

THE AILA STYLE GUIDE

(IN-HOUSE)

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GENDER-NEUTRAL LANGUAGE

AILA supports the use of non-gender-specific language and gender-inclusive pronouns where possible. When the gender of a person is not identified, “they,” “their,” and “them” replace “he,” “she,” “his,” “her,” “him,” and constructions like “he or she” and “his or her.”

your congressperson is the chair of the committee

When the president speaks, their word is final.

If a respondent wants to file an asylum application, they must do so using Form I-589.

If you want a client to pay you quickly, allow them to use a credit card.

Anyone who believes that is kidding themselves.

When referring to an individual, respect their pronouns if known to you.

ABBREVIATION/ACRONYMS

Abbreviations for particular words

With minor exceptions, AILA follows the BlueBook abbreviation of certain words, which are contained in various tables of the BlueBook. If you do not have access to the BlueBook, ask an AILA legal editor for assistance. In citations, the use of these abbreviations is required. These abbreviations can serve as a model for any used in text as well.

Abbreviations for:

Case names: Table T6

Names of institutions as authors: Table T6

Names of periodicals: Tables T6, T13, and T10, but abbreviate “University” as “U.” Also, omit the words “a,” “at,” “in,” “of,” and “the” (but retain the word “on”). Furthermore, if the title consists of only one word after those words have been omitted, do not abbreviate the remaining word.

Names of looseleaf and bound services/reporters: Table T15

Court names: Table T7, except that BIA uses no periods. See below for additional jurisdictional entities that do not use periods.

Explanatory phrases appended to citations: Table T8

Legislative documents: Table T9

U.S. states, cities, and territories: Table T10.1, but see rules below, which supersede if there is a conflict with the table.

Countries and regions: Tables T10.2 and T10.3, but see below for abbreviation of “United States.”

Judges and officials: Table T11, except that ALJ uses no periods, and Attorney General may be abbreviated AG.

Months: Table T12

Publishing terms: Table T14. Note that the abbreviation for an edition of a book is “ed.” [not capitalized] and likewise the abbreviation for editor is “ed.” For more, see **TITLES OF WRITTEN, AUDITORY, VISUAL, AND OTHER ARTISTIC WORKS**.

Subdivisions: Table T16

amend.
art.
ch.
cl.
no.
p., pp.
para. or ¶ [paragraph symbol]
pt.
sec. or § [section symbol]
subdiv.
subsec.
supp.
tit.
vol.

United States Citizenship and Immigration Services is abbreviated USCIS. Never CIS.

Use of “the” preceding abbreviation/acronym

Although a spelled-out term may or may not be preceded by “the”, AILA does not use “the” before certain abbreviations/acronyms. These include EOIR, DOS, DOL, DOJ, DHS, CBP, ICE, USCIS, VSC, TSC, NBC, KCC, OFLC.

The Executive Office for Immigration Review is part of the Department of Justice.
EOIR is part of DOJ.

U.S. Citizenship and Immigration Services is part of the Department of Homeland Security.

USCIS is part of DHS.

She is a member of the American Immigration Lawyers Association.

She is a member of AILA.

Precede an abbreviation/acronym with “the” where it sounds more natural.

Appeal is taken to either the AAO or the BIA.

Twenty percent of employees of the CIA did not file their taxes with the IRS.

The law can be found in section 101 of the INA and volume 9 of the FAM.

DHS replaced the INS.

Use of periods

Generally (see exceptions below), abbreviations are followed by a period.

In re Mercedes-Benz Emissions Litigation, No. 2:16-cv-881 (**D.N.J. Jan.** 8, 2020).

Use periods for U.S. and D.C. (see below).

However, there is no period where the last letter of the original word is set off from the rest of the abbreviation by an apostrophe.

Am. Bar Ass'n
Comm'r
Dep't

Do not use periods when (1) acronyms and other abbreviations formed from the initial letters of words have been introduced in parentheses; and (2) the acronym/abbreviation is not previously spelled out because it is so commonly understood.

USCIS is part of **DHS**.

The Secure Electronic Network for Travelers Rapid Inspection (**SENTRI**) provides expedited **CBP** processing, at the United States–Mexico border, of preapproved travelers considered low-risk.

Do not use periods for the following jurisdictional entities in case cites:

Matter of Simeio Solutions, LLC, 26 I&N Dec. 542 (**AAO** 2015).

Matter of Jones, A98 765 432 (**IJ** Apr. 14, 1990).

Matter of Andrade, 19 I&N Dec. 488 (**BIA** 1987).

Matter of R–A–, 22 I&N Dec. 906 (**AG** 2001).

Matter of HealthAmerica, 2006-PER-1 (**BALCA** July 18, 2006).

Complainant v. Respondent, ALJ No. 2020-00000, -00001 (**ALJ** Jan. 1, 2021).

Complainant v. Respondent, ARB No. 2021-0000, ALJ No. 2020-00000 (**ARB** Jan. 1, 2021).

Abbreviation/acronym as short form of full term

Spell out the full name of a term the first or only time it is used. You may use commonly understood abbreviations and acronyms without spelling them out first, e.g., DHS, USCIS, ICE, CBP, IRS, FBI, BIA, AILA, PERM, but avoid using nonobvious abbreviations and acronyms unless they have been spelled out first.

If the term will be used again within the same general discussion, you may follow the spelled-out term with an abbreviation in parentheses. (Do not use quotation marks.) If you do so, thereafter use only the abbreviation.

In removal proceedings, it is possible to ask for relief under the Convention against Torture (CAT). The standards for CAT relief differ from those applicable to withholding of removal.

Even if the spelled-out term will not be used again, you can follow it with an abbreviation/acronym where, in your judgment, readers are likely to recognize, or want to know, the abbreviation/acronym more than the spelled-out term.

The Electronic System for Travel Authorization (ESTA) is an automated system that determines the eligibility of visitors to travel to the United States under the Visa Waiver Program.

Terms should be spelled out again in distinct parts or divisions likely to be read separately.

When the first use of the abbreviation/acronym is possessive, place the apostrophe +s outside the parentheses.

A lawful permanent resident (LPR)'s tax obligation

When the first use of the abbreviation/acronym is plural, pluralize it within the parentheses.

Lawful permanent residents (LPRs) cannot vote in federal elections

When the first use of the abbreviation/acronym occurs in a heading, you can either follow the rules above, or treat the term as if it is first occurring in the body of the text.

1. Unaccompanied Alien Children (UAC)

UAC lack lawful immigration status in the United States. ...

or

1. Unaccompanied Alien Children

Unaccompanied alien children (UAC) lack lawful immigration status in the United States. ...

or

1. UAC

Unaccompanied alien children (UAC) lack lawful immigration status in the United States. ...

When you want to introduce an abbreviated form of a long name or title without using acronyms or initials (i.e., using a full word or words instead), the rules above apply. Precede the abbreviated form with a “hereinafter” when doing so will help the reader understand that the parenthetical is introducing a short form. Do not use quotation marks, “i.e.,” or “a/k/a.”

An Act to Prevent Pernicious Political Activities (the Hatch Act).

A landmark opinion in this area was *In re Multidistrict Private Civil Treble Damage Antitrust Litigation Involving Motor Vehicle Air Pollution Control Equipment* (hereinafter *Air Pollution Control Antitrust Case*)

Abbreviation of U.S. city, state, and territory names; foreign country names

In text, do not abbreviate state names unless they follow a city name or are used to designate political affiliation. When abbreviating the names, use the two-letter postal designation (caps, no periods).

The state of California

Irvine, CA

New York tax law

Senator Charles Schumer (D-NY)

The District of Columbia is abbreviated D.C. (with periods), except when used as part of a postal address.

The AILA National Office is located in Washington, D.C.
Violation of a D.C. municipal ordinance
Write to AILA at 1331 G Street NW, Washington, DC 20005.

When abbreviating a city name, follow BlueBook Table T9 (see above).

I spent some time in California and the traffic in L.A. was bad.

When abbreviating a country name, follow Blue Book Table T9 (see above).

There is a different immigration system in the U.K.

Abbreviation of United States

Spell out United States, except when used as an adjective.

The United States and Mexico share a border.
The U.S. border with Mexico is nearly 2,000 miles long.
Taylor v. United States, 495 U.S. 575 (1990).

Optionally, you may deviate from the general rule to maintain parallel structure with the names/abbreviations of other countries.

The North American Free Trade Agreement, U.S.-Mex.-Can., art. 102, Dec. 8, 1993.
New Zealand law and United States law each provide ...

Educational degrees are abbreviated without periods.

BA
BS
MA
JD
PhD
MBA
LLM
LLB

TYPOGRAPHY

Italics/Bold/Underline/Superscript/Small Caps

For italicization and other typography in citations, see CITATIONS, below.

For italicization of titles of written, auditory, visual, and other artistic works, see TITLES OF WRITTEN, AUDITORY, VISUAL, AND OTHER ARTISTIC WORKS, below.

For emphasis, use *italics*. The occasional use of **bold** is OK but not preferred. Do not underline or use ALL CAPS.

