Note: This exhibit was filed before *Matter of DOBROTVORSKII*, 29 I&N Dec. 211 (BIA 2025) so it does not include a USC/LPR "sponsor" which is now a strong best practice. *See id.*

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DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
FORT SNELLING, MINNESOTA

In the matter of:	
[redacted]	[redacted]
In removal proceedings	

Immigration Judge: Kalin IVANY

Next Hearing: May 19, 2025

RESPONDENT'S MEMORANDUM IN SUPPORT OF BOND

May 14, 2025

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
FORT SNELLING, MINNESOTA

In the matter of:	)
[redacted]	)
In removal proceedings	)

RESPONDENT'S MEMORANDUM IN SUPPORT OF BOND

Respondent requests that the immigration judge redetermine the conditions of detention and release Respondent on a reasonable bond of $1,500. In support of this request, Respondent submits the following:

1. Respondent [redacted] hereinafter "Respondent" or "Mr. [redacted]") is a native and citizen of Jordan.

2. Respondent first entered the U.S. in or around April 2, 2024, and was placed into removal proceedings. *See* NTA.

3. The Department of Homeland Security ("DHS") determined that Respondent did not need to be detained, and released him sometime after this entry.

4. Respondent spent the year in the Twin Cities area contributing to the community. *See* Respondent's Bond Exhibit at Tab B.

5. Respondent has the support of many friends and neighbors in the Minnesota community to support him as he seeks fear-based relief before the immigration court. *See* Tab. B.

6. Respondent had already-existing plans to marry his U.S. citizen girlfriend, Carolann Medina, but was not expecting to be detained by ICE. *Id*.

7. Respondent diligently filed fear-based relief with the immigration court. *See* I-589.

8. Respondent will be eligible to apply for work authorization next month.

9. Respondent has no criminal history. *See* Respondent's Bond Exhibit at Tab A.

10. Respondent appeared at all of his immigration hearings and never attempted to flee law enforcement.

11. Respondent respectfully asks the Court to grant him a bond in the amount of $1,500 to ensure his appearance at his future hearings.

I. ARGUMENT

In *Matter of Guerra*, 25 I&N Dec. 37, 40 (BIA 2006), the Court set forth a series of factors that Immigration Judges could look to some or all of them when considering whether to release a respondent from custody including:

(1) whether the alien has a fixed address in the United States;
(2) the alien's length of residence in the United States;
(3) the alien's family ties in the United States, and whether they may entitle the alien to reside permanently in the United States in the future;
(4) the alien's employment history;
(5) the alien's record of appearance in court;
(6) the alien's criminal record, including the extensiveness of criminal activity, the recency of such activity, and the seriousness of the offenses;
(7) the alien's history of immigration violations;
(8) any attempts by the alien to flee prosecution or otherwise escape from the authorities; and
(9) the alien's manner of entry to the United States.

Id. The above factors weigh in Respondent's favor.

A. **Respondent is not a flight risk.**

Respondent has been non-detained in the United States for over one year, out in the community. He has his physical address of [redacted] where he lives with a roommate. *See* Bond Questionnaire. He previously had his mailing address as [redacted], which was his uncle's house, to ensure he did not miss any important immigration paperwork. Upon release, Respondent will return to [redacted] to live. Respondent has

retained undersigned counsel, who will also inform him of all immigration hearings. He has already-existing plans to marry his US citizen fiancée, [redacted]. *See* Respondent's Bond Hearing Exhibit, Tab B at 19-20. Upon marriage, the Islamic faith allows them to live together, which they plan to do once married. *Id*. Once Respondent and [redacted] are legally married, they intend to pursue a marriage-based residency process for Respondent. Respondent has other family in the United States, such as his uncle, [redacted]. *Id*. at 74. Respondent has many friends in the Minnesota area. *Id*. at 70-74. Respondent is eligible for work authorization next month, and will be seeking that the moment he is eligible. Respondent owns property in the form of a car. *See* I-213 page 2.

Respondent has had a pending removal case for more than one year while he has not been detained. During that time, he attended all immigration hearings. He filed pleadings, relief, and was diligent in preparing his case. He never tried to evade authorities. *See* I-213 in which it notes "arrested without incident" on page 2. In fact, Respondent was arrested at the immigration court following his hearing which he attended. Respondent's actions over the past year have proven that he is not a flight risk.

B. **Respondent is not a danger to the community.**

Respondent has no criminal history. *See* Respondent's Bond Hearing Exhibit at 1-8. Respondent has one petty misdemeanor offense for no driver's license/insurance. *Id*. at 1. This is not a crime. *See* Minn. Stat. 609.02(4); *Id*. at 2-3. Respondent is not, and has not been accused of any crimes. Respondent has never harmed, attempted to harm or wished to harm anyone or anything. Respondent's sole immigration violation is his entry without inspection in order to seek asylum. *See* NTA. Respondent has timely filed for asylum. *See* I-589.

II. CONCLUSION

Respondent warrants release on bond. He has no criminal history and has proven through his actions that he is not a flight risk. Respondent by and through undersigned counsel, respectfully requests that this Court release him so that he can work with undersigned counsel to adequately prepare for his individual hearing.

Respectfully submitted,

Kelsey Allen _____ Dated: 05/14/2025

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PROOF OF SERVICE

On May 14, 2025, I, Kelsey Allen served a copy of:

RESPONDENT'S MEMORANDUM IN SUPPORT OF BOND

and any attached pages, on the Office of the Chief Counsel at 1 Federal Drive, Suite 1800 Fort Snelling, MN 55111 by e-service at BLMOCCSERVICE@ice.dhs.gov.

Signed: Kelsey Allen Dated: 05/14/2025