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This webinar is a production of the Defender Services Office, Training Division

Winning Detention Hearings For Our Noncitizen Clients: Educating Judges To Reject The Myths

Presenter: Joan Politeo, Visiting Attorney
Advisor, Training Division

[TRAINING EVENTS](#)[TRAINING MATERIALS
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CRIMINAL DEFENSE](#)[LITIGATION SUPPORT](#)[CAPITAL DEFENSE
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PLEASE NOTE

- Please mute your telephones and disable your video camera for the duration of this presentation.
- Questions for today's presenter may be submitted electronically using the Q & A window to the right of your screen. Questions will be addressed at the conclusion of the presentation.

A screenshot of a web browser window titled "Q&A". The window has a tab labeled "All (0)". Below the tab is a large empty text area for questions. At the bottom, there is a text input field with the placeholder text "Select a question, and then type your answer here. There is a 256 character maximum." and two buttons: "Send" and "Send Privately...".



- Polling questions will be asked during the webinar and your responding to those questions is necessary for two reasons:
 - First, unlike during live seminars, the presenter has no other means of receiving feedback from the audience. Your answers will help to focus the presentation and to provide information that may be used in planning future presentations.
 - Second, most CLE providers require polling questions as a means of confirming attendance and approving credit hours.
- Thank you for your participation.

WINNING DETENTION HEARINGS FOR OUR NONCITIZEN CLIENTS

Educating Judges to Reject the Myths

NO HUMAN BEING IS ILLEGAL

Human beings can be beautiful or more beautiful,
they can be fat or skinny, they can be right or wrong, but illegal?
How can a human being be illegal?

- Elie Wiesel





ESCALATING PROSECUTIONS OF NONCITIZENS

From 2009 to 2013, Increase of Over 9%
Immigration Offenses, Now Close to

22,209 or 26 % of Total Cases

Figure Doesn't Include Fraudulent
Documents, Passport or Other Types of
Cases Involving Noncitizens

PROSECUTORS ROUTINELY SEEK DETENTION



PROSECUTORS ARGUE MYTHS

Rejected in Iowa, Illinois,
Nebraska, Florida, Kansas,



New York, Washington D.C., California,
Oregon and Many More Districts

WHAT WE WILL COVER

- Begin with the story of Mr. Castro-Inzunza, illustrates the myths;
- Bail Reform Act;
- The Myths: Unlawful Status,
ICE Holds,
ICE detention;
- The Mantras – Arguments , Bail Reform Act;
- Mr. Alvarez-Trujillo's story illustrates the mantras that defeat the myths, educate the judges to grant bond;
- Motions You Can File

Mr. Castro Inzunza's Story

Temporary Resident 1980s, Farmworker



Special Agricultural Worker Program

Mr. Castro on a Path to Citizenship,
Automatic Lawful Permanent
Residency, on December 2, 1990



March 1989, Mr. Castro Arrested Drug Offense

Advice of Counsel Pled Guilty



Pled Guilty Early No Investigation



Plea Entered Years Before USSC Padilla v. Kentucky - IAC, Deportation Consequences

Neither His Attorney Nor the Court
Advised Mr. Castro that Pleading Guilty
Would Likely Result in Deportation



- 1993 – Mr. Castro's Lawful Permanent Residency status (Green Card) Revoked and He Was Deported



August, 1994, Mr. Castro had
Counsel Seek to Withdraw Plea,
IAC, Bad Advice, Deportation



State Supreme Court 1995 Denied Mr. Castro's Petition

Mr. Castro Does Not Give Up, 2003
Reapplies Once Again for Admission



2011, ICE Takes Custody Of Mr. Castro, Indictment

- ICE Reinstates 1993 Deportation Order;
- Mr. Castro, with No New Convictions Other than 1989 Drug Offense, IAC Plea, Indicted for Illegal Reentry, 8 U.S.C. 1326

December 1, 2011, Counsel
Attempted Again to Withdraw
Mr. Castro's 1990 Guilty Plea

Padilla v. State of Kentucky

USSC Held that Counsel's Failure to Advise
of Possible Removal from U.S.