Italicize non-English words and phrases unless they have been incorporated into common English usage. Foreign words and phrases that are often used in immigration-specific or legal writing generally are considered to be in common English usage and should not be italicized. However, very long Latin phrases and obsolete or uncommon Latin words and phrases should remain italicized.

gracias
notario
je ne sais quoi
fideicomiso
malum in se
de minimis
pro bono
expressio unius est exclusio alterius
schadenfreude

Do not italicize i.e., e.g., et al., et seq.

Do not italicize urls or email addresses.

Italicize the lowercase letter “*l*” when used as a subdivision, as in a statute or rule, to distinguish it from the numeral “1”:

8 CFR 214.2(*l*)

Do not use superscript for “th”, “nd”, or “rd”, etc. in ordinals.

The **22nd** day of the month
United States v. Asuncion, 974 F.3d 929 (**9th** Cir. 2020).

Superscript characters do not take on any of the font characteristics of preceding text. I.e., they never take bold or italics.

AILA does not use small caps or underlining in text or citations.

Spacing

Use a single space between sentences and after colons, semicolons, etc. Do not double space under any circumstances.

Do not insert a space before or after em dashes.

There is no space after any section symbol (§), or paragraph symbol (§), or currency symbol (\$, €, £, ¥), whether single or double. See **Section Symbols (§), Paragraph Symbols (§), and Currency Symbols (\$, €, £, ¥)**, below.

Generally, close up the space between two or more abbreviated single capital letters (or numerals and ordinals). This includes initials in personal names.

The residents of Washington, **D.C.** have a **U.S.** representative.
United States v. Epstein, 240 F. Supp. 84 (**S.D.N.Y.** 1965).
Wilson v. Mar. Overseas Corp., 150 **F.3d** 1 (1st Cir. 1998).
In re Interest of A.S., 906 **N.W.2d** 467 (Iowa 2018).
Eric C. Surette, J.D., Annotation, *Liability of Businesses to Governments and Consumers for Breach of Data Security for Consumers' Information*, 1 **A.L.R.7th** art. 2 (2015).
W.E.B. Du Bois

Exception: AILA cites periodicals as they are abbreviated in BlueBook Table T13. Per this style, when one or more of the capitals refers to the name of an institutional entity, set the capital or capitals referring to the entity off from other adjacent single capitals with a space.

B.C. L. Rev.
N.Y.U. L. Rev.
S. Ill. U. L.J.

Leave a space between any abbreviated single capital letter and a longer abbreviation, and between two or more longer abbreviations.

Miller v. Reddin, 293 **F. Supp.** 216 (C.D. Cal. 1968).
Oversight & Mgmt. Bd. for P.R., 140 **S. Ct.** 855 (2020).
A record by **P. Diddy**
In re Johnny O., 107 **Cal. App. 4th** 888, 132 **Cal. Rptr. 2d** 471 (**Cal. Ct. App.** 2003).

When citing to a footnote or footnotes, there is no space between the “n.” or “nn.” and the number(s). See **CITATIONS**, below.

Akhil Reed Amar, *The Two-Tiered Structure of the Judiciary Act of 1789*, 138 U. Pa. L. Rev. 1499, 1525 **n.80** (1990).
Schneider v. Cal. Dep’t of Corr., 151 F.3d 1194, 1197 **nn.1, 2** (9th Cir. 1998).

In text, there is no space between the superscript footnote number and the immediately preceding character.

Apostrophes and Quotation Marks

*For how to use apostrophes, see **USE OF APOSTROPHES**, below.*
*For how to present quoted material, see **QUOTATIONS**, below.*

Use directional or “**smart**” apostrophes and quotation marks; **don’t** use straight ones.

Double and single quotation marks next to each other should appear as triple quote marks, with no space in between.

According to *Torres*, the court “is not required to grant leave to amend when doing so would be futile. ‘Repleading would be futile here because the defect in subject matter jurisdiction does not appear to be **curable.**’” (quoting *Baker v. New York*, 128 F. App’x 185, 186 (2d Cir. 2005)).

En Dashes and Em Dashes

*For how to use en dashes and em dashes, see **USE OF HYPHENS, EN DASHES, AND EM DASHES**, below.*

AILA uses an en dash symbol (–) and an em dash symbol (—), not two consecutive hyphens.

Section Symbols (§), Paragraph Symbols (¶), and Currency Symbols (\$, €, £, ¥)

Do not place a space after any section symbol, paragraph symbol, or currency symbol, whether single or double.

INA §245.
8 USC §§1101(a), 1245(a).
Report, ¶2.
Memorandum, ¶¶2, 7.
The fee was raised to \$565.

Use only one section or paragraph symbol when citing to multiple subsections/subparagraphs.

INA §245(a), (c).
Report, ¶2(f)(i), (ii), (iv).

When a cite includes the notation et seq. following a section number, use a single section/paragraph symbol in front of the section/paragraph number, not a double.

8 CFR §214.2 et seq.
Report, ¶80 et seq.

In text references to authorities, you may use a section (§) or paragraph (¶) symbol in place of the words “section” and “paragraph” (or in place of the abbreviations “sec.” and “para.”). Be consistent throughout.

The controlling law can be found at §245 of the INA.

However, in text, only use the section symbol when referring to a provision in the U.S. Code or a federal regulation.

The controlling law can be found at 8 USC §1255.
The regulations at 8 CFR §§245.1 and 245.2

To specify a currency or to distinguish between currencies using the same symbol, insert the country abbreviation, with no periods, immediately before the symbol. No space appears.

US\$1,000
CAN\$1,200
MXN\$20,000

Symbols Such as @, #, %, &, etc.

The percent symbol (%) may be used in place of the word “percent.” Be consistent throughout. In tables, always use numerals and the symbol.

The plus sign (+) may be used in place of the words “plus” or “positive” as a preposition or as a compound noun or compound adjective. Be consistent throughout. In tables, always use numerals and the symbol. There is a space before and after the symbol, except omit a preceding space when the symbol follows a number or letter used as an adjective.

2 + 2 = 4.

She had 20-plus years of experience.

She had 20+ years of experience.

It is a 55+ community.

He got an A+ on the exam.

HIV+ individuals

Except in mathematical formulas, the use of the minus symbol (-) used in place of the words “minus” or “negative” is discouraged because of its similarity to a hyphen.

The equal symbol (=) may be used in place of the word “equal” or “equals.” Be consistent throughout. In tables, always use numerals and the symbol. Place a space in front of and after the symbol.

The BIA found support for this “custodial arrest = custody” position based on its own dicta in *Matter of West*.

An ampersand (&) may be used in place of the word “and” in company/institution/firm names, but is discouraged elsewhere. There is no space in front of or after the symbol.

AT&T

Marc J. Hetherington **and** Thomas J. Rudolph, *Why Washington Won’t Work: Polarization, Political Trust, and the Governing Crisis* (2015).

Do not use a serial comma before an ampersand.

Jacksons, Monk & Rowe

The use of the “commercial at” or “at sign” (@) is generally restricted to email addresses. Do not use it as a replacement for the word “at.”

CAPITALIZATION

Titles

Subject to the rules below, capitalize the initial letter of each word in a title.

Generally, do not capitalize articles “the”, “a”, and “an”; the conjunctions “and”, “but”, “for,” “nor,” and “or”; and prepositions of any length (unless they immediately follow a colon).

Using the Convention against Torture in Removal Proceedings
Border Admissions during the Trump Administration: On the Front Lines

Pursuant to the rule above, the words “That”, “Which”, “Who”, “When”, etc. are always capitalized.

Lowercase “to” not only as a preposition but also as part of an infinitive (to Run, to Hide, etc.). See below for capitalizing “To” when it is used adverbially or adjectively, or as the first word in a hyphenated phrase.

Lowercase “as” in any grammatical function, as long as it is not part of a hyphenated term.

Do not lowercase prepositions when they are used adverbially or adjectively.

Look **Up**
An Offer That He Could Not Turn **Down**
The **On** Button
After Being Knocked **Out**, It Took Him a While to Come **To**

Do not lowercase prepositions when they compose part of a Latin expression used adjectively or adverbially.

The **De** Minimis Exception to the Rule
How to Avoid Being Removed **In** Absentia

Lowercase the part of a proper name that would be lowercased in text, such as “de” or “von.”

The Trials of Mr. de Groot and Mr. von Bulow

Always capitalize the first element of a hyphenated term, regardless of its part of speech.

Selling Your Home with an **As-Is** Proviso
Completing Those Items on Your **To-Do** List

Subject to the exceptions discussed below, capitalize any subsequent elements in a hyphenated term.

Bringing Immigration Law into the Twenty-First Century
A Two-Thirds Majority of Non-English-Speaking Representatives
DOS Issues Record-Breaking Numbers of Short-Term Visas

If the first element in a hyphenated term is merely a prefix or combining form that could not stand by itself as a word (e.g., “anti,” “pre,” etc.), do not capitalize the second element unless it is a proper noun or proper adjective, or unless it is an article, preposition, or one of the coordinating conjunctions “and,” “but,” “for,” “nor,” or “or”. Third and subsequent elements of a hyphenated phrase follow the otherwise applicable capitalization rules.

