



## [Detail](#)

**Complaint Number:** 735

**Immigration Judge:** (b)(6)

**Complaint Received Date:** 03/28/13

**Current ACIJ**

Santoro, Christopher A.

**Past ACIJs:**

**Final Action**  
Written counseling

**Final Action Date**  
04/01/13

**Status**  
CLOSED

**Base City**  
(b) (6)

A-Numbers(s)	Complaint Nature(s)	Complaint Source(s)
(b)(6)	In-court conduct	BIA

**Complaint Narrative:** Ij, during testimony and in rendering oral decision, suggested that respondent could falsely state he did not remember witnessing criminal conduct if he wished to avoid testifying at a trial (and thereafter suffering harm in his country).

Complaint History	
03/28/13	Complaint referred to ACIJ
04/01/13	Written counseling
04/05/13	Database entry created

# Memorandum



Subject	Date
(b) (6) (BIA March 27, 2013)	March 28, 2013

To

Brian O'Leary, Chief Immigration Judge

MaryBeth Keller, Assistant Chief Immigration Judge

From

David L. Neal, Chairman

Attached please find a copy of the Board's decision dated March 27, 2013, and relevant portions of the record in the above-referenced matter.

The Board asked me to bring this case to your attention.

Further, the Board anticipates returning the record of proceedings for this remanded case to the Immigration Court in one week. If you wish to review the record prior to its return to the Immigration Court, please contact Suzette Henderson.

Thank you for your attention to this matter.

Attachments



U.S. Department of Justice

Executive Office for Immigration Review

*Board of Immigration Appeals  
Office of the Clerk*

5107 Leesburg Pike, Suite 2000  
Falls Church, Virginia 22041

(b) (6)

DHS/ICE Office of Chief Counsel - (b)(6) & (b)(7)(C)

(b)(6) & (b)(7)(C)

Name: (b) (6)

A (b) (6)

Date of this notice: 3/27/2013

Enclosed is a copy of the Board's decision and order in the above-referenced case.

Sincerely,

*Donna Carr*

Donna Carr  
Chief Clerk

Enclosure

Panel Members:  
Adkins-Blanch, Charles K.

schuckec  
User team: Docket



**U.S. Department of Justice**

**Executive Office for Immigration Review**

*Board of Immigration Appeals  
Office of the Clerk*

5107 Leesburg Pike, Suite 2000  
Falls Church, Virginia 22041

**(b) (6)**

**DHS/ICE Office of Chief Counsel - (b)(6) & (b)(7)(C)**

**(b)(6) & (b)(7)(C)**

**Name: (b) (6)**

**A (b) (6)**

**Date of this notice: 3/27/2013**

Enclosed is a copy of the Board's decision in the above-referenced case. This copy is being provided to you as a courtesy. Your attorney or representative has been served with this decision pursuant to 8 C.F.R. § 1292.5(a). If the attached decision orders that you be removed from the United States or affirms an Immigration Judge's decision ordering that you be removed, any petition for review of the attached decision must be filed with and received by the appropriate court of appeals within 30 days of the date of the decision.

Sincerely,

*Donna Carr*

Donna Carr  
Chief Clerk

Enclosure

Panel Members:  
Adkins-Blanch, Charles K.

schuckec  
Userteam: Docket

Falls Church, Virginia 22041

---

File: A(b) (6)

Date: MAR 27 2013

In re: (b) (6)

IN DEPORTATION PROCEEDINGS

APPEAL

ON BEHALF OF RESPONDENT: (b) (6) Esquire

ON BEHALF OF DHS: (b)(6) & (b)(7)(C)  
Assistant Chief Counsel

APPLICATION: Asylum; withholding of removal

This case was last before this Board on June 30, 2003, when we returned the record for the Immigration Judge to adjudicate a motion to reopen. The respondent, a native and citizen of Bolivia, now appeals from a September 6, 2011, decision of an Immigration Judge. The Immigration Judge found the respondent removable, denied his applications for asylum and withholding of removal, and granted voluntary departure. *See* sections 208, 241(b)(3) of the Immigration and Nationality Act, 8 U.S.C. §§ 1158, 1231(b)(3).<sup>1</sup> The Department of Homeland Security opposes the appeal. The respondent's request for oral argument is denied, 8 C.F.R. § 1003.1(e)(7). The appeal will be dismissed, but the record will be remanded on the issue of voluntary departure.

