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Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
100 Montgomery Street, Suite 200
San Francisco, CA 94104

In the Matter of	)	
Gleidson Rodrigues da Silva	)	**File No. A 203-758-084**
In Removal Proceedings	)	

Immigration Judge: **N/A**

Next Hearing Date: **N/A**

RESPONDENT'S MOTION TO REOPEN PROCEEDINGS AND RESCIND IN ABSENTIA REMOVAL ORDER

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I. INTRODUCTION

Respondent, Gleidson Rodrigues da Silva (A# 203-758-084), respectfully moves this Honorable Court, pursuant to INA § 240(b)(5)(C)(ii), 8 U.S.C. § 1229a(b)(5)(C)(ii), and 8 C.F.R. § 1003.23(b)(4)(ii), to rescind the *in absentia* removal order entered on January 31, 2020, and to reopen these proceedings. This Motion rests on three independent and mutually reinforcing grounds.

First, Respondent never received constitutionally adequate notice of the hearing at which he was ordered removed. The Record of Proceedings obtained through FOIA establishes that on June 12, 2019, Respondent, then seventeen years old, was served in person with a Notice to Appear ("NTA") that listed no hearing date, stating only "a date to be set." *See* Exhibit 4. On or about December 12, 2019, the Court issued a Notice of Hearing rescheduling the matter to January 31, 2020, at 8:30 a.m. *See* Exhibit 5 (Notice of Hearing).

That Notice of Hearing was addressed and mailed exclusively to "Elias-Antunes, Arilson," the adult who had fraudulently presented himself as Respondent's father at the border, under Arilson's lead file number (A088-013-049), at an address where Respondent has never resided. The Court's own mailing of the decision was returned with the notation "Unable to forward, No address provided." *See* Exhibit 3 (Court Notice of Decision, Returned Undelivered). Respondent never received this Notice of Hearing and accordingly did not appear. Because DHS cannot establish that written notice of the actual hearing date was provided to Respondent as required by INA § 239(a), rescission is mandatory under INA § 240(b)(5)(C)(ii).

Second, even if this Court were to find notice sufficient, which Respondent expressly denies, reopening is independently warranted based on extraordinary circumstances and the totality of the equities. Respondent was a minor victim of a scheme that deceived him and his family, exploited his minority and his family's financial vulnerability, and used him as a shield to facilitate an adult's unlawful entry. That adult, Arilson Elias-Antunes, had a prior federal conviction for passport and visa fraud (December 2006, Miami, Florida), a fact that underscores Respondent's role as a victim rather than a willing participant. *See* Exhibit 7 (Arilson Elias-Antunes' Form I-213). Respondent has since built a stable and law-abiding life in the United States: he has worked continuously in the construction industry, has no criminal history, and is the father of a United States citizen child, Arthur, born August 8, 2024.

Third, Respondent is now married to a United States citizen. On March 21, 2026, Respondent married Sophia Lehnen Rodrigues Miranda in San Mateo County, California. *See* Exhibit 13 (Marriage Certificate). Respondent's marriage to his son's mother, following a relationship of over five years, provides a concrete and immediate path to lawful permanent residence through a family-based petition. This consummated change in personal circumstances reinforces the equities favoring reopening. These three grounds, together with the documented failure of notice, compel reopening.

II. PROCEDURAL HISTORY

Respondent is a native and citizen of Brazil, born on September 16, 2001, in Buritis, Rondônia. Respondent's true name is Gleidson Rodrigues da Silva; the surname "Silva-Antunes," under which his immigration proceedings were docketed, was imposed on him as part of a scheme orchestrated by third parties that facilitated his crossing into the United States while he was still a minor. Resp't Decl. ¶ 1.

On June 12, 2019, Respondent entered the United States near El Paso, Texas, at seventeen years of age. Resp't Decl. ¶ 31. At the time of entry, Arilson Elias-Antunes, an adult who was a stranger to Respondent before that trip, presented himself to border authorities as Respondent's father and presented fraudulent travel documents on Respondent's behalf. Resp't Decl. ¶¶ 26-31. The Form I-213 prepared by immigration officers upon Respondent's processing expressly states: "All pertinent information needed for child's assigned A-file was provided by the child's parent. All documents were served upon the parent." *See* Exhibit 6

(Respondent's Form I-213). Respondent himself, a seventeen-year-old who spoke no English, was not individually provided with any immigration documents; they were given to the adult fraudulently registered as his father.

On that same date, June 12, 2019, Respondent was served in person with a Notice to Appear. *See* Exhibit 4. The NTA identified the hearing location as the San Francisco Immigration Court, 100 Montgomery Street, Suite 800, San Francisco, California, but listed no hearing date, stating only "a date to be set.". The NTA was later annotated by hand with the date "MARCH 25 2020," which was subsequently crossed out. Immigration officers provided Respondent with oral advisals in Portuguese regarding the nature of the proceedings and the consequences of failure to appear; however, no specific hearing date was communicated at that time because none had been set.

On or about December 12, 2019, the Immigration Court issued a Notice of Hearing rescheduling the case to January 31, 2020, at 8:30 a.m., in Courtroom 26. *See* Exhibit 5 (Notice of Hearing). This notice was consolidated under Arilson's lead file (A088-013-049) and addressed exclusively to "Elias-Antunes, Arilson" at 375 Oxford Street, San Francisco, CA 94134. The Certificate of Service indicates service by mail dated December 13, 2019. Respondent's name and A-number (A203-758-084) appeared only in the "RE:" line, not in the addressee block. Respondent was not independently served with this hearing notice. The court mailing of the decision was likewise returned with the notation "Unable to forward, No address provided," confirming that mail sent to that address did not reach its intended recipients. *See* Exhibit 3.

On January 31, 2020, neither Respondent nor Arilson appeared, and the Immigration Court entered *in absentia* orders of removal against both individuals. *See* Exhibit 2 (In Absentia Removal Order). Respondent was not notified of that order and did not know of its existence. He learned of it only years later, when he retained current counsel. Resp't Decl. ¶ 44. Upon learning of the order and consulting with counsel, Respondent proceeded with reasonable diligence to prepare and file this Motion.

III. TIMING OF THIS MOTION, NO FILING DEADLINE APPLIES

This Motion is timely as a matter of law. A motion to rescind an *in absentia* removal order based on lack of proper notice under INA § 239(a) may be filed at any time, without limitation. INA § 240(b)(5)(C)(ii), 8 U.S.C. § 1229a(b)(5)(C)(ii); 8 C.F.R. § 1003.23(b)(4)(ii). There is no ninety-day filing deadline and no numerical bar applicable to motions premised on lack of notice. *See Matter of Bulnes,* 25 I&N Dec. 57 (BIA 2009) (motion to reopen for lack of notice may be filed even after departure). Accordingly, this Motion is procedurally proper regardless of the time elapsed since entry of the removal order.

To the extent the Court considers the alternative grounds discussed in Argument D below, the Court retains independent sua sponte authority to reopen proceedings at any time in the interest of justice. 8 C.F.R. § 1003.23(b)(1).

IV. FILING FEE, NOT REQUIRED

No filing fee is required for this Motion. Where the basis for a motion to reopen is lack of proper notice in removal proceedings, the applicable regulation expressly waives the filing fee. 8 C.F.R. § 1003.24(b)(2)(v). Because this Motion is grounded first and foremost on Respondent's failure to receive proper notice under INA § 239(a), no fee accompanies this filing.

V. AUTOMATIC STAY OF REMOVAL

The filing of this Motion automatically stays Respondent's removal pending the Court's disposition. INA § 240(b)(5)(C); 8 C.F.R. § 1003.23(b)(4)(ii). Respondent respectfully requests that ICE be notified of the applicability of this automatic stay provision. *See Matter of Rivera,* 21 I&N Dec. 232, 234 (BIA 1996).

VI. LEGAL STANDARD

An Immigration Judge may enter an *in absentia* removal order only if DHS establishes by clear, unequivocal, and convincing evidence that the written notice required under INA § 239(a)(1) or § 239(a)(2) was provided and that the respondent is removable. INA § 240(b)(5)(A).

An *in absentia* order "shall be rescinded" upon a motion to reopen filed at any time if the respondent demonstrates that he "did not receive notice in accordance with paragraph (1) or (2)" of INA § 239(a). INA § 240(b)(5)(C)(ii); 8 C.F.R. § 1003.23(b)(4)(ii). The statute's mandatory language, "shall be rescinded," leaves no room for discretion: once lack of the required notice is established, rescission follows as a matter of law.

The Supreme Court has held that a Notice to Appear that omits the time or place of the hearing is not a valid notice under INA § 239(a). *See Pereira v. Sessions,* 138 S. Ct. 2105, 2113-14 (2018). Where an NTA fails to specify the hearing date, a subsequent notice of hearing must be properly served to supply the missing information; absent proper service of that subsequent notice, the statutory notice requirement is not satisfied. *See also Niz-Chavez v. Garland,* 141 S. Ct. 1474, 1486 (2021).

Separately, the Court possesses authority to reopen proceedings sua sponte at any time in the interest of justice. 8 C.F.R. § 1003.23(b)(1). In addition, proceedings may be reopened based on newly available evidence, including changed personal circumstances bearing on eligibility for relief. INA § 240(c)(7); 8 C.F.R. § 1003.23(b)(3). Sua sponte reopening is appropriate where a respondent demonstrates exceptional circumstances, including equities so compelling that they override the general policy of finality. *See Matter of G-D-,* 22 I&N Dec. 1132, 1133-34 (BIA 1999).

VII. STATEMENT OF THE FACTS

A. Family Background and Circumstances Leading to Respondent's Departure from Brazil

Respondent grew up in a family of modest means in Buritis, Rondônia. Resp't Decl. ¶¶ 2-9. His mother raised four children largely on her own, working long hours selling spices and condiments, and Respondent, as the eldest son, began working manual jobs at approximately twelve years of age to help support the household. Resp't Decl. ¶¶ 5-8. Respondent's mother fell into debt and was pressured and threatened by creditors, a situation that a local court ultimately addressed by ordering repayment in installments, although the harassment continued. Resp't Decl. ¶ 10.

It was in this context of poverty, debt, and fear that a man known to Respondent's uncle proposed that Respondent travel to the United States. Resp't Decl. ¶¶ 11-14. Respondent's mother initially refused, stating that Respondent was too young, but the man returned repeatedly, insisted, and represented that the trip would be organized and safe and that Respondent would have support upon arrival. Resp't Decl. ¶¶ 13-14. Respondent's mother, worn down by the family's financial desperation and the man's persistence, ultimately agreed. Resp't Decl. ¶ 16. Respondent, then seventeen, accepted because he believed it was a way to help his mother escape her debts; the decision was not his own initiative. Resp't Decl. ¶¶ 16-17.

B. Respondent Was a Minor Used to Facilitate an Adult's Unlawful Entry Through Fraudulent Documents He Neither Created Nor Controlled

The individual who organized Respondent's trip assumed full control over Respondent's travel documents. Resp't Decl. ¶¶ 20-21. Days before departure, he brought Respondent a document bearing Respondent's photograph but a different surname, "Antunes" rather than

Respondent's true surname "Rodrigues," and asked Respondent to sign it. Resp't Decl. ¶ 21. Respondent, seventeen years old, with no education about legal documents or immigration processes and never having seen a passport before, signed it without understanding that it was fraudulent. Resp't Decl. ¶¶ 21-22.

Respondent traveled to Goiânia, where he met Arilson Elias-Antunes for the first time, a complete stranger who would present himself as Respondent's father for the remainder of the journey. Resp't Decl. ¶¶ 26-27. From that point forward, Arilson held all of Respondent's travel documents; Respondent never had access to his own passport. Resp't Decl. ¶ 28. At every checkpoint, it was Arilson who presented documents and answered questions, affirmatively representing that Respondent was his son, while Respondent remained silent. Resp't Decl. ¶¶ 27, 29.

Respondent entered the United States on June 12, 2019, still seventeen years old. Resp't Decl. ¶ 31. Immigration officers processed Respondent and Arilson together. The I-213 prepared for Respondent confirms that "[a]ll pertinent information needed for child's assigned A-file was provided by the child's parent" and that "[a]ll documents were served upon the parent." *See* Exhibit 6 (Respondent's Form I-213). Although Respondent was served in person with a Notice to Appear, that NTA listed no hearing date, only "a date to be set," and any advisals were given to a seventeen-year-old who spoke no English, in the presence of and under the control of a man he had met only days earlier. The address listed on the NTA, 375 Oxford Street, San Francisco, CA 94134, was not Respondent's address; it was the address of João Carlos Perreira, listed on the I-213 as the point of contact for Arilson. Respondent had no connection to that address and never resided there.

