

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

DEFENDANT'S MOTION FOR RELEASE ON BOND

Now comes the defendant, Robel Phillipos, by and through counsel, and requests this Court to release him on bond.

In support of this motion, the Mr. Phillipos has filed affidavits in support of his request from family members, community leaders, and respected members of the community, attached hereto and incorporated herein by reference, and further states as follows:

I. FACTS

A. BACKGROUND INFORMATION

1. Mr. Phillipos is 19 years of age. He was born in Boston and raised in Cambridge, Massachusetts. He is a lifelong resident of Massachusetts.
2. Mr. Phillipos is a graduate of Cambridge Rindge and Latin School. As a student, Mr. Phillipos was known to his friends and teachers as someone who “was always respectful of his teachers and was very friendly with his classmates.” (See Attached, Exhibits, Mother’s Affidavit).
3. Mr. Phillipos has strong family ties to the United States and lived in Cambridge,

- MA, with his mother prior to his arrest. Mr. Phillipos comes from a well-educated family, and was raised by his hard working single mother who obtained an associate's degree from Roxbury Community College, a bachelor's degree in Political Science from Northeastern University, and a master's Degree in Social Work from Boston University. (See Attached, Exhibits, Mother's Affidavit).
4. In addition to his mother, Mr. Phillipos has many aunts, uncles, and cousins who are residents of Massachusetts. Mr. Phillipos enjoys strong and extensive community support from his family's church, his friends, and neighbors. Mr. Phillipos is universally described by his support network as friendly, kind, and genuine. (See Attached Affidavits).
 5. Until the most recent semester, Mr. Phillipos attended the University of Massachusetts at Dartmouth. (See Attached Affidavits).
 6. Prior to May 1, 2013, Mr. Phillipos had never been charged with or arrested for any crime whatsoever.

B. SUMMARY OF THE ALLEGATIONS

7. Mr. Phillipos is not charged with having any knowledge whatsoever of the Boston Marathon bombings of April 15, 2013, or with helping the surviving suspect after the incident in any way whatsoever. Nor is there any allegation that Mr. Phillipos removed, tampered with, or destroyed any potential evidence after the bombing. Finally, there is no allegation that Mr. Phillipos collaborated in any way with the other two individuals charged with obstruction of justice.
8. Rather, the government charged Mr. Phillipos with making a misrepresentation related to the conduct of his college friends, Azamat Tazhayakov and Dias

Kadyrbayev, who are charged with obstruction of justice.

9. The government has conceded, at Mr. Phillipos' initial appearance, that Mr. Phillipos does not pose any danger to the community. However, the government alleges that he poses a flight risk if released while trial is pending. The application the statutory law to the facts of the case, however, shows otherwise.

I. ARGUMENT

A. MR. PHILLIPOS IS ENTITLED TO A PRESUMPTION OF RELEASE ON BOND.

10. Title 18 United States Code Section 3142(a) states "that upon the appearance before a judicial officer of a person charged with an offense, the judicial officer shall make a determination regarding bail status of the defendant, and shall enter an order designating a defendant's custodial status" under one of four categories.
- a. Released on personal recognizance *or* upon execution of an unsecured appearance bond (following the provisions of Section 3142(b)).
 - b. Released on a condition or combination of conditions as defined by Section 3142(c).
 - c. temporarily detained to permit revocation of conditional release, deportation, or exclusion under Section 3142(d); or
 - d. detained pursuant to the provisions of Section 3142(e). 18 U.S.C. § 3142(a).
11. Title 18, United States Code, Section 3142(b) requires a judicial officer to order the pretrial release of a defendant on personal recognizance or upon the defendant's execution of an unsecured appearance bond. If, however, the judicial officer finds the release of a defendant on personal recognizance or unsecured appearance bond would not reasonably assure the defendant's appearance at future

proceedings, or will pose a danger to the safety of any other person or the community, then the court will have no obligation to order release. 18 U.S.C. §§ 3142(b) and 3142(c). The judicial officer would then follow the provisions of Title 18, United States Code, Section 3142(c).

12. A defendant who does not qualify for release under Section 3142(b), may nonetheless be released under Section 3142(c). The judicial officer must impose the least restrictive condition or combination of conditions necessary to reasonably assure the defendant's appearance as required and to reasonably assure the safety of any person and the community. 18 U.S.C. § 3142(c)(1)(B).
13. The Court must consider several factors in determining a defendant's eligibility for pretrial release on personal recognizance, unsecured appearance bond, or release on conditions. These factors are listed in Section 3142(g), including:
 - a. the nature and circumstances of the offense (in particular whether it is an offense which is violent or nonviolent in nature, or involves narcotics);
 - b. the weight of the evidence against the person;
 - c. the history and characteristics of the person--character--including physical and mental condition, family ties, employment, financial resources, length of time in the community, community ties, past conduct history relating to drug or alcohol abuse, criminal history, record of court appearances;
 - d. whether, at the time of the current offense or arrest, the person was on probation, on parole, or on other release pending trial, sentencing, appeal, or completion of sentence for an offense under Federal, State, or local law; and
 - e. In addition to considering evidence of the factors set forth above, the court may upon its own motion, or upon the motion of the government attorney, conduct an inquiry into the source of any property to be designated for potential forfeiture or offered as collateral to secure any bond. 18 U.S.C. § 3142(g)(4). If the court determines that any such

collateral or property, because of its source, will not reasonably assure the appearance of the defendant as required, the designation or use of the collateral or property as security for a bond shall be refused. 18 U.S.C. § 3142(g)(4).

