U.S. Citizenship and Immigration Services

Non-Precedent Decision of the Administrative Appeals Office

In Re: 42213167

Date: APR. 23, 2026

Appeal of Service Center Operations (SCOPS) Decision

Form I-140, Immigrant Petition for Alien Workers (Extraordinary Ability)

The Petitioner seeks classification as an alien of extraordinary ability in business. *See* Immigration and Nationality Act (the Act) section 203(b)(1)(A), 8 U.S.C. § 1153(b)(1)(A). This first preference classification makes immigrant visas available to those who can demonstrate their extraordinary ability through sustained national or international acclaim and whose achievements have been recognized in their field through extensive documentation.

Service Center Operations (SCOPS) denied the petition, concluding the Petitioner did not establish, as required, either a one-time achievement or that she met at least three of the ten initial evidentiary criteria for this immigrant classification. The matter is now before us on appeal pursuant to 8 C.F.R. § 103.3.

The Petitioner bears the burden of proof to demonstrate eligibility by a preponderance of the evidence. *Matter of Chawathe*, 25 I&N Dec. 369, 375-76 (AAO 2010). We review the questions in this matter de novo. *Matter of Christo's, Inc.*, 26 I&N Dec. 537, 537 n.2 (AAO 2015). Upon de novo review, we will dismiss the appeal.

I. LAW

Section 203(b)(1)(A) of the Act makes visas available to immigrants with extraordinary ability if:

(i) the alien has extraordinary ability in the sciences, arts, education, business, or athletics which has been demonstrated by sustained national or international acclaim and whose achievements have been recognized in the field through extensive documentation;

(ii) the alien seeks to enter the United States to continue work in the area of extraordinary ability; and

(iii) the alien's entry will substantially benefit prospectively the United States.

The term "extraordinary ability" refers only to those individuals in "that small percentage who have risen to the very top of the field of endeavor." 8 C.F.R. § 204.5(h)(2). The implementing regulation at

8 C.F.R. § 204.5(h)(3) sets forth a multi-part analysis. First, a petitioner can demonstrate sustained acclaim and the recognition of achievements in the field through a one-time achievement (that is, a major, internationally recognized award) or qualifying documentation that meets at least three of the ten categories listed at 8 C.F.R. § 204.5(h)(3)(i) – (x) (including items such as awards, published material in certain media, and scholarly articles).

Where a petitioner meets these initial evidence requirements, we then consider the totality of the material provided in a final merits determination and assess whether the record shows sustained national or international acclaim and demonstrates that the individual is among the small percentage at the very top of the field of endeavor. *See Kazarian v. USCIS*, 596 F.3d 1115 (9th Cir. 2010) (discussing a two-part review where the documentation is first counted and then, if fulfilling the required number of criteria, considered in the context of a final merits determination); *see also Amin v. Mayorkas*, 24 F.4th 383 (5th Cir. 2022); *Visinscaia v. Beers*, 4 F. Supp. 3d 126, 131-32 (D.D.C. 2013); *Rijal v. USCIS*, 772 F. Supp. 2d 1339 (W.D. Wash. 2011).

II. ANALYSIS

A. Evidentiary Criteria

Because the Petitioner has not claimed or established her receipt of a major internationally recognized award, she must satisfy at least three of the alternate regulatory criteria at 8 C.F.R. § 204.5(h)(3)(i)-(x). The Petitioner claimed to have satisfied eight of these criteria and SCOPS determined she met two, relating to judging the work of others in her field and authorship of scholarly articles in professional publications.[1] *See* 8 C.F.R. § 204.5(h)(3)(iv) and (vi).

On appeal, the Petitioner maintains that she also meets the criteria relating to awards, memberships, published material, original contributions, leading or critical role, and high salary. *See* 8 C.F.R. § 204.5(h)(3)(i), (ii), (iii), (v), (viii), and (ix). We agree with the Petitioner that she satisfies the leading or critical role criterion at 8 C.F.R. § 204.5(h)(3)(viii).[2] Because the Petitioner has fulfilled three of the criteria at 8 C.F.R. § 204.5(h)(3), we will proceed to a final merits determination.