C. Arilson Elias-Antunes Was a Repeat Immigration Offender Who Exploited Respondent's Minority

The Record of Proceedings reveals that Arilson Elias-Antunes was not a first-time border crosser. His Form I-213 records the following prior immigration history: on December 27, 2006, Arilson was encountered at the Port of Miami as an inadmissible alien; on December 28, 2006, he was arrested by ICE Enforcement and Removal Operations in Miami for passport and visa fraud; and on January 29, 2007, he was sentenced to time served with one year of supervised release. *See* Exhibit 7 (Arilson Elias-Antunes' Form I-213).

Arilson's prior federal conviction for document fraud is directly relevant to the circumstances of Respondent's entry: the adult who orchestrated the use of a fraudulent passport and the false parent-child relationship at the border was an individual with a documented history of precisely this type of criminal conduct. Respondent, by contrast, was a seventeen-year-old with no prior contact with the immigration system, no knowledge that his documents were fraudulent, and no agency in the scheme.

D. Respondent Was Abandoned Immediately After Entry, Without Knowledge of Any Hearing Date

Immediately after release, Arilson returned Respondent's identity documents and told him, in substance, that he would not accompany Respondent any further, that "that court thing has nothing to do with me," and that he was not really Respondent's father. Resp't Decl. ¶¶ 33-34. Arilson then left. Respondent, seventeen years old, spoke no English, had no money, knew no one in the United States, and had documents he was only beginning to understand were not what he had believed them to be. Resp't Decl. ¶ 35. Although Respondent had been present when a Notice to Appear was issued, that NTA contained no hearing date. Respondent had no way of knowing when or where he was expected to appear, and the one person who might have conveyed that information had just abandoned him.

Respondent and a companion who had traveled under similar circumstances were eventually taken in by an acquaintance living in the United States, who explained to them for the first time that what had been done to them constituted document fraud and that their situation was serious. Resp't Decl. ¶¶ 36-38. Until that moment, Respondent had believed the entire process was a legitimate part of traveling to the United States; he did not know his documents were fraudulent, and he did not understand that presenting himself as another man's son was unlawful. Resp't Decl. ¶ 38.

Respondent did not appear at his removal hearing because he did not know a hearing had been scheduled for January 31, 2020. The NTA he received at the border contained no date. The Notice of Hearing that subsequently set the January 31 date was mailed exclusively to Arilson at 375 Oxford Street, an address where Respondent has never lived, and that mailing was returned to the Court as undeliverable. Resp't Decl. ¶ 40; Exhibit 5 (Notice of Hearing); Exhibit 3 (Court Notice of Decision, Returned Undelivered). Respondent also understood, based on the experience of another minor who had traveled under similar arrangements, that he was expected to appear accompanied by the adult listed as his parent; once Arilson disappeared, Respondent believed he had no way to attend on his own. Resp't Decl. ¶ 41. Members of the Brazilian community later told Respondent, incorrectly but in a manner that had a real and paralyzing effect, that appearing in court would result in his arrest and deportation because of the fraudulent documents, and that fear kept him from seeking legal help for years. Resp't Decl. ¶ 43.

On January 31, 2020, the Immigration Court entered an *in absentia* removal order against Respondent under the name Gleidson Silva-Antunes. *See* Exhibit 2. Respondent was not notified of that order and had no actual knowledge of it. He learned of its existence only years later, when he retained current counsel. Resp't Decl. ¶ 44.

E. Elements of Deception and Exploitation of Respondent's Minority

Respondent's account reflects a pattern in which adults exploited his status as a minor and his family's financial vulnerability to facilitate an unlawful border crossing. Respondent and his mother were deceived as to the true nature of the arrangement: they were told the trip would be organized safely and that Respondent would be supported upon arrival, and were never told that fraudulent documents would be used or that Respondent would be presented as the son of a stranger. Resp't Decl. ¶ 46. None of the promises made to induce Respondent's mother to allow him to travel were kept; Respondent was instead abandoned at an airport with no money, no language skills, and no support. Resp't Decl. ¶ 47. The decision to send Respondent did not originate with him or his mother; it followed repeated pressure directed at a family already burdened by debt and threats from creditors. Resp't Decl. ¶ 48. Respondent's youth was, on this record, the very feature that made the scheme workable: the presence of a minor accompanied by an adult registered as his father was intended to, and did, reduce scrutiny at the border. Resp't Decl. ¶ 49.

Respondent states plainly that he did not intend to defraud the United States immigration system, did not know his documents were forged, and did not understand that presenting himself as another man's son was unlawful. Resp't Decl. ¶¶ 53-54. Respondent did not choose the false name under which his case is docketed, did not choose the man who was falsely registered as his father, and had no control over his travel documents at any point. Resp't Decl. ¶ 54. He asks that this Court evaluate his case in light of these actual circumstances, rather than the fraudulent record created by others' conduct. Resp't Decl. ¶¶ 65-66.

F. Respondent's Life in the United States, Equities, and Family Ties

Since arriving in the United States, Respondent has worked continuously, currently in hardwood flooring installation within the construction industry. Resp't Decl. ¶ 58. Respondent reports no criminal history. The fraudulent name under which he was forced to live prevented him from enrolling in school to complete his education and, for years, from seeking any legal assistance for fear of arrest and deportation, a fear grounded in what he was told by others in the community rather than in fact. Resp't Decl. ¶¶ 56-57.

Respondent is married to Sophia Lehnen Rodrigues Miranda, a United States citizen whom he met after arriving in the United States. Their relationship began in 2020 and was formalized in August 2021; the couple later lived together with Sophia's parents in Daly City, California, and subsequently obtained their own apartment.

On August 8, 2024, their son Arthur Lehnen Rodrigues, a United States citizen, was born at Kaiser Foundation Hospital in Redwood City, San Mateo County. *See* Exhibit 15 (Birth Certificate of Arthur Lehnen Rodrigues). Resp't Decl. ¶ 60. Respondent describes his son as his central motivation to build a stable and lawful future and to be present in a way his own father was not. Resp't Decl. ¶¶ 60-61. On June 17, 2025, Respondent proposed to Sophia, and on March 21, 2026, the couple married in San Mateo County, California. *See* Exhibit 13 (Respondent's Marriage Certificate).

The couple currently resides with Sophia's parents while they work toward establishing their own household. Respondent's marriage to a United States citizen now provides a concrete and immediate path to lawful permanent residence through a family-based petition, discussed further in Section VIII.D.3 below. Respondent's removal from the United States would foreclose that path to lawful status and would separate him from his wife and son.

VIII. ARGUMENT

A. Respondent Did Not Receive Notice of the Hearing at Which He Was Ordered Removed, Because the Only Notice Containing the Actual Hearing Date Was Mailed Exclusively to an Unrelated Adult at an Address Where Respondent Never Resided, and Was Returned Undelivered

The INA requires that notice of a removal hearing be provided to the respondent in person or by mail. INA § 239(a)(1)-(2); 8 C.F.R. § 1003.18(b). The Supreme Court has held that a Notice to Appear that fails to specify the time and place of the hearing is not a valid notice under INA § 239(a)(1). *See Pereira v. Sessions,* 138 S. Ct. 2105, 2113-14 (2018). Where an NTA omits the hearing date, DHS bears the burden of establishing that a subsequent notice supplying that information was properly served on the respondent. *See Niz-Chavez v. Garland,* 141 S. Ct. 1474, 1486 (2021).

The Record of Proceedings in this case establishes a chain of events that renders any claim of adequate notice untenable. On June 12, 2019, Respondent was served in person with an NTA at the border. Respondent does not dispute that this service occurred. However, that NTA did not contain a hearing date; it stated only "a date to be set." *See* Exhibit 4 (Respondent's Notice to Appear). Under *Pereira,* this document alone did not constitute complete notice of a removal hearing, because it did not inform Respondent when he was expected to appear.

On December 12, 2019, the Immigration Court issued a Notice of Hearing that, for the first time, specified a hearing date: January 31, 2020, at 8:30 a.m., in Courtroom 26. *See* Exhibit 5 (Notice of Hearing). This was the only document that ever communicated the actual date on which Respondent was required to appear. It was therefore critical that this notice reach Respondent personally. It did not. The Certificate of Service on the Notice of Hearing establishes that it was served by mail dated December 13, 2019, addressed exclusively to "Elias-Antunes, Arilson" at 375 Oxford Street, San Francisco, CA 94134. Respondent's name and A-number appeared only in a "RE:" line on the notice; the mailing was not addressed to Respondent, was not sent to any address associated with Respondent, and was consolidated under Arilson's lead file number (A088-013-049) rather than treated as an independent case requiring independent service.

The address to which the Notice of Hearing was mailed, 375 Oxford Street, San Francisco, CA 94134, was not Respondent's address. It was the address of João Carlos Perreira, identified in the I-213 as the point of contact for Arilson, not for Respondent. Respondent has never resided at that address, has no connection to it, and would not have received mail sent there. Resp't Decl. ¶ 40. Moreover, even as to Arilson, the mailing failed: the court's cover sheet bears the notation "Unable to forward, No address provided," indicating that the Notice of Hearing was returned to the Court undelivered. *See* Exhibit 3 (Court Notice of Decision, Returned Undelivered). The notice reached neither its intended recipient nor Respondent.

The BIA has recognized that the presumption of delivery attaching to mailed notice is not absolute and may be rebutted by a respondent's credible declaration together with corroborating circumstances. *Matter of M-R-A-,* 24 I&N Dec. 665, 673-74 (BIA 2008). Here, the rebuttal does not rest on Respondent's credibility alone. The documentary record itself, obtained through FOIA, affirmatively establishes that the Notice of Hearing was never addressed to Respondent, was sent to an address where he did not live, and was physically returned to the Court as undeliverable. This is not a case of a missing signature or an ambiguous mail log; it is a case in which DHS's own records demonstrate, on their face, that notice of the hearing date never reached the respondent.

Furthermore, the I-213 itself confirms that Respondent was treated not as an independent respondent but as a dependent of Arilson: "All pertinent information needed for child's assigned A-file was provided by the child's parent. All documents were served upon the parent." *See* Exhibit 6 (Respondent's Form I-213). DHS's own documentation thus acknowledges that Respondent personally was never served with documents; they were given to the "parent," who was in fact a stranger with a criminal history of immigration fraud, who abandoned Respondent within hours of release and had no further contact with him. Respondent had every reason to appear and contest removal, and did not fail to appear out of indifference but because he never knew the hearing had been scheduled for January 31, 2020. Resp't Decl. ¶¶ 40-43.

Because DHS cannot establish that written notice of the actual hearing date was provided to Respondent as required by INA § 239(a), rescission is mandatory. INA § 240(b)(5)(C)(ii).

B. DHS Cannot Rely on Any Purported Failure by Respondent to Appear or Update His Address, Because Respondent, Then a Minor, Was Never Effectively Informed of Any Such Obligation

To the extent the Department contends that Respondent bears responsibility for failing to appear or to maintain a current address with the Court, that argument fails. The obligation to appear and to keep an address current with the Court is meaningful only where a respondent has first received notice sufficient to inform him of the proceedings and of that obligation. *See Matter of G-Y-R-,* 23 I&N Dec. 181, 186-90 (BIA 2001) (the government may not rely on a respondent's failure to comply with address-related obligations where the respondent did not receive the notice that was supposed to advise him of that requirement).

While the NTA served on Respondent at the border may have contained written advisals regarding address obligations, those advisals were delivered to a seventeen-year-old who spoke no English, in a setting controlled entirely by Arilson, and the NTA itself contained no hearing date. Respondent could not meaningfully comply with an obligation to keep an address current with a court for a hearing of which he had no date, under a false name he did not choose, at an address he had never lived at and that was selected by others. The I-213's own statement that "[a]ll documents were served upon the parent" confirms that immigration officers themselves treated Arilson, not Respondent, as the responsible party for all notice and compliance purposes. Respondent cannot be charged with failing to satisfy an obligation that, as a practical matter, was never meaningfully communicated to him. Resp't Decl. ¶¶ 32, 40, 42.

C. The Due Process Clause Independently Requires Rescission

Although the statutory notice defect is sufficient on its own to require rescission, the circumstances here also reflect a violation of Respondent's constitutional due process rights. The Fifth Amendment guarantees that no person shall be deprived of liberty without due process of law, and removal is a severe sanction implicating substantial liberty interests. *See Mathews v. Eldridge,* 424 U.S. 319, 335 (1976). Due process requires notice "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane v. Cent. Hanover Bank & Trust Co.,* 339 U.S. 306, 314 (1950).