INEFFECTIVE ASSISTANCE of COUNSEL

Motion Denied – March 12, 2012

Married 19 Years to U.S. Citizen,
Children, Wife Operates Own
Business, His Mother Here Too



Court Considered Bail Reform Act Factors at Detention Hearing

Elements of Offense, Non-Violent;

No Weapons Possession;

No Drug Distribution or Usage, Alcoholism;

No Negative Evidence Re Mental Health;

Weight of Evidence Least of the Factors.

Mr. Castro - Not a Flight Risk

GOVERNMENT'S POSITION ON FLIGHT
UNDERMINED BY MR. CASTRO'S
DEMONSTRATED DESIRE TO REMAIN IN U.S.
ONGOING FIGHT FOR RELIEF FROM
DEPORTATION

GOVERNMENT FOCUSES ARGUMENT ON
ICE HOLD, REINSTATEMENT OF REMOVAL
ORDER

Mr. CASTRO WINS

Emergency Motion to U.S. Court of Appeals
District Court Ordered to Set Conditions of Release



WHILE MR. CASTRO ON PRETRIAL RELEASE

- His Lawyer Continues the Fight;
- Plea to a Misdemeanor Improper Entry,
with no custodial sentence

misdemeanor

BAIL REFORM ACT BACK ON BOOKS FOR NONCITIZENS AS CONGRESS INTENDED



HARSH TREATMENT OF NONCITIZENS AT EACH STAGE OF PROCEEDINGS

- ◉ Denied Pretrial Release;
- ◉ Deprived of Participation in Alternatives to Incarceration Programs;
- ◉ Deprived of Participation in Drug Treatment in Prison, RDAP Benefit of Year Off for Successful Completion;
- ◉ Deprived of Early Release to Half-Way House;
- ◉ Detained in Immigration Custody After Completion of Sentence.

Fundamentals of Bail



A Resource Guide for Pretrial Practitioners and
a Framework for American Pretrial Reform

BAIL REFORM ACT, 1984

IN OUR SOCIETY, LIBERTY IS THE NORM,
DETENTION PRIOR TO TRIAL IS THE
CAREFULLY LIMITED EXCEPTION



CONGRESS INTENDED THAT ANY PERSON CHARGED WITH A FEDERAL OFFENSE SHALL BE RELEASED PENDING TRIAL, SECTION 3142(a)(1)(2):

- Personal Recognizance;
- Upon Execution of Unsecured Appearance Bond;
- On Conditions or Combinations of Conditions

UNLESS

● Judge Finds:

NO CONDITIONS WILL
REASONABLY ASSURE
APPEARANCE IN COURT

AND/OR SAFETY OF
COMMUNITY 18 U.S.C. 3142(b)

We Are Not Required to Guarantee Client's Appearance 3142 -NO IRONCLAD GUARANTEE



ALL NEED IS REASONABLE ASSURANCE

10 DAY TEMPORARY DETENTION TO PERMIT
REVOCATION OF CONDITIONAL RELEASE,
DEPORTATION, OR EXCLUSION 3142(d)

Motion by Government Under (d) to Allow
Time to Decide if Client Should be
Transferred to ICE for Removal from U.S.

Doesn't Apply to Lawful Permanent
Residents (LPR/Green Card Holder).

LPR's Entitled to Full Bond Hearing.
Apply 3142(g) Factors.

ARGUE MANDATED RELEASE BY USING COMPELLING LANGUAGE FROM CASES AND THE STATUTE

- The Court Must Grant Bond and “Set the Least Restrictive Conditions of Release” 3142(c)(B);
“Only in Rare Circumstances Should Release Be Denied”, *U.S. v. Gebro*, 948 F.2d 1118, 1121 (9th Cir. 1991);
- “Doubts Regarding the Propriety of Release Should Be Resolved in Favor of Defendant”, *Herzog v. United States*, 75 S.Ct. 349(1955); *United States v. Motamedi*, 767 F.2d 1403, 1405 (9th.Cir. 1985).

PRESUMPTIONS – DRUG CASES

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DEFENDER SERVICES OFFICE
TRAINING DIVISION

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TRAINING EVENTSTRAINING MATERIALS AND VIDEOSSELECT TOPICS IN CRIMINAL DEFENSELITIGATION SUPPORTCAPITAL DEFENSE TRAININGSUPREME COURT ADVOCACY PROGRAMEMPLOYMENT

The Defender Services Office Training Division furthers the right to effective assistance of counsel by providing training and other resources to attorneys appointed under the Criminal Justice Act.