B. Final Merits Determination

Given the structure of the regulations and the two-step analysis described in *Kazarian*, the satisfaction of three evidentiary criteria alone does not automatically or presumptively establish eligibility. In a final merits determination, we evaluate whether a petitioner has demonstrated, by a preponderance of the evidence, their sustained national or international acclaim,[3] that they are among the small percentage at the very top of their field of endeavor, and that their achievements have been recognized in the field through extensive documentation. Therefore, we analyze an individual's accomplishments

[1] SCOPS concluded that the Petitioner did not satisfy the criteria relating to awards, memberships, published material, original contributions, leading or critical role, and high salary. *See* 8 C.F.R. § 204.5(h)(3)(i), (ii), (iii), (v), (viii), and (ix).
[2] For example, the Petitioner provided evidence indicating that she has performed in a critical role for her employer and that the organization has a distinguished reputation.
[3] *See generally* 6 *USCIS Policy Manual* F.2(A)(1), https://www.uscis.gov/policy-manual (stating that the definition of "sustain" is "to support or maintain, especially over a long period of time . . . To persist in making (an effort) over a long period of time").

and weigh the totality of the evidence to determine if their successes are sufficient to demonstrate extraordinary ability in the field of endeavor. *See* section 203(b)(1)(A)(i) of the Act; 8 C.F.R. § 204.5(h)(2), (3); *see also Kazarian*, 596 F.3d at 1119-20.[4]

On appeal, the Petitioner contends that her "achievements have been widely recognized and have produced enduring, field-level impacts in financial risk management." She also argues that "the totality of the record demonstrates sustained national acclaim and recognized achievements placing [her] among the small percentage at the very top of [her] field." The Petitioner further asserts that SCOPS did not properly analyze her employer's 2023 award, professional memberships, media coverage, contributions and role for , and salary. Below, we will evaluate the totality of the evidence, based on the documentation presented to SCOPS, in the context of the final merits determination.

The record indicates that the Petitioner received a Master of Business Administration degree in controllership and finance from (2004), a master's degree in accounting sciences from (2008), and a Ph.D. in business administration from (2016). Since joining in 2002, the Petitioner has worked in investor relations, accounting, credit risk analysis, and operational risk management and internal control. More recently, the Petitioner has served as a manager in the compliance verification and fraud prevention department for automatic indirect operations and as a counselor of the ethics commission of the system. She contends that she is "a professional of extraordinary ability" in risk management.

As discussed further below, the Petitioner has not demonstrated that her achievements to date reflect a "career of acclaimed work in the field" as contemplated by Congress at H.R. Rep. No. 101-723, 59 (Sept. 19, 1990). Nor has she shown that she has risen to that small percentage at the very top of the field of endeavor. *See* 8 C.F.R. § 204.5(h)(2). The commentary for the proposed regulations implementing section 203(b)(1)(A)(i) of the Act provides that the "intent of Congress that a very high standard be set for aliens of extraordinary ability is reflected in this regulation by requiring the petitioner to present more extensive documentation than that required" for lesser classifications. 56 Fed. Reg. 30703, 30704 (July 5, 1991). Here the Petitioner has not established that she meets these very high standards. *See Amin v. Mayorkas*, 24 F.4th at 386-87 (stating that the narrow definition reflects the stringency of the extraordinary ability standard).

Regarding the Petitioner's service as a judge of the work of others in her field, an evaluation of the significance of her experience is appropriate to determine if such evidence is indicative of the extraordinary ability required for this highly restrictive classification. *See Kazarian*, 596 F. 3d at 1121-22.[5] Participation in the peer review process does not automatically demonstrate that an individual has sustained national or international acclaim. Here, the Petitioner provided documentation

[4] *See generally* 6 *USCIS Policy Manual supra*, at F.2(B)(2) (stating that USCIS officers should evaluate the evidence together when considering the petition in its entirety to determine if a petitioner has established by a preponderance of the evidence, the required high level of expertise required for this immigrant classification).