Here, the only notice containing the actual hearing date was mailed to a third party at an address unconnected to Respondent, and was returned to the Court undelivered. DHS's own records confirm that Respondent, a seventeen-year-old, unrepresented minor who spoke no English, was treated as a dependent of an adult who turned out to be a convicted immigration fraudster, and that all documents were served upon that adult rather than upon Respondent individually.

Under these circumstances, no process reasonably calculated to reach Respondent was ever employed. Ordering a deceived and abandoned minor removed *in absentia,* based on a hearing notice that was mailed exclusively to his fraudulent "father" and returned as undeliverable, offends the constitutional requirement of meaningful process. The Court need not reach this constitutional ground if it grants rescission on statutory grounds, but the due process violation underscores why rescission is compelled.

D. In the Alternative, Extraordinary Circumstances Independently Warrant Reopening: Respondent Was a Minor Exploited to Facilitate Another's Unlawful Entry and Has Since Developed Substantial, Well-Documented Equities

Even if this Court were to conclude that statutory rescission for lack of notice is unavailable, which Respondent expressly denies, reopening is separately warranted based on the totality of the circumstances and the equities at stake. 8 C.F.R. § 1003.23(b)(1); INA § 240(c)(7). Reopening is permitted where circumstances have arisen subsequent to the prior proceeding bearing on Respondent's eligibility for relief. 8 C.F.R. § 1003.23(b)(3).

D.1. Respondent's Entry Was Procured Through the Deception and Exploitation of a Minor by an Adult with a Documented History of Immigration Fraud

The circumstances of Respondent's entry reflect the deception and exploitation of a child. Respondent, then seventeen, did not choose to leave Brazil; the plan originated with an adult who repeatedly pressured Respondent's mother, exploiting the family's financial desperation and debt. Resp't Decl. ¶¶ 13-17, 48. Respondent was never told that the documents used to bring him into the United States were fraudulent or that he would be presented as the son of a stranger; he was told only that everything would be handled safely and that he would be supported upon arrival. Resp't Decl. ¶¶ 14, 46-47.

None of those assurances were honored: Respondent was abandoned at an airport, alone, without money, without English, and without anyone to turn to. Resp't Decl. ¶¶ 33-36. His minority itself was the tool that made the scheme workable, since an adult accompanied by a child registered as his son drew less scrutiny than an adult traveling alone. Resp't Decl. ¶ 49.

The Record of Proceedings now confirms that the adult at the center of this scheme, Arilson Elias-Antunes, had a prior federal conviction for passport and visa fraud (December 2006, Miami, Florida). *See* Exhibit 7 (Arilson Elias-Antunes' Form I-213). This is not a case of two individuals making a mutual decision to cross the border together with false documents. It is a case of a minor being recruited, deceived, and used by an adult with a documented history of exactly this type of criminal conduct. The Court should weigh this disparity in evaluating the extraordinary circumstances that led to Respondent's entry and to his failure to appear.

D.2. Respondent Has Since Developed Substantial Equities Warranting Reopening

Since his entry as a minor in 2019, Respondent has built a stable, law-abiding life. He has worked continuously in the construction industry, currently installing hardwood flooring, and reports no criminal history. Respondent is the father of a United States citizen child, Arthur Lehnen Rodrigues, born August 8, 2024, and is now married to Arthur's mother, Sophia Lehnen Rodrigues Miranda, a United States citizen. *See* Exhibit 15 (Birth Certificate of Arthur Lehnen Rodrigues); Exhibit 13 (Respondent's Marriage Certificate). Resp't Decl. ¶¶ 58-63.

The removal order presently on record was entered under a name that was never Respondent's own, arising from a scheme in which Respondent was the instrument, not the architect. Allowing that order to stand, without any opportunity for Respondent to be heard, would permanently separate a United States citizen spouse and a United States citizen child from Respondent based on proceedings of which Respondent had no knowledge and no opportunity to participate.

D.3. Respondent's Marriage to a United States Citizen Provides a Concrete, Immediate Path to Lawful Status

Respondent's equities are further, and independently, strengthened by his marriage to a United States citizen. On March 21, 2026, Respondent married Sophia Lehnen Rodrigues Miranda in San Mateo County, California, following a relationship that began in 2020 and that has included cohabitation, the birth of their son Arthur in 2024, and a public engagement in June 2025. *See* Exhibit 13 (Respondent's Marriage Certificate). This is not a marriage of convenience entered in response to these proceedings; it is the culmination of a five-year relationship that predates, and is independent of, this Motion.

Respondent's marriage to a United States citizen spouse provides an immediate basis for a family-based immigrant visa petition (Form I-130) on his behalf, which counsel intends to file. Once approved, that petition would establish Respondent's prima facie eligibility to seek adjustment of status or other appropriate relief in reopened proceedings. As the spouse of a U.S. citizen, Respondent qualifies as an immediate relative under INA § 201(b)(2)(A)(i), a classification with no annual numerical limitation and immediate visa availability. *See* INA § 201(b); 8 U.S.C. § 1151(b).

This creates a pathway to adjustment of status under INA § 245 that was not available at the time of the original proceedings. Where a respondent develops new eligibility for relief subsequent to a hearing, reopening is warranted. 8 C.F.R. § 1003.23(b)(3); *see also* INA § 240(c)(7)(C)(i). Absent rescission of the *in absentia* order, Respondent is barred from discretionary relief for ten years pursuant to INA § 240(b)(7), which would foreclose pursuit of this relief pathway. Reopening is necessary to allow Respondent to pursue this newly available form of relief.

E. In the Alternative, the Court Should Exercise Its Sua Sponte Authority to Reopen These Proceedings

An Immigration Judge may reopen proceedings sua sponte at any time in the interest of justice. 8 C.F.R. § 1003.23(b)(1). Sua sponte reopening is appropriate where a respondent demonstrates exceptional circumstances, including equities so compelling that they override the general policy of finality in removal proceedings. *See Matter of G-D-,* 22 I&N Dec. 1132, 1133-34 (BIA 1999).

The totality of circumstances here presents precisely such a case. Respondent entered the United States at seventeen years of age, deceived and used by a convicted immigration fraudster to facilitate that adult's unlawful entry. He was served with a Notice to Appear that contained no hearing date, and the subsequent Notice of Hearing supplying the actual date was mailed exclusively to the fraudulent "father" and returned to the Court as undeliverable.

He had no legal representation, no English proficiency, and no meaningful understanding of the proceedings against him. He has resided in the United States continuously since 2019, has no criminal history, is the father of a United States citizen child, and is married to a United States citizen spouse with a concrete path to lawful permanent residence through a family-based petition. Resp't Decl. ¶¶ 1, 31-44, 58-63; Exhibits 4, 5, 6, 7, 13, 15.

The equities are overwhelmingly in Respondent's favor. Allowing the *in absentia* order to stand would result in the removal of a young man who was brought here as a child through deception, who has built a law-abiding life, and who now has a United States citizen wife and child, based on a proceeding he knew nothing about. Sua sponte reopening is warranted as an independent and alternative basis for relief.

IX. RESPONDENT'S GOOD FAITH AND EQUITIES FAVOR REOPENING

Respondent has consistently demonstrated good faith. He did not devise the scheme that brought him unlawfully into the United States as a minor; he was its instrument. He did not knowingly fail to appear at a hearing; he never knew the hearing date. The NTA he received at the border contained no date, and the only notice that did contain the date was mailed to someone else and returned undelivered. Upon learning, years later and through counsel, that an in absentia order had been entered against him, Respondent acted with reasonable diligence in retaining counsel and pursuing this Motion. Resp't Decl. ¶ 44.

Respondent has lived in the United States continuously since 2019. He has no criminal history and has established meaningful ties, including steady employment, marriage to a United States citizen, and a United States citizen child. These equities strongly support reopening.

X. CONCLUSION

The Record of Proceedings in this case, obtained through FOIA, affirmatively establishes that Respondent never received notice of the hearing at which he was ordered removed *in absentia.* The Notice to Appear served on Respondent at the border contained no hearing date. The subsequent Notice of Hearing, which for the first time specified the January

31, 2020 date, was mailed exclusively to Arilson Elias-Antunes, a convicted immigration fraudster who had fraudulently posed as Respondent's father, at an address where Respondent never resided, and was returned to the Court as undeliverable. The I-213 itself confirms that "[a]ll documents were served upon the parent," not upon Respondent.

Rescission is mandatory under INA § 240(b)(5)(C)(ii) and *Matter of M-R-A-*. Independently, reopening is warranted in light of the extraordinary circumstances of Respondent's entry as a deceived and exploited minor and the substantial equities he has since developed, including fatherhood to a United States citizen child, marriage to a United States citizen spouse, and a concrete path toward lawful status.

XI. RELIEF REQUESTED

WHEREFORE, Respondent respectfully requests that this Honorable Court:

1. Rescind the *in absentia* removal order entered on January 31, 2020;

2. Reopen these proceedings pursuant to INA § 240(b)(5)(C)(ii) and 8 C.F.R. § 1003.23(b)(4)(ii), or, in the alternative, pursuant to 8 C.F.R. § 1003.23(b)(1);

3. Re-calendar Respondent's case before the Immigration Court under Respondent's true legal name, Gleidson Rodrigues da Silva;

4. Permit Respondent, in reopened proceedings, to pursue adjustment of status or such other relief as may be appropriate based on his marriage to a United States citizen and the family-based immigrant visa petition (Form I-130) filed, or to be filed, on his behalf; and

5. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Otavio Haverroth Silva (Bar N. 343486)
Attorney at Law
P.O. Box 90487
San Diego, CA 92169
Counsel for Respondent

Exhibit list

Exhibit 1

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

DECLARATION OF GLEIDSON SILVA ANTUNES
ALIEN NUMBER 203-758-084
IN SUPPORT OF MOTION TO REOPEN

I, Gleidson Rodrigues da Silva, declare, and hereby inform that:

1. My name is Gleidson Rodrigues da Silva. I am 24 years old, and I was born on September 16, 2001, in the city of Buritis, in the State of Rondônia, Brazil. The surname "Silva-Antunes," as it appears in my United States immigration records, was imposed on me without my understanding what was happening, as part of a scheme orchestrated by third parties that facilitated my entry into the United States when I was a minor, at the age of seventeen.

2. I grew up in a humble family in the city of Buritis, Rondônia, a small and quiet town in the interior of Brazil. We lived in Sector 4, on Rua Jaru. Buritis is a town with little crime, peaceful, where people know each other.

3. My mother separated from my father when my brother and I were very young. I have no memory of my parents together. My father is the biological father only of me and my second brother. After the separation, he came to see us a few times, but he never brought anything, never provided consistent financial or emotional support. Over time, he simply vanished. He would move to other cities and we would lose contact. My mother did not encourage us to look for him. His absence was a constant in my life.

4. During the early years, we lived with my maternal grandmother, who gave us support and stability. My grandmother passed away when I was approximately seven or eight years old. Her death was a turning point in my childhood, because from that moment on, my mother was left completely alone as both father and mother of the household. There were five of us: me, my mother, my brother, my sister, and my youngest brother.

5. Over the years, my mother had other relationships, but none lasted very long—two or three years each. None of those partners took on a fatherly role for us. I, being the oldest son and the only male in the house most of the time, assumed from a very early age responsibilities that were not mine. I took care of my siblings, I took care of the house while my mother worked. I was a child taking care of children.

6. My mother worked producing and selling spices and condiments. Her work required constant travel outside the city to sell her products in other locations. She was frequently absent, sometimes for days at a time. My mother had very little formal education—she did

not complete elementary school—but she did everything she could to ensure we did not go without food. We did not go hungry, but we lived in tight circumstances. It was a daily struggle.

7. I began working when I was approximately twelve years old. My first job was at an auto body repair shop, where they fixed crashed cars. Afterward, I worked at a truck body manufacturing facility, cleaning the premises. Later, I went to an agricultural supply store, where I carried heavy bags of animal feed, corn, salt, and other products. It was physically demanding work for a child my age.

8. After the agricultural store, I spent approximately one year helping my mother produce and package the spices she sold. I helped her so that she would not have to pay someone else. At sixteen, I got a job at a glass installation company, where I installed doors, windows, and shower enclosures. There, I earned approximately R$ 1,200.00 per month. Every month, I gave at least R$ 200.00 to my mother for groceries. I contributed whatever I could, because she alone could not afford to maintain the household.