14. Under the statute, Mr. Phillipos is entitled to release. Given the attendant circumstances in this case, Mr. Phillipos proposes a combination of factors to provide the Court with sufficient guarantee that, if released, he will return to answer the charge in this case.
15. The application of the above factors to the facts of this case shows Mr. Phillipos poses no risk of flight. Therefore, the Court must release him pending trial.
16. Given the only plausible explanation for even raising the issue of flight risk is the nature of the charge, Mr. Phillipos argues that the charge, in and of itself, does not support the government's argument of flight risk.
17. In fact, the nature and circumstances of the charge against Mr. Phillipos count favorably toward his release. He is not charged with a violent offense.
18. Although the charge stemmed from the investigation of the horrendous attack of April 15 at the Boston Marathon, Mr. Phillipos has nothing to do with the incident.
19. The government alleges that Mr. Phillipos made misrepresentations about whether or not he had been in the bombing suspect's dormitory room on April 18, 2013, and with regard to his knowledge of the conduct of the two individuals charged with obstruction of justice.
20. The school record shows that Mr. Phillipos had taken a leave of absence for a semester and did not attend school in the spring. As a result, he had not had contact with the main suspect or the other two individuals for over two months.

But by sheer coincidence and bad luck, he was invited to attend a seminar on campus on April 18. As such, he did not have much to offer the authorities regarding the investigation of the suspect.

21. After April 18, 2013, Mr. Phillipos was questioned on multiple occasions on separate dates.
22. Mr. Phillipos was not represented by counsel at any time during the separate and multiple interrogations.
23. The nature of the interrogation and the methods used during the process will offer ample explanation as to how Mr. Phillipos ended up facing the charge of making material misrepresentation.
24. This case is about a frightened and confused 19 year old who was subjected to intense questioning and interrogation, without the benefit of counsel, and in the context of one of the worst attacks against the nation.
25. The weight of the federal government under such circumstances can have a devastatingly crushing effect on the ability of an adolescent to withstand the enormous pressure and respond rationally.
26. It is important to note that despite the repeated questioning, Mr. Phillipos remained at his residence making himself available to federal authorities at all times. Although he was arrested at his home, he would have voluntarily walked in to Court had he been summonsed to appear.
27. Mr. Phillipos has every incentive to attend future court hearings. The charge has ruined his once bright future. He will suffer its enduring and devastating effect for

the rest of his life. The only way he can salvage his future is by clearing his name.

He is committed to do just that.

28. The charge levied against him—intentionally making material misrepresentation to a federal agent—is refutable and Mr. Phillipos looks forward to proving his innocence at trial.
29. Under the circumstances, he has every incentive to appear in Court at future hearings.
30. Moreover, the history and characteristics of Mr. Phillipos support his release. Mr. Phillipos is a college student with strong family and personal ties to his community. He has lived in Massachusetts his entire life and has been involved with the Cambridge community since a very young age. Mr. Phillipos is described as someone who is friendly, mild-mannered, peaceful, and respectful of his elders.
31. Prior to his arrest, Mr. Phillipos lived with his mother in Cambridge, Massachusetts. Many of his family members, with whom he maintains close relationships, live in the Boston area. In addition to enjoying strong relationships with his numerous family members, Mr. Phillipos enjoys strong and extensive community support from his friends, neighbors and his family's church. Mr. Phillipos has no criminal history or involvement with the criminal justice system prior to his arrest in this matter.
32. Mr. Phillipos has proposed a suitable home plan and a third-party custodian.

33. In sum, Mr. Phillipos does not present a risk of flight. His personal history and ties to the community, in addition to the particular nature and circumstances of the offense, are compelling evidence of the absence of any flight risk.

CONCLUSION

Wherefore, Mr. Phillipos respectfully requests this Court to enter a pretrial release order releasing him on pretrial release conditions including GPS monitoring and contact restrictions in addition to all other standard conditions of release.

Respectfully submitted
Robel Phillipos
By his attorneys,

/s/ Derege B. Demissie

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES

v. Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPPORT OF ROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Genet Bekele, state and depose as follows:

1. I am Robel Phillipos's mother. I am a United States citizen.
2. I reside in Cambridge, Massachusetts. I have lived in Massachusetts since 1981.
3. I have an Associate's Degree from Roxbury Community College, a B.S. in Political Science from Northeastern University, and a Master's Degree in Social Work from Boston University.
4. I am currently a domestic violence specialist for a service agency. Previously, I was a protective services social worker, a program director of a domestic violence shelter, and a counselor for immigrant refugees for many years.
5. My son, Robel, was born on October 18, 1993 in Boston, Massachusetts. I raised him as a single mother, working two jobs. Despite having worked two jobs, I have always been an involved parent in Robel's life since he was young. I raised him with Christian values and taught him the value of working hard. I attended all teacher conferences, chaperoned many of his field trips, and made sure he did his homework every night.
6. With every opportunity he had, Robel has always tried to make things easier on me. He

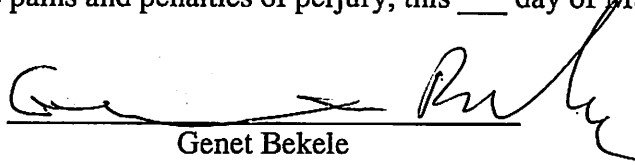
was very cognizant of the hard work that I had to put in being a single parent. Robel helped around the house by doing the dishes and the laundry, running errands such as going to the grocery store, and showing his appreciation in little ways.

