

NOT FOR PUBLICATION

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

MATTER OF:

Jennifer Grace SMYRNOS, D2025-0209

Respondent

FILED

JUN 22 2026

ON BEHALF OF EOIR: Nathan S. Hendriksen, 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 Creppy, Appellate Immigration Judge

CREPPY, Appellate Immigration Judge

The respondent is disbarred from the practice of law before the Board of Immigration Appeals, the Immigration Courts, and the Department of Homeland Security ("DHS"), effective September 9, 2025.

On August 21, 2025, the Virginia State Bar Disciplinary Board issued an interim order suspending the respondent from the practice of law in the Commonwealth of Virginia. On August 25, 2025, the Disciplinary Counsel for the Executive Office for Immigration Review ("EOIR") and the Disciplinary Counsel for DHS jointly petitioned for the respondent's immediate suspension from practice before the Board of Immigration Appeals, the Immigration Courts, and DHS. We granted the petition on September 9, 2025. *See* 8 C.F.R. §§ 1003.103(a)(1) and (4) (discussing grounds for immediate suspension).

On April 16, 2026, the Virginia State Bar Disciplinary Board issued an order accepting the respondent's Consent to Revocation of her license to practice law in the Commonwealth of Virginia. On April 22, 2026, the Disciplinary Counsels for EOIR and DHS filed a Joint Notice of Intent to Discipline ("NID") based upon the respondent's resignation while a disciplinary investigation or proceeding is pending. 8 C.F.R. §§ 1003.102(e), 1003.103(b)(2).

On May 22, 2026, the respondent filed a timely answer to the NID, admitting the allegations, declining to contest the disciplinary charge, and expressly waiving any right to a hearing. The respondent further consents to the imposition of reciprocal discipline and the sanction of disbarment as proposed in the NID.

In light of the foregoing, the respondent will be ordered disbarred from practice before the Board of Immigration Appeals, the Immigration Courts, and DHS. The respondent's disbarment will be effective as of September 9, 2025, the date of our immediate suspension order. The following orders will be entered.

ORDER: The Board hereby disbars the respondent from practice before the Board of Immigration Appeals, the Immigration Courts, and DHS, effective September 9, 2025.

FURTHER ORDER: The respondent must maintain compliance with the directives set forth in our prior order. The respondent must 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 DHS.

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