9. I attended school until my second year of high school. I had already repeated a year in eighth grade. At seventeen, when the possibility of going to the United States arose, I was halfway through my second year and had to drop out. I never completed high school.

10. My family's financial situation was very difficult. My mother, trying to maintain the household and support four children, had to borrow money. When she was unable to repay the amount on time, the lenders began to pressure and threaten her. The matter went to court, and a judge ordered her to pay in installments. Even so, the creditor's children continued to harass and intimidate my mother, who lived in fear that they would harm her or us, her children.

11. That was the state of my family when the idea of my going to the United States arose: a single mother with little education, in debt, being threatened, raising four children in a small town, with no support network and no visible alternatives. I was the oldest child and felt the weight of trying to help.

12. Two of my uncles were already planning to go to the United States. One of them was my Uncle Adriano, the husband of my mother's sister, who visited our home frequently. Uncle Adriano told me he had met a man who helped Brazilians emigrate to the United States. In my understanding, this man worked organizing travel and assisting people who wanted a better life abroad.

13. During one of his visits, Uncle Adriano suggested to my mother: "Why don't you send Gleidson to the United States?" My mother refused immediately. She said I was too young and could not go. I was not yet eighteen. She did not want to send me under any circumstances.

14. However, the man that my uncle had mentioned did not accept the refusal. He returned personally to our home, accompanied by my uncle, on more than one occasion. He called my mother, insisted, and asked my uncle to speak with her again. He presented the trip to the United States as a real and safe opportunity for our family. He told my mother he could take me in an organized manner, without risks, and that I would have support upon arrival. He conveyed the impression that this was a structured and legitimate process. He initially suggested that my mother come with me, but she refused because she could not abandon my younger siblings.

15. My mother and I had no knowledge of or experience with immigration processes. We did not know what a visa was, how legal entry into another country worked, or how complex immigration law could be. To us, this man was an acquaintance of my uncle who offered a service: helping people go to the United States.

16. My mother, pressured by the financial situation, the debts, the threats from creditors, and the man's repeated insistence, eventually gave in. She called me at home, together with my stepfather at the time, and asked me if I wanted to go. I remember she was already crying before I even answered. She asked: "Do you think you can handle living far from your mother?" I had never lived away from her. I had never planned to leave Brazil. The idea did not originate from me.

17. I accepted because I saw in that possibility a chance to help my mother escape the debts and the threats. I said to her: "Since we're living like this, I'll go. In five years I'll be back, I'll come back home." I did not come to the United States to get rich or to build a life for myself. I came because my mother was suffocating, and I, as the oldest son, felt the obligation to try to save my family.

18. The man mentioned there would be costs related to organizing the trip, initially around R$ 13,000.00 with an additional amount due upon my arrival. In our understanding, those amounts covered airfare, fees, documents, lodging, and other expenses associated with an international trip. Neither my mother nor I had any frame of reference for what international travel cost, and the figures did not seem abnormal to us. To us, it was the price of an opportunity.

19. My mother did not have that money. The stepfather at the time had a friend who worked in Rondônia, and that friend lent the initial amount. My family, already in debt, went deeper into debt. But we believed it was an investment in my future and in my family's future. There was nothing, in our perception, that indicated we were paying for something illegal.

20. The man assumed full responsibility for organizing the trip. He told my mother he would take care of everything: tickets, documents, logistics. My mother said she did not know how to handle those things, and he replied that she did not need to worry, that he would resolve everything. He asked for copies of my documents, my identity card and birth

certificate, which my mother provided because she understood them to be part of the arrangements he was making on our behalf.

21. Days later, he appeared at our home with a document that contained my photograph. I noticed that the surname on the document was not mine—it read “Antunes” instead of “Rodrigues.” He asked me to sign it. In my seventeen-year-old mind, that was part of the process. I had no knowledge of how documents for international travel were issued. I had never seen a passport in my life. I believed that the document was necessary, perhaps some formality or specific registration that I did not understand. I signed it because I trusted that the man, recommended by my own uncle, was handling things properly.

22. I had absolutely no idea that the document was forged or that signing something with a different name had any legal significance. No one explained anything to me, and I had no reason to question what an adult I trusted had placed in front of me. I was a teenager from a small town in the interior of Brazil, with no education about laws, documents, or immigration processes. I had never traveled outside my city. My understanding was simple: that piece of paper was part of the necessary “paperwork” for me to travel.

23. My mother also did not understand what was happening. She had very little formal education, had never dealt with international documents, and trusted entirely in the word of that man, who had been introduced to her by her own brother-in-law. For her, just as for me, everything appeared to be done as part of a normal and organized process.

24. My original documents remained with my mother in Brazil. I carried my original identity card for domestic travel within Brazil. The passport and other travel documents remained entirely under the responsibility of the man who organized the crossing and the people he designated. I did not have access to the passport at any point during the trip. That, in my perception, seemed normal: he was taking care of everything, as he had promised.

25. I left Buritis, Rondônia, by bus, accompanied by a friend from the same town who was also being taken under the same conditions. My mother packed my things, bought me some clothes, and said goodbye. I was a seventeen-year-old boy leaving home for the first time. There was nothing in that farewell that made me suspect I was being drawn into something wrong. To me, I was going to seek a better life to help my family.

26. We traveled to Goiânia, in the State of Goiás, where, following instructions received by phone, we met the people who would accompany us on the trip. We were directed to a hotel, and there we met the men who would travel with us. It was at that moment that I met Arilson Elias-Antunes, the adult man who, as I was told, would travel with me and present himself as my responsible guardian.

27. Arilson Elias-Antunes was a complete stranger to me. I had never seen him before that day. I recall that when we met, someone even joked about the fact that I am dark-skinned and he is white. Despite the obvious physical difference, I did not question the situation. In my understanding, that was the arrangement that had been made so I could travel, since

I was a minor and could not travel alone. I did not understand that presenting oneself as father and son involved identity falsification. To me, it was simply the way the trip had been organized.

28. From the moment we met Arilson, the passports and travel documents remained in his possession. He held everything at all times. I had no access to my own passport at any point. They organized everything: the airline tickets, the transfers, the departure points. My friend and I simply followed instructions, as any young person would follow the guidance of an adult responsible for a trip.

29. At every airport and checkpoint we passed through, it was Arilson who presented the documents to the authorities. It was he who answered the questions. It was he who affirmed, pointing at me, that I was his son. I remained silent. He always took the lead. I did not object, because I believed that was the correct procedure. At no point was I told that anything about it was irregular. I simply went along, trusting that everything was being done the right way.

30. I did not feel the urge to tell authorities he was not my father, because, in my mind, nothing wrong was happening. I remember telling my mother before departure: "Mom, if I get in, great. If I don't, I'll just go back home." To me, it was that simple. I was not fleeing from anything. I was going to pursue an opportunity, in the manner the man recommended by my uncle had organized.

31. On June 12, 2019, we entered the United States through the El Paso, Texas region. I was seventeen years old. Arilson Elias-Antunes identified himself as my father to the border agents. He presented the travel documents. The agents processed our data and collected our fingerprints. I remember seeing other families there as well, parents with their children. Nothing about it seemed abnormal to me.

32. We received documents that I would later learn were called Notices to Appear (NTAs). I understood, in a very limited way and through Spanish—since I did not speak a single word of English—that there was something related to a future appearance. However, the documents were handed to Arilson, not to me. I did not keep any copy. I did not know the date, did not know the location, did not know the address. Everything was directed to him.

33. What happened next completely changed my understanding of everything that had occurred. After our release at the border, Arilson Elias-Antunes approached my friend and me and handed us the passports and identity documents. He said, coldly, that from that point forward we were on our own. That he would not continue with us. That his role was only to get us inside the country and that, from there on, he had nothing more to do with us.

34. When I asked about the appearance the agents had mentioned, he replied: "That court thing has nothing to do with me. I'm not really your father. I'm not going to follow through with any of it." He said the same thing to my friend. It was in that moment,

hearing those words, that I began to understand that something was profoundly wrong. The man who had traveled with me, who had presented himself as my father before authorities, who had held my documents throughout the entire trip, was telling me that none of it was real. And after saying that, he simply turned around and disappeared.

35. My friend and I were left abandoned, alone, inside an airport in the United States. I was seventeen years old. I did not speak English—not even "hi" or "bye." I had no money. I did not know where to go. I did not know anyone in that country. I was holding documents that I was now beginning to understand were not what I had thought they were. And there was no one in the world who could help me in that moment. It was the first time in my life that I felt a real fear of being completely alone.

36. Desperate, I managed to call my mother in Brazil using phone credits we had purchased in Mexico during the trip. I told her we had been abandoned. My mother, in despair, called the man who had organized everything. He, through his contacts, arranged for someone in the United States to come pick us up at the airport.

37. That is how I met Dani, a Brazilian woman who had been living in the United States for many years. Dani took us into her home and gave us our first shelter and guidance. When my friend and I told her our story—the documents with different names, the man posing as a father, the abandonment—she was shocked. She explained to us, with a clarity I had never received before, that what had been done constituted identity fraud, that it was a federal crime in the United States, and that the situation I was in was extremely serious.

38. That was the moment I understood, for the first time, the true scope of what had happened to me. Until that instant, I believed that everything that had been done was part of a legitimate process to help me reach the United States. I did not know the passport was forged. I did not know that the document I signed with another name was a crime. I did not know that presenting myself as the son of a stranger constituted fraud. I was kept in ignorance throughout the entire process and only discovered the truth when it was already too late.

39. I called my mother and said, with a heavy heart: "Mom, this passport is a bomb. If I go back to Brazil, I'll be arrested just because of it." I also told her: "You cannot do this to anyone else. If I had tried for a student visa, my life would have been completely different." In that moment, I felt anger, fear, and a profound sense of having been used. I was a child who trusted adults, and those adults deceived me.

40. I did not attend the immigration court hearing. The reasons are multiple and all stem from my condition as a deceived and abandoned minor. First, I had no knowledge of the date, the location, or the address of the court. The NTA-related documents were given exclusively to Arilson Elias-Antunes, who was listed as my father in the records. I did not keep any copy. And since the NTA was linked to the false name and the address provided by Arilson, any subsequent notification was directed to him, not to me.

41. Second, I believed I needed to appear at the hearing accompanied by Arilson, since he was listed as my father in the immigration records. When he abandoned me and said he had nothing to do with the court, I concluded there was no way for me to go alone. I learned that a friend who had come under similar conditions, but with his real father, attended the hearing with his father. This reinforced my belief that I needed to be accompanied. It never occurred to me that I could or should appear on my own.

42. Third, I was a seventeen-year-old teenager in a foreign country, with no understanding of the American legal system, without speaking a single word of English, and with absolutely no legal guidance. I had no attorney, no interpreter, and no one who could explain my rights or obligations.

43. Fourth, after understanding the severity of the forgery, I developed a deep fear. People in the Brazilian community in the United States told me that if I appeared in court, I would be arrested because of the false documents. That they would send me away. That information, although I now know it was incorrect, paralyzed me. The fear of being arrested and deported prevented me from seeking any kind of legal assistance or attending any hearing. I lived with that constant fear for years.

44. On January 31, 2020, an in absentia removal order was issued against me by the Immigration Court in San Francisco, California, under the name Gleidson Silva-Antunes, case number A203-758-084. I was not notified of that order. I did not know it existed. I only became aware of it when my current attorneys informed me, years later.

45. I want to make it absolutely clear that I was a victim of human trafficking. The elements that characterize this victimization are present in every stage of my story.

46. First, there was deception. The man who organized my crossing deceived my mother and me. He presented himself as someone offering a legitimate opportunity. He conveyed trust, safety, and seriousness. He promised that everything would be done in an organized and safe manner. At no point did he reveal to us that the documents would be forged, that I would be registered as the son of a stranger, or that I would be abandoned after entering the country. He exploited our ignorance about immigration processes and kept us in the dark throughout.

47. Second, there were unfulfilled promises. He promised that someone would be waiting for me, that I would have support upon arrival, that I would be safe and protected. The reality was the opposite: I was left at an airport, not knowing where to go, unable to speak the language, without money, and with no safety net. None of the promises that convinced my mother to let me go were fulfilled.