HOT TOPICS

- Sentencing Resources
- Johnson v. United States
- Retroactivity: 2014 Amendments to USSG § 1B1.10
- CJA Study Website
- Federal Adaptation of NLADA Performance Guidelines in CJA Cases
- CJA Panel Info: Forms, Guidelines, Rates, Voucher Reference Tool, Case-Budgeting
- Clemency

FEDERAL DEFENDER WEBSITES

- Alaska
- Alabama, Middle
- Alabama, Northern
- Alabama, Southern
- Arizona
- Arkansas, Eastern
- Arkansas, Western
- California, Eastern

UPCOMING TRAINING EVENTS

COMBINED FEDERAL DEFENDER STAFF and PRIVATE CJA PRACTITIONERS PROGRAMS

WINNING STRATEGIES SEMINAR

LONG BEACH, CALIFORNIA | January 12 - January 14, 2017

[REGISTER HERE](#)

[DRAFT AGENDA](#)

FUNDAMENTALS OF FEDERAL CRIMINAL DEFENSE

 to-circumvent-rule....jpg ^

POLLING QUESTION

#1

HAVE YOU ARGUED FOR BOND
IN CASE INVOLVING A
NONCITIZEN CLIENT?

(A) YES

☐

(B) NO

☐

MYTH 1

Undocumented
Status is
Evidence Itself of
Flight

MYTH 1

Undocumented
Status Establishes
Evidence of
Inherent Risk of
Flight

MYTH 1

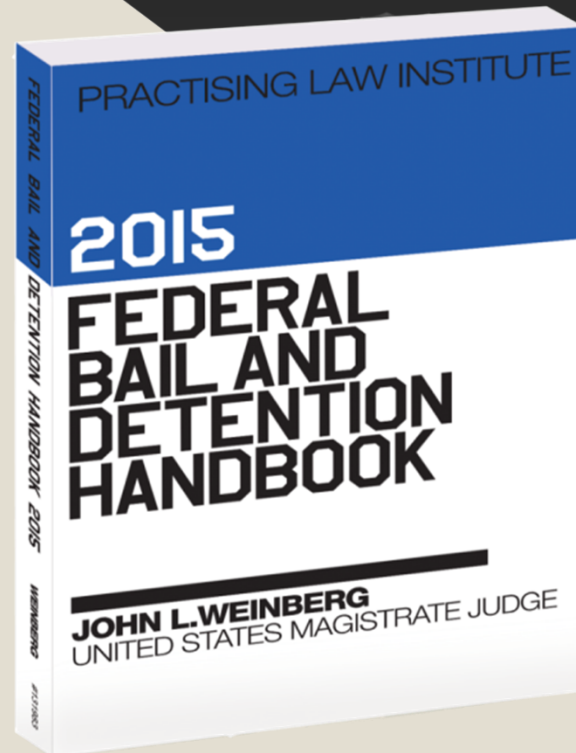
Undocumented
Status Establishes
Client has Powerful
Motivation to Flee
the Country