[5] *See also generally* 6 *USCIS Policy Manual*, *supra*, at F.2(B)(1) (providing that the second step requires USCIS to evaluate the person's judging participation to determine whether it was indicative of the person being of that small percentage who has risen to the very top of the field of endeavor and enjoying sustained national or international acclaim).

showing that she reviewed one manuscript for *Journal of Advances in Mathematics and Computer Science* (2018). In addition, she submitted emails inviting her to review a manuscript for *Asian Journal of Advanced Research and Reports* (2023), a manuscript for *Asian Journal of Economics, Business and Accounting* (2024), and multiple book chapters for BP International (2024), but she did not present evidence showing that she completed these reviews. Nor has the Petitioner offered evidence demonstrating that the level and frequency of her participation in the peer review process are indicative of sustained national or international acclaim in the field of risk management. Further, the Petitioner did not demonstrate how her judging experience differentiates her from others in the field, show the significance of reviewing manuscripts for these journals and publisher, or otherwise provide context regarding her service as a peer reviewer. *See Hamal v. United States Dep't of Homeland Sec.*, No. 21-5160, 2023 WL 1156801, at *2 (D.C. Cir. Jan. 31, 2023) (finding the petitioner did not provide needed context for his judging experience and the response to his work).

The context of the Petitioner's judging experience is relevant, as reviewing manuscripts for journals that select peer reviewers based on subject matter expertise would not provide strong support for the petition. Possessing expertise in a field is a considerably lower threshold than having sustained acclaim at the very top of the field. At issue here is the extent to which the Petitioner's peer review activities have required, reflected, or resulted in her national or international acclaim. The Petitioner, however, has not shown that peer review of the type she performed contributes to establishing her sustained national or international acclaim or places her among that small percentage at the very top of the field of endeavor. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(2).

In addition, the Petitioner provided documentation of her membership with the Regional Accounting Council (Brazil), the Institute of Risk Management (Technical Specialist and Professional), the Institute of Auditors of Brazil, and the Association of PUC-RJ Alumni as well as her "Risk Management Professional C31000" certification from the International Accreditation Board for Risk Management, but she did not offer evidence that they require outstanding achievements of their members or other information to demonstrate that these memberships are exclusive, or otherwise indicative of sustained national or international acclaim at the very top of her field. *See Hamal v. U.S. Dep't of Homeland Sec.*, No. CV 19-2534 (RC), 2021 WL 2338316, at *4 (D.D.C. June 8, 2021), *aff'd sub nom. Hamal v. United States Dep't of Homeland Sec.*, No. 21-5160, 2023 WL 1156801 (D.C. Cir. Jan. 31, 2023) (upholding plaintiff did not contextualize his membership to demonstrate sustained national or international acclaim).

For example, the Petitioner provided information from the Institute of Risk Management stating that "Technical Specialist Membership" is "[f]or anyone working in a specialist area of risk who has at least 5 years' risk management experience and holds a relevant postgraduate academic or professional qualification as well as "[o]pen to practicing academics teaching on a risk-related university degree program." The supporting documents relating to the Petitioner's Institute of Risk Management designations, certifications, and other memberships listed above are not sufficient to demonstrate her sustained national or international acclaim or to place her among that small percentage who have risen to the very top of her field of endeavor. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(2). *See also Donskoy v. United States Citizenship & Immigr. Servs.*, No. 21-CV-04757-CRB, 2021 WL 5240224, at *5 (N.D. Cal. Nov. 11, 2021) (upholding the petitioner's membership did not demonstrate the requisite level of achievement or sustained acclaim to establish extraordinary ability).

Likewise, authorship and publication of original research do not automatically show sustained national or international acclaim and place an individual at the top of their field. The Petitioner provided evidence that she authored one article each in *Accounting & Finance Journal*, *International Research Journal of Finance and Economics*, *Global Journal of Management and Business Research*, *Accounting Information Journal*, *Thinking about Accounting*, and *SemeAD*.[6] Depending on a journal's level of recognition, as demonstrated by evidence in the record, there may be an elevated level of prestige or acclaim associated with publication in a particularly highly ranked journal.[7] The Petitioner, however, did not provide sufficient support for her claim that publication in the aforementioned journals elevates her to that small percentage at the very top of her field. *See* 8 C.F.R. § 204.5(h)(2). Nor has the Petitioner shown that her publication record (six articles from 2008 to 2018) is consistent with sustained national or international acclaim in the field. *See* section 203(b)(1)(A)(i) of the Act.