48. Third, I felt pressured to travel. The decision did not originate from me. The man approached my mother repeatedly, insisting, going to our house, using my uncle as an intermediary. He exploited my family's desperate financial situation to convince us. My mother, in debt and under threat from creditors, succumbed to the pressure. I, as her son,

felt the obligation to go and help. There was no free and informed choice. There was pressure, insistence, and manipulation of vulnerable people.

49. Fourth, I felt used because of my minor status. Looking back, I understand that the man deliberately exploited my condition as a minor. He knew that the presence of a child accompanied by an adult registered as a "father" would raise fewer suspicions at borders. My minor status was the tool that facilitated the crossing. I was not a conscious participant in this scheme—I was the instrument that made the scheme possible. I was used.

50. Fifth, I have the profound sense of having been exploited. That man did not care about me or my family. He wanted to make money. He exploited my mother's financial vulnerability, my age, my naïveté, and my entire family's lack of education. He pushed a family that was already suffocating deeper into debt. He deceived us with promises he never intended to keep. And when he was done profiting, he severed all ties, leaving me abandoned and alone in a foreign country.

51. Even after arriving in the United States, I was not entirely free from the man's influence. When my friend, who came under the same conditions, decided not to pay the remaining balance, I was afraid. I told him: "Your family lives there. If you don't pay, he could do something to your mother or father." The man knew where our families lived in Brazil. The urgency I felt to pay was not goodwill—it was fear of retaliation against my mother and my siblings.

52. I worked in the United States to repay the R$ 13,000.00 my mother had borrowed and to settle the remaining balance. I sent the money to my mother in Brazil, she repaid the lender, and I settled the balance directly. Only after everything was paid did the contact end. Since then, I have had no connection whatsoever with that man or with Arilson Elias-Antunes.

53. I want to make it absolutely clear that I did not intend to commit fraud. I did not know the documents were forged. I did not know the passport was falsified. I did not understand that presenting myself as another man's son constituted an irregularity. In my perception and in my mother's perception, everything was being done legitimately by someone who knew the procedures. I was a seventeen-year-old child from a poor, uneducated family who trusted adults who, in reality, were using me for profit.

54. I did not choose to falsify my name. I did not choose who would be registered as my father. I had no control over the documents at any point. I did not understand the legal consequences of what was being done. And when I arrived at the destination, I was simply discarded. The fraud was not mine. It was committed against me.

55. Today, with the maturity and understanding I now possess, I know that what was done was wrong. I still talk to my mother about it, and I tell her: if I had the understanding I have now, I would have refused. If I had tried for a student visa, my life would have been

completely different. But at the time, I lacked that perspective. I was a boy who wanted to help his mother, and I trusted those who told me they could help.

56. The document forgery profoundly harmed my life in the United States. Since I arrived, I have been unable to enroll in any school because my name was false. I wanted to finish high school. I needed just one more year to complete it. But when I tried to correct my name, people in the community told me I would be arrested and deported. I gave up. I have lived all these years carrying a name that is not mine, in constant shame and fear.

57. I did not study because of the false name. I did not seek legal help out of fear of being arrested. I lived for years in a limbo: working, contributing, trying to build something, but always with the shadow of the fraud committed against me hanging over every decision of my life.

58. Despite everything, I rebuilt my life with what I had. I have worked since my first day in the United States. I learned to communicate in English in the workplace, by listening to my employers and clients. Today, I work installing hardwood floors in the construction industry. I am hardworking, honest, and dedicated. I hope to one day take a course in electrical work to grow professionally.

59. I met Sofia, a Brazilian woman who came to the United States as a child and whose family is now composed of American citizens. We met at a party when I had been living in the United States for about two years. Our relationship started gradually, but on October 24, 2020, we became a couple. We have been together since.

60. On August 8, 2024, our son Arthur was born, an American citizen. Arthur is one year and four months old as of the time of this declaration. He is the reason I fight every day. He is the reason I want to be better, to be present, and to build something solid and worthy.

61. I know what it means to grow up without a father. I lived it. I know what it means to be a child and take on adult responsibilities because there was no one else to do it. I know the pain that a father's absence causes. And I do not want, in any way, my son to go through what I went through. I want to be present in Arthur's life, in Sofia's life, and to build for them the stability I never had.

62. Currently, we are living with Sofia's parents, who took us in when finances became tight after Arthur's birth and the period in which Sofia stepped away from work. Sofia works as a dental assistant and has returned to work approximately four months ago. We both contribute equally to maintaining the household and caring for our son. We are rebuilding, and I believe that soon we will have our own home.

63. My greatest fear is being deported and separated from my family. Sofia does not wish to and does not intend to live in Brazil. Her entire life and her family's life is in the United States. Her parents live here. Her career is here. She has made clear on multiple occasions that she will not move to Brazil. If I am removed, I fear my marriage will be destroyed,

that I will lose my daily presence in my son's life, and that the unity of my family will collapse.

64. On June 17, 2025, I proposed to Sophia, and on March 21, 2026, we were married in a ceremony in San Mateo County, California. Sophia and I have been in a committed relationship since 2020, and our marriage is the natural continuation of the life we have built together with our son Arthur. Arthur Lehnen Rodrigues, our son, was born on August 8, 2024, at Kaiser Foundation Hospital in Redwood City, San Mateo County, California, and is a United States citizen by birth. Arthur is the center of my life, and my greatest motivation to resolve my immigration situation is to ensure that I can remain present for him and for Sophia. I want to provide for my family, to be a father to Arthur in a way that my own father was never present for me, and to build a stable, lawful future for us in the United States. My removal would separate me from my wife and my son, both of whom are United States citizens, and would deprive Arthur of the daily presence and care of his father.

65. I fear that my son will grow up without his father, repeating the cycle I have fought so hard to break. That is the fear that accompanies me every day. It is not an abstract fear: it is a concrete fear, based on my own life history and the absence I myself experienced.

66. I ask this Court to consider the circumstances of my entry into the United States. I was a minor, without education, without resources, and without understanding of the legal system. I was the victim of a human trafficking scheme in which adults exploited my minor status, my family's financial vulnerability, and my lack of education to transport me across international borders with forged documents, without my knowledge of the illegal nature of what was being done. I had no control over the documents, I received no legal guidance, I was not properly notified of my immigration hearings, and I was abandoned upon arrival at my destination.

67. I did not intend to defraud the United States immigration system. I did not know I was participating in fraud. I was a child who trusted adults who presented themselves as people willing to help, but who, in reality, used me for profit. I ask for the opportunity to have my case reevaluated based on the actual circumstances and to remain in the United States, where my family, my work, my life, and my son's future are.

68. Accordingly, I declare that everything I have reported is true. I did not choose the path by which I was taken. I was deceived, pressured, instrumentalized, and abandoned by people who exploited my age, my ignorance, and my family's vulnerability. But I chose to rebuild my life with dignity, and I ask to be given the opportunity to continue doing so.

I declare, under penalty of perjury, that the foregoing is true and correct.

/Signature/

____

GLEIDSON SILVA-ANTUNES
Date: 08/21/2026

I, ANDRE PENNA MELLO, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Portuguese to English has been performed by myself, a qualified translator fluent in both languages, and that the following is an accurate and complete translation of the document.

______________________________ Date: August 21, 2026.

DEPARTAMENTO DE JUSTIÇA DOS ESTADOS UNIDOS
SECRETARIADO EXECUTIVO DE IMIGRAÇÃO
CORTE DE IMIGRAÇÃO

DECLARAÇÃO DE GLEIDSON SILVA ANTUNES
NÚMERO DE ALIEN 203-758-084
EM APOIO À MOTION TO REOPEN

Eu, Gleidson Rodrigues da Silva, declaro, venho por meio desta, informar que:

1. Meu nome é Gleidson Rodrigues da Silva, tenho 24 anos e nasci em 16 de setembro de 2001, na cidade de Buritis, no Estado de Rondônia, Brasil. O sobrenome "Silva-Antunes", conforme consta nos registros de imigração dos Estados Unidos, foi imposto a mim, sem que eu compreendesse o que estava acontecendo, como parte de um esquema articulado por terceiros que viabilizou minha travessia para os Estados Unidos quando eu era menor de idade, aos dezessete anos.
2. Cresci em uma família humilde na cidade de Buritis, Rondônia, uma cidade pequena e tranquila no interior do Brasil. Morávamos no Setor 4, na Rua Jaru. Buritis é uma cidade com pouca criminalidade, pacata, onde as pessoas se conhecem.
3. Minha mãe se separou do meu pai quando eu e meu irmão éramos muito novos. Eu não tenho nenhuma lembrança dos meus pais juntos. Meu pai é pai apenas de mim e do meu segundo irmão. Após a separação, ele apareceu algumas vezes para nos visitar, mas nunca levava nada, nunca deu assistência financeira nem emocional consistente. Com o tempo, ele simplesmente sumiu. Ia para outras cidades e nós perdíamos o contato. Minha mãe não nos incentivava a procurá-lo. A ausência dele foi uma constante na minha vida.
4. Nos primeiros anos, moramos com a minha avó materna, que nos deu apoio e estrutura. Minha avó faleceu quando eu tinha aproximadamente sete ou oito anos. A morte dela foi um marco na minha infância, porque a partir dali minha mãe ficou completamente sozinha como pai e mãe da casa. Éramos cinco pessoas: eu, minha mãe, meu irmão, minha irmã e o meu irmão mais novo.
5. Ao longo dos anos, minha mãe teve outros relacionamentos, mas nenhum durou muito tempo — dois, três anos cada um. Nenhum desses companheiros assumiu o papel de pai para nós. Eu, sendo o filho mais velho e o único homem da casa na maior parte do tempo, assumi desde muito cedo responsabilidades que não eram minhas. Eu cuidava dos meus irmãos, cuidava da casa enquanto minha mãe trabalhava fora. Eu era criança cuidando de crianças.
6. Minha mãe trabalhava produzindo e vendendo temperos e condimentos. O trabalho dela exigia viagens constantes para fora da cidade, para vender seus produtos em outras

localidades. Ela se ausentava com frequência, às vezes por dias seguidos. Minha mãe tinha pouca escolaridade — não chegou a completar o ensino fundamental — mas fez de tudo para que não nos faltasse comida. Nós não passamos fome, mas vivíamos apertados. Era uma correria diária.

7. Comecei a trabalhar quando tinha cerca de doze anos de idade. Meu primeiro emprego foi em uma oficina de lanternagem automotiva, onde reformavam carros batidos. Depois, trabalhei em uma fábrica de carrocerias de caminhão, limpando o local. Mais tarde, fui para uma casa agrícola, onde eu carregava sacos pesados de ração para animais, milho, sal e outros produtos. Era um trabalho físico pesado para uma criança da minha idade.

8. Depois da casa agrícola, fiquei aproximadamente um ano ajudando minha mãe na produção e ensacolamento dos temperos que ela vendia. Eu a ajudava para que ela não precisasse pagar outra pessoa. Aos dezesseis anos, consegui emprego em uma vidraçaria, onde instalava portas, janelas e boxes de banheiro. Lá, eu ganhava cerca de R$ 1.200,00 por mês. Todo mês eu dava pelo menos R$ 200,00 para minha mãe comprar alimentos. Eu contribuía com o que podia, porque ela sozinha não dava conta de manter a casa.

9. Frequentei a escola até o segundo ano do ensino médio. Já havia repetido um ano na oitava série. Aos dezessete anos, quando surgiu a possibilidade de eu ir para os Estados Unidos, eu estava na metade do segundo ano e tive que abandonar os estudos. Eu não concluí o ensino médio.

10. A situação financeira da minha família era muito difícil. Minha mãe, para tentar manter a casa e sustentar quatro filhos, precisou pegar dinheiro emprestado. Quando não conseguiu devolver o valor no prazo, as pessoas que emprestaram o dinheiro começaram a pressioná-la e a ameaçá-la. A situação chegou à justiça, e um juiz determinou que ela pagaria em parcelas. Mesmo assim, os filhos da credora continuaram perturbando e intimidando minha mãe, que vivia com medo de que fizessem mal a ela ou a nós, seus filhos.

11. Esse era o cenário da minha família quando a ideia de eu ir para os Estados Unidos surgiu: uma mãe solteira, com pouca instrução, endividada, ameaçada, criando quatro filhos em uma cidade pequena, sem rede de apoio e sem alternativas visíveis. Eu era o filho mais velho e sentia o peso de tentar ajudar.

