

Attorney for Respondent  
Address  
Phone  
Email  
EOIR ID:

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
CHICAGO, ILLINOIS

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IN THE MATTER OF:	)	DETAINED
	)	
RANDALL	)	File No:
	)	
In removal proceedings	)	A 200 200 200
	)	

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**MOTION FOR BOND**

Immigration Judge: \_\_\_\_\_

Next Hearing Date: Feb 16, 2022

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
CHICAGO, ILLINOIS

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IN THE MATTER OF:	)	DETAINED
	)	
RANDALL	)	File No:
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**MOTION FOR BOND**

NOW COMES Respondent RANDALL by and through his Attorney \_\_\_\_\_, pursuant to 8 C.F.R. §§ 1003.19, 1236.1(d) (2013), and *Matter of Joseph*, asking this Honorable Court to set a bond in this matter, and in support thereof states as follows:

1. Respondent has been living in the United States since 2006 and he has two U.S. Citizen children.

**RELIEF:**

2. Respondent is eligible for non-LPR cancellation of removal. He has been living in the United States since 2006 - only leaving one time for approximately 2 months.

3. Respondent has two U.S. Citizen children ages 6 & 15. (Group Exhibit A- Birth Certificates).

4. In addition, Respondent was the victim of assault in 2019 and is eligible for a U-Visa. (Exhibit B- Incident Report).

**CRIMINAL HISTORY:**

5. On 06/13/20, was arrested for DUI. (Exhibit C- Incident Report Form).

6. Respondent was sentenced to one year in jail and served 120 days.

## **SAFETY PLAN**

7. Respondent is committing to a safety plan that he will not be driving unless he has a valid license.
8. Respondent's partner has a valid driver's license and has committed to drive Respondent to work if he needs a ride. (Exhibit D- Driver's License and Letter from Partner).
9. Additionally, Respondent lives 2 blocks from the #38 bus line in Indianapolis which takes him 1 block away from his job - at 1777 N 93rd St. Indianapolis, IN.

WHEREFORE, Respondent respectfully requests that this Honorable Court enter an Order:

- a. Setting Respondent's bond at \$2,500.00.

Respectfully Submitted,

Attorney for Respondent

Address

Phone

Email

EOIR ID:

## EXHIBIT LIST

EXHIBIT A- BIRTH CERTIFICATES OF RESPONDENT'S CHILDREN

EXHIBIT B- INCIDENT REPORT WHEN RESPONDENT WAS THE VICTIM OF AN ASSAULT  
IN 2019 SHOWING PRIMA FACIE ELIGIBILITY FOR A U-VISA

EXHIBIT C- INCIDENT REPORT FROM RESPONDENT'S DUI ARREST

EXHIBIT D- DRIVER'S LICENSE AND LETTER FROM RESPONDENT'S PARTNER

# EXHIBIT A

## BIRTH CERTIFICATES OF RESPONDENT'S 2 CHILDREN

Birth certificates showing  
Randall to be the father of  
both children

# EXHIBIT B

INCIDENT REPORT SHOWING  
RESPONDENT WAS THE  
VICTIM OF AN ASSAULT IN  
2019

INCIDENT REPORT FROM 2019  
SHOWING RANDALL WAS  
ASSAULTED AND SUFFERED A  
LACERATION TO THE EYE



# EXHIBIT C

INCIDENT REPORT FROM 2020  
WHEN RESPONDENT WAS  
ARRESTED FOR A DUI

# ROCHESTER POLICE DEPARTMENT

## Incident Report Form

06/13/20

WELFARE CHECK

Primary Officer: **WOOD**

- |  |  |  |  |  |
|--|--|--|--|--|
| <input type="checkbox"/> Juvenile Involved | <input type="checkbox"/> Investigation | <input type="checkbox"/> Video Available | <input type="checkbox"/> Gang Related              | <input type="checkbox"/> Paperless       |
| <input type="checkbox"/> Domestic Related  | <input type="checkbox"/> Suspects      | <input type="checkbox"/> Bias Crime      | <input type="checkbox"/> Accident                  | <input type="checkbox"/> Administrative  |
| <input type="checkbox"/> Alcohol Involved  | <input type="checkbox"/> Arrests Made  | <input type="checkbox"/> Drugs Involved  | <input type="checkbox"/> Ready for DA / Prosecutor | <input type="checkbox"/> Alarm Activated |

Log Number 06/13/2020	Incident Number	File Number	Case Number	UCR
Incident Type <b>WELFARE CHECK</b>	Dispatcher dkglll	Source PHONE	District	Status NEW

Incident Date / Times						Incident Occurred At or Between	
Date Received 06/13/2020	Day Rec'd Saturday	Rcvd 0908	Disp 0911	Arr 0914	Clrd 1023	Earliest Date and Time	Latest Date and Time

Disposition <b>INCIDENT REPORT</b>	Cleared by Exception	<input type="checkbox"/> Suspended			
JCR Clearance	UCR Occur Date	UCR Clear Date	UCR Count	UCR Human Traffic Code	UCR HT Count 0

Location <b>ROCHESTER IN 48975</b>	<input type="checkbox"/> Intersection	
Cross Street	GPS Loc X 0	GPS Loc Y 0

Municipality: <b>ROCHESTER</b>	Premise Code	Arson Value
Business Name <b>KROGER FUEL STATION</b>	Weather	
Gang	Time of Day	

Modus Operandi Coding	Victim:
Entry:	Property:
Exit:	Area:
Method:	Time of Day:

**WEAPON USED:**Caller / Complainant Type: Normal  Anonymous  Hangup  Refused **INVOLVED PERSONS**

<b>CALLER</b>	<b>CODE</b>	<b>CAUSE</b>					
Name (Last, First, Middle) - Address <b>JACKSON, DEBRA</b>	Juvenile <input type="checkbox"/>	Date of Birth	Age	Race	Sex	Ethnic	Social Security Number
	Weight	Height	Hair	Eyes	Phone Number		
	Driver License Number	State	Class	Expiration Date			
	ID Provided	ID Detail					

Link Comments

CD-20-03023

06/13/2020



APPROVED BY:

APPROVED ON:

# ROCHESTER POLICE DEPARTMENT

## Incident Report Form

06/13/20

WELFARE CHECK

### INVOLVED PERSONS

#### DRIVER

CODE: DRIVER

Name (Last, First, Middle) - Address: **RANDALL**

Juvenile

Date of Birth	Age	Race	Sex	DOB	Social Security Number
Weight	Height	Hair	Eyes	Phone Number	
Driver License Number			State	Class	Expiration Date
ID Provided			ID Detail		

Link Comments

#### VEHICLE OWNER

CODE: OWN1

Name (Last, First, Middle) - Address: **LOPEZ, COLUMBUS IN 47201**

Juvenile

Age: **24**

Date of Birth	Age	Race	Sex	DOB	Social Security Number
Weight	Height	Hair	Eyes	Phone Number	
Driver License Number			State	Class	Expiration Date
ID Provided			ID Detail		

Link Comments

### INVOLVED VEHICLES

Incident Type: <b>ACCIDENTAL</b>	Type (A=Auto/Truck): <b>A</b>	Plate Number: <b>813RGN</b>	State: <b>IN</b>	Plate Type Code: <b>PC</b>	Tag Year: <b>2021</b>	Date Listed: <b>06/13/20</b>	Current Vehicle: <input checked="" type="checkbox"/>
Vehicle Year: <b>FORD</b>	Model: <b>EPD</b>	Color: <b>BLU</b>	Vehicle Identification Number (VIN)		USDOT Number	ICG Number	
Vehicle Style/Type: <b>UTILITY</b>			Insurance Company			Insurance Company Policy Number	

Involved Comments

### INVOLVED BUSINESSES / ORGANIZATIONS

Business / Organization Name: <b>KROGER FUEL STATION</b>			Business Address: <b>61 E 16TH ST</b>				
Phone 1	Phone 2	Phone 3	City: <b>ROCHESTER, IN 46975</b>				

Involved Comments

### RESPONDING / INVOLVED UNITS, OFFICERS, TIMES

Division	Supervisor / ID
----------	-----------------

Agency Numbers	Units & Times
13	13-20-01930
	1311
	DISP 09:11:01
	ARRV 09:14:23
	CLRD 10:23:14
	133
	DISP 09:11:09
	ARRV 09:14:21
	CLRD 10:23:14

CD-20-03023

06/13/2020



APPROVED BY:  
APPROVED ON:

# ROCHESTER POLICE DEPARTMENT

## Incident Report Form

3

06/13/2020

WELFARE CHECK

### COMMENTS / NARRATIVES

Title

**ncd Comment**

Narrative Created By / Creation Date

**JIANNA K. GILLILAND**

06/13/2020

Narrative Updated By / Update On

Narrative Approved By / Approved Date

Input: dkgill 06/13/2020 09:10:55 Edited: dkgill 06/13/2020 09:10:55  
CP ADV'D THERE IS A MALE ASLEEP IN THE VEH PARKED IN FRONT OF THE RECYCLE BINS  
AT SMITH FARM STORE.

Input: dkgill 06/13/2020 09:23:22 Edited: dkgill 06/13/2020 09:23:22  
I AM NOT SHOWING EITHER SUBJ HOLDS A VALID LIC

Input: dkgill 06/13/2020 09:24:53 Edited: dkgill 06/13/2020 09:24:53  
133 ADV'D SUBJ TESTED .150 ON THE PBT .....09:23

Input: dkgill 06/13/2020 09:31:24 Edited: dkgill 06/13/2020 09:31:24  
EN ROUTE TO F3 WITH THAT MALE SUBJ REF SIG 42.

Input: dkgill 06/13/2020 09:31:35 Edited: dkgill 06/13/2020 09:31:35  
1311 ADV'D HE WILL BE FOLLOWING 3.

Input: dkgill 06/13/2020 09:31:46 Edited: dkgill 06/13/2020 09:31:46  
THEY SECURED THE VEH.

Input: dkgill 06/13/2020 10:01:59 Edited: dkgill 06/13/2020 10:01:59  
EN ROUTE TO F1 WITH 1 MALE J3.

Input: dkgill 06/13/2020 10:06:03 Edited: dkgill 06/13/2020 10:06:03  
23 THE JAIL

CD-20-03023

06/13/2020



APPROVED BY:

APPROVED ON:

# EXHIBIT D

LETTER AND DRIVER'S  
LICENSE FROM  
RESPONDENT'S PARTNER

LETTER FROM PARTNER  
THAT THEY WILL TAKE  
RANDALL TO WORK AND A  
PICTURE OF THEIR  
LICENSE

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	)	
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**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of the Respondent's **Motion:**

IT IS HEREBY ORDERED:

1. That the Motion is GRANTED and Respondent's Bond be set at \$2500.

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Date

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Immigration Judge

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
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**PROOF OF SERVICE**

On 1/19/22, I, Attorney served a copy of the attached papers to the Office of Chief Counsel-DHS/ICE by e-filing a copy through:

ICE/OCC  
E-Filing System  
<https://eserviceregistration.ice.gov/>

    /s/ Attorney      
\_\_\_\_\_