We review the findings of fact, including the determination of credibility, made by the Immigration Judge under the "clearly erroneous" standard. 8 C.F.R. § 1003.1(d)(3)(i). We review all other issues, including whether the parties have met the relevant burden of proof, and issues of discretion, under a *de novo* standard. 8 C.F.R. § 1003.1(d)(3)(ii). Because the respondent's application for relief was filed before May 11, 2005, it is not subject to the provisions of the REAL ID Act of 2005 (I.J. at 4; Exhs. 5, 8).

We agree with the Immigration Judge's conclusion that the respondent has not established that he is eligible for asylum. The Immigration Judge found no past persecution where the respondent attended a political meeting where multiple people were shot in 1981 but the respondent escaped uninjured, his house was ransacked shortly thereafter, the police subsequently warned him he could be in danger, he was threatened in the street in 1989, and he

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<sup>1</sup> The respondent has not challenged his removability on appeal. In addition, the respondent has not meaningfully challenged the Immigration Judge's denial of protection under the Convention Against Torture (Respondent's Appellate Brief at 2). *See Matter of Edwards*, 20 I&N Dec. 191, 196 n.4 (BIA 1990) (noting that issues not addressed on appeal are deemed waived).

was never physically harmed (I.J. at 2, 4; Tr. at 197).<sup>2</sup> The respondent does not challenge this past persecution determination on appeal. Thus, he is not entitled to the presumption of a well-founded fear of future persecution. See *Matter of D-I-M-*, 24 I&N Dec. 448, 450 (BIA 2008); 8 C.F.R. § 1208.13(b)(1).

The respondent also has not established a well-founded fear of persecution in Bolivia on account of his imputed political opinion.<sup>3</sup> While the 1981 attack occurred during a political meeting, the respondent's fear is that the perpetrators are concerned about witnesses to the crime (I.J. at 3-4; Respondent's Appellate Brief at 8-10). However, we have found that a criminal group who threatens a government informant does so out of personal motives and not on account of imputed political opinion. See *Matter of C-A-*, 23 I&N Dec. 951, 954 (BIA 2006), cited with approval for a different issue in *Crespin-Valladares v. Holder*, 632 F.3d 117 (b)(6) Cir. 2011).

Further, the record does not demonstrate a reasonable possibility that the respondent would be singled out for persecution on a protected ground. See 8 C.F.R. § 1208.13(b)(2). The respondent stated that he was warned of threats in 1981 after the incident and that one of the individuals from the 1981 attack recognized him in the street when he returned to Bolivia in 1989 and threatened him (I.J. at 3; Tr. at 150, 165-69; Exh. 8-A personal statement). The transcript reflects that the respondent also testified that he heard through friends that individuals were threatened with harm if they were to testify against former military members (Tr. at 165). The transcript further indicates that the respondent's brother testified that when he returned to Bolivia a friend told him that the respondent needs to be careful and he also testified that one of the attendees at the 1981 meeting had been disappeared at an unspecified date (I.J. at 4; Tr. at 175-91). The respondent on appeal and in proceedings below did not identify specific documentary evidence to support the claimed harm to witnesses who testify under similar conditions (Tr. at 159-61; Exhs. 8, 9; Respondent's Appellate Brief at 9-10). The respondent has not provided documentary evidence that the 1981 incident in which he was involved is being or has been investigated, although the current government is prosecuting military individuals for past atrocities (I.J. at 5).<sup>4</sup>

<sup>2</sup> The respondent does not challenge the Immigration Judge's finding that the respondent was threatened during the 1989 encounter but that his claim of being physically attacked was not credible (I.J. at 3; Tr. at 150, 179-81).


<sup>3</sup> The respondent on appeal asserts only imputed political opinion as the statutorily protected ground (Respondent's Brief at 7-8), and not membership in a particular social group. See *Matter of C-A-*, 23 I&N Dec. 951 (BIA 2006) (rejecting a proposed particular social group of noncriminal informants working against a drug cartel); see also *Zelaya v. Holder*, 668 F.3d 159, 166 (4th Cir. 2012) (emphasizing that the accepted particular social group in *Crespin-Valladares v. Holder*, *infra*, excluded the individual who agreed to be a prosecutorial witness).