12. Dois tios meus já estavam planejando ir para os Estados Unidos. Um deles era meu tio Adriano, marido da irmã da minha mãe, que frequentava muito a nossa casa. Meu tio Adriano me contou que tinha conhecido um homem que ajudava brasileiros a emigrar para os Estados Unidos. Na minha compreensão, esse homem trabalhava organizando viagens e auxiliando pessoas que queriam uma vida melhor no exterior. Eu não tinha nenhuma razão para desconfiar que se tratasse de algo fora da legalidade.

13. Durante uma de suas visitas, meu tio Adriano sugeriu à minha mãe: “Por que você não manda o Gleidson pros Estados Unidos?” Minha mãe recusou imediatamente. Ela disse

que eu era muito novo e que não podia ir. Eu não tinha 18 anos ainda. Ela não queria me mandar de jeito nenhum.

14. No entanto, o homem que o meu tio mencionou não aceitou a recusa. Ele voltou pessoalmente à nossa casa, acompanhado do meu tio, em mais de uma ocasião. Ele ligava para minha mãe, insistia, pedia para meu tio falar com ela novamente. Ele apresentou a ida aos Estados Unidos como uma oportunidade real e segura para a nossa família. Disse à minha mãe que conseguiria me levar de forma organizada, sem riscos, e que eu teria amparo ao chegar. Ele transmitiu a impressão de que se tratava de um processo estruturado e legítimo. Ele sugeriu inicialmente que minha mãe viesse comigo, mas ela recusou porque não podia abandonar meus irmãos mais novos.

15. Minha mãe e eu não tínhamos conhecimento nem experiência com processos migratórios. Nós não sabíamos o que era um visto, como funcionava a entrada legal em outro país, nem quão complexa era a legislação de imigração. Para nós, aquele homem era um conhecido do meu tio que oferecia um serviço: ajudar pessoas a irem para os Estados Unidos. Não nos passou pela cabeça que pudesse haver algo de ilegal naquilo. Era como contratar alguém para resolver uma viagem que nós, por falta de instrução, não saberíamos resolver sozinhos.

16. Minha mãe, pressionada pela situação financeira, pelas dívidas, pelas ameaças dos credores e pela insistência daquele homem, acabou cedendo. Ela me chamou em casa, junto com o padrasto da época, e me perguntou se eu queria ir. Eu lembro que ela já estava chorando antes mesmo de eu responder. Ela perguntou: “Você acha que dá conta de morar longe da mãe?” Eu nunca tinha morado longe dela. Eu nunca tinha planejado sair do Brasil. A ideia não partiu de mim.

17. Eu aceitei porque vi naquela possibilidade uma chance de ajudar minha mãe a sair das dívidas e das ameaças. Eu disse a ela: “Já que a gente vive desse jeito, eu vou. Com cinco anos eu tô de volta, eu venho, eu volto embora pra casa.” Eu não vim para os Estados Unidos para ficar rico ou fazer minha vida. Eu vim porque a minha mãe estava sufocada, e eu, como filho mais velho, senti a obrigação de tentar salvar a minha família.

18. O homem mencionou que haveria custos relacionados à organização da viagem, inicialmente cerca de R$ 13.000,00, com um valor adicional a ser pago após minha chegada. No nosso entendimento, esses valores cobriam passagens aéreas, taxas, documentos, hospedagem e outras despesas associadas a uma viagem internacional. Nem minha mãe nem eu tínhamos qualquer referência sobre quanto custava viajar para o exterior, e os valores não nos pareceram anormais. Para nós, era o preço de uma oportunidade.

19. Minha mãe não tinha esse dinheiro. O padrasto da época tinha um amigo que trabalhava em Rondônia, e esse amigo emprestou o valor inicial. Minha família, que já estava endividada, se endividou ainda mais. Mas nós acreditávamos que aquilo era um

investimento no meu futuro e no futuro da minha família. Não havia nada, na nossa percepção, que indicasse que estávamos pagando por algo ilegal.

20. O homem assumiu total responsabilidade pela organização da viagem. Disse à minha mãe que cuidaria de tudo: passagens, documentos, logística. Minha mãe disse que não sabia lidar com essas coisas, e ele respondeu que ela não precisava se preocupar, que ele resolveria tudo. Ele pediu cópias dos meus documentos, minha carteira de identidade e certidão de nascimento, que minha mãe forneceu por entender que faziam parte dos preparativos que ele estava organizando em nosso nome.

21. Dias depois, ele apareceu em nossa casa com um documento que continha minha foto. Eu percebi que o sobrenome no documento não era o meu — constava "Antunes" em vez de "Rodrigues." Ele me pediu para assiná-lo. Na minha cabeça de dezessete anos, aquilo fazia parte do processo. Eu não tinha conhecimento de como funcionava a emissão de documentos para viagens internacionais. Eu nunca tinha visto um passaporte na vida. Eu acreditei que aquele documento era necessário, talvez alguma formalidade ou registro específico que eu não compreendia. Eu assinei porque confiava que o homem, indicado pelo meu próprio tio, estava conduzindo as coisas corretamente.

22. Eu não tinha absolutamente nenhuma ideia de que o documento era falso ou de que assinar algo com um nome diferente tinha qualquer significado legal. Ninguém me explicou nada, e eu não tinha motivo para questionar o que um adulto em quem eu confiava havia colocado à minha frente. Eu era um adolescente de uma cidade pequena no interior do Brasil, sem instrução sobre leis, documentos ou processos migratórios. Eu nunca havia viajado para fora da minha cidade. A minha compreensão era simples: aquele papel fazia parte dos "trâmites" necessários para eu poder viajar.

23. Minha mãe também não compreendeu o que estava acontecendo. Ela tinha pouca escolaridade, nunca havia lidado com documentos internacionais e confiou inteiramente na palavra daquele homem, que havia sido apresentado a ela pelo próprio irmão. Para ela, assim como para mim, tudo parecia estar sendo feito dentro de um processo normal e organizado.

24. Meus documentos originais ficaram com a minha mãe no Brasil. Eu carreguei minha identidade original para deslocamentos dentro do Brasil. O passaporte e demais documentos de viagem ficaram inteiramente sob a responsabilidade do homem que organizou a travessia e das pessoas que ele designou. Eu não tive acesso ao passaporte em nenhum momento durante a viagem. Aquilo, na minha percepção, parecia normal: ele estava cuidando de tudo, conforme havia prometido.

25. Eu saí de Buritis, Rondônia, de ônibus, acompanhado de um amigo da mesma cidade que também estava sendo levado nas mesmas condições. Minha mãe arrumou minhas coisas, comprou algumas roupas e se despediu de mim. Eu era um menino de dezessete anos saindo de casa pela primeira vez. Não havia nada naquela despedida que me fizesse

suspeitar de que eu estava sendo envolvido em algo errado. Para mim, eu estava indo buscar uma vida melhor para ajudar minha família.

26. Fomos até Goiânia, no Estado de Goiás, onde, seguindo instruções recebidas por telefone, encontramos as pessoas que nos acompanhariam na viagem. Fomos orientados a ir a um hotel, e lá conhecemos os homens que viajariam conosco. Foi nesse momento que eu conheci Arilson Elias-Antunes, o homem adulto que, conforme me foi explicado, viajaria comigo e se apresentaria como meu acompanhante responsável.

27. Arilson Elias-Antunes era um completo desconhecido para mim. Eu nunca o tinha visto antes daquele dia. Lembro que, quando nos encontramos, alguém até brincou sobre o fato de eu ser moreno e ele ser branco. Apesar da evidente diferença física, eu não questionei a situação. Na minha compreensão, aquele era o arranjo que havia sido feito para que eu pudesse viajar, já que eu era menor de idade e não podia viajar sozinho. Eu não entendia que se apresentar como pai e filho envolvia falsificação de identidade. Para mim, era simplesmente a forma como a viagem havia sido organizada.

28. Desde o momento em que encontramos Arilson, os passaportes e documentos de viagem ficaram em posse dele. Ele segurava tudo o tempo inteiro. Eu não tive acesso ao meu próprio passaporte em nenhum momento. Eles organizaram tudo: as passagens aéreas, os deslocamentos, os pontos de embarque. Eu e meu amigo apenas seguíamos instruções, como qualquer jovem seguiria as orientações de um adulto responsável por uma viagem.

29. Em todos os aeroportos e pontos de controle pelos quais passamos, era Arilson quem entregava os documentos às autoridades. Era ele quem respondia às perguntas. Era ele quem afirmava, apontando para mim, que eu era seu filho. Eu permanecia calado. Ele sempre tomava a frente. Eu não contestava, porque acreditava que aquele era o procedimento correto. Em nenhum momento me foi explicado que algo daquilo era irregular. Eu apenas acompanhava, confiando que tudo estava sendo conduzido da maneira certa.

30. Eu não senti vontade de dizer às autoridades que ele não era meu pai, porque, na minha cabeça, não havia nada de errado acontecendo. Eu lembro de ter dito à minha mãe antes de partir: “Mãe, se eu entrar, tá de boa. Se eu não entrar, eu vou voltar pra casa.” Para mim, era simples assim. Eu não estava fugindo de nada. Eu estava indo buscar uma oportunidade, da maneira que o homem indicado pelo meu tio havia organizado.

31. Em 12 de junho de 2019, entramos nos Estados Unidos pela região de El Paso, Texas. Eu tinha dezessete anos. Arilson Elias-Antunes se apresentou como meu pai perante os agentes de fronteira. Ele apresentou os documentos de viagem. Os agentes processaram nossos dados e coletaram nossas digitais. Eu lembro de ter visto que outras famílias também estavam lá, pais com seus filhos. Nada daquilo me pareceu anormal.

32. Recebemos documentos que, posteriormente, vim a saber que se chamavam Notices to Appear (NTAs). Eu entendi, de forma muito limitada e através do espanhol — pois eu não

falava nenhuma palavra de inglês — que havia algo relacionado a um comparecimento futuro. No entanto, os documentos foram entregues a Arilson, e não a mim. Eu não fiquei com nenhuma cópia. Eu não sabia a data, não sabia o local, não sabia o endereço. Tudo foi direcionado a ele.

33. O que aconteceu em seguida mudou completamente a minha compreensão de tudo o que havia ocorrido. Após a liberação na fronteira, Arilson Elias-Antunes nos procurou — a mim e ao meu amigo — e nos entregou os passaportes e as identidades. Ele disse, com frieza, que a partir daquele ponto nós estávamos por nossa conta. Que ele não ia seguir conosco. Que o papel dele era apenas nos colocar dentro do país e que, dali em diante, ele não tinha mais nada a ver com a gente.

34. Quando eu perguntei sobre o comparecimento que os agentes haviam mencionado, ele respondeu: "Esse negócio da corte aí não é comigo, não. Eu não sou teu pai de verdade. Eu não vou seguir com isso não." Ele disse a mesma coisa ao meu amigo. Foi naquele momento, ouvindo aquelas palavras, que eu comecei a compreender que algo estava profundamente errado. O homem que havia viajado comigo, que se apresentou como meu pai perante autoridades, que segurou meus documentos durante toda a viagem, estava me dizendo que nada daquilo era real. E, depois de dizer isso, ele simplesmente virou as costas e desapareceu.

35. Eu e meu amigo ficamos abandonados, sozinhos, dentro de um aeroporto nos Estados Unidos. Eu tinha dezessete anos. Não falava inglês — nem "hi", nem "bye." Não tinha dinheiro. Não sabia para onde ir. Não conhecia ninguém naquele país. Eu estava com documentos que eu agora começava a entender que não eram o que eu achava que fossem. E não havia nenhuma pessoa no mundo que pudesse me ajudar naquele momento. Foi a primeira vez na minha vida que eu senti medo real de estar completamente sozinho.

36. Desesperado, consegui ligar para a minha mãe no Brasil usando créditos de telefone que tínhamos comprado no México durante a viagem. Eu contei que havíamos sido abandonados. Minha mãe, desesperada, ligou para o homem que havia organizado tudo. Ele, por meio de seus contatos, conseguiu que uma pessoa nos Estados Unidos fosse nos buscar no aeroporto.

37. Foi assim que eu conheci Dani, uma brasileira que morava nos Estados Unidos há muitos anos. Dani nos acolheu em sua casa e nos deu o primeiro abrigo e orientação. Quando eu e meu amigo contamos para ela a nossa história — os documentos com nomes diferentes, o homem que se passou por pai, o abandono — ela ficou chocada. Ela nos explicou, com uma clareza que eu nunca havia recebido antes, que o que havia sido feito era falsificação de identidade, que aquilo era um crime federal nos Estados Unidos, e que a situação em que eu me encontrava era extremamente grave.