The Root Causes of Anti-immigrant Sentiment
Developments Post-*Kazarian*
Exercising Out-of-the-Money Options

When citing or referring to a title, you may change the capitalization as it appears in the original to conform with these rules. If you do, be consistent throughout.

Specific persons, officials, groups, government offices, or government bodies

AILA follows the rules and exceptions in BlueBook Rule 8(c). These are:

Act. Capitalize “Act” when referring to a specific legislative act.

The record of the hearing shows that the Act required operators to pay for their own retirees.

It should not require an act of Congress to get this done.

Administrator; Commissioner; Chair, Mayor, President, Secretary, Senator, Congressperson, other job titles. Capitalize these terms except in their generic sense.

The respondent’s case appeal was denied by the INS Commissioner.

For almost 20 years, the statute has provided that the DHS Secretary make all necessary determinations.

She was elected Chair last year.

A secretary of state has great power.

Mayor Eric Garcetti

[Referring to U.S. President:] A sitting President’s executive power allows them to pardon convicted criminals.

The presidential veto does not confer such power upon the President.

The Executive Committee consists of a president, a vice-president, a secretary, and a treasurer.

Agency; Board; Committee; Department. Capitalize these terms except in their generic sense.

The AILA Board of Governors

AILA's USCIS Case Assistance Committee

AILA's Content Delivery and Analytics Department

The Agency reported that all areas of the country met the standard for nitrogen dioxide.

An agency's determination is not final until the time for appeal has expired.

The Board upheld the judge's decision to remove the respondent.

The matter can be put to a vote before the Association's Board of Directors.

Congress

Members of Congress are immune from false imprisonment claims under certain circumstances.

The congressional hearings were held on the potential cumulative effects of these three rules.

Circuit. Capitalize "Circuit" when used with a circuit's name or number.

We have decided to follow the Fifth Circuit and District of Columbia Circuit in that regard, rather than this circuit's unclear precedent.

Code. Capitalize "Code" when referring to a specific code.

At least one court considered the significance of the change between the 1939 and 1954 Codes.

Commonwealth. Capitalize "Commonwealth" if it is a part of the full title of a state, if the word it modifies is capitalized, or when referring to a state as a governmental actor or a party to a litigation.

The Commonwealth of Massachusetts sued several companies.

The Commonwealth may not relitigate the issue in a post-conviction hearing.

Constitution. Capitalize "Constitution" when naming any constitution in full or when referring to the U.S. Constitution, but do not capitalize the adjective form "constitutional."

Students in this class have studied the full faith and credit clause of the Pennsylvania Constitution. The students agree that the clause in that constitution is substantially similar to the Full Faith and Credit Clause of the U.S. Constitution.

Constitutional Clause or Article or Amendment. Capitalize nouns that identify specific parts of state or the U.S. Constitution when referring to them in textual sentences, but not in citations.

Of all the amendments in the U.S. Constitution, the Fifth Amendment may be the most complex.

Accordingly, there was no violation of Article I, Section 8, Clause 17 of the Constitution.

See U.S. Const. art. I, §8, cl. 17.

Court. Capitalize “Court” only when naming the court in full or when referring to the U.S. Supreme Court.

The case was referred to immigration court.

The California Supreme Court found no violation in such a case.

The argument in the state supreme court concerning the lack of prior notice was based solely on state authorities.

When the Court approves the argument, it becomes constitutional doctrine for the entire country.

The court of appeals reversed the trial court.

The Court of Appeals for the Fifth Circuit affirmed.

Federal. Capitalize “Federal” when the word it modifies is capitalized. Otherwise, lowercase.

The Federal Constitution provides for three branches of government.

A higher level of clarity is required in statutes that require federal spending.

Judge, Justice. Capitalize these words only when giving the name of a specific judge or justice or when referring to a Justice of the United States Supreme Court.

The immigration judge ordered removal.

In one of the first decisions on point, Judge Cedarbaum rejected a group appointment.

This era of constitutional noninterference ended when the Justices proclaimed a profound national commitment to the principle that debate on public issues should be uninhibited.

The justices of the state’s highest court will hear oral arguments on the issue of capital punishment at the end of the month.

State. Capitalize “State” only if it is a part of the full title of a state, if the word it modifies is capitalized, or when referring to a state as a governmental actor or as a party to a litigation.

The principal issue is whether the State of Kansas may impose its motor fuel tax.

The State Commissioner adopted a broad-based policy.

The State brought this action two years ago.

A state may not interfere in the enforcement of federal immigration law.

AILA capitalizes the word Administration when referring to a president’s Administration.

Changes were made during the Biden Administration.

Internet and web

AILA does not capitalize internet or web.

Academic degrees, courses, and subjects

Official names of courses of study are capitalized. Academic subjects are not capitalized unless they form part of a department name or an official course name or are themselves proper nouns (e.g., English, Latin).

She has published widely in the history of religions.

They have a wide variety of courses in gender studies.

He is majoring in comparative literature.

She is pursuing graduate studies in philosophy of science.
Jones is Chair of the Committee on Comparative Literature.
I am signing up for Archaeology 101.
A popular course at the Graham School of General Studies is Basic Manuscript Editing.
His ballroom dancing classes have failed to civilize him.

Names of degrees, fellowships, and the like are lowercased when referred to generically.

a master's degree; a doctorate; a fellowship; master of business administration (MBA)

Racial and ethnic designations

Capitalize Black when describing people and cultures of African origin, and the terms Hispanic and Latino when referring to groups of people. Do not capitalize white or brown in reference to race or culture, however.

Martin Luther King, Jr. championed voting rights for Blacks in the South.
Biden's share of votes by Latinos decreased by eight percentage points compared to Hillary Clinton's.
The non-college white population, while declining as a share of the electorate, remains quite large.

NUMERALS AND ORDINALS

As to numerals and ordinals in times and dates, see Time and Date, below.

Basic rule

Spell out numbers one to nine, and ordinal numbers first to ninth. Use numerals for numbers 10 and above, and for ordinal numbers 10th and above.

Exceptions

Always spell out a numeral/ordinal when it is the first word of a sentence.

You can spell out round numbers like hundred, thousand, etc. Be consistent with that throughout.

In a pair or series of numbers that includes both a number that is usually spelled out and one that is not, you may either spell them all out or use a numeral for each. Be consistent in doing so throughout.

three- and ten-year bars
five-, ten-, and twenty-dollar bills

The 9th, 10th, and 11th of February
In the last three months, the court granted 22, 6, and 8 asylum applications,
respectively.

Spell out Tenth and Eleventh when referring to the Tenth and Eleventh Circuit Courts of Appeals in text.

If part of a citation, numerals are used for ordinal numbers 9th and under.

Mary Kramer, *Immigration Consequences of Criminal Activity: A Guide to Representing Foreign-Born Defendants* 233 (9th ed. 2021).
Gibson v. Collier, 920 F.3d 212, 222 (5th Cir. 2019).

Ordinals ending in 2 or 3 (2d, 2nd, 3d, 3rd)

In text where a numeral is required, use “nd” and “rd” where the last numeral is 2 or 3, respectively.

2nd, 3rd, 72nd, 73rd, 102nd, 103rd, etc.

In citations, use “d”.

2d, 3d, 72d, 73d, 102d, 103d, etc.

Long numbers

Use commas in numbers that contain four or more uninterrupted digits.

An estimated 1,000 visas will become available.
Last year, 469,568 from Japan people visited Hawaii.

Exception: Do not employ this convention in citations to pages, statutes, volume numbers, internet database locators, docket numbers, the U.S. Code, the Federal Register, or other sources whose classification systems do not themselves include commas.

United States v. Walker, No. 00-**40098**-JAR, 2003 WL **131711** (D. Kan. Jan. 6, 2003).
67 Fed. Red. **76559** (Dec. 12, 2002).

Dollars and cents

Omit zeroes indicating no cents when describing whole dollar amounts.

\$250 (*Not* \$250.00)

TIME AND DATE

Days of the month are expressed in numerals, not ordinals.

October 1, 2016; October 1 (not October 1st)

When a date consisting of a month, day, and year is not immediately followed by a period, colon, or semicolon, a comma follows the year:

The November 20, 2014, memorandum from the secretary set forth new guidelines.

For a range of dates, use either an en dash or the from/to construction

October 16–18
from October 16 to 18

When referring to a month of a particular year, do not follow the month with a comma, nor the word “of”.

June 2015

When expressing time of day, use periods in a.m. and p.m., and do not capitalize.

2:15 p.m.

An hour expressed without minutes can be expressed in any of the following ways. Be consistent throughout.

2:00 p.m.
2 p.m.
two o'clock

COMMAS

AILA uses the serial comma, also known as the Oxford comma. Where there is a series of three or more items or phrases, place a comma before the conjunction joining the last two.

red, white, and blue

The respondent can ask for prosecutorial discretion, ICE counsel can drop charges, or the immigration judge can enter an order sua sponte.

