

# **Immigration Court Objection Cheat Sheet**

## **Most common objections for ICE cross**

- **Relevance** (Push back; everything is not relevant!)
- **Compound question** (2+ questions in one)
- **Ambiguous/vague question:** (Will create confusion)
- **Argumentative; badgering the witness**
- **Asked and answered**
- **Calls for speculation/legal conclusion**
- **Lacks a question**
- **Misquoting the witness, misrepresenting the record, improper characterization**
- **No foundation/Assumes a fact not in evidence**

## **Objections for ICE evidence**

- **Untimely; did not comply with filing deadline, no good cause for lateness; prejudices respondent**
- **Lack of authentication; not an original; no chain of custody**
- **Unreliable; contains hearsay/multiple levels of hearsay; no opportunity to cross; no corroboration or foundation**
- **More prejudicial than probative**
- **Relevance**

## **Other objections**

- **Leading (ICE may object to you during direct – rephrase)**
- **Calls for hearsay** (Admissible in imm court but may still choose to point out)
- **“Your honor I have to note for the record”** – The non-objection objection where you must note what is happening for the audio record and cannot wait – interpreter is sleeping; client is crying; client is pointing to his head; ICE is banging on the table/rolling eyes/shaking head; an uninvited person has come into the room; guards are doing something distracting/disruptive