MANTRA- EDUCATE THE JUDGES

Myth –Respond with the
MANTRA



BAIL REFORM ACT APPLIES TO ALL ACCUSED of FEDERAL OFFENSES

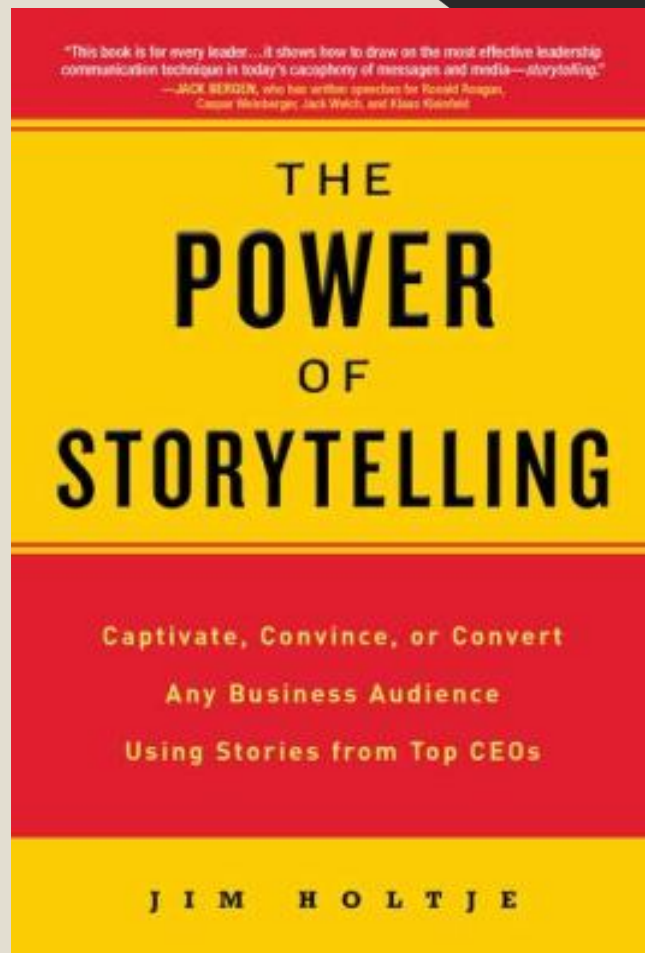


Section 3142(g)

Factors

- (1) the nature and circumstances of the crime charged;
- (2) the weight of the evidence against the defendant;
- (3) the history and characteristics of the defendant, including family ties, employment, community ties, past conduct;
- (4) the nature and seriousness of the danger to the community or to an individual.

PULL THE JUDGE IN WITH YOUR CLIENT'S STORY



MAGISTRATE OR DISTRICT JUDGES ARE NOT IMMIGRATION JUDGE

- Must Weigh Bond Factors – Magistrate Judge Not an Immigration Judge, Complexity of Immigration Law