See also and *see generally* are not followed by a comma. See **CITATIONS**, below.

Follow e.g. and i.e. with a comma.

Id. with a further pinpoint is not followed by a comma. See **CITATIONS**, below.

See id. §1.7.
Id. at 563.

For use of the comma after the month or year in dates, see **TIME AND DATE**.

USE OF APOSTROPHES

Generally, apostrophes are not used to pluralize.

2010s
LPRs
I-130s

However, apostrophes may be used to avoid confusion when pluralizing lowercase letters and abbreviations with two or more interior periods or with both capital and lowercase letters.

x's and y's
M.A.'s; Ph.D.'s
do's and don'ts.

AILA uses “U.S. Attorney’s Office” and “attorney’s fees”.

USE OF HYPHENS, EN DASHES, AND EM DASHES

Hyphens

AILA follows the hyphenation guide in the *Chicago Manual of Style*, in which hyphens should be added only if doing so will prevent a misreading or otherwise significantly aid comprehension. We send an email, not an e-mail.

Compounds formed with prefixes are normally closed, i.e., they do not take hyphens.

noncitizen
posttraumatic stress

Words that might otherwise be misread should be hyphenated.

Use a hyphen before a capitalized word or a numeral.

pre-IIRAIRA
mid-2000s

Use a hyphen to separate two a's, two i's, or other combinations of letters or syllables that might be confusing

anti-immigrant
re-creation
co-op
ultra-annoying

A hyphen can make for easier reading by showing structure and, often, pronunciation.

When compound modifiers such as *high-profile* or *book-length* precede a noun, hyphenation usually lends clarity. Where no ambiguity could result, hyphenation is unnecessary. Err on the side of eliminating any possible ambiguity (using a hyphen).

realistic-probability test (meaning that the test measures a realistic probability;
hyphen used to distinguish from a probability test that is realistic)
moral turpitude charge (meaning that the charge is one of moral turpitude; no hyphen
used because there is little chance that this phrase could be understood as referring to
a turpitude charge that is moral)
much-needed clothing
public welfare administration
graduate student housing

Do not use a hyphen with proper nouns used as a compound modifier of another noun.

New Zealand law
Frank Sinatra records

Compounds formed by an adverb ending in “ly” plus an adjective or participle are not hyphenated either before the noun, since ambiguity is virtually impossible.

largely irrelevant data
smartly dressed woman

Compounds of any type that follow the noun they modify usually do not require hyphenation.

The protesters were righteously angry.
The scholar was well read.
Her actions in that moment were ill advised.

Multiple hyphens are usually appropriate for compound modifiers consisting of more than two words as well.

over-the-counter drug
winner-take-all contest

If the compound modifier consists of an adjective that itself modifies a compound, additional hyphens may not be necessary.

late nineteenth-century literature
current USCIS-approved forms

When the second part of a hyphenated expression is omitted, the suspended hyphen is retained, followed by a space (or, in a series, by a comma).

3- and 10-year bars
Chicago- or Milwaukee-bound passengers

When the second part of a solid compound is omitted, a suspended hyphen is introduced, followed by a space (or, in a series, by a comma).

both over- and underfed cats
pre- and postmodern architecture

For more on the use of hyphens vs. en dashes with compound modifiers, see below.

En dashes

Use an en dash for number ranges.

The years 1993–2000 were heady ones for the computer literate.
For source citations and indexing, see chapters 14–16.
In Genesis 6:13–21 we find God’s instructions to Noah.
Join us on Thursday, 11:30 a.m.–4:00 p.m., to celebrate the New Year.
I have blocked out December 2016–March 2017 to complete my manuscript.

For the sake of parallel construction, the word “to” or “through” (or “until”) should be used if the word “from” precedes the first element in a pair expressing a range; similarly, “and” should be used if “between” precedes the first element. Don’t use an en dash.

She was in college from 2012 to 2016.
He usually naps between 11:30 a.m. and 1:30 p.m.

En dashes can be used to substitute for the word “to.”

The London–Paris train leaves at two o’clock.
On November 20, 1966, Green Bay defeated Chicago, 13–6.
The legislature voted 101–13 to adopt the resolution.

En dashes should not be used to substitute for the sense of “between” or “among.” Use a hyphen instead.

The U.S.-Canada-Mexico agreement

An en dash may be used to indicate an unfinished number range or to indicate redacted letters.

The History of Cartography (1987–) is a multivolume work published by Chicago.
Jack Stag (1950–)
Matter of B–, 21 I&N Dec. 66 (BIA 1996).

Use an en dash in place of a hyphen in a compound adjective when one of the elements of that compound adjective is an “open compound” (i.e., two or more separate words that together form an adjective).

non–lawful permanent resident
Chuck Berry–style lyrics

For purposes of the rule above, treat an abbreviation as if it is a single word. If such is the case, you might not have an open compound, and thus will be using a hyphen instead of an en dash.

non-LPR cancellation of removal
non-U.S. citizen
then-AG Holder

If the compound adjective includes a hyphenated compound, they are joined by a hyphen rather than an en dash.

non-English-speaking peoples
a two-thirds-full cup

Em dashes

The em dash, often simply called the dash, can be used to set off an amplifying or explanatory element, and in that sense can function as an alternative to parentheses, commas, or a colon—especially when an abrupt break in thought is called for.

A question mark or an exclamation point—but never a comma, a colon, or a semicolon—may precede an em dash.

Without further warning—but what could we have done to dissuade her?—she left the plant, determined to stop the union in its tracks.
Only if—heaven forbid!—you lose your passport should you call home.

If the context calls for an em dash where a comma would ordinarily separate a dependent clause from an independent clause, the comma is omitted. Likewise, if an em dash is used at the end of quoted material to indicate an interruption, the comma can be safely omitted before the words that identify the speaker.

Because the data had not been fully analyzed—let alone collated—the publication of the report was delayed.

“I assure you, we shall never—” Sylvia began, but Mark cut her short.

QUOTATIONS

“In-line” quotes

If your quote is not lengthy (will take up fewer than three lines), keep it in line with the rest of the text (i.e., not otherwise set off from the rest of the text) and enclose it within quotation marks.

Change any double quotation marks appearing in the source material to single quotation marks.

Source material: The respondent argues that the *Moncrieffe* Court’s discussion of “antique firearms” in reference to the “realistic probability” test was dicta and that it has been superseded by *Descamps* in any case.

Quoting the source: The respondent’s argument was that the “**the Moncrieffe** Court’s discussion of ‘**antique firearms**’ in reference to the ‘**realistic probability**’ test was dicta and that it has been superseded by *Descamps* in any **case**.”

However, if the beginning of your quote coincides with the beginning of a quote in the source, and the end of your quote coincides with the end of that quote in the source as well, just use double quotation marks. (I.e., the otherwise applicable rule would produce a single quotation mark followed by a double, which should be avoided in this case.)

Source material: If “the agency’s answer is based on a permissible construction of the statute,” that is the end of the matter.

Quoting the source: The dispositive question is whether “the agency’s answer is based on a permissible construction of the statute.”

Alternate between double and single quotation marks as appropriate.

Source material: In this context, “the distinction between ‘jurisdictional’ and ‘non-jurisdictional’ interpretations is a mirage.”

Quoting the source: The Court noted that, “[i]n this context, ‘the distinction between “jurisdictional” and “non-jurisdictional” interpretations is a mirage.’”

Do not indicate the paragraph structure from the source material.

Block quotes

If your quote is lengthy (will take up three lines or more), set it off from the rest of the text using no quotation marks (i.e., use a “block quote”). Indent left and right to form the “block.” Also use block quote format when the source material would commonly be set off from the text, such as lines of poetry or dialogue from a play.

Do not place quotation marks at the beginning or end of a block quote. In a block quotation, any quotation marks appearing in the original are retained.

The paragraph structure of the source material is indicated in a block quote by mimicking the indentation in the source material. However, do not indent the first sentence of the block quote (and do not use an ellipsis) if language beginning the first paragraph in the source material has been omitted. To indicate omission at the beginning of subsequent paragraphs, insert and indent an ellipsis. Indicate the omission of one or more entire paragraphs by inserting and indenting four periods (“. . .”) on a new line.

Source material:

In *Matter of Mendez-Orellana*, 25 I&N Dec. 254, 255–56 (BIA 2010), we held that the status of a firearm as an “antique” is an affirmative defense to a removal charge under section 237(a)(2)(C) of the Act with respect to which the respondent bears the burden of proof, rather than a fact that the DHS must disprove under the categorical approach. In light of *Moncrieffe*, we clarify that a State firearms statute that contains no exception for “antique firearms” is categorically overbroad relative to section 237(a)(2)(C) of the Act only if the alien demonstrates that the State statute has, in fact, been successfully applied to prosecute offenses involving antique firearms. The alien may carry that burden by proving that the statute was so applied in his own case, but *Moncrieffe* makes clear that the burden may also be satisfied by a showing that the statute has been so applied to others. Our holding in *Matter of Mendez-Orellana* is clarified accordingly.