38. Aquele foi o momento em que eu compreendi, pela primeira vez, a real dimensão do que havia acontecido comigo. Até aquele instante, eu acreditava que tudo o que tinha sido

feito fazia parte de um processo legítimo para me ajudar a chegar aos Estados Unidos. Eu não sabia que o passaporte era falsificado. Eu não sabia que o documento que eu assinei com outro nome era um crime. Eu não sabia que me apresentar como filho de um desconhecido configurava fraude. Eu fui mantido na ignorância durante todo o processo e só descobri a verdade quando já era tarde demais.

39. Eu liguei para a minha mãe e disse, com o coração apertado: “Mãe, esse passaporte é uma bomba. Se eu voltar ao Brasil, eu vou preso só por causa dele.” Eu também disse a ela: “Você não pode fazer isso com mais ninguém. Se eu tivesse tentado um visto de estudante, minha vida teria sido completamente diferente.” Naquele momento, eu senti raiva, medo e uma profunda sensação de ter sido usado. Eu era uma criança que confiou em adultos, e esses adultos me enganaram.

40. Eu não compareci à audiência na corte de imigração. As razões são múltiplas e todas decorrentes da minha condição de menor de idade enganado e abandonado. Primeiro, eu não tinha conhecimento da data, do local nem do endereço da corte. Os documentos relativos à NTA foram entregues exclusivamente a Arilson Elias-Antunes, que constava como meu pai nos registros. Eu não fiquei com nenhuma cópia. E como a NTA estava vinculada ao nome falso e ao endereço fornecido por Arilson, qualquer notificação posterior foi direcionada a ele, e não a mim.

41. Segundo, eu acreditava que precisava comparecer à audiência acompanhado de Arilson, já que ele constava como meu pai nos registros de imigração. Quando ele me abandonou e disse que não tinha nada a ver com a corte, eu concluí que não havia como eu ir sozinho. Eu soube de um amigo que veio nas mesmas condições, porém com seu pai verdadeiro, e que esse amigo foi à audiência acompanhado do pai. Isso reforçou minha crença de que eu precisava ir acompanhado. Em nenhum momento me ocorreu que eu poderia ou deveria comparecer por conta própria.

42. Terceiro, eu era um adolescente de dezessete anos em um país estrangeiro, sem compreensão do sistema legal americano, sem falar uma palavra de inglês e sem nenhuma orientação jurídica. Eu não tinha advogado, não tinha intérprete, não tinha ninguém que pudesse me explicar os meus direitos ou obrigações.

43. Quarto, após ter compreendido a gravidade da falsificação, eu desenvolvi um medo profundo. Pessoas da comunidade brasileira nos Estados Unidos me disseram que, se eu aparecesse na corte, eu seria preso por causa dos documentos falsos. Que iriam me mandar embora. Essa informação, embora eu hoje saiba que era incorreta, me paralisou. O medo de ser preso e deportado me impediu de buscar qualquer tipo de ajuda jurídica ou de comparecer a qualquer audiência. Eu vivi com esse medo constante durante anos.

44. Em 31 de janeiro de 2020, uma ordem de deportação in absentia foi emitida contra mim pela Corte de Imigração de San Francisco, Califórnia, sob o nome de Gleidson Silva-Antunes, caso número A203-758-084. Eu não fui notificado dessa ordem. Eu não

sabia que ela existia. Só tomei conhecimento dela quando meus atuais advogados me informaram, anos depois.

45. Eu quero deixar absolutamente claro que eu fui vítima de tráfico humano. Os elementos que caracterizam essa vitimização estão presentes em cada etapa da minha história.

46. Primeiro, houve engano. O homem que organizou minha travessia enganou minha mãe e a mim. Ele se apresentou como alguém que oferecia uma oportunidade legítima. Ele transmitiu confiança, segurança e seriedade. Ele prometeu que tudo seria feito de forma organizada e segura. Em nenhum momento ele nos revelou que os documentos seriam falsificados, que eu seria registrado como filho de um desconhecido, ou que eu seria abandonado após a entrada no país. Ele explorou a nossa ignorância sobre processos migratórios e nos manteve na escuridão durante todo o processo.

47. Segundo, houve promessas não cumpridas. Ele prometeu que eu teria alguém me esperando, que eu teria apoio ao chegar, que eu estaria seguro e amparado. A realidade foi o oposto: eu fui largado em um aeroporto, sem saber para onde ir, sem falar o idioma, sem dinheiro e sem nenhuma rede de proteção. Nenhuma das promessas que convenceram minha mãe a me deixar ir foi cumprida.

48. Terceiro, eu me senti pressionado a viajar. A decisão não partiu de mim. O homem procurou minha mãe repetidamente, insistindo, indo à nossa casa, usando meu tio como intermediário. Ele se aproveitou da situação financeira desesperadora da minha família para nos convencer. Minha mãe, endividada e ameaçada por credores, cedeu à pressão. Eu, como filho, senti a obrigação de ir para ajudar. Não houve uma escolha livre e informada. Houve pressão, insistência e manipulação de pessoas vulneráveis.

49. Quarto, eu me senti usado por ser de menor. Olhando para trás, eu compreendo que aquele homem se aproveitou deliberadamente da minha condição de menor de idade. Ele sabia que a presença de uma criança acompanhada de um adulto registrado como "pai" levantaria menos suspeitas nas fronteiras. Minha menoridade foi a ferramenta que facilitou a travessia. Eu não era um participante consciente desse esquema — eu era o instrumento que tornava o esquema possível. Eu fui usado.

50. Quinto, eu tenho a sensação profunda de ter sido aproveitado. Aquele homem não se importava comigo nem com a minha família. Ele queria ganhar dinheiro. Ele explorou a vulnerabilidade financeira da minha mãe, a minha idade, a minha ingenuidade e a falta de instrução da minha família inteira. Ele endividou ainda mais uma família que já estava sufocada. Ele nos enganou com promessas que nunca pretendeu cumprir. E quando terminou de lucrar, cortou qualquer vínculo, me deixando abandonado e sozinho em um país estrangeiro.

51. Mesmo após a chegada nos Estados Unidos, eu não fui totalmente livre da influência daquele homem. Quando meu amigo, que veio nas mesmas condições, decidiu não pagar o valor restante, eu tive medo. Eu disse a ele: "Sua família mora lá. Se você não pagar, ele

pode fazer alguma coisa com sua mãe, seu pai." O homem sabia onde as nossas famílias moravam no Brasil. A pressa que eu tive em quitar o valor não foi gesto de boa vontade: foi medo de retaliação contra a minha mãe e meus irmãos.

52. Eu trabalhei nos Estados Unidos para devolver os R$ 13.000,00 que minha mãe havia pegado emprestado e para quitar o restante. Eu mandei o dinheiro para minha mãe no Brasil, ela pagou o emprestador, e eu quitei o saldo diretamente. Só depois de pagar tudo é que o contato foi encerrado. Desde então, nunca mais tive nenhum vínculo com aquele homem nem com Arilson Elias-Antunes.

53. Eu quero deixar absolutamente claro que eu não tive a intenção de cometer fraude. Eu não sabia que os documentos eram falsos. Eu não sabia que o passaporte era falsificado. Eu não compreendia que me apresentar como filho de outro homem configurava uma irregularidade. Na minha percepção e na percepção da minha mãe, tudo estava sendo feito de forma legítima por alguém que conhecia os procedimentos. Eu era uma criança de dezessete anos, de uma família pobre, sem instrução, que confiou em adultos que, na verdade, estavam me usando para lucrar.

54. Eu não escolhi falsificar meu nome. Eu não escolhi quem seria o homem registrado como meu pai. Eu não tive controle sobre os documentos em nenhum momento. Eu não compreendia as consequências legais do que estava sendo feito. E quando cheguei ao destino, fui simplesmente descartado. A fraude não foi minha. Ela foi cometida contra mim.

55. Hoje, com a maturidade e a compreensão que tenho, eu sei que o que foi feito era errado. Eu falo com a minha mãe até hoje e digo: se eu tivesse o pensamento que tenho agora, eu teria recusado. Se eu tivesse tentado um visto de estudante, minha vida teria sido completamente diferente. Mas na época, eu não tinha essa visão. Eu era um menino que queria ajudar a mãe, e confiei em quem me disse que poderia me ajudar.

56. A falsificação dos documentos prejudicou profundamente a minha vida nos Estados Unidos. Desde que cheguei, eu não consegui me matricular em nenhuma escola, porque meu nome estava falso. Eu queria terminar o ensino médio. Eu precisava de apenas mais um ano para concluir. Mas quando tentei regularizar meu nome, pessoas da comunidade me disseram que eu seria preso e deportado. Eu desisti. Eu vivi todos esses anos carregando um nome que não é meu, com vergonha e medo constantes.

57. Eu não estudei por causa do nome falso. Eu não busquei ajuda jurídica por medo de ser preso. Eu vivi anos em um limbo: trabalhando, contribuindo, tentando construir algo, mas sempre com a sombra da fraude que foi cometida contra mim pairando sobre cada decisão da minha vida.

58. Apesar de tudo, eu reconstruí minha vida com o que eu tinha. Eu trabalhei desde o primeiro dia nos Estados Unidos. Aprendi a me comunicar em inglês no ambiente de trabalho, ouvindo meus patrões e clientes. Hoje, trabalho com instalação de pisos de

madeira na área de construção civil. Sou trabalhador, honesto e dedicado. Tenho vontade de um dia fazer um curso de eletricidade para crescer profissionalmente.

59. Conheci Sofia, uma brasileira que veio para os Estados Unidos ainda criança e cuja família já é composta de cidadãos americanos. Nós nos conhecemos em uma festa quando eu já morava nos Estados Unidos há cerca de dois anos. O nosso relacionamento começou aos poucos, mas em 24 de outubro de 2020, nos assumimos como casal. Estamos juntos desde então.

60. Em 8 de agosto de 2024, nasceu nosso filho, Arthur, cidadão americano. Arthur tem um ano e quatro meses no momento em que escrevo esta declaração. Ele é a razão pela qual eu luto todos os dias. Ele é a razão pela qual eu quero ser melhor, estar presente, e construir algo sólido e digno.

61. Eu sei o que significa crescer sem pai. Eu vivi isso. Eu sei o que significa ser criança e assumir responsabilidades de adulto porque não havia quem as assumisse. Eu sei a dor que a ausência paterna causa. E eu não quero, de maneira nenhuma, que meu filho passe pelo que eu passei. Eu quero estar presente na vida do Arthur, na vida da Sofia, e construir para eles a estabilidade que eu nunca tive.

62. Atualmente, moramos com os pais de Sofia, que nos acolheram quando as finanças ficaram apertadas após o nascimento do Arthur e o período em que Sofia se afastou do trabalho. Sofia trabalha como assistente de dentista e já retornou às atividades há aproximadamente quatro meses. Nós dois contribuímos igualmente para a manutenção da casa e dos cuidados com o nosso filho. Estamos nos reerguendo e acredito que em breve teremos nosso próprio lar.

63. Meu maior medo é ser deportado e separado da minha família. Sofia não deseja e não pretende morar no Brasil. Toda a vida dela e de sua família está nos Estados Unidos. Os pais dela vivem aqui. A carreira dela está aqui. Ela já deixou claro, em diversas ocasiões, que não vai se mudar para o Brasil. Se eu for removido, temo que meu casamento seja destruído, que eu perca o convívio diário com meu filho e que a unidade da minha família se desfaleça.

64. Em 17 de junho de 2025, pedi Sophia em casamento, e em 21 de março de 2026 nos casamos em uma cerimônia no Condado de San Mateo, Califórnia. Sophia e eu estamos em um relacionamento comprometido desde 2020, e nosso casamento é a continuação natural da vida que construímos juntos com nosso filho Arthur. Arthur Lehnen Rodrigues, nosso filho, nasceu em 8 de agosto de 2024, no Kaiser Foundation Hospital em Redwood City, San Mateo County, Califórnia, e é cidadão americano por nascimento. Arthur é o centro da minha vida, e minha maior motivação para resolver minha situação imigratória é garantir que eu possa permanecer presente para ele e para Sophia. Quero sustentar minha família, ser um pai para Arthur de uma forma que meu próprio pai nunca esteve presente para mim, e construir um futuro estável e dentro da lei para nós nos Estados Unidos.

Minha remoção me separaria da minha esposa e do meu filho, ambos cidadãos americanos, e privaria Arthur da presença e do cuidado diário de seu pai.