MANTRA- Not About Status

Family Ties – Bail Reform Act



MANTRA- Not About Status

Employment – Bail Reform Act



MANTRA- Not About Status

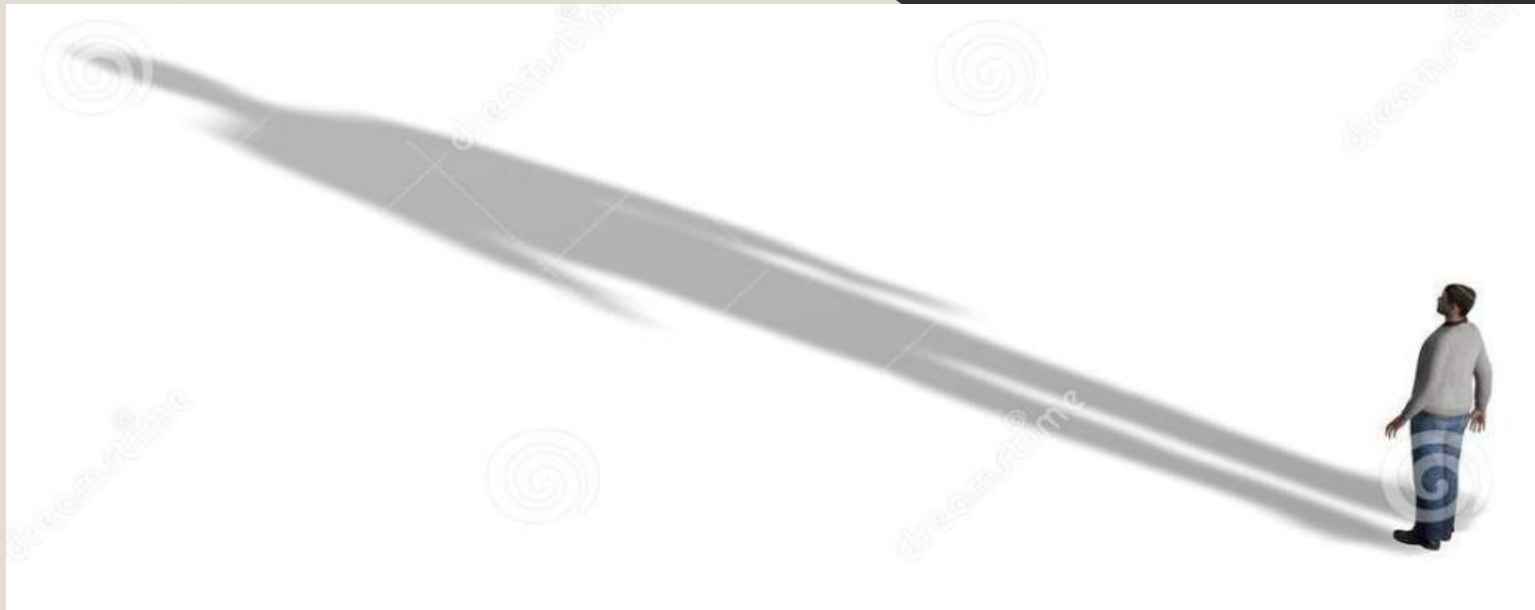
Community Ties – Bail Reform Act



MANTRA- Not About Status

Past Conduct– Bail Reform Act

If multiple years between conviction and new arrest, argue remoteness of past criminal conduct and post-offense rehabilitation



MANTRA – Cannot Circumvent Bail Reform Act

- THE MATERIALS AND CASES DISCUSS ALL THE FACTORS THAT MUST BE WEIGHED UNDER SECTION 3142(g).



MANTRA – Cannot Circumvent Bail Reform Act

- Deportable Alien Not a Flight Risk Where Conditions Can Be Set to Ensure Return to Court, *United States v. Adomako*, 150 F.Supp.2d 1302, 1304 (M.D. Fla. 2001);
- Unlawful Status “Does Not Tip the Balance” for Detention, (*U.S. v. Townsend*, 897 F.2d 989, 994 (9th Cir. 1990);
- Unlawful Status Does Not Mandate Detention, (*U.S. v. Chavez-Rivas*, 536 F.Supp.2d 962 (E.D. Wisconsin 2008).

MYTH 2

IMMIGRATION DETAINER:

An “ICE hold” is Itself Evidence
of Flight Risk

MYTH 2

IMMIGRATION DETAINER:

Bond Must be Denied Because
Your Client May Consent to be
Removed and "Escape"
the Criminal Case

POLLING QUESTION #2

HOW LONG IS THE US MARSHAL
REQUIRED TO HOLD YOUR CLIENT, AFTER
BOND SET, WHEN AN ICE DETAINER HAS
PREVIOUSLY BEEN FILED?

(A) 48 HOURS

☐

(B) 10 Days

☐

MANTRA

An ICE Detainer is Not An Immigration Charging Document

DEPARTMENT OF HOMELAND SECURITY
IMMIGRATION DETAINER - NOTICE OF ACTION

Subject ID: _____ File No: _____
Event #: _____ Date: _____

TO: (Name and Title of Institution - OR Any Subsequent Law Enforcement Agency) _____
FROM: (Department of Homeland Security Office Address) _____

MAINTAIN CUSTODY OF ALIEN FOR A PERIOD NOT TO EXCEED 48 HOURS

Name _____ of _____ Alien _____
Date _____ of Birth _____
Nationality _____ Sex _____

THE U.S. DEPARTMENT OF HOMELAND SECURITY (DHS) HAS TAKEN THE FOLLOWING ACTION RELATED TO THE PERSON IDENTIFIED ABOVE, CURRENTLY IN YOUR CUSTODY:

☐ Determined that there is reason to believe the individual is an alien subject to removal from the United States. The individual (check all that apply):

has a prior felony conviction or has been charged with a felony offense;	has been convicted of illegal entry pursuant to 8 U.S.C. § 1325;
has three or more prior misdemeanor convictions;	has legally re-entered the country after a previous removal or return;
has a prior misdemeanor conviction or has been charged with a misdemeanor for an offense that involves violence, threats, or assaults; sexual abuse or exploitation; driving under the influence of alcohol or a controlled substance; unlawful flight from the scene of an accident; the unlawful possession or use of a firearm or other deadly weapon; the distribution or trafficking of a controlled substance; or other significant threat to public safety;	has been found by an immigration officer or an immigration judge to have knowingly committed immigration fraud; or
	otherwise poses a significant risk to national security, border security, or public safety; and/or other (specify) _____

☐ Initiated removal proceedings and served a Notice to Appear or other charging document. A copy of the charging document is attached and was served on _____ (date).

☐ Served a warrant of arrest for removal proceedings. A copy of the warrant is attached and was served on _____ (date).

☐ Obtained an order of deportation or removal from the United States for this person.

This action does not limit your discretion to make decisions related to this person's custody classification, work, quarter assignments, or other matters. DHS discourages discussing internal charges based on the existence of a detainer.