The respondent has not demonstrated that he was prosecuted for discharging an “antique firearm,” nor has he identified any Utah decision reflecting that anyone else has ever been so prosecuted. Thus, we discern no “realistic probability” that section 76-10-508.1 would be applied in that manner.

The respondent argues that the *Moncrieffe* Court’s discussion of “antique firearms” in reference to the “realistic probability” test was dicta and that it has been superseded by *Descamps* in any case. We find those arguments unpersuasive. Although *Moncrieffe* was not a firearms case, application of the “realistic probability” test was central to the Court’s holding, and its discussion of the “antique firearm” issue—which was offered in response to a specific governmental objection—was meant to illustrate how the Court understood that test to apply in actual practice. Accordingly, that discussion is entitled to great weight.

Quoting the source:

The alien may carry that burden by proving that the statute was so applied in his own case, but *Moncrieffe* makes clear that the burden may also be satisfied by a showing that the statute has been so applied to others....

....

... Although *Moncrieffe* was not a firearms case, application of the “realistic probability” test was central to the Court’s holding, and its discussion of the “antique firearm” issue—which was offered in response to a specific governmental objection—was meant to illustrate how the Court understood that test to apply in actual practice. Accordingly, that discussion is entitled to great weight.

Alterations

Do not alter the source material in accordance with AILA style rules or any other style rules. Other alterations are made as follows:

Indicate grammatically necessary or explanatory alterations of or additions to the original material using brackets.

Source material: This question requires us to address a more general issue: whether the sentencing court in applying § 924(e) must look only to the statutory definitions of the prior offenses, or whether the court may consider other evidence concerning the defendant’s prior crimes.

Quoting the source: “This question requires us to address a more general issue: whether the sentencing court in applying [18 USC] § 924(e) must look only to the statutory definitions of the prior offenses, or whether the court may consider other evidence concerning the defendant’s prior crimes.”

When a letter must be changed from upper to lower case, or vice versa, enclose it in brackets.

Source material: We agree that, in the absence of a plain indication of an intent to incorporate diverse state laws into a federal criminal statute, the meaning of the federal statute should not be dependent on state law.

Quoting the source: *United States v. Turley*, 352 U. S. 407, 411 (1957) (“[I]n the absence of a plain indication of an intent to incorporate diverse state laws into a federal criminal statute, the meaning of the federal statute should not be dependent on state law.”).

Indicate the omission of letters from a common root word with empty brackets, with space in between the brackets, or with additions made necessary by the omission within the brackets.

Source material: (a) the actor discharges a firearm in the direction of any person or persons, knowing or having reason to believe that any person may be endangered by the discharge of the firearm;

Quoting the source: The second clause of that section requires only that the accused “**know[]** or **hav[e]** reason to believe” that discharge of the firearm may endanger a person; it does not require that the firearm be discharged for a particular purpose.

Significant mistakes in the original should be followed by [sic]. The correct word or phrase, if not obvious, should be set forth and explained in a footnote appearing after [sic].

Source material: This list of statutes are necessarily incomplete.

Quoting the source: “This list of statutes are [sic] necessarily incomplete.”

Do not use an ellipsis to begin quoted material when you are omitting material from the beginning of a sentence in the source material.

Source material: We therefore reject petitioner’s view that Congress meant to include only a special subclass of burglaries, either those that would have been burglaries at common law or those that involve especially dangerous conduct. These limiting constructions are not dictated by the rule of lenity.

Quoting the source: The Court did not agree that “Congress meant to include only a special subclass of burglaries, either those that would have been burglaries at common law or those that involve especially dangerous conduct.”

On the other hand, when using quoted material as a full sentence, use an ellipsis followed by a period (or other punctuation) if you’re not using the rest of the source sentence.

Source material: We therefore reject petitioner’s view that Congress meant to include only a special subclass of burglaries, either those that would have been burglaries at common law or those that involve especially dangerous conduct. These limiting constructions are not dictated by the rule of lenity.

Quoting the source: The Court did not agree that “Congress meant to include only a special subclass of burglaries”

Use parentheticals to indicate that emphasis has been added to the quote or that alterations (bracketed material) come from the source. Also use parentheticals to indicate any omission of citations or footnote numbers. There is no need to indicate the omission of a citation or footnote number that follows the last word quoted.

“The fact that individuals define themselves in a significant way through their sexual relationships suggests . . . that much of the richness of a relationship will come from the freedom to *choose* the form and nature of these *intensely personal bonds*.” *Bowers v. Hardwick*, 478 U.S. 186, 205 (1986) (Blackmun, J., dissenting) (second emphasis added).

The court of appeals recognized the city’s substantial interest in limiting the sound emanating from the bandshell. The court concluded, however, that the city’s sound-amplification guideline was not narrowly tailored to further this interest, because “it has not [been] shown . . . that the requirement of the use of the city’s sound system and technician was the *least intrusive means* of regulating the volume.” *Ward v. Rock Against Racism*, 491 U.S. 781, 797 (1989) (alteration in original) (citation omitted).

There is no need to indicate that emphasis comes from the source. I.e., do not use (emphasis in original).

Punctuation around quotation marks

Generally, a period or comma goes inside the right quotation mark; colons and semicolons go outside the quotation mark.

He described what he heard as a “short, sharp shock.”
“Thus conscience does make cowards of us all,” she replied.

She told me, “Thus conscience does make cowards of us all”; I didn’t believe her.
The following Senate Democrats put forward “Plan C”: a proposal to provide parole to 6.5 million individuals who are undocumented.

Question marks and exclamation points follow closing quotation marks unless they belong within the quoted matter.

“Timber!”
“What’s the rush?” she wondered.
Which of Shakespeare’s characters said, “All the world’s a stage”?

When using quotation marks around words, phrases, or informational strings that the reader must know or type exactly as such, any punctuation should appear outside the quotation marks.

In box 4.a., enter “None”.
Your password is “password%5!”.

Footnotes and citations following quote

If a footnote is used to identify the source of the quoted material, the footnote number in the text is usually placed at the end of the quote. If a footnote is not used, and the citation for the source of quoted material appears in the text instead, the citation's appearance depends on whether a block quote is used or not. If it is a block quote, the citation begins at the left margin on the line immediately following the block quote and should not be indented.

There remains the problem of applying this conclusion to cases in which the state statute under which a defendant is convicted varies from the generic definition of "burglary." If the state statute is narrower than the generic view, *e.g.*, in cases of burglary convictions in common law States or convictions of first-degree or aggravated burglary, there is no problem, because the conviction necessarily implies that the defendant has been found guilty of all the elements of generic burglary. And if the defendant was convicted of burglary in a State where the generic definition has been adopted, with minor variations in terminology, then the trial court need find only that the state statute corresponds in substance to the generic meaning of burglary. *Taylor v. United States*, 495 U.S. 575, 599 (1990).

If a quote is in-line (i.e., is not a block quote) and the citation for the source of quoted material appears in the text (i.e., not in a footnote), use a citation clause or sentence.

As explained by Mary Kramer, "[a]n individual who has been convicted of a controlled substance violation during the required statutory period of good moral character," INA §316(a)(3); 8 USC §1427(a)(3), "is ineligible for naturalization." *See* INA §101(f)(3); 8 USC §1101(f)(3); 8 CFR §316.10(b)(2)(iii).

TITLES OF WRITTEN, AUDITORY, VISUAL, AND OTHER ARTISTIC WORKS

For style of titles of written works in citations, see CITATIONS, below.

In text, italicize the names of any written, auditory, visual, and other artistic works, including books, magazines, articles, blogs, radio and television programs, podcasts, songs and other musical works, plays and other theatrical productions, etc.

The article appeared in the latest issue of *POLITICO*.

War and Peace is a long novel.

In her article *The Need for Immigration Reform*, Sally Jones reviews legislative efforts over the past 50 years.

My favorite Beach Boys album is *Pet Sounds*.

He was a guest on the *Joe Rogan Experience* podcast.

We invite you to contribute to AILA's *Think Immigration* blog.

The Mona Lisa hangs in the Louvre in Paris.

Cats ran for many years on Broadway.

The senator made those comments on CNN's *Reliable Sources*.

The titles of databases are not italicized.

The Foreign Labor Certification Data Center is the location of the Online Wage Library for prevailing wage determinations.

The book will become available on AILALink next month.

You will need a subscription to Westlaw or LexisNexis to find that case.

Books: website and marketing

Outside of legal text and citations (for example on web stores and marketing materials), book titles should appear in regular (i.e., not italic) font and be capitalized using title case.

Designate any edition by use of subsequent comma and the abbreviation “ed.” [not capitalized]. Editions ending with a 2 are abbreviated “2d” and editions ending with a 3 are abbreviated “3d”.

International Adoption and Other Immigration Options for Children, 2d ed.