<sup>4</sup> The respondent has not contested the Immigration Judge's determination that that he did not establish that the government was unable or unwilling to protect him (I.J. at 2, 4-7).

We do not find the foregoing, considered in light of the country conditions evidence of record, sufficient to meet the respondent's burden of proof.<sup>5</sup> Thus, the respondent has not established eligibility for asylum.<sup>6</sup> Inasmuch as the respondent has not satisfied the lower burden of proof required for asylum, it follows that he also has not met the higher standard of eligibility for withholding of removal under section 241(b)(3) of the Act (I.J. at 7).

Effective January 20, 2009, an Immigration Judge who grants an alien voluntary departure must advise the alien that proof of posting of a bond with the Department of Homeland Security must be submitted to the Board of Immigration Appeals within 30 days of filing an appeal, and that the Board will not reinstate a period of voluntary departure in its final order unless the alien has timely submitted sufficient proof that the required bond has been posted. 8 C.F.R. § 1240.26(c)(3). See *Matter of Gamero*, 25 I&N Dec. 164 (BIA 2010). Although the respondent failed to submit timely proof of having paid the bond, the record reflects that the Immigration Judge did not provide the respondent with the required advisals (Tr. at 208-09). See 8 C.F.R. § 1240.26(c)(3)(ii). Therefore, the record will be remanded for the Immigration Judge to grant a new period of voluntary departure and to provide the required advisals.

ORDER: The record is remanded for further proceedings consistent with the foregoing opinion and for the entry of a new decision.

  
\_\_\_\_\_  
FOR THE BOARD

<sup>5</sup> The respondent does not raise a claim of pattern or practice of persecution. See 8 C.F.R. § 1208.13(b)(2)(iii)(A).

<sup>6</sup> We observe with disapproval the Immigration Judge's suggestion that the respondent could avoid the situation he fears by pretending to no longer remember the 1981 incident should a prosecutor wish to call him as a witness (I.J. at 5-6; Tr. at 153). Such a proposition is an inappropriate factor within a well-founded fear analysis. To the extent that the respondent on appeal argues that the Immigration Judge inappropriately speculated that there is a lesser chance that the respondent would be recognized in Bolivia in the current day, over 30 years after the 1981 incident, than when he was recognized in 1989, which was 9 years later (Respondent's Appellate Brief at 8-10), such a finding is a factual evaluation of the likelihood of future events, which we review on a clear error basis. See 8 C.F.R. § 1003.1(d)(3)(i); see also *Turkson v. Holder*, 667 F.3d 523, 530 (4th Cir. 2012) (holding that "a decision regarding a petitioner's likely future mistreatment is a factual determination"). We find no clear error in the Immigration Judge's finding that the likelihood of harm has lessened during the intervening decades (I.J. at 4-5). See generally 8 C.F.R. § 1208.13(b)(1)(i)(A) (recognizing changed country conditions can impact a claim for asylum).

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
UNITED STATES IMMIGRATION COURT

(b) (6)

File No.: A (b) (6)

September 6, 2011

In the Matter of

(b) (6)

Respondent

)  
)  
) IN DEPORTATION PROCEEDINGS  
)  
)

CHARGE: Section 241(a)(2)(B)(I) - controlled substance violation.

APPLICATIONS: Asylum; withholding of removal; Convention against Torture relief.

ON BEHALF OF RESPONDENT:

(b) (6)

ON BEHALF OF DHS:

(b)(6) & (b)(7)(C)

Assistant Chief Counsel

ORAL DECISION OF THE IMMIGRATION JUDGE

Respondent is a 53-year-old male, native and citizen of Bolivia, who became a permanent resident in 1989. On September 23, 1992 he was convicted of possession of cocaine under (b) (6) law. Respondent has admitted the allegations, and based on his admission the Court, long ago, found him deportable under Section 241(a)(2)(B)(I), conviction of a controlled substance violation.

Respondent's asylum application is based on the fact that he



was a labor union leader in Bolivia, he was also active in various left-wing political parties and causes. In 1981 he was attending a secret meeting at which the presidential candidate of his party was present and other leaders of the party were present. The gathering was attacked by an army unit, possibly police, as well. The political candidate was killed, one of the leaders of respondent's political party was killed and other people were killed, also, a total of 12. Respondent was able to escape, although he saw the people who did it, and the people who did it apparently saw him, at least, that is his testimony.