7. Robel is very close with our family including my siblings, nieces and nephews. Being a single mother, our extended family's presence and support were always important to us. Our extended family, which includes my cousins and their children, are very close to us as well. We have annual family reunions, which between 60 to 70 family members attend.
8. Everyone knows Robel as being a compassionate, thoughtful, and sociable person. He was always been respectful toward his teachers and very friendly with his classmates. He displays the same attitudes toward our neighbors and everyone he encountered. He was well liked by everyone I know including his teachers and his classmates. Robel has friends from diverse backgrounds and was accepting of everyone he encountered. He has always been an extremely friendly, mild-mannered and very peaceful kid who respects his elders.
9. Growing up in Cambridge, Robel was a part of various community programs. Since at a young age, Robel always talked about how he enjoyed community work. As an example, Robel participated in the Cambridge Mayor's Program starting when he was about 14 years old. He was a part of this program for several years being assigned to various community-centered organizations in Cambridge. Robel's responsibilities varied between administrative tasks to participating in skills and leadership trainings to tutoring younger students in math. Also, Robel was part of the Cambridge Kid's Council after being appointed by the Cambridge City Manager in 2010. In this program, Robel met with city

officials to address concerns for the youth in the city. Robel also was invited to attend the National League of Cities Convention in 2010 and 2011.

10. Robel graduated from Cambridge Rindge and Latin School in 2011. He was an Honor Roll student during his freshman and sophomore years of high school. Robel attended UMass Dartmouth beginning fall of 2011. Given our close relationship, I visited him very often and spoke to him on the phone at least once every two days. Robel decided after this past fall semester to take a Semester off from school. Beginning December of 2012, Robel moved back into our apartment and had been living with me. Robel was in the process of securing an internship when he was detained.
11. As a person of Ethiopian decent living in Boston, I, and my family members living in the area, look forward to the Boston Marathon every year. It is an event we celebrate each year cheering on TV or at the sidelines as Ethiopian athletes cross the finish line.
12. When the devastating event took place on April 15, we mourned for those who lost their lives and prayed for the injured.
13. My son wants nothing more than the opportunity to clear his name. My whole family is in complete shock over the accusation made against him. We are all in disbelief that this is actually happening to our family.
14. I love my son unconditionally as does the rest of our family. I am willing to do whatever I can to support my son as he struggles to deal with this ordeal. The whole family is committed to helping him fight the charge filed against him.
15. I have no doubt that my son will abide by any condition of release the Court may impose and my family is willing to assist him to comply with each and every condition.

Signed under the pains and penalties of perjury, this 2 day of May 2013.



Genet Bekele

AFFIDAVIT IN SUPPORT OF ROBEL PHILLIPOS' REQUEST FOR RELEASE ON BOND

I, Risa L. Mednick, state and depose as follows:

I reside in Cambridge, Massachusetts where I am the Executive Director of Transition House, Inc. a community-based nonprofit organization that works with victims of domestic violence.

I have known Ms. Genet Bekele since 2007, when we were both asked to join the Community Crisis Response Team, a project of the Victims of Violence Program at Cambridge Health Alliance. Funding cuts forced the Crisis Response Team to shut down a few years ago, but during its long tenure, it offered a highly specialized response for traumatized individuals, families and community groups in the aftermath of violence. Genet and I trained together and met monthly with other human service professionals to develop and discuss intervention strategies.

Our paths intersected again when I became the Chair of the Board of Directors at Transition House, and later its Executive Director. Genet had been the Director of the organization's Emergency Shelter for several years before I was affiliated with the organization. My colleagues and I continue to draw on her expertise in her role with the Massachusetts Department of Transitional Assistance. Genet generously offers her time and skills to address domestic violence and we continue to work together on the Cambridge Domestic Violence Task Force and the Cambridge, Arlington Belmont High Risk Assessment Team.

I met Robel Phillipos during the 2009-2010 school year while he served on the Cambridge Kids' Council. I was asked to advise on a Youth and Family Subcommittee and worked with Robel as well as other youth and adult community leaders to inform the Council's strategic plan. Robel quickly distinguished himself as a highly informed member of the working group with keen insights about the issues we were addressing. He impressed me as a remarkably bright, sensitive, articulate teenager with a surprisingly nuanced understanding of how social issues impact families and youth and ways our project might circumvent the shame and stigma of asking for help. It was he who approached me after a meeting one evening to introduce himself as Genet Bekele's son. It wasn't a surprise at all that Robel would share his mother's deeply rooted ethos for community service as well as her intelligence and empathic temperament.

No news could have been more shocking than learning of Robel's arrest on Wednesday, May 1, 2013. Our community is carrying a heavy burden of common shock, trauma and pain in the aftermath of horrific violence. Cambridge is a small city with the sensibility of a village; everyone is connected and no one is unaffected. I and other colleagues have reached out to Genet and her family to offer support. I am committed to offering Genet and Robel any help I can.

Signed under the pains and penalties of perjury, this 4th day of May 2013.



Risa L. Mednick
Cambridge, Massachusetts

I Ronit Barkai state and depose as follows:

I reside in the town of Reading MA. I have a Masters in Science in Counseling and Psychology and have been working with assisting victim of sexual assault and domestic violence for 23 years. I started working for Transition House in May of 2002. Transition House assists victims of violence in fleeing violence, finding safety and rebuilding their life. I am currently serving in the role of Director of Supported Services and Community Partnerships.

I met Genet Bekele in May 2002, she was the Director of Transition House's Emergency Shelter at the time and she had been the second person to interview me for the position of Coordinator of the new Transitional Living Program. The interview went very well, we connected on many levels and both Genet and I were excited with starting to work together. Shortly after the interview I began working at Transition House and Genet was a wonderful support and ally to me. She was passionate in helping victims of violence and was empathic and strong in her mission to help our clients. We worked closely together for several years and then Genet moved on to another position helping elders that were abused. We continued to maintain contact and once in a while had lunch together. I always felt that she understood me, and I loved seeing her. At some point Genet took on a position at the Department of Transitional Assistance (DTA) as the Domestic Violence Advocate. She helped victims of violence navigate the complex system of DTA. We started working closely again and I enjoyed working with her in the Cambridge Domestic Violence Task Force, and later also as fellow members in the Cambridge, Arlington and Belmont High Risk Team. The team works to prevent cases of lethality for victims of violence and Genet helped us in providing coordinated support for these cases.