Immigration Options for Artists, Entertainers & Athletes, 3d ed.

Electronic book is stylized eBook.

LISTS AND OUTLINES

Lists may be either run in to the text or set vertically. Short, simple lists are usually better run in, especially if the introductory text and the items in the list together form a sentence. Lists that require typographic prominence, that are relatively long, or that contain multiple levels should be set vertically.

Run-in lists

If numerals or letters are used to mark the divisions in a run-in list, enclose them in parentheses. If the introductory material forms a grammatically complete sentence, a colon should precede the first parenthesis. The items are separated by commas unless any of the items requires internal commas, in which case all the items will usually need to be separated by semicolons.

The qualifications are as follows: a doctorate in physics, five years’ experience in a national laboratory, and an ability to communicate technical matter to a lay audience.

Compose three sentences to illustrate analogous uses of (1) commas, (2) em dashes, and (3) parentheses.

Data are available on three groups of counsel: (1) the public defender of Cook County, (2) the member attorneys of the Chicago Bar Association’s Defense of Prisoners Committee, and (3) all other attorneys.

Vertical lists

A vertical list is best introduced by a grammatically complete sentence, followed by a colon. There are two basic types of lists: (1) unordered, in which the items are introduced by a bullet or other such marker or by nothing at all, and (2) ordered, in which items are introduced by numbers or letters. If the list is unordered, and unless the items consist of complete sentences, each item carries no end punctuation and each can usually begin lowercase (except for proper nouns). For lists whose items require more prominence, capitalization may instead be preferred; choose one approach and follow it consistently.

Your application must include the following documents:

- a full résumé
- three letters of recommendation
- all your diplomas, from high school to graduate school
- a brief essay indicating why you want the position and why you consider yourself qualified for it
- two forms of identification

If the items are numbered (i.e., the list is ordered), a period follows the numeral. It is customary to capitalize items in a numbered list even if the items do not consist of complete sentences. Closing punctuation is used only if items consist of complete sentences.

Compose three sentences:

1. To illustrate the use of commas in dates
2. To distinguish the use of semicolons from the use of periods
3. To illustrate the use of parentheses within dashes

Generally, bulleted lists are formatted in the same way as numbered lists.

Use the Control Panel to make changes to your computer:

- To uninstall or repair a program or to change how it runs, go to Programs, and then choose Programs and Features.
- To adjust the resolution displayed by your monitor, go to Appearance and Personalization, and then choose Display. (Lowering the resolution will increase the size of images on the screen.)
- To add a language other than English or to change handwriting options, go to Clock, Language, and Region, and then choose Language.

However, if none of the items in a bulleted list consist of complete sentences, each item can usually begin lowercase (except for proper nouns). For bulleted lists whose items require more prominence, capitalization may instead be preferred; choose one approach and follow it consistently.

The style sheet allows for two types of lists:

- ordered lists, marked with numbers or letters
- unordered lists, marked by bullets or other ornaments (or unmarked)

If the items in a vertical list complete a sentence begun in the introductory text, semicolons or commas may be used between the items, and a period should follow the final item. (If the items include internal punctuation, semicolons are preferred.) Each item begins with a lowercase letter, even if the list is a numbered list. A conjunction (“and” or “or”) before the final item is optional. Such lists, often better run in to the text, should be set vertically only if the context demands that they be highlighted.

Reporting for the Development Committee, Jobson reported that

1. a fundraising campaign director was being sought;
2. the salary for this director, about \$175,000 a year, would be paid out of campaign funds; and
3. the fundraising campaign would be launched in the spring of 2023.

CITATIONS

The INA and Other Statutes

Basic style:

INA §101(a)(15)(E).

28 USC §1292.

Child Status Protection Act, Pub. L. No. 107-208, 116 Stat. 927 (2002). If the act contains the year in the title, do not repeat the year at the end. Immigration Services and Infrastructure Improvements Act of 2000, Pub. L. No. 106-313, §§201–05, 114 Stat. 1251, 1262–65.

When citing a statute that is part of the INA, cite to the INA only (i.e., do not cite to 8 USC only or give a parallel cite to 8 USC).

No periods in acronyms such as INA or USC.

No space between the section symbol (§) and the statute number.

Regulations (CFR and Fed. Reg.)

Basic style:

8 CFR §214.2(d)(2)(ii).

59 Fed. Reg. 55910 (Nov. 9, 1994). Give the name of the rule or regulation only if the rule or regulation is commonly cited that way or the information would otherwise aid in identification.

Constitutions

U.S. Const. art. I, §9, cl. 2.

U.S. Const. amend. XIV, §2.

Cases (federal courts)

Case names are italicized.

Basic style:

Clark v. Martinez, 543 U.S. 371 (2005). If not in U.S. cite to S. Ct. if available.

Zhu v. Gonzalez, 411 F.3d 292 (D.C. Cir. 2005); *United States v. Lara*, 590 F. App'x 574, 584 (6th Cir. 2014).

Glassroth v. Moore, 229 F. Supp. 2d 1290 (M.D. Ala. 2002).

Unpublished:

Cite to Westlaw or Lexis if known, or to the slip opinion.

Quarles v. United States, 587 U. S. ____ (2019) (slip op. at 3).

Gibbs v. Frank, No. 02-3924, 2004 U.S. App. LEXIS 21357, at *18–19 (3d Cir. Oct. 14, 2004).

Int'l Snowmobile Mfrs. Ass'n v. Norton, No. 00-CV-229-B, 2004 WL 2337372, at *3, *7 (D. Wyo. Oct. 14, 2004); *Ross v. Weissman*, No. 90-345, slip op. at 6 (D. Mass. Dec. 4, 1990).

Cases (administrative courts)

Case names are italicized.

Basic styles:

Immigration court

Matter of Jones, A98 765 432 (IJ Apr. 14, 1990).

Court location and IJ name optional

BIA (published in I&N Dec.)

Matter of Andrade, 19 I&N Dec. 488 (BIA 1987).

BIA (unpublished)

Matter of Ardestani, A026 591 156 (BIA May 12, 1989).

Attorney General opinions

Matter of R–A–, 22 I&N Dec. 906 (AG 2001).

AAO (precedent, published in I&N Dec.)

Matter of Dhanasar, 26 I&N Dec. 884 (AAO 2016).

AAO (nonprecedent)

Note: the newer cases use the “*In re* + # style below.

In re 07208889 (AAO Jan. 22, 2021).

Matter of J–M–M–D–, ID#1517832 (AAO Oct. 2, 2018).

Matter of [name redacted], LIN 02 184 53385 (AAO Sept. 17, 2002).

Matter of [name and file number redacted] (AAO Dec. 23, 2011).

Append AILA Doc. No. or url (optional)

BALCA

Matter of Dearborn Pub. Schools, 91-INA-222 (BALCA Dec. 7, 1993) (en banc)

Matter of HealthAmerica, 2006-PER-1 (BALCA July 18, 2006).

OCAHO

Dhillion v. Regents of Univ. of California, 3 OCAHO No. 429 1993, OCAHO Case No. 92B00097 (Mar. 10, 1993).

DOL ARB

Complainant v. Respondent, ARB No. 2021-0000, ALJ No. 2020-00000, slip op. at [page number] (ARB Jan. 1, 2021).

Opinion for consolidated cases: Use *Matter of*, not *Matters of*

Matter of Arrabally and Yerrabelly, 25 I&N Dec. 771 (BIA 2012).

Presidential proclamations, executive orders, etc.

Cite to Fed. Reg. if therein; otherwise to official whitehouse.gov website. Prior administration documents are available through the Compilation of Presidential Documents at govinfo.gov and can be cited to that website.

Exec. Order No. 13780, *Protecting the Nation from Foreign Terrorist Entry into the United States*, 82 Fed. Reg. 13209 (Mar. 6, 2017).

Presidential Proclamation No. 9844, *Declaring a National Emergency Concerning the Southern Border of the United States*, 84 Fed. Reg. 34 (Feb. 15, 2019).

Presidential Memorandum, Joseph R. Biden, Jr., *Memorandum for the Secretary of State on the Emergency Presidential Determination on Refugee Admissions for Fiscal Year 2021* (Apr. 16, 2021), www.whitehouse.gov/briefing-room/presidential-actions/2021/04/16/memorandum-for-the-secretary-of-state-on-the-emergency-presidential-determination-on-refugee-admissions-for-fiscal-year-2021.

Presidential Memorandum, Donald J. Trump, *Memorandum on Securing the Southern Border of the United States* (Apr. 4, 2018), www.govinfo.gov/content/pkg/DCPD-201800218/pdf/DCPD-201800218.pdf.

Agency memoranda, press releases, etc.

Almost all appear on aila.org, so strive to provide the AILA document number. Otherwise, provide url.

[Author indicated]

Memorandum from Jeff Weiss, Acting Dir., INS Office of Int'l Affairs, *Guidelines for Children's Asylum Claims* (Dec. 10, 1998), AILA Doc. No. 09042230.