Respondent was subsequently visited by soldiers who searched his house, respondent was not at home at the time, they were looking for evidence and they threw things around and broke things up.

Later the police came to the house when he was there, but what they basically told him was the army was after him, that if he knew anything about the killing, he should probably keep it to himself because he could be in danger. Respondent interpreted the warning from the police as a helpful warning, rather than a threat, apparently, they were more favorable to him than the military was.

Respondent at that point became afraid and made arrangements to leave the country. He was able to obtain his exit clearance and a visa to Mexico, he traveled to Mexico and then entered the United States across the Mexican border in 1981.

Respondent later benefitted from the legalization program to obtain permanent resident status in 1989.

In 1989, presumably after he became a permanent resident, respondent returned to Bolivia for his mother's funeral. His half-brother, (b) (6), went with him, apparently some other relatives did, as well.

Possibly in the cemetery or possibly on the street, the respondent saw one of the military people who had committed the murders, that person also saw him. Respondent's testimony is that person tried to grab respondent, presumably to murder him, but respondent was able to get away. Respondent's brother, (b) (6), who heard the story contemporaneously since he was with respondent in Bolivia although not with him at the time of this attack, indicated that respondent was afraid because he got a bad look from this man and the man made threats. He did not mention anything about physical contact, which respondent claims was involved. Due to the discrepancy in testimony, the Court does not believe that respondent was physically attacked in 1989, merely that he was threatened. Although he certainly took that threat seriously and has never returned to Bolivia since.

Respondent believes that the military people who committed the murders would still wish to kill him, as a potential witness, all these years later, and that possibly the current government, which is anti-military and certainly would be consistent with the respondent's left-wing political party membership and union

membership, that that government may call him as a witness against the military people who are being tried for crimes committed during the military dictatorship of years past.

Now respondent seems to be a credible witness. His story has not varied since he brought it up in 1994, or maybe before that, and it certainly is consistent with country conditions.

It is also corroborated by some other documentation in the file and his brother, (b) (6).

Respondent was never actually harmed while he was still in Bolivia. He might have been shot when the police attacked the gathering, but he got away. The military may have harmed him when they raided his house, although that is speculative. The police had an opportunity to arrest him, had they wanted to, but they actually warned him about the military, so there is certainly is no past persecution in this case, therefore, no presumption arises which needs to be rebutted.

This is not a REAL ID case, it was filed well-before the REAL ID cutoff date.

#### FINDINGS OF FACT AND CONCLUSIONS OF LAW

I find that respondent was not harmed in the past nor was he attacked in 1989 physically, and I find that he was looked at and threatened by the military person who encountered him, but there was no physical contact.

As to respondent's claim that he has a fear of persecution, the Court finds that he may have had a fear of persecution at the

time he left Bolivia, although the passage of time has certainly erased any check of threat to him.

The fact that somebody recognized him in 1989, which was about nine years after he left the country, does not mean that anyone would recognize him 30 years later.

At the time respondent may have felt threatened by military people, who were in the military and had access to the governmental machinery.

Thirty years from these events, it is extremely unlikely that any of these military folks are still in the military, it is rare that anyone serves more than 30 years in the military in any country. In addition, the current government of the country is entirely consistent with the respondent's political leanings, Evo Morales, the president, is a Socialist, he has the support of labor unions, he has the support of indigenous peoples, he has the support of the political left. Currently, the Morales government is actually prosecuting military individuals for some of the atrocities they committed in the past, of which there were quite a few.

There is no evidence in this case that they are investigating the 30-year-old murder that respondent is talking about. One would think that if they were prosecuting it there would be some evidence available to show that. But even if they do desire to prosecute that, respondent's only fear is that he might be called as a witness by the government to testify against

the people who killed his friends so many years ago. If respondent did not wish to testify all he has to do is tell the authorities that he does not remember, and then they will not call him as a witness, because what prosecutor is going to call a witness who does not remember what happened. That is not a very noble thing for respondent to do, but if he truly is afraid of being called as a witness he has that option.

In any event, fear of being called as a witness in the prosecution of a murder is not persecution under the Act. Even police informants, who are certainly more involved in the prosecution process than the respondent would be, have been found not to have a well-founded fear of persecution on account of the very real threats to them by the people that they would testify against. See Matter of C-A-, 23 I&N Dec. 951 (BIA 2006); Adhiyappa v. INS, 58 F.3d 261 (6th Cir. 1995).