I spoke with Genet last week wanting to invite her to an event we were planning for the 18th of May that we wanted her to participate in. I asked how she and Robel were doing after the recent events in Boston and she told me that Robel went to High School and College with the younger Boston Bomber, Dzhokhar Tsarnaev. She told me that Robel was home and very upset about the events that happened. Robel had told her that he was shocked and disappointed in his lack of judgment in character and how this took him completely by surprise. We both spoke about how sad this all was and how could a local boy that everyone liked suddenly conduct such horrible acts, causing death and pain.

Genet has always proudly spoken of Robel since we met in 2002. My daughter is only a year younger and we always spoke at length about how our children were doing. She would show me his school pictures and I admired how as a single mother she raised such a wonderful son. She educated him to be responsible, caring and focused on his future. When I spoke with her last week we were planning for our children to finally meet and to have lunch together. Genet was always telling me of Robel's achievements in school, both academically and in the Kids Council. Robel would call Genet when working at our shelter and I would hear their conversations. In my mind he is still a young sweet boy waiting for his mother to come home and calling about his day. I met him only once many years ago and he seemed very wise and focused.

I was shocked to hear of Robel's entanglement in the Boston Bombing events. To me it sounded like a young boy making mistakes and not knowing how to get out of a very scary situation. Genet has raised

him to love and care about people and I am sure both Robel and Genet are deeply pained by this crazy turn of events.

I am willing to help Genet and the family in any way I can. I left Genet messages on both her phones and sent an email to her upon hearing of the recent events, trying to be of help.

Signed under the pains and penalties of perjury, this 4th day of May 2013.

/s/ Ronit Barkai

Ronit Barkai

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT OF ROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Mesele Kifle, state and depose as follows:

1. I reside in Cambridge, Massachusetts, with my wife and daughter.
2. Up until last month, I was a manager for a parking company in Boston, Massachusetts. I was in that position for about 29 years.
3. I have a B.S. in Political Science from UMass-Boston.
4. I am Robel's mother's cousin. I have known Robel since he was born. Robel and I are very close. Before he went off to college, I saw him for family gatherings and other occasions. Living in Cambridge, I saw him frequently.
5. Robel is a very nice kid. He is well-mannered, friendly, and kind. Robel is very respectful toward elders. I saw Robel grow up with many friends—he is very social. I know most of his childhood friends; they are all good character friends. Robel was very active growing up. He played soccer with those friends and often included my daughter. Robel has a great relationship with his mother. His mother worked hard to support him as a single mother. She raised him with strong Christian values and taught him to be respectful, friendly, and family-oriented.
6. Along with the rest of my family, I am shock about the accusations made against Robel. It is very uncharacteristic of Robel to be associated in such a case. Without any doubt, along with the rest of our family, I will stand by Robel and support him any way I can. I look forward to helping him clear his name.

Signed under the pains and penalties of perjury, this 3 day of May 2013.


Mesele Kifle

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Almaz Kiros, state and depose as follows:

I reside in the city of Brighton, Massachusetts. I work in the service area in Boston

I have known Genet for over 28 years. I have also known Rebel since his birth. In fact Robel grew up with my kids. Especially when he was little he went to Saint Anthony's Catholic school Kindergarten with my kids. I had the joy seeing him grow up and I enjoyed every moment. Genet has worked hard all through the years I have known her to make sure Robel was provided with what he needed and he grew up loved and I have learned a lot from her during this time.. Because Robel grew up with such love d he also became caring and well behaved boy. I am always impressed by his behavior and how he carried himself among others. I was stunned when I heard the news about the charges against him and I pray to God for him and his family. I know God is on their side and I will also stand with them during this difficult time. I will be on their side to support them in anyway I can.

Signed under the pains and penalties of perjury, this 3 day of May 2013.

ALMAZ KIROS 
(Name)

AFFIDAVIT IN SUPORT OF ROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

My name is Salem Mekuria and I have lived in Jamaica Plain, MA since 1982. I am a Professor of Art at Wellesley College since 1993. I would like to write a brief statement of support on behalf of Robel Phillipos.

I have known Robel since his birth. His mother is the best friend of my sister Sehin Mekuria. I knew his mother Genet Bekele many years before Robel's arrival in this world and have watched her raise him on her own with devoted love and care.

I know Robel as a sweet, loving and responsible child and young man. He loves and respects his mother and would never do anything to disappoint her. Having been raised to observe Ethiopian culture, he has always been very deferential to his elders. I know he is a very good student, respects authority and loves learning.

Robel's mother is one of the most humanitarian and generous beings I know. Having experienced hardship as a refugee after escaping from a repressive military regime, she has been working tirelessly to help others with similar experiences. She is grateful that she was given the opportunity to be in a position to help many traumatized families to make the transition into normalcy. She believes and is committed to justice and fairness. I trust that is how she raised Robel: to respect and revere human life, to uphold the cause of justice and to love freedom.

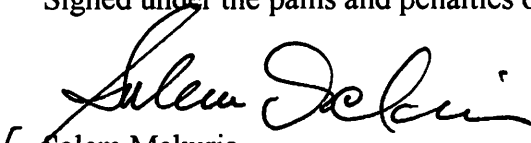
I was and still am in shock that this unexpected event has engulfed even this peace loving family. It is so completely unbelievable that a sweet and responsible kid like Robel could encounter such an unlikely and unfortunate situation. I am bewildered.

However, I know that this experience has taught him a great life lesson and that were he to be released into the custody of his mother, he would in no way pose a threat to anyone, nor will he ever find himself in this kind of predicament again.