As authoring scholarly articles is often inherent to the work of professionals in academia (including graduate students), the citation history or other evidence of the influence of an individual's articles can be an indicator to determine the recognition they have received in the field and whether such recognition has been sustained. Such an analysis at the final merits determination stage is appropriate pursuant to *Kazarian,* 596 F. 3d at 1122. The Petitioner, however, has not offered statistical evidence or other objective metrics indicating that the number of citations received by her scholarly articles sets her apart from others in her field or otherwise demonstrates her sustained national or international acclaim in the risk management field. Nor has the Petitioner shown that her published work has received recognition at a level consistent with being among that small percentage at the very top of her field. *See* 8 C.F.R. § 204.5(h)(2).

Additionally, the Petitioner has not demonstrated that her presented works have garnered her national or international acclaim. *See* section 203(b)(1)(A) of the Act. While she offered evidence showing that she presented topics at the [redacted], and the [redacted], the Petitioner did not demonstrate the significance of her specific presentations, their level of prestige or recognition, or how they have impacted her field consistent with her being among that small percentage at the very top of the field. *See* 8 C.F.R. § 204.5(h)(2).

Regarding her awards and recognitions, the Petitioner presented documentation indicating that [redacted]' president designated her "to act as Counselor of the Ethics Committee of the [redacted]" (2022), that she received a congratulatory email informing her a paper she coauthored was published in *International Research Journal of Finance and Economics* (2015), that she received a congratulatory message informing her she passed a "Written Qualifying Exam" at [redacted] (2015), that she received a letter from [redacted] notifying her she was "selected candidate for the position of

[6] The Petitioner also presented documents indicating that she was invited to submit papers for publication in *Global Journal of Management and Business*, *International Journal of Latest Engineering and Management Research*, *International Journal of Current Research*, *International Journal of Finance & Banking Studies*, *Applied Economics and Finance*, *International Business Research*, and *International Journal of Economics, Finance and Management Sciences*, but she has not shown the invitations she received to submit papers to these open access journals are unusual in her field or otherwise indicative of sustained acclaim at the very top of her field.

[7] *See generally* 6 *USCIS Policy Manual*, *supra*, at F.2(B)(2).

ADIG/DEPR/GEAM1 manager" (2021), and that she was commended for organizing an event of the [redacted] Ethics Committee (2023). The Petitioner, however, has not shown that these communications from her employer and [redacted] constitute prizes or awards that place her among that small percentage at the very top of the field of endeavor. *See* 8 C.F.R. § 204.5(h)(2); *see also Mishra v. Richardson*, No. 120CV991LMBTCB, 2021 WL 1566071, at *4 (E.D. Va. Apr. 20, 2021) (upholding that internal awards from the plaintiff's employer did not translate into sustained national or international acclaim).

The Petitioner also submitted a [redacted] daily online blog article stating that the company "won the sixth edition of the [redacted] Award 2023" and that "[t]he winning project was the [redacted], developed in partnership with [redacted]. The system monitors land use in rural areas to detect deforestation with indications of illegality in the granting of credit by financial institutions accredited by [redacted]." This article identifies the head of the Compliance and Fraud Prevention Department at [redacted], R-S-, but it does not mention the Petitioner. In a letter supporting the petition, R-S- stated:

> One of [the Petitioner's] most impactful projects involved the use of [redacted], a georeferenced tool that monitors deforestation across Brazil's ecosystems. Through her leadership of the project front that proposed the procedure, [redacted] integrated its credit system with the [redacted] database in 2023, using satellite technology to track deforestation activities.... Through this system, [the Petitioner] played a central role in preventing the allocation of BRL 553 million in financing to 2,731 financing requests of rural landowners involved in illegal deforestation, across 25 states. The project not only protected the bank's financial integrity by aligning credit disbursements with environmental standards but also enhanced [redacted]' reputation for environmental stewardship, underscoring the institution's commitment to sustainable development.... Furthermore, the project's success earned [redacted] the 6th edition of the [redacted] 2023 Award, which celebrates innovative financial sector solutions.

While the record includes information about the [redacted] Award from the [redacted]'s website, the Petitioner has not demonstrated the significance of this award in her field beyond her company and the presenting organization. Nor is there evidence from the [redacted] specifically identifying her as an [redacted] Award recipient. *See 72andSunny Partners LLC v. Mayorkas*, No. 222CV04465CASGJSX, 2023 WL 5661527, at *8 (C.D. Cal. Aug. 28, 2023) (upholding that support letters were of limited probative value to demonstrate that beneficiary was the "de facto honoree" of the award because they were submitted by colleagues and clients rather than members of the awarding bodies). Here, the Petitioner has not demonstrated her receipt of the [redacted] Award or that she received media coverage or other attention relating to the award that rises to the level of demonstrating her national or international acclaim in the field.