IT IS REQUESTED THAT YOU:

☐ Maintain custody of the subject for a period **NOT TO EXCEED 48 HOURS**, excluding Saturdays, Sundays, and holidays, beyond the time when the subject would have otherwise been released from your custody to allow DHS to take custody of the subject. This request derives from federal regulation 8 C.F.R. § 237.7(c). For purposes of this immigration detainer, you are not authorized to hold the subject beyond these 48 hours. As early as possible prior to the time you otherwise would release the subject, please notify DHS by calling _____ during business hours or _____ after hours or in an emergency. If you cannot reach a DHS Official at these numbers, please contact the ICE Law Enforcement Support Center in Burlington, Vermont at: (802) 872-6020.

☐ Provide a copy to the subject of this detainer.

☐ Notify this office of the time of release at least 30 days prior to release or as far in advance as possible.

☐ Notify this office in the event of the inmate's death, hospitalization or transfer to another institution.

☐ Consider this request for a detainer operative only upon the subject's conviction.

☐ Cancel the detainer previously placed by this Office on _____ (date).

(Name and title of Immigration Officer) _____ (Signature of Immigration Officer)

TO BE COMPLETED BY THE LAW ENFORCEMENT AGENCY CURRENTLY HOLDING THE SUBJECT OF THIS NOTICE:
Please provide the information below, sign, and return to DHS using the envelope enclosed for your convenience or by faxing a copy to _____. You should maintain a copy for your own records so you may track the case and not hold the subject beyond the 48-hour period.

Local Booking/Inmate #: _____ Latest criminal charge/conviction: _____ (date) _____ Estimated release: _____ (date)

Last criminal charge/conviction: _____

Notice: Once in our custody, the subject of this detainer may be removed from the United States. If the individual may be the victim of a crime, or if you want this individual to remain in the United States for prosecution or other law enforcement purposes, including acting as a witness, please notify the ICE Law Enforcement Support Center at (802) 872-6020.

(Name and title of Officer) _____ (Signature of Officer)

DHS Form I-247 (12/12) Page 1 of 1

MANTRA

ICE Detainer Not a Bail Reform Act Factor

- ◉ SECTION 3142(d):
- ◉ BAIL DETERMINATIONS FOR NONCITIZENS MUST BE MADE WITHOUT CONCERN FOR LATER DEPORTATION OR EXCLUSION