[Author not indicated]

EOIR Memorandum, *Operating Policies and Procedures Memorandum 03-06: Procedures for Going Off-Record During Proceedings* (Oct. 10, 2003), AILA Doc. No. 03121714.

[Policy memorandum]

USCIS Policy Memorandum, *Updated Guidance for the Referral of Cases and Issuance of Notices to Appear (NTAs) in Cases Involving Inadmissible and Deportable Aliens* (June 28, 2018), AILA Doc. No. 18070539.

[Press release]

USCIS Press Release, *DHS Announces 12-Month Extension of Temporary Protected Status for Liberia* (Aug. 16, 2005), AILA Doc. No. 05081642.

State Department cables

DOS Cable, *B-1 in Lieu of H*, State 00101466 (Oct. 12, 2012), AILA Doc. No. 12102246.

DOS Cable, *Update to 9 FAM 302.8 Public Charge—INA 212(a)(4)*, 18 State 942 (Jan. 4, 2018), AILA Doc. No. 18012235.

DOS Cable, *Implementing Executive Order 13780 Following Supreme Court Ruling—Guidance to Visa-Adjudicating Posts* (June 28, 2017), AILA Doc. No. 17062901.

DOL/ETA/OFLC FAQs

OFLC PERM FAQs, Round 14 (May 13, 2019), at 8,
www.dol.gov/sites/dolgov/files/ETA/oflc/pdfs/PERM_FAQ-Round-14_051419.pdf.

OFLC FAQs, www.foreignlaborcert.doleta.gov/faqsanswers.cfm, PERM Program, Multiple Positions, Q&A 2.

Agency policy/procedure manuals

USCIS Policy Manual vol. 12, pt. G, ch. 3.G.1. Always spell out USCIS Policy Manual. Do not italicize.

9 Foreign Affairs Manual (FAM) 302.4-2(B)(3)b.(5)(a)(ii). On subsequent references to the manual, use only acronym FAM. E.g., 9 FAM 302.4-2(B)(3)b.(5)(a)(ii).

Adjudicator's Field Manual (AFM) ch. 23.2. On subsequent references to the manual, use only acronym AFM. E.g., AFM ch. 23.2.

Bills, congressional documents

S. 516, 105th Cong. §2 (1997).

H.R. 422, 106th Cong. (1999).

H.R.J. Res. 124, 105th Cong. (1998).

S. Res. 141, 106th Cong. (1999) (enacted).

Transforming the Federal Government to Protect America from Terrorism: Hearing Before the H. Select Comm. on Homeland Sec., 107th Cong. 23–25 (2002) (statement of John Ashcroft, Att'y Gen. of the United States).

H.R. Rep. No. 99-253, pt. 1, at 54 (1985).

S. Rep. No. 84-2, at 7 (1955).

142 Cong. Rec. H11460 (daily ed. Sept. 27, 1996) (statement of Rep. Tanner).

U.S. Immigr. Comm'n, *Immigration Legislation*, S. Doc. No. 61-758, at 613 (3d Sess. 1911).

Louis Fisher, Cong. Rsch. Serv., RL31340, *Military Tribunals: The Quirin Precedent* 30 (2002).

Treaties and other international agreements

Include the agreement's name; the state parties, if applicable; the subdivision referred to, if applicable; the date of signing; and a source in which the treaty can be found.

North American Free Trade Agreement, U.S.-Can.-Mex., Dec. 17, 1992 (entered into force Jan. 1, 1994), 32 I.L.M. 289 [hereinafter NAFTA].

United States-Mexico-Canada Agreement, U.S.-Mex.-Can., art. 20, Oct. 1, 2018 (entered into force July 1, 2020), <https://ustr.gov/trade-agreements/free-trade-agreements/united-states-mexico-canada-agreement/agreement-between> [hereinafter USMCA].

Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, art. 2(2), opened for signature Dec. 10, 1984, S. Treaty Doc. No. 100-20 (1988), 1465 U.N.T.S. 85 [hereinafter CAT].

Rules, Model Codes, Restatements, Sentencing Guidelines

Fed. R. Civ. P. 12(b)(6).

Fed. R. Evid. 410.

Unif. R. Evid. 404(b).

Sup. Ct. R. 17.

1st Cir. R. 6(a).

Fed. R. App. P. 2.

Restatement (Third) of Unfair Competition §3 (Am. L. Inst. 1995).

U.S. Sent'g Guidelines Manual §2D1.1(c) (U.S. Sent'g Comm'n 2004).

Unif. Tr. Code §105 (Unif. L. Comm'n 2000).

Model Rules of Pro. Conduct r. 1.15 cmt. (Am. Bar Ass'n 1983).

Model Code of Pro. Resp. Canon 2 (Am. Bar Ass'n 1980).

Correspondence: letters and emails

When citing unpublished letters or emails, identify the document type (e.g., letter, email) and give the writer and addressee (if any) by name, title, and institutional affiliation. Indicate where the correspondence is being held in a parenthetical. Emails can include time and date for specificity.

Letter from Anna Dimitrijevic, Bluebook Ed. Chair, Harvard L. Rev., to Joe Kurtenbach, Bluebook Bus. Chair, Harvard L. Rev. (Feb. 1, 2020) (on file with the Harvard Law School Library).

Letter from Graham Sternberg, Bluebook Ed. & Strategy Chair, Harvard L. Rev., to author (Feb. 13, 2020) (on file with author).

E-mail from Mary Miles Prince, Assoc. Dir., Vanderbilt L. Lib., to Edward C. Brewer, III, Assistant Professor of L., Salmon P. Chase Coll. of L. (Sept. 26, 2019, 06:15 CST) (on file with author).

Books and reports

Place volume #, if any, in front of author name(s).

Page #, if used, directly follows book title; do not use “at” or “p.” Section, paragraph, chapter numbers, etc., also directly follow title.

Spell out an author’s full name. Two authors: separate with “and” (rather than ampersand).

Three or more: one author with et al.

Must include year of publication.

Only indicate publisher when edition is not by the original publisher.

Matthew Butterick, *Typography for Lawyers* 54 (2010).

J.R. McNeill and William H. McNeill, *The Human Web: A Bird’s-Eye View of World History* 319 (2003).

David Hunter et al., *International Environmental Law and Policy* 555 (3d ed. 2006).
A Bentham Reader 101 (Mary Peter Mack ed., 1969).

21 Charles Alan Wright & Arthur R. Miller, *Federal Practice and Procedure* §1006 (3d ed. 1998).

Human Rights Watch, *World Report 2004: Human Rights and Armed Conflict* 148 (2004).

Dictionaries

Good-Faith Bargaining, Black’s Law Dictionary (10th ed. 2014).

Articles in compilation book

Author(s) first, then article title in italics, followed by comma and word “in” in italics, then book title.

If book is consecutively paginated, page number where article begins directly follows book title. Do not use “at” or “p.”

David Muusz and Sarah K. Peterson, *Using Alternative Wage Surveys for the U.S. Department of Labor Prevailing Wage Process*, in *Immigration Options for Academics and Researchers* 119 (3d ed. 2021).

If each article in book starts on its own page 1, cite to page number within article by placing it at end.

Maris Liss and Rekha Sharma-Crawford, *Best Practices for a Successful Trial Strategy*, in *AILA’s Immigration Litigation Toolbox* (7th ed. 2021), at 2.

Articles in magazines, journals, newspapers, and other periodicals

Law reviews:

Elizabeth F. Emens, *Integrating Accommodation*, 156 U. Pa. L. Rev. 839, 894 (2008).

Newspapers and magazines (*print versions*):

Edition date is not in parentheses, but rather set off by commas after title. Page number follows the edition date, preceded by “at”. Unlike citing to the online version, date is not in parentheses when citing to print version.

Benjamin Wittes, *Without Precedent*, Atlantic Monthly, Sept. 2005, at 39, 40.
Scott Martelle, *ID Law Keeps Nuns, Students from Polls*, L.A. Times, May 7, 2008, at A14.

For online version, see below—Material appearing on website.

Material appearing on website

If material is an online version of something that is in print, our preference is to cite to the online source.

Books and reports should be cited like the print version, with the url appended at the end.

All other material should begin with the author’s name if there is a named author. Otherwise, begin with the name of the organization, institution, or business entity on whose website the material appears. (There is no need to indicate both.) Follow with information identifying the material (the name of the article, main identifying heading, or page title), italicized. If the material is dated, place that in parentheses after the title, followed by a comma, followed by the url.

Cyrus D. Mehta, *The Legal Basis Underpinning the New Automatic Extension of Work Authorization for H-4, L-2 and E-2 Spouses, and Why It Must Still Be Challenged* (Nov. 22, 2021), <http://blog.cyrusmehta.com/2021/11/the-legal-basis-underpinning-the-new-automatic-extension-of-work-authorization-for-h-4-l-2-and-e-2-spouses-and-why-it-must-still-be-challenged.html>.
CBP, *Border Patrol History*, www.cbp.gov/border-security/along-us-borders/history.

To focus the cite on material within a lengthy webpage, use parenthetical at end of cite.