As a law-abiding citizen of this country and this state, I understand and greatly appreciate the daunting task the authorities face to protect all of us from the kind of senseless tragedy we have witnessed here. But I am very certain that this young man is not someone who would knowingly want to hurt any living being, nor collaborate with others to do so. It is with this conviction that I write in support of his request for release on conditions.

Thank you for granting me the opportunity to express my support.

Signed under the pains and penalties of perjury, this 3rd day of May 2013.


Salem Mekuria

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Kifle Asfaw, state and depose as follows:

I reside in the city of Boston, Massachusetts, at 10 Lourdes Ave. I have had health issues related to Kidney failure and I am currently a Dialysis patient and have been unable to work for a couple years.

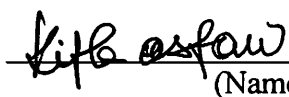
I have known Genet, Robel for the past 15 years. During these years I have spent quality time with Robel on many occasions. Since I have interest in History I read a lot especially after staying home. His mom has encouraged him to spend more time with me and on these several occasions I have had the chance to discussing history with Robel. His knowledge of American Revolution and Civil War is very impressive. He loved literature and spends a lot of his time reading. Our mutual love for great literature allowed us to discuss several subjects.

I found Robel knowledgeable in many areas. His approach is kind and positive and I always had high expectation of what he could accomplish in life. He has impressed me with his well rounded knowledge and behavior towards others. I was touched by the care he showed me in my moments of suffering from my illness. He was a source of comfort and provided me with much needed company.

I was devastated when I heard the news about Robel and I am still shocked about it. The allegation is so inconsistent with Robel's character that I am very eager to learn the whole truth in the coming months.

Until then, all I could do is pray to God that he and his family stay strong during this difficult time. I will be on their side to support them in anyway I can.

Signed under the pains and penalties of perjury, this _ day of May 2013.



(Name)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Martha Goldberg, state and depose as follows:

1. I reside in the city of Cambridge, Massachusetts.
2. I a BA from the University of Connecticut and Maters Degree from St. Michael's College in Vermont.
3. I am a Sponsored Programs Administrator at John F. Kennedy School of Government at Harvard University.
4. I met Genet fifteen years ago as a coworker at the International Institute of Boston. I knew all about Robel as she would talk about him and many of the other staff members knew him. We were all proud of him because he was a really sweet, smart kid. After I left IIB I would continue to hear about Robel over the years and that he was a great student and very kind. When we adopted our teenage daughter from Ethiopia, I reached out to Genet for support. My daughter goes to Cambridge Rindge and Latin and I told her about Robel and that if she needed help she should ask him. He is the kind of person who helps others just like his mother. I went to wedding a few months ago and Genet proudly showed a picture of Robel.
5. My impression of Robel is based on all the good stories I have heard about him from his mother and mutual friends. I think of him often because my daughter is Ethiopian and as she struggles to get used to the culture, I always think of Robel and how he was able to be an American kid, but also keep all the cultural values of an Ethiopian boy- respect for elders, kindness to others, and understanding the value of his culture and religion as well as friends, family and education. When I read in the paper that the judge had admonished him for looking down at the floor instead of into her eyes, I felt sad because that is a sign of respect for in Ethiopian culture- not to look into the eyes of someone older or in authority, and to speak softly. My daughter reports from the high school that his former teachers and the students who know him are shocked by this as Robel is truly a good kid

and student.

6. I know that Genet, Robel's mother is a social worker, an intelligent and caring woman who has spent her career helping others. She is a great mother who is proud and supportive of her son who loves her. She is a religious woman who taught her son traditional values and how to respect others.
7. I saw Robel's face on a TV screen as I was walking by and I knew immediately who he was. I stopped to listen and had a feeling of deep shock and fear for him. I cried and my heart was racing - I felt as if it had happened to my own child. I immediately called a very close friend of Genet's to see what was happening. Now, a few days later, I feel the same -I am in shock. I know people always say when something happens that a child is good- but in this case I know it to be true.
8. I will help this family in any way that I can. My heart and thoughts are with them every moment at his time and I am praying for them. Today is especially sad for them to be apart as it is Ethiopian Orthodox Christian Easter (called Fasika) a time when a family should be together.

Signed under the pains and penalties of perjury, this 4th day of May 2013.

/s/ Martha Goldberg

Martha Goldberg

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Akalu Mekuria state and depose as follows:

At present, I live, with my wife and two sons, at 18 Brinton Street, Apt. 3, Roxbury MA. 02119. I am a naturalized citizen of this great nation. I am a college graduate with BS degree in Bio-medical chemistry. I am owner and operator of Josh Limousine Service. I also work as an on call interpreter and translator for the Trial Courts of Massachusetts. I am also a member of the Ethiopian Evangelical Church in Boston.

I first met Robel's mother, Genet, before Robel was born. This was when I first moved to boston in 1990. Since she was my sister's (Sehin Mekuria) best friend, she came to see and welcome me. After a little while we became like a family. I started to visit her two to three time per month. When I saw Genet became pregnant, I congratulate her. After Robel was born, I went to the hospital and visited the new baby and his mom. Robel was a cute baby and we all liked him.

As the years go by, Robel started growing and whenever I go to visit her he smiles and greets me warmly. Robel was a quit spoken and well mannered kid. I remembered attending several of his birthday parties. He was so good at playing basket ball while he still was still very young. I remember giving him some tips on how to be good at dribbling the ball on both hands. I showed him some drills to do. The next time I went to visit them he showed me his mastery in dribbling. He told me he wanted to be as good as his idol Kobe Bryant. When he finished high school, I went to his graduation party and congratulated him. He was still very perceptive and

well reasoned young man with great ambition and potential. Even though he was the only child for his single mother, he was surrounded by cousins and a niece during his growing years. Robel was not rebellious kid as most teenagers were when they reach adolescence. He was always respectful to his mother, his relatives and everyone he came in contact with.