MANTRA

- Government Can Get the ICE Hold Lifted, Release Client



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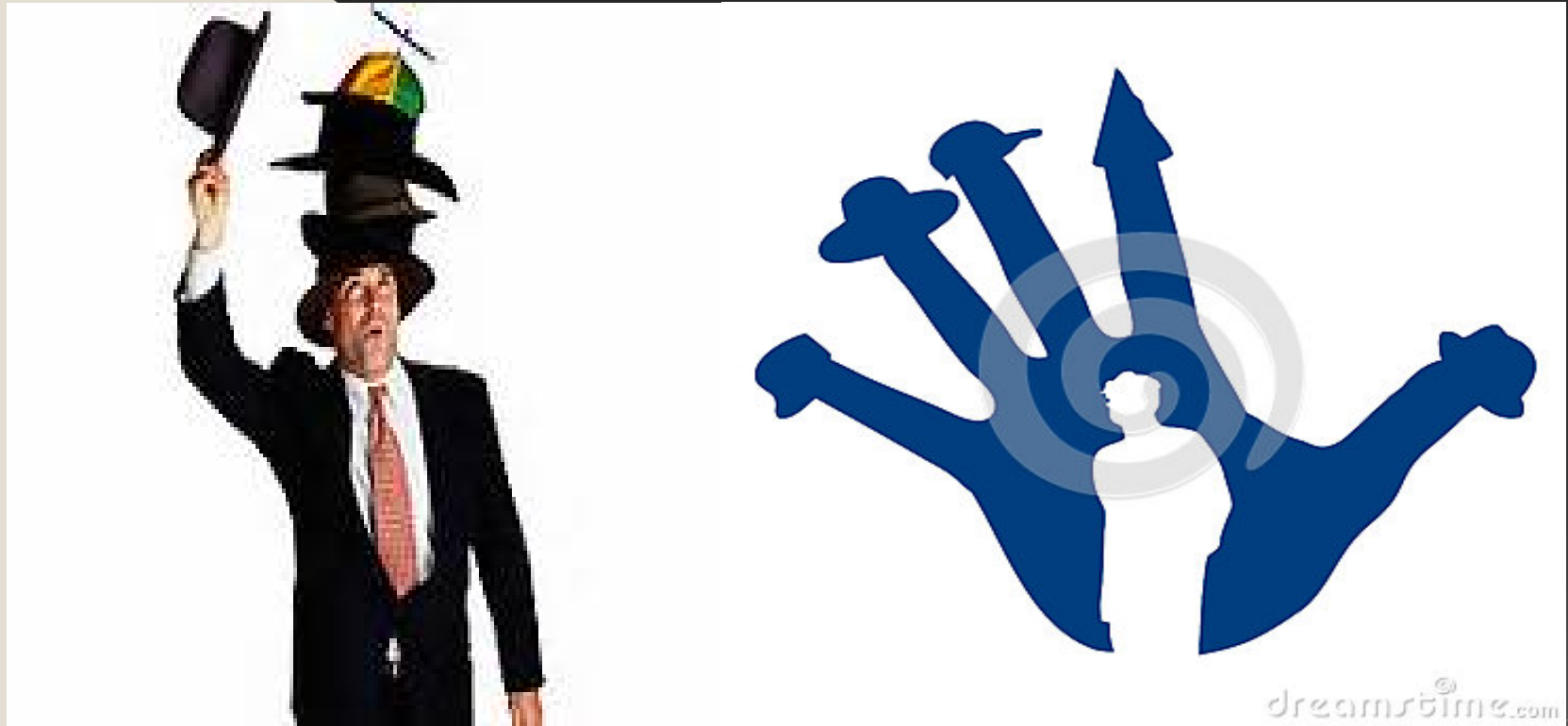
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MANTRA – AUSA, ICE,
MARSHALS = SAME



EXECUTIVE BRANCH - Work Together

MYTH 3

Undocumented Clients Released on Bond Automatically Transferred to ICE On Detainer



MANTRA

Immigration Detention

- Noncitizens Released on Bond CANNOT be Held in Immigration Facility



MANTRA- ICE Custody

- Transfer to Immigration Custody
To Be Held for Criminal Trial is NOT
Authorized By Law



MANTRA – Departure Control Orders

- 8 C.F.R. 215.3(g); 22 C.F.R. 46.3(g)
Deportation – Pending Criminal Case
Deemed Prejudicial to the Interests of
United States



MANTRA - Section 3142(d)

- ◉ 18 U.S.C. Section 3142(d):
- ◉ ONLY AFTER FINDING DEFENDANT A SERIOUS RISK OF FLIGHT OR DANGER, CAN ORDER TEMPORARY DETENTION FOR NO MORE THAN **10 DAYS** SO IMMIGRATION CAN TAKE CUSTODY TO DEPORT NOT TO DETAIN

POLLING QUESTION # 3

Which of the following grounds can a judicial officer grant the government's motion for detention?

- (A) Ice detainer filed
- (B) Client unlawfully in the United States
- (C) Both (A) and (B)
- (D) None of the above

ENRIQUE TRUJILLO-ALVAREZ'S STORY

● 46 Years of Age



ENRIQUE TRUJILLO-ALVAREZ'S STORY

- Lived in Portland for 18 years;
- Purchased a home 15 years ago with his wife



ENRIQUE TRUJILLO-ALVAREZ'S STORY

- Sole Financial Support for Wife and Three U.S. Citizen Children



ENRIQUE TRUJILLO-ALVAREZ'S STORY

A Couple of Months Before He Was Arrested for Driving with Suspended License, his Daughter in Hospital for 2 Months, Encephalitis. Mr. Trujillo at Hospital Entire Time.