In addition, any threat to the respondent at the present time comes from nongovernmental sources. These people are unlikely to still be in the army and, in fact, if they are defendants in a criminal trial, they certainly would, even if they were still in the army, they would not have any connection to the levers of power, such as they did at the time respondent fled Bolivia. It is always possible that a criminal defendant may try to kill a witness, that happens in the United States, it happens anywhere that witnesses against thugs are testifying. However, there does not seem to be any serious chance of it

happening, and even if there was a 10% chance or greater of it happening, restated, there is no nexus for a factor for which asylum could be granted.

Although respondent may have had a fear of persecution due to his political connections back in 1981, he certainly no longer has any fear from the government on that basis.

Therefore, I find that respondent has not carried his burden of proof to show that there is even a 10% chance that he would be persecuted on account of one of the factors for which asylum or withholding could be granted. Obviously, his failure to meet the burden of proof for asylum, he has failed to carry the higher burden of proof for withholding of removal.

As to the Convention against Torture relief, respondent has presented no evidence that he would be tortured if he returned to Bolivia. Even if there was some possibility that he might be tortured by the people he would testify against, which is purely speculative at this time, they are not operating with the consent or acquiescence or willful blindness of the government. In fact, the government is attempting to prosecute them, which would be the whole basis of respondent's claim. Therefore, the respondent cannot possibly be deemed to have carried his burden of proof under the Convention against Torture.

Respondent has lived in the United States a long time, he make a bad mistake in 1992, for which, in the manner of inspector Javert of "Les Mis," the government is relentlessly pursuing him

20 years after he possessed some cocaine, but he certainly is deserving of discretionary relief. He has brothers and sisters who are permanent residents, he has got a daughter who is a U.S. citizen, he has apparently been well-behaved in the United States since his possession of cocaine conviction back in 1992. So the Court will grant voluntary departure in the exercise of discretion.

ORDERS

The Court's orders are as follows:

- (1) I find respondent deportable under Section 241(a)(2)(B)(I) of the Act;
- (2) His applications for asylum, withholding of removal and Convention against Torture relief are denied;
- (3) Voluntary departure will be granted through November 7, 2011, with the necessity of posting a bond in the amount of \$500 no later than September 13, 2011, with an alternate order of removal to Bolivia if he fails to comply.

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(b) (6)  
Immigration Judge

CERTIFICATE PAGE

I hereby certify that the attached proceeding before  
JUDGE (b) (6), in the matter of:

(b) (6)

A (b) (6)

(b) (6)

is an accurate, verbatim transcript of the recording as provided by  
the Executive Office for Immigration Review and that this is the  
original transcript thereof for the file of the Executive Office  
for Immigration Review.



Barbara Culliton, Transcriber

Free State Reporting, Inc.

November 16, 2011  
(completion date)

By submission of this CERTIFICATE PAGE, the Contractor certifies  
that a Sony BEC/T-147, 4-channel transcriber or equivalent, and/or  
CD, as described in Section C, paragraph C.3.3.2 of the contract,  
was used to transcribe the Record of Proceeding shown in the above  
paragraph.



1 have problems with these people.

2 Q. Do you know who the current president of Bolivia is?

3 A. Evin Morales [sic] -- Evo Morales.

4 Q. And Mr. Morales is, is a man of the left. Correct?

5 A. Yes. But the military people are being processed right  
6 now.

7 Q. What do you mean, being processed?

8 A. Because of, of the act from the past, so I think they  
9 might want to use me as a witness.

10 Q. You think the government may want to use you as a  
11 witness against the military people who murdered your friends in  
12 the past.

13 A. Yes, I think so, because they've been processing many  
14 people.

15 Q. By processing you mean prosecuting?

16 A. Yes, exactly.

17 Q. Would you just be clearer? You -- do you have any fear  
18 that the Morales government would harm you?

19 A. No. But I think they can use me to prosecute military  
20 people, and I don't want that.

21 Q. All right. Well, though, they might call you as  
22 witness, but if you didn't want to be a witness you could say you  
23 don't remember. That wouldn't be a very brave thing to do, but  
24 it might be safer. But the Morales government doesn't want to  
25 harm you. Does it?