The Petitioner has not demonstrated that her awards and recognitions reflect a "career of acclaimed work in the field" as contemplated by Congress. H.R. Rep. No. 101-723 at 59. Rather, they indicate recognition limited to her employer or her academic achievement and therefore they do not show that she has sustained national or international acclaim in the field. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(3). USCIS has long held that even athletes performing at the major league level do not automatically meet the statutory standards for classification as an individual of "extraordinary ability." *Matter of Price*, 20 I&N Dec. 953, 954 (Assoc. Comm'r 1994). The Petitioner

has not contextualized how her awards and recognitions show that she "is one of that small percentage who [has] risen to the very top of the field of endeavor." *See* 8 C.F.R. § 204.5(h)(2).

With respect to the submitted media coverage, the Petitioner presented mostly articles that were about [redacted] and its projects and not about her. For example, the *Globo.com* articles she provided are about [redacted] and its utilization of data from [redacted] to block financing for rural landowners involved in irregular deforestation rather than about the Petitioner. *See Kinuthia v. Rosenberg*, No. CV 17-10255-LTS, 2018 WL 1243955, at *5 (D. Mass. Mar. 8, 2018), *aff'd sub nom.*, *Kinuthia v. Velarde*, No. 18-1244, 2019 WL 11671989 (1st Cir. July 3, 2019), *cert. denied*, 140 S. Ct. 2643, 206 L. Ed. 2d 714 (2020) (finding it is not enough that the material merely relates to the applicant's work). *See also Gadhave v. Thompson*, No. 3:21-CV-2938-D, 2023 WL 6931334, at *3-4 (N.D. Tex. Oct. 19, 2023) (upholding published material must be specifically about the applicant and focus on his personal work in the relevant field, not merely relate to the applicant's work, mention his name, or include his photo). Regarding the articles that specifically discussed the Petitioner, she did not establish that they were published in major media or otherwise garnered her national or international acclaim in the field.

The Petitioner has not demonstrated that the limited amount of media coverage she has received throughout her career is consistent with the sustained national or international acclaim necessary for this highly restrictive visa classification. *See* section 203(b)(1)(A) of the Act. Further, she has not shown how her overall press coverage is indicative of a level of success consistent with being among that small percentage who has risen to the very top of the field of endeavor. *See* 8 C.F.R. § 204.5(h)(2). In addition, Petitioner has not established that the volume, duration, and type of media reporting on her and her activities in the field are reflective of a "career of acclaimed work in the field" as contemplated by Congress. H.R. Rep. No. 101-723 at 59. *See also Bodhankar v. United States Citizenship & Immigr. Servs.*, No. 119CV706MADCFH, 2020 WL 777211, at *5 (N.D.N.Y. Feb. 18, 2020) (finding the lack of press about the plaintiff was not consistent with national or international acclaim).

The Petitioner also asserts that she has performed in leading or critical role as a risk manager and ethics committee member with [redacted]. The Petitioner, however, has not provided evidence showing that these roles have garnered her sustained national or international acclaim or place her among that small percentage at the very top of the field of endeavor. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(2). While the Petitioner provided letters of support discussing her projects at [redacted], she has not offered supporting evidence demonstrating how her specific roles are indicative of her high standing in the field or otherwise reflect that she has sustained national or international acclaim or recognition for her achievements. *See Agrawal v. Miller*, No. 4:24CV3143, 2025 2879217, at *23 (D. Neb. Sept. 12, 2025) (upholding that plaintiff's roles do not place her at the top of the field or demonstrate sustained national or international acclaim).

Regarding the Petitioner's salary at [redacted], she provided her pay statements from June 2024 through August 2024 listing her "Monthly salary" as R$30,964.08. She also presented compensation data from Salaryexpert.com listing the "Average Base Salary" for the position of "Risk Manager" in Brazil. This "average" salary data, however, is insufficient to show that her compensation reflects a high salary relative to others in her field or otherwise places her among that small percentage who have risen to the very top of the field. *See* 8 C.F.R. § 204.5(h)(2).