MR. TRUJILLO'S FIGHT FOR BAIL

- DETENTION
HEARING



PRETRIAL SERVICES REPORT

- ◉ Verified Lengthy Employment History;
- ◉ Verified that Carmelita, 8 Year old Daughter Just Released from Hospital;
- ◉ Mr. Trujillo Sole Support for Family;
- ◉ No Convictions in Over Decade;
- ◉ Property to Post AND Has Sureties

**RECOMMENDATION By PTS:
DETENTION??????**

MAGISTRATE JUDGE DENIES GOVERNMENT'S MOTION FOR DETENTION ON FLIGHT GROUNDS



- PROSECUTOR REQUESTS STAY OF THE
RELEASE ORDER OF MAGISTRATE
JUDGE:

DENIED

- No Appeal to District or Circuit
Court of Appeal Filed by AUSA

◎ ALL TOO COMMON RESPONSE BY PROSECUTORS

ICE Agents Seized Mr. Trujillo and
Transported him to an ICE
Detention Facility

DEFIED RELEASE ORDER

Mr. Trujillo's Lawyers Fought And In the End Were Victorious



MOTIONS TO FILE

IF CLIENT TRANSFERRED INTO ICE CUSTODY:

- ◉ Ex Parte Application for Hearing Re Bail;
- ◉ Motion to Enforce the 3142 Release Order;
- ◉ Contempt or Habeas Petition for Release from Ice Custody

Emergency Motion to the Circuit Court of Appeal

If the Magistrate and District Court Judges Reject Your Arguments, Detains Client, Consider Immediately Filing Appeal

A 3D sign with the word "Emergency" in red and white, slanted upwards, set against a dark background.

Emergency





**JUST DON'T
GIVE UP THE
FIGHT**

KAITLYN_



Survey





TRAINING EVENTS

TRAINING MATERIALS
AND VIDEOS

SELECT TOPICS IN
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- CJA Panel Info: Forms, Guidelines, Rates, Voucher Reference Tool, Case-Budgeting
- Clemency
- More Topics . . .

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Alabama, Northern
Alabama, Southern
Arizona
Arkansas, Eastern
Arkansas, Western
California, Eastern

FEDERAL DEFENDER BLOGS

OTHER LEGAL BLOGS

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NON-CAPITAL MITIGATION SKILLS WORKSHOP
ST. LOUIS, MISSOURI | October 13 - October 15, 2016
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DRAFT AGENDA

TRAIN THE TRAINERS WORKSHOP
ATLANTA, GEORGIA | November 02 - November 04, 2016
REGISTER HERE (WAITLIST ONLY)
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FEDERAL DEFENDER PROGRAMS

ORIENTATION SEMINAR FOR ASSISTANT FEDERAL DEFENDERS

SANTA FE, NEW MEXICO | November 14 - November 18, 2016

APPELLATE WRITING WORKSHOP FOR FEDERAL DEFENDERS

WASHINGTON, DISTRICT OF COLUMBIA | February 22 - February 24, 2017

CAPITAL HABEAS UNIT (CHU) CONFERENCE

SAN ANTONIO, TEXAS | March 20 - March 22, 2017

TRAINING DIVISION WEBINARS

LATEST NEWS

July 28, 2016

Sentencing Commission Issues Report to Congress on Career Offender Enhancements

Today the Sentencing Commission issued its **Report to the Congress: Career Offender Sentencing Enhancements**, recommending that the career offender provisions focus on violent offenders, as opposed to drug trafficking only offenders. The report also recommended that Congress enact a uniform definition of "crime of violence" for all federal statutes consistent with the new sentencing guidelines definitions. For more on the report see the Commission's **press release**.

June 28, 2016

Supreme Court Grants Cert in Johnson Guidelines Case; Issues Opinion Holding Reckless is a Misdemeanor Crime of Domestic Violence Under 18 U.S.C. § 922

Defender Services Office

Training Division

Administrative Office of the United States Court

One Columbus Circle, N.E., Suite 4-200

Washington, DC 20544

800-788-9908 (toll free [hotline](#))

202-502-2900 (voice)

202-502-2911 (fax)

Training Division Upcoming Training Events

➤ *Webinar*

- MARCH 14, 2017 at 11:00 am & repeated on MARCH 16, 2017 at 2:00 pm – Strategies for Defending Noncitizens Against Increased Federal Prosecutions and Presidential Executive Orders (with the National Immigrant Justice Center)

➤ *Live Training Seminars*

- APRIL 6-8, 2017 – Race in the Federal Criminal Court: Strategies in the Pursuit of Justice (Baltimore, MD)
- JUNE 8-10, 2017 – Winning Strategies & Fundamentals (Houston, TX)

Visit www.fd.org for more events and details