# Immigration Judge Complaint Intake Form

**HQ Use Only:**  
complaint #: \_\_\_\_\_  
source: first / subsequent

Date Received at OCIJ: 3/28/13

complaint source type	
<input type="checkbox"/> anonymous <input type="checkbox"/> respondent's attorney <input type="checkbox"/> third party (e.g., relative, uninterested attorney, courtroom observer, etc.) <input type="checkbox"/> other: _____	<input checked="" type="checkbox"/> BIA <input type="checkbox"/> respondent <input type="checkbox"/> OIL <input type="checkbox"/> Circuit <input type="checkbox"/> EOIR <input type="checkbox"/> OPR <input type="checkbox"/> DHS <input type="checkbox"/> OIG <input type="checkbox"/> Main Justice <input type="checkbox"/> media
complaint receipt method	
<input type="checkbox"/> letter <input type="checkbox"/> fax	<input checked="" type="checkbox"/> IJC memo (BIA) <input type="checkbox"/> unknown <input type="checkbox"/> email <input type="checkbox"/> other: _____ <input type="checkbox"/> phone (incl. voicemail) <input type="checkbox"/> in-person
date of complaint source	complaint source contact information
(i.e., date on letter, date of appellate body's decision)  3/28/13	name: BIA address: _____ _____ _____ email: _____ phone: _____ fax: _____
additional complaint source details	
(i.e., DHS component, media outlet, third party details, A-number)  (b) (6)	

IJ name	base city	ACIJ
(b) (6)		Santoro
relevant A-number(s)	date of incident	
(b) (6)	9/6/2011	
allegations		
IJ, during testimony and in rendering oral decision, suggested that respondent could falsely state he did not remember witnessing criminal conduct if he wished to avoid testifying at a trial (and thereafter suffering harm in his country).		
nature of complaint		
<input checked="" type="checkbox"/> in-court conduct <input type="checkbox"/> incapacity	<input type="checkbox"/> out-of-court conduct <input type="checkbox"/> other: _____	<input type="checkbox"/> due process <input type="checkbox"/> bias <input type="checkbox"/> legal <input type="checkbox"/> criminal



## **Moutinho, Deborah (EOIR)**

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**From:** Santoro, Christopher A (EOIR)  
**Sent:** Monday, April 01, 2013 3:42 PM  
**To:** Moutinho, Deborah (EOIR)  
**Cc:** Keller, Mary Beth (EOIR)  
**Subject:** IJC (b) (6) (WAS)  
**Attachments:** IJC (b) (6) 1.doc

Deborah – an IJC intake sheet for the db. The e-mail below is the written counseling. Thanks.

**Christopher A. Santoro**  
Assistant Chief Immigration Judge

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**From:** Santoro, Christopher A (EOIR)  
**Sent:** Monday, April 01, 2013 3:36 PM  
**To:** (b) (6) (EOIR)  
**Subject:** A(b) (6)

Judge (b) (6)

The BIA referred your oral decision in the above-captioned case to OCIJ for review. This is a Bolivian asylum case you heard on the merits on September 6, 2011. Among respondent's statements was an indication that he feared harm if he returned to his country and was called as a witness in a criminal trial.

During the respondent's testimony, after he said he thought he might be called as a witness, you said: "if you didn't want to be a witness you could say you don't remember. That wouldn't be a very brave thing to do, but it might be safer." During your oral decision, you said, "If respondent does not wish to testify all he has to do is tell the authorities that he does not remember, and then they will not call him as a witness, because what prosecutor is going to call a witness who does not remember what happened. That is not a very noble thing for respondent to do, but if he is truly afraid of being called as a witness he has that option."

Although the Board affirmed your denial of asylum, footnote six of the decision highlights their (and our) concern about an IJ suggesting that someone can or should lie to government officials and/or obstruct justice to avoid harm. Knowing you, I assume you weren't actually suggesting that course of conduct, but the fact that you incorporated that issue into your oral decision does suggest judicial approval of it. If I'm misreading this, please tell me; but if I'm not, please file this along with my similar comments about the (b) (6) case: editorializing from the bench is almost never a good practice, and often one that can be taken the wrong way.

Chris

**Christopher A. Santoro**  
Assistant Chief Immigration Judge