DOL, ETA, *Policies and Regulations*, www.dol.gov/agencies/eta/foreign-labor/policy (subheading Temporary Programs).

Do not italicize the url.

Can omit http:// before www.

Do not include any “last visited” date.

Avoid bare citation to url, as readers will not be able to identify the material if web link is broken.

Use of short cites, *supra*, *infra*, *id.*

Short cites: Once you have provided a full citation to an authority, you may use a “short form” in later citations to the same authority, so long as (1) it is clear to the reader which authority is referenced; (2) the full citation falls in the same general discussion; and (3) the reader will have little trouble locating the full citation. **However, do not use “*supra*” or “*infra*” as a means of repeating or short-citing authorities in other footnotes, as footnote numbers too often change during the editorial process. Use a proper short cite instead.**

Footnote 1 (full cite): *Zhu v. Gonzalez*, 411 F.3d 292 (D.C. Cir. 2005).

Footnote 5 (pinpoint cite): *Zhu*, 411 F.3d at 294.

Footnote 9 (no pinpoint): *Zhu*, 411 F.3d 292.

Footnote 1 (full cite): Memorandum from Jeff Weiss, Acting Dir., INS Office of Int’l Affairs, *Guidelines for Children’s Asylum Claims* (Dec. 10, 1998), AILA Doc. No. 09042230.

Footnote 5 (short cite): Memorandum from Jeff Weiss, AILA Doc. No. 09042230.

Footnote 1 (full cite): David Muusz and Sarah K. Peterson, *Using Alternative Wage Surveys for the U.S. Department of Labor Prevailing Wage Process*, in *Immigration Options for Academics and Researchers* 119 (3d ed. 2021).

Footnote 5 (short cite): David Muusz and Sarah K. Peterson, in *Immigration Options for Academics and Researchers* 119.

Use of *id.*: The abbreviation *id.* must be used as a short cite to the same exact (single) immediately preceding authority, whether within the same footnote or in the immediately preceding footnote. **Do not use *id.* where the immediately preceding footnote or citation string consists of more than one authority.** Use a short cite instead.

Footnote 1: The law is clear. *Matter of Andrade*, 19 I&N Dec. 488 (BIA 1987). There are no exceptions. *Id.* at 490.

Footnote 1: *Matter of Andrade*, 19 I&N Dec. 488 (BIA 1987).

Footnote 2: *Id.* at 490.

Footnote 1: *Matter of Andrade*, 19 I&N Dec. 488 (BIA 1987); *Matter of Arrabally and Yerrabelly*, 25 I&N Dec. 771 (BIA 2012).

Footnote 2 (where the authority is only the second case in footnote 1): *Matter of Arrabally and Yerrabelly*, 25 I&N Dec. 771.

Footnote 1: *Matter of Andrade*, 19 I&N Dec. 488 (BIA 1987); *Matter of Arrabally and Yerrabelly*, 25 I&N Dec. 771 (BIA 2012).

Footnote 2 (where the authority is both cases in footnote 1): *Matter of Andrade*, 19 I&N Dec. 488 (BIA 1987); *Matter of Arrabally and Yerrabelly*, 25 I&N Dec. 771 (BIA 2012).

Id. with a further pinpoint is not followed by a comma.

See id. §1.7.

Id. at 563.

The period after *id.* is always italicized.

If part of a full cite, such as a case name, appears in text immediately before the footnote, that part should be omitted in the footnote cite.

Text: The court in *Taylor v. United States* [footnote 2] held that §924(e) is not limited to those burglaries that involve especially dangerous conduct.

Footnote 2: 495 U.S. 575 (1990).

Signals – see, see also, see generally, etc.

Use no signal when the authority (i) directly states the proposition, (ii) identifies the source of a quotation, or (iii) identifies an authority referred to in the text. Use no signal, for example, when directly quoting an authority or when restating numerical data from an authority.

See is used instead of no signal when the proposition is not directly stated by the cited authority but obviously follows from it; there is an inferential step between the authority cited and the proposition it supports.

See also is used when the cited authority constitutes additional source material that supports the proposition. The use of a parenthetical explanation of the source's relevance is encouraged.

See generally is used when the cited authority presents helpful background material related to the proposition. The use of a parenthetical explanation of the cite's relevance is encouraged.

Cf. is used when the cited authority supports a proposition different from the main proposition but sufficiently analogous to lend support. Literally, “cf.” means “compare.” The citation's relevance will usually be clear to the reader only if it is explained. Parenthetical explanations, however brief, are therefore strongly recommended.

E.g. is used when the cited authority states the proposition and other authorities also state the proposition, but citation to them would not be helpful or is not necessary.

But see is used when the cited authority clearly supports a proposition contrary to the main proposition.

Words like “see” or “compare” can be used as the verbs of textual sentences, with material that would otherwise be included in a parenthetical explanation as part of the sentence itself. Do not italicize words like *see* when used this way.

See Christina L. Anderson, Comment, *Double Jeopardy: The Modern Dilemma for Juvenile Justice*, 152 U. Pa. L. Rev. 1181, 1204–07 (2004), for a discussion of restorative justice as a reasonable replacement for retributive sanctions.

Quoting, citing, etc. parentheticals

Place descriptive or explanatory phrases such as quoting, citing, etc. in parentheses after the main cite. Do not italicize.

United States v. Arnold, 58 F.3d 1117, 1121 (6th Cir. 1995) (citing *Taylor v. United States*, 495 U.S. 575, 602 (1990)).

Citing to specific page(s), footnote(s), etc.

Page cites come before the date parenthetical, without any introductory abbreviation. Don’t use “p.” or “pp.”

Arthur E. Sutherland, *Constitutionalism in America* 45 (1965).

Use “at” if the page number may be confused with another part of the citation; use a comma to set off “at.” Use this form, for example, when the title of a work ends with an Arabic numeral or when the work uses Roman numerals for pagination.

Biographical Directory of the Governors of the United States 1978–1983, at 257 (Robert Sobel and John W. Raimo eds., 1983).

Thomas I. Emerson, *Foreword* to Catharine A. MacKinnon, *Sexual Harassment of Working Women*, at vii, ix (1979).

When referring to specific material within a separately paginated source (i.e., it begins on a page other than 1), include both the page on which the source begins and the page on which the specific material appears (a pincite), separated by a comma:

Matthew Roskoski, Note, *A Case-by-Case Approach to Pleading Scienter Under the Private Securities Litigation Reform Act of 1995*, 97 Mich. L. Rev. 2265, 2271–75 (1999).

Catharine A. MacKinnon, *On Exceptionality: Women as Women in Law*, in *Feminism Unmodified* 70, 76–77 (1987).

When referring specifically to material on the first page of such a source, repeat the page number.

Christina M. Fernández, Note, *Beyond Marvin: A Proposal for Quasi-Spousal Support*, 30 Stan. L. Rev. 359, 359 (1978).

When citing material that spans more than one page, give the inclusive page numbers, separated by an en dash. Always retain the last two digits, but drop other repetitious digits. If a hyphen or dash would be ambiguous because of the page numbering system, use the word “to”.

Edward L. Rubin, Note, *Fairness, Flexibility, and the Waiver of Remedial Rights by Contract*, 87 Yale L.J. 1057, 1065–69 (1978).

Boris I. Bittker and James S. Eustice, *Federal Income Taxation of Corporations and Shareholders* ¶5.06, at 5-31 to -32 (5th abr. ed. 1987).

To cite a footnote, give the page on which the footnote appears, “n.,” and the footnote number, with no space between “n.” and the number. Cite multiple footnotes (or endnotes) by using “nn.” No space follows “nn.”

Akhil Reed Amar, *The Two-Tiered Structure of the Judiciary Act of 1789*, 138 U. Pa. L. Rev. 1499, 1525 n.80 (1990).
141 nn.180–86

The style above applies when the footnote spans more than one page and you’re citing the whole footnote. When referring to specific pages of a footnote that spans more than one page, cite all those pages, rather than just the page on which the footnote begins.

Akhil Reed Amar, *The Two-Tiered Structure of the Judiciary Act of 1789*, 138 U. Pa. L. Rev. 1499, 1561–62 n.222 (1990).

To cite both a range of pages and also a single footnote that appears within the page range, cite the page range followed by a comma and then cite the footnote in the typical manner (page on which it begins followed by “n.”).

Akhil Reed Amar, *The Two-Tiered Structure of the Judiciary Act of 1789*, 13 U. Pa. L. Rev 1499, 1523–24, 1524 n.75 (1990).

To refer to both a page in the text and a footnote that begins on that page, use an ampersand between the page and the note number.

Irene Merker Rosenberg, Essay, Winship *Redux: 1970 to 1990*, 69 Tex. L. Rev. 109, 123 & n.90 (1990).

Also use an ampersand in place of a comma to avoid confusion when citing nonconsecutive footnotes that appear on the same page, or when you have more than two nonconsecutive footnotes that appear on the same page.

291 nn.14 & 18, 316 nn.4, 6 & 8–9i