Robel's mother, Genet Bekele, though single mom, was a very strong mother who gave everything she has for her child, so that he will develop his mental and physical potentials. She raised a well disciplined and goal oriented young man. When I first met her she was working at the International Center in down town Boston. While there Genet, due to her love and commitment to immigrants, worked tirelessly to help them transition smoothly in to the American way of living. She made sure they get the proper training in language and working skills. She was so valuable, especially for Ethiopians, because she was from Ethiopia and spoke the language. When new arrivals come to our church for help, most of the time, we referred them to the Center and Genet would give them help immediately. Genet was liked by the Ethiopian Community in Boston for her tireless effort to improve the well being of its members. She wanted the Community to be well organized so that it will get all the benefits that it deserves from the government and non-governmental agencies. I am sure most people who came to Boston in the 90's know Genet and remember her dedicated service to the Community.

Genet has two sisters and three brothers who live in Boston. Almost all of them are married with children. They are very close to each other. Her extended family is so large that, they do their annual meeting in a retreat or a camp. Genet has strong love for education that she obtained her bachelor and masters degrees in social work while raising her son as a single mom and at the same, working full time.


When I saw Robel on TV and heard of his arrest, I was shocked and couldn't believe my eyes and my ears. I said to my wife, "he might have said something silly or wasn't serious about it. Or he didn't understand the seriousness of his response to the agents." When I called my sister and asked her about the allegation, her answer confirmed my prediction.

Since the day I heard about his arrest, I am praying for his safe release and for the authorities to see through this child the innocence and child like behavior he exhibited during the questioning. I am also praying for his single mom that God would comfort her through this tough and tragic period.

If Robel is released, I will make sure he understands that, responding to authorities

should always be with respect and thoughtfulness not with careless indifference. I and my wife, with his Aunt, her husband and his children will help him be more focused and better prepared to achieve his educational and social goals, eventually become a productive citizen of this great nation, by encouraging and guiding him to attend our church and have a personal relationship with the Lord Jesus Christ, the only Savior and Transformer of people's lives. Our family and the families of our church are praying for his safe release and quick resolution of this case. We are also praying for the honorable judges that God will give them wisdom to dig out the truth and give a fair and unbiased ruling.

Signed under the pains and penalties of perjury, this 4th day of May 2013.

Akale Mekun'a 

(Name)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Dawit Getachew, state and depose as follows:

I reside in the city of Arlington, Massachusetts.

I went to college for an associate's degree.

I am an MBTA employee.

I used to coach a community oriented soccer team on Saturdays that Robel would attend with his mother. We see each other as extended family.

Robel was always a very respectful kid who wasn't very talkative but always excelled in sports even when being the youngest/ smallest player.

Ever since I've met Robel's mother after coming to the U.S., she's been a very reserved, educated, and independent women that I have always respected.

I was shocked after seeing him on the news and don't completely believe that he is guilty of what he did after knowing him as being a very genuine and respectful young man.

I am willing to help his mother financially to assist with paying for the lawyer or any other expenses that is brought up during these times.

Signed under the pains and penalties of perjury, this 3rd day of May 2013.



Dawit Getachew

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

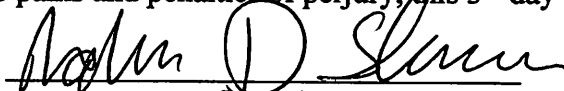
I, Nahum D. Solomon, state and depose as follows:

I currently reside in the city of Boston, Massachusetts and I am a senior at Wentworth Institute of Technology in Boston studying Computer Engineering Technology. I am currently employed as an assistant teacher at 12th Baptist Church Afterschool in Boston.

I am Robel's immediate cousin, thus his mother is my aunt. Robel is a wonderful cousin of mine and I see him as my little brother. My impression of him is that he is a driven and goal orientated individual. From personal experience, Robel has always been calm, gentle, and respectful. When my family first came to the U.S., Robel's mother took us in and helped us settle. She is a great woman who helps out the family as well as many other people. I see her as my own mother. Our family is caring, loving and constantly supports one another.

When I heard this news of Robel of the news, I was in shock and devastated. My heart sank. I couldn't believe that my beloved cousin was on the news and was arrested. I was crying and was in a state of shock. I couldn't believe that this was going on. During this difficult time I am more than happy and more than willing to assist Robel, his mother and his family in any capacity.

Signed under the pains and penalties of perjury, this 3rd day of May 2013.



(Name)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT OF ROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Bethlehem Solomon, state and depose as follows:

I currently reside in the city of Boston, Massachusetts. I am currently a junior at Brandeis University in Waltham, MA studying Health: Science, Society, & Policy and Education Studies. I am currently employed as a Peer Counselor at Brandeis University's Office of Student Financial and Academic Services.

I know Robel and his family at a personal level as I am his cousin and his mother is my aunt. Robel and I have grown up together and spent much time together throughout my life. Robel and his mother were a crucial part of my childhood and still play a key role in my life today. Robel's mother, Genet, took care of me often as a child of her own.

Robel is and has always been that he is a kind individual that is often around family or close friends. Robel is amiable to those around him. He is calm and considerate at times. Even when Robel has a conflicting opinion, he is careful to think of those around him and be sure that no one is offended. Robel willingly puts those around him first. He is a loving cousin that enjoys being in the company of his family.


Genet is an individual that is constantly thinking of others. She raised Robel as a single parent, but often with the assistance of the family. Genet is hardworking individual but is always willing to sacrifice for others. She is unwavering in her character. There is absolutely nothing negative that I can say about Robel, his mother or family. His family is one that is loving, always there for one another, and encouraging.

I was in complete awe and disbelief when I heard of Robel's arrest. I wrote it off as false until I saw his name and then picture on the media. Upon this confirmation, I was deeply saddened and

disheartened. This was completely unexpected and unforeseen by me or any member of our family.