In addition, the Petitioner offered a compilation of monthly salary information for "Managers" at four other Brazilian development banks. The Petitioner, however, has not demonstrated that the salary data she compiled from only four banks offers a valid comparison of her salary relative to the earnings of others in the field. Nor has the Petitioner established that the salary information she provided for "Managers" at these banks offers a relevant basis for comparison for her position as a "Risk Manager." *See Matter of Price*, 20 I&N Dec. at 954 (considering a professional golfer's earnings versus other PGA Tour golfers); *see also Skokos v. U.S. Dept. of Homeland Sec.*, 420 F. App'x 712, 713-14 (9th Cir. 2011) (finding salary information for those performing lesser duties is not a comparison to others in the field); *Grimson v. INS*, 934 F. Supp. 965, 968 (N.D. Ill. 1996) (considering NHL enforcer's salary versus other NHL enforcers); *Muni v. INS*, 891 F. Supp. 440, 444-45 (N. D. Ill. 1995) (comparing salary of NHL defensive player to salary of other NHL defensemen).

Here, the Petitioner has not shown that her salary is high in relation to others in her field. Nor has she established that her earnings place her among that small percentage who have risen to the very top of the field. *See* 8 C.F.R. § 204.5(h)(2). Further, she has not presented multiple years of earnings showing sustained national or international acclaim in the risk management field. *See* section 203(b)(1)(A)(i) of the Act. *See also Jafarov v. United States Citizenship & Immigr. Servs.*, No. 23 CIV. 3372 (PAE), 2024 WL 69056, at *9 (S.D.N.Y. Jan. 5, 2024) (finding the failure to show consistent high wage earnings did not reflect sustained national or international acclaim and a single year's, or even a few years', worth of salary data unlikely to satisfy this requirement).

Finally, we acknowledge that the Petitioner provided letters of recommendation from others in her field.[8] Letters of this kind are helpful to explain the nature and impact of the Petitioner's contributions to the field. However, while not without weight in the final merits determination, reference letters should explain in specific terms why the authors believe the Petitioner qualifies as a person with extraordinary ability, and should be supported with sufficient corroborating documentary evidence to establish that the Petitioner is recognized as being among that small percentage at the very top of the field of endeavor and that she has garnered the required sustained national and international acclaim for her achievements. *See generally* 6 *USCIS Policy Manual*, *supra* at F.2(B)(3) (discussing the evidentiary value of letters of support at the final merits determination stage).

H-T-V-A-, Head of the Department of Operations and Microcredit in the Indirect Operations and Digital Channels Division at [redacted], stated that the Petitioner "served as the lead coordinator of . . . the [redacted] Procedure, a reform that introduced a new compliance rule for rural credit operations" and that "[t]his initiative linked access to financing directly to proof of lawful environmental standing, requiring [redacted] to use independent satellite monitoring data to detect deforestation on rural properties before any loan could be approved." H-T-V-A- further asserted that the [redacted] Procedure "ensured that [redacted] could continue supporting Brazil's agribusiness sector while maintaining strict adherence to legal and regulatory standards that protect the institution's financial integrity and reputation." In addition, C-C-C-, Head of the Department of Operations within the Digital Channels Division at [redacted], wrote that the Petitioner "coordinated the design and implementation of [redacted]" which "marked a key milestone for [redacted]' operational and environmental risk controls." C-C-C- further claimed that the Petitioner's work established "a new technological and governance standard in the financial industry,

[8] While we discuss a sampling of these letters, we have reviewed and considered each one.

one that would be replicated by several other public and private banks," but she did not specifically identify those banks. Nor has the Petitioner offered evidence that her specific work on this project has affected the banking industry in a significant way or has otherwise garnered her national or international acclaim in the field of risk management. Unsupported assertions have no evidentiary value and are insufficient to establish a filing party has satisfied their burden of proof. *See Matter of Mariscal-Hernandez*, 28 I&N Dec. 666, 673 (BIA 2022).

Furthermore, Dr. A-C-F-P-, a retired professor and the Petitioner's doctoral advisor at [redacted], indicated that the Petitioner's dissertation addressed "how to integrate scenario analysis into the measurement of operational risk capital within the regulatory framework of the Basel Accords" and proposed "a replicable framework that combined quantitative loss-distribution modeling with qualitative scenario-based techniques structured through the Delphi method." Dr. A-C-F-P- also wrote that the Petitioner "designed the model within the operational environment of [redacted] . . . and successfully demonstrated how an advanced measurement approach could be tailored to the realities of a public financial institution." While Dr. A-C-F-P- further claimed that the Petitioner's model "was a significant milestone for Brazil's financial system," he did not provide specific examples of its influence on either academic research or institutional practice beyond her employer or alma mater at a level signifying national or international acclaim in the field.

