 45 days. *See Matter of Kronegold*, 25 I&N Dec. 157, 161-62 (BIA 2010) (following deferential approach and imposing identical reciprocal discipline against suspended or disbarred practitioners). The respondent's period of suspension will run concurrent with his period of suspension in Michigan.

At this point in time, the respondent's 45-day period of suspension has expired, and we consider the motion for reinstatement filed by the respondent on April 15, 2026. In support of his motion, the respondent submitted evidence showing that he is currently authorized to practice law in Michigan and that he meets the definition of attorney provided in 8 C.F.R. § 1001.1(f). *See* 8 C.F.R. § 1003.107(a)(1) (discussing requirements for reinstatement). Disciplinary Counsels have filed a joint non-opposition to the respondent's motion for reinstatement. Disciplinary Counsels do not dispute that the respondent meets the regulatory definition of attorney, nor have they identified any evidence indicating that the respondent failed to comply with the terms of our suspension order. Accordingly, we will grant the respondent's motion for reinstatement. 8 C.F.R. § 1003.107(a)(3). The following orders will be entered.

ORDER: The Board hereby suspends the respondent from practice before the Board of Immigration Appeals, the Immigration Courts, and DHS for 45 days, effective February 4, 2026.

FURTHER ORDER: The respondent is reinstated to practice before the Board of Immigration Appeals, the Immigration Courts, and DHS, as of the date of this order.

FURTHER ORDER: This reinstatement should be reflected in any public notices maintained and disseminated by the Executive Office for Immigration Review regarding attorney discipline.

FURTHER ORDER: If the respondent wishes to represent a party before DHS, the Immigration Courts, or the Board, he must file a Notice of Appearance (Form G-28, Form EOIR-26, or Form EOIR-27) even in cases in which he was counsel prior to his suspension.

¹ Disciplinary Counsels filed an Amended Joint Notice of Intent to Discipline with the Board on March 19, 2026, amending the effective date of the proposed discipline to February 4, 2026, the effective date of the Michigan suspension order.