During this difficult time, I am more than willing to help Robel and our family as needed.

Signed under the pains and penalties of perjury, this 3rd day of May 2013.



(Name)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
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I, Kifle Alemu, state and depose as follows:

I reside in the city of Boston, Massachusetts and am a high school graduate. Although I was recently laid off, I held my previous position at General Land for the past approximately 15 years..

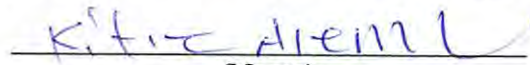
I am Robel's uncle and his mother is my sister. I have known Robel all his life and I've watched him grow and took care of him as my own son. Robel is a gentle, kind, polite and respectful young man. Robels is considerate of his family and anyone that he encounters. He cares a great deal about his mother and family.

Robel's mother is my older sister. When I immigrated to the U.S, she did everything necessary to help me settle. She has always shown kindness and has cared for me and our other siblings. She is a hardworking, caring mother who has always consistently helped and supported Robel throughout his life.

When I heard the news of Robel's arrest, I was extremely shocked and heartbroken. I was unable to wrap my mind around what was going, especially knowing Robel as a gentle young man who has never been in any trouble.

During this difficult time, I am willing to help out and support Robel, Robel's mother and my entire family with anything and in any way that I can.

Signed under the pains and penalties of perjury, this 4 day of May 2013.



(Name)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Zewditu Alemu, state and depose as follows:

I reside in the city of Somerville, Massachusetts.

I am a dental assistant by profession.

I work for Children's Hospital of Boston in Boston Massachusetts.

I am the younger half sister of Genet Bekel who is the mother of Robel. Rbel is my beloved nephew who is the only child of my sister. I am very involved in his upbringing. I have the only child named Naod who is of the same age as Robel. Hence they grew up like siblings.

Robel is very polite and respectful person to anyone. He is also a shy boy who loves calm environment. He is loving and caring to others too. His mother and the entire famiy circle consisting of aunts, uncles, niece and nephews provided support and love to the young ones including Robel. As a result Robel has been a hard working and achieving student. Robel has been working part time since he was 14 years old. He helps and care to his dear mother.


Robel's mother, Genet Bekele is an icon lady who cared and supported her son, her sisters and brothers and other people in the community. She brought up her only child as a single mother working two jobs. She encouraged her son to succeed in his educational pursuit. She sponsored and brought over her brothers and sisters including myself. She helped all of us in settling down in our new homeland. Genet assisted many Ethiopian and other immigrants in the area. Genet worked hard to empower women and families to reach their potential.

I was shocked and stunned when I heard the news of his arrest. I could not control my tears. I do not believe that my beloved Robel crosses the line intentionally to support or assist such a horrendous act against us the people of the USA. By nature he does not like violence. He love

peaceful environment. I have faith in the US justice system that it will at the end exonerate Robel.

I will do anything in my power to support my sister and Robel in their endeavors to seek justice and arrive at the truth. I have been with her and will continue supporting her and her family.

Signed under the pains and penalties of perjury, this 3rd day of May 2013.


Zewditu Alemu

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Dr.Telahun Gebrehiwot, state and depose as follows:

I reside in the city of Cambridge, Massachusetts.

I have a Ph.D. in public administration

I am employed at Boston University as a Lecturer.

I have known Robel since childhood. I am one of the instructors in the Saturday Program that we run for the community. His mother is also part of it.

He is a very quiet, respectful and intelligent individual. He is very attentive and a home boy that very greatly respects his mother and others.

His mother is a well-respected social worker. She always helps almost anyone that needs help in immigration, housing, court cases and hospital referrals.

I was shocked and could not comprehend what is happening.

I believe in my heart that Robel is a decent and innocent individual that doesn't involve himself in such activities.

Signed under the pains and penalties of perjury, this 3rd day of May 2013



Dr. Telahun Gebrehiwot

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Teshome Bekele, state and depose as follows:

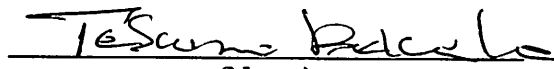
I reside in the city of Medford, Massachusetts and have completed high school. Currently, I am employed as a limousine driver. I am Robel's uncle and have known him ever since his birth. His mother is my sister and I have known her all of my life.

Robel is a gentle and calm young man who has shown me love, respect and kindness his life. He has always been polite and shown a willingness to help his family and mother from a young age. Robel's mother, Genet, is my sister. She is one of the hardest working people that I know and has done a great deal to raise Robel. This family is one that is honest, caring, loving and always looking out for one another.

When I heard the news of Robel's arrest, I was in a total state of shock. I couldn't believe that the Robel that I knew and witnessed grow up was arrested. It is still like a dream that I'm yet to awake from. It is truly devastating.

During this difficult time, I am more than willing to help, support and comfort Robel, and the family with anything that can be done.

Signed under the pains and penalties of perjury, this 3rd day of May 2013.


(Name)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

Docket No.: 13-MJ-02162

ROBEL PHILLIPOS

AFFIDAVIT IN SUPORT O FROBEL PHILLIPOS' REQUEST FOR
RELEASE ON CONDITIONS

I, Getachew Sheferaw, state and depose as follows:

I reside in the city of Somerville, Massachusetts.

I am a graduate of Quincey College in Massachusetts with Associate Degree in Art.

I work for Omni Guide Surgical as manufacturer technician in Cambridge, MA.

Robel is the son of my sister-in-law, Ms. Genet Bekele. He and my son Naod grew up together like siblings. They stayed together most weekends, during school vacations and holidays. Our two families are also very close. I am very closely involved in his upbringing. I know him like my son Naod. Genet brought him up as single mother. She gave him the best upbringing.