These and the other letters the Petitioner submitted summarize aspects of her work at [redacted] and praise her skills and contributions as a risk manager and scholar, but they do not demonstrate that her achievements have been widely recognized in her field or otherwise show that she has garnered sustained acclaim at the very top of her field. Overall, while the recommendation letters attest to the Petitioner's significant skills and accomplishments, they do not establish her extraordinary ability when considered in the totality of the evidence. The letters do not show that the Petitioner has achieved national or international acclaim from the field or attracted a level of attention placing her at the very top of her field. *See Jafarov v. USCIS*, No. 23 CIV. 3372 (PAE), 2024 WL 69056, at *9 (finding testimonial letters were insufficient to establish his relative status in the field and do not compare him to others).

Further, the letters' authors did not provide sufficient information and explanation to show that the Petitioner is viewed by the overall field, rather than by a solicited few, to be among the upper echelon or that she has garnered recognition on a national or international scale, consistent with being among the small percentage at the very top of the field of endeavor. *Mishra v. Richardson*, No. 1:20-cv-991 (LMB/TCB), 2021 WL 1566071, at *3 (E.D. Va. Apr. 20, 2021) (finding that none of the plaintiff's letters point to evidence of extensive documentation of his accomplishments to show sustained national or international acclaim). Although the letters highlight the Petitioner's work, they do not reflect a career of acclaimed work in the field, garnering the required sustained national or international acclaim. *See Bodhankar v. USCIS*, No. 1:19-CV-706 (MAD/CFH), 2020 WL 777211, at *5 (N.D.N.Y. Feb. 18, 2020) (finding the submitted letters failed to establish the plaintiff's contributions resulted in significant acclaim).

The record as a whole, including the evidence discussed above, does not establish the Petitioner's eligibility for the benefit sought.[9] Here, the Petitioner seeks a highly restrictive visa classification, intended for individuals already at the top of their respective fields, rather than those progressing toward the top. *Matter of Price*, 20 I&N Dec. at 954 (concluding that even major league level athletes do not automatically meet the statutory standards for classification as an individual of "extraordinary ability"); *Amin v. Mayorkas*, 24 F.4th at 394 (stating that extraordinary ability is such an elite level of accomplishment); *Lapteva v. Schuurmans*, No. 8:24CV83, 2025 WL 815087, at *1 (D. Neb. Mar. 10, 2025) (stating that EB-1 visa are intended to be available to only an exceedingly small amount of individuals with extraordinary ability).

In this case, the Petitioner has not shown the significance of her work is indicative of the required sustained national or international acclaim or it is consistent with a career of acclaimed work in the field. *See* section 203(b)(1)(A)(i) of the Act. The evidence related to her awards, memberships, media coverage, judging, original contributions, authorship of scholarly articles, presented work, and roles reflects that she has received some recognition for her contributions and expertise in her field but falls short of establishing that she satisfied the requirements for this classification at the time of filing. While the Petitioner need not establish that there is no one more accomplished to qualify for the classification sought, the record is insufficient to demonstrate that she is among the small percentage at the top of her field. *See* 8 C.F.R. § 204.5(h)(2).

III. CONCLUSION

For the reasons discussed above, the Petitioner has not established her eligibility as an alien of extraordinary ability.

ORDER: The appeal is dismissed.

NOTICE: This constitutes the final decision in this matter. The filing of a motion will not postpone the effect of the decision. 8 C.F.R. § 103.5(a)(1)(iv). Aliens who are not lawfully present, or who are otherwise inadmissible or deportable, may be subject to the commencement of removal proceedings under section 240 of the Act through the issuance of a Form I-862, Notice to Appear. Those proceedings may result in their removal from the United States and possible ineligibility for future visas or other immigration benefits.

[9] *See generally* 6 *USCIS Policy Manual*, *supra*, at F.2(B)(2) (providing that some evidence weighs more favorably on its own, while other evidence is more persuasive when viewed with other evidence).