Robel is very polite and respectful in his behavior. Robel is a sweet shy kid who loves quiet environment. He even does not like watching horror or war video/movies. He is very loving and caring boy to others. Robel also received the support and love of larger family circle composed of aunts, uncles, niece and nephews who recognized and appreciated his good work. Academically Robel has been consistently successful student. Robel worked part time job since he was 14 years old. He dearly loves his mother who sacrificed her life and provided him with Robel is a sweet kid who loves quiet environment. He even does not like watching horror or war video/movies. upright upbringing.

Robel's mother, Genet Bekele is a role model person who cared and supported her son, her sisters and brothers and other people in the community. She brought up her only child as a single mother working two jobs. She did her best to support her son to succeed in his educational pursuit. She sponsored and brought over her brothers and sisters including my wife. She helped all of them in settling down in our new homeland. Genet assisted many Ethiopian and other immigrants in the area. Genet also advocated for the empowerment of the Ethiopian

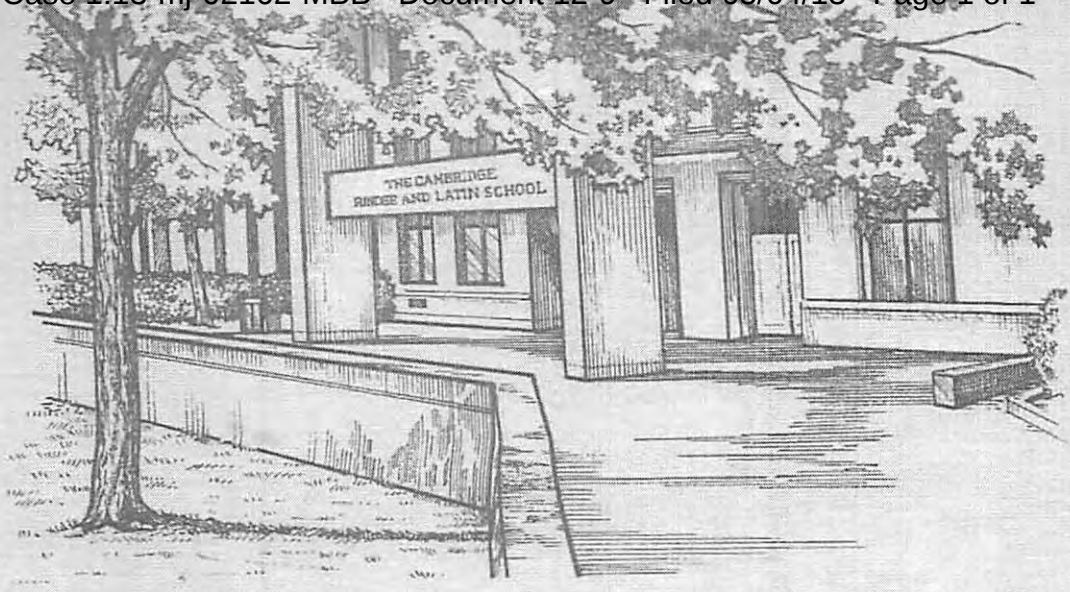
community in the area.

I was extremely shocked when I heard the news of his arrest. Knowing Robel so closely, it is hard to believe and accept the news. By nature he does not like violence. He loves peaceful environment. I have faith in the US justice system that the truth will come out and Robel will be exonerated.

I will do anything in my power to support the family in its endeavor to seek justice and arrive at the truth.

Signed under the pains and penalties of perjury, this 3rd day of May 2013.


Getachew Sheferaw



THE City of Cambridge

This certifies that

Robel Phillipos

has completed the program of study and other criteria established and endorsed by the Cambridge School Committee and awards this

Diploma

Given at the Cambridge Rindge and Latin School in Cambridge, Massachusetts on this second day of June, Two Thousand and Eleven.

Jeffrey M. Young
Superintendent
Christopher Salsed
Principal



David P. Maher
His Honor, David P. Maher
School Committee
Marc C. McGovern, Vice Chair
Alfred B. Fantini
Richard Harding, Jr.
Patricia Nolan
Nancy Tauber
Alice L. Turkel

Robel Phillipos

Education

UMass Dartmouth, Dartmouth MA
B.S. in Marketing and Minor in sociology
Cambridge Rindge and Latin School

Expected Graduation 2015

Class of 2011

Skills:

- Excellent communication skills
- Bilingual (Amharic and English)
- Lobbying and Leadership skills
- Proficient in Microsoft word, PowerPoint and publisher

Employment and Community Services

Cambridge Kid's Council

03/2010-6/2011

- Appointed by the Cambridge City Manger
- Voting Member of the Cambridge Kids Counsel

YIS (Youth Involvement sub-committee)

10/2010-06/2011

- Worked with group of adult to increase youth participation in civic life
- Participated on the Bill H 553 on lowering voting age to 17 In MA
- Met with Congressman Michael Capuano and various representatives

Community Learning Center

6/2011-9/2011

- Receptionist
- Basic office work such as filing, shredding, and making appointments

YPP (Youth Peoples Project)

10/2009-1/2010

- Monitored & tutored Mathematics to youth age 7-11
- Promoted math literacy

Tot Lot Child Care center

07/2009-08/2009

- Assisted teachers w/teaching children
- Provided cross-cultural education

Sub Urban Justice

7/2007-8/2008

- Learned and shared social justice perspective with participants
- Participated in Leadership trainings
- Provided leadership training area schools and community programs

NSP (Neighborhood Service project)

3/2008-5/2008

- Provided volunteer services to the community programs
- Participated skill and leadership trainings

Honors and Awards:

- Honor role: Freshman, sophomore and Junior year
- Sent to the National League of cities Convention

3/2009, 3/2010