65. Eu tenho medo de que meu filho cresça sem o pai dele, repetindo o ciclo que eu tanto lutei para interromper. Esse é o medo que me acompanha todos os dias. Não é medo abstrato: é medo concreto, baseado na minha própria história de vida e na ausência que eu mesmo vivi.

66. Eu peço que este tribunal considere as circunstâncias da minha entrada nos Estados Unidos. Eu era um menor de idade, sem formação, sem recursos e sem compreensão do sistema legal. Eu fui vítima de um esquema de tráfico humano no qual adultos se aproveitaram da minha menoridade, da vulnerabilidade financeira da minha família e da minha falta de instrução para me transportar através de fronteiras internacionais com documentos falsificados, sem que eu tivesse conhecimento da natureza ilegal do que estava sendo feito. Eu não tive controle sobre os documentos, não recebi orientação jurídica, não fui notificado adequadamente sobre as audiências de imigração e fui abandonado ao chegar ao destino.

67. Eu não tinha a intenção de fraudar o sistema de imigração dos Estados Unidos. Eu não sabia que estava participando de uma fraude. Eu era uma criança que confiou em adultos que se apresentaram como pessoas dispostas a ajudar, mas que, na verdade, me usaram para lucrar. Eu peço a oportunidade de ter meu caso reavaliado com base nas circunstâncias reais e de permanecer nos Estados Unidos, onde está a minha família, o meu trabalho, a minha vida e o futuro do meu filho.

68. Sendo assim, declaro que tudo o que relatei é verdadeiro. Eu não escolhi o caminho pelo qual fui levado. Eu fui enganado, pressionado, instrumentalizado e abandonado por pessoas que se aproveitaram da minha idade, da minha ignorância e da vulnerabilidade da minha família. Mas eu escolhi reconstruir minha vida com dignidade, e peço que me seja dada a oportunidade de continuar a fazê-lo.

Eu declaro, sob pena de perjúrio, que o acima é verdadeiro.

____

GLEIDSON SILVA ANTUNES
Data: 21/08/2026

Exhibit 2

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
SAN FRANCISCO, CALIFORNIA

IN THE MATTER OF: DATE: Jan 31, 2020
SILVA-ANTUNES, GLEIDSON

CASE NO. A203-758-084

RESPONDENT IN REMOVAL PROCEEDINGS DECISION

Jurisdiction was established in this matter by the filing of the Notice to Appear issued by the Department of Homeland Security, with the Executive Office for Immigration Review and by service upon the respondent. See 8 C.F.R. § 1003.14(a), 103.5a.

The respondent was provided written notification of the time, date and location of the respondent's removal hearing. The respondent was also provided a written warning that failure to attend this hearing, for other than exceptional circumstances, would result in the issuance of an order of removal in the respondent's absence provided that removability was established. Despite the written notification provided, the respondent failed to appear at his/her hearing, and no exceptional circumstances were shown for his/her failure to appear. This hearing was, therefore, conducted in absentia pursuant to section 240(b)(5)(A) of the Immigration and Nationality Act.

[ ] At a prior hearing the respondent admitted the factual allegations in the Notice to Appear and conceded removability. I find removability established as charged.

[X] The Department of Homeland Security submitted documentary evidence relating to the respondent which established the truth of the factual allegations contained in the Notice to Appear. I find removability established as charged.

I further find that the respondent's failure to appear and proceed with any applications for relief from removal constitutes an abandonment of any pending applications and any applications the respondent may have been eligible to file. Those applications are deemed abandoned and denied for lack of prosecution. See Matter of Pearson, 13 I&N Dec. 152 (BIA 1969); Matter of Perez, 19 I&N Dec. 433 (BIA 1987); Matter of R-R, 20 I&N Dec. 547 (BIA 1992).

ORDER: The respondent shall be removed to BRAZIL or in the alternative to on the charge(s) contained in the Notice to Appear.

PHAN, CHRISTOPHER
Immigration Judge

cc: Assistant District Counsel
Attorney for Respondent/Respondent Z1

Exhibit 3

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
100 MONTGOMERY ST., SUITE 800
SAN FRANCISCO, CA 94104

ELIAS-ANTUNES, ARILSON
375 OXFORD STREET
SAN FRANCISCO, CA 94134

In the matter of ELIAS-ANTUNES, ARILSON, et al — File A 088-013-049, 203-758-084 — DATE: Jan 31, 2020

__ Unable to forward - No address provided.

__ Attached is a copy of the decision of the Immigration Judge. This decision is final unless an appeal is filed with the Board of Immigration Appeals within 30 calendar days of the date of the mailing of this written decision. See the enclosed forms and instructions for properly preparing your appeal. Your notice of appeal, attached documents, and fee or fee waiver request must be mailed to:
Board of Immigration Appeals
Office of the Clerk
5107 Leesburg Pike, Suite 2000
Falls Church, VA 22041

✓ Attached is a copy of the decision of the immigration judge as the result of your Failure to Appear at your scheduled deportation or removal hearing. This decision is final unless a Motion to Reopen is filed in accordance with Section 242b(c)(3) of the Immigration and Nationality Act, 8 U.S.C. § 1252b(c)(3) in deportation proceedings or section 240(b)(5)(C), 8 U.S.C. § 1229a(b)(5)(C) in removal proceedings. If you file a motion to reopen, your motion must be filed with this court:
IMMIGRATION COURT
100 MONTGOMERY ST., SUITE 800
SAN FRANCISCO, CA 94104

__ Attached is a copy of the decision of the immigration judge relating to a Reasonable Fear Review. This is a final order. Pursuant to 8 C.F.R. § 1208.31(g)(1), no administrative appeal is available. However, you may file a petition for review within 30 days with the appropriate Circuit Court of Appeals to appeal this decision pursuant to 8 U.S.C. § 1252; INA §242.

__ Attached is a copy of the decision of the immigration judge relating to a Credible Fear Review. This is a final order. No appeal is available.

__ Other: ______________________________

COURT CLERK
IMMIGRATION COURT — FF

cc:

, ,

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
SAN FRANCISCO, CALIFORNIA

IN THE MATTER OF:
ELIAS-ANTUNES, ARILSON

DATE: Jan 31, 2020

CASE NO. A088-013-049

RESPONDENT IN REMOVAL PROCEEDINGS

DECISION

Jurisdiction was established in this matter by the filing of the Notice to Appear issued by the Department of Homeland Security, with the Executive Office for Immigration Review and by service upon the respondent. See 8 C.F.R. § 1003.14(a), 103.5a.

The respondent was provided written notification of the time, date and location of the respondent's removal hearing. The respondent was also provided a written warning that failure to attend this hearing, for other than exceptional circumstances, would result in the issuance of an order of removal in the respondent's absence provided that removability was established. Despite the written notification provided, the respondent failed to appear at his/her hearing, and no exceptional circumstances were shown for his/her failure to appear. This hearing was, therefore, conducted in absentia pursuant to section 240(b)(5)(A) of the Immigration and Nationality Act.

[ ] At a prior hearing the respondent admitted the factual allegations in the Notice to Appear and conceded removability. I find removability established as charged.

[X] The Department of Homeland Security submitted documentary evidence relating to the respondent which established the truth of the factual allegations contained in the Notice to Appear. I find removability established as charged.

I further find that the respondent's failure to appear and proceed with any applications for relief from removal constitutes an abandonment of any pending applications and any applications the respondent may have been eligible to file. Those applications are deemed abandoned and denied for lack of prosecution. See Matter of Pearson, 13 I&N Dec. 152 (BIA 1969); Matter of Perez, 19 I&N Dec. 433 (BIA 1987); Matter of R-R, 20 I&N Dec. 547 (BIA 1992).

ORDER: The respondent shall be removed to BRAZIL or in the alternative to on the charge(s) contained in the Notice to Appear.

PHAN, CHRISTOPHER
Immigration Judge

cc: Assistant District Counsel
Attorney for Respondent/Respondent

Z1

Exhibit 4

U.S. Department of Homeland Security

Notice to Appear

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID:365663706 FINS #:1281454068 File No: A203 758 084

DOB: 09/16/2001 Event No:EPS1906000355

In the Matter of:

Respondent: GLEIDSON SILVA-ANTUNES currently residing at:

375 OXFORD STREET SAN FRANCISCO, CALIFORNIA, UNITED STATES 94134 (415)541-2211

(Number, street, city and ZIP code) (Area code and phone number)

☐ 1. You are an arriving alien.

☒ 2. You are an alien present in the United States who has not been admitted or paroled.

☐ 3. You have been admitted to the United States, but are removable for the reasons stated below.

FAMU

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of BRAZIL and a citizen of BRAZIL ;
3. You arrived in the United States at or near EL PASO, TX , on or about June 12, 2019 ;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

DEC 1

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

Ex-1A
1/31/20
IJ Chris Phan

☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

☐ Section 235(b)(1) order was vacated pursuant to: ☐8CFR 208.30(f)(2) ☐8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

100 MONTGOMERY ST., SUITE 800 San Francisco CA US 94104

(Complete Address of Immigration Court, including Room Number, if any)

on MARCH 25, 2020 ~~a date to be set~~ at 0800 AM ~~a time to be set~~ to show why you should not be removed from the United States based on the

(Date) *(Time)*

charge(s) set forth above. GERARDO ARROYO PATROL AGENT IN CHARGE (ACTING)

(Signature and Title of Issuing Officer)

Date: June 12, 2019 Las Cruces, New Mexico

(City and State)

See reverse for important information

Form I-862 (Rev. 08/01/07) N

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 3.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents, which you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.

At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear and that you are inadmissible or removable on the charges contained in the Notice to Appear. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge.

You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of departure voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

Failure to appear: You are required to provide the DHS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to one of the offices listed in 8 CFR 241.16(a). Specific addresses on locations for surrender can be obtained from your local DHS office or over the internet at http://www.ice.gov/about/dro/contact.htm. You must surrender within 30 days from the date the order becomes administratively final, unless you obtain an order from a Federal court, immigration court, or the Board of Immigration Appeals staying execution of the removal order. Immigration regulations at 8 CFR 241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Act.

Request for Prompt Hearing

To expedite a determination in my case, I request an immediate hearing. I waive my right to a 10-day period prior to appearing before an immigration judge.

Before:

_______________________ *(Signature of Respondent)*

Date: _______________

_______________________ *(Signature and Title of Immigration Officer)*

Certificate of Service

This Notice To Appear was served on the respondent by me on June 12, 2019, in the following manner and in compliance with section 239(a)(1)(F) of the Act.

[X] in person [ ] by certified mail, returned receipt requested [X] by regular mail

[ ] Attached is a credible fear worksheet.

[X] Attached is a list of organizations and attorneys which provide free legal services.

11/01/2019

The alien was provided oral notice in the PORTUGUESE language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

X

(Signature of Respondent if Personally Served)

DAKOTA REYNOLDS Border Patrol Agent

(Signature and Title of officer)

3654

Exhibit 5

NOTICE OF HEARING IN REMOVAL PROCEEDINGS
IMMIGRATION COURT
100 MONTGOMERY ST., SUITE 800
SAN FRANCISCO, CA 94104

LEAD FILE: 088-013-049
RE: 088-013-049 ELIAS-ANTUNES, ARILSON
203-758-084 SILVA-ANTUNES, GLEIDSON

DATE: Dec 12, 2019

TO:

HEARING DATE ON NOTICE TO APPEAR IS CANCELED. NEW DATE SHOWN BELOW.

ELIAS-ANTUNES, ARILSON
375 OXFORD STREET
SAN FRANCISCO, CA 94134

Please take notice that the above captioned case has been scheduled for a MASTER hearing before the Immigration Court on Jan 31, 2020 at 08:30 A.M. at:
100 MONTGOMERY ST., 4TH FLOOR, COURTROOM 26
SAN FRANCISCO, CA 94104

You may be represented in these proceedings, at no expense to the Government, by an attorney or other individual who is authorized and qualified to represent persons before an Immigration Court. Your hearing date has not been scheduled earlier than 10 days from the date of service of the Notice to Appear in order to permit you the opportunity to obtain an attorney or representative. If you wish to be represented, your attorney or representative must appear with you at the hearing prepared to proceed. You can request an earlier hearing in writing.

Failure to appear at your hearing except for exceptional circumstances may result in one or more of the following actions: (1) You may be taken into custody by the Department of Homeland Security and held for further action. OR (2) Your hearing may be held in your absence under section 240(b)(5) of the Immigration and Nationality Act. An order of removal will be entered against you if the Department of Homeland Security established by clear, unequivocal and convincing evidence that a) you or your attorney has been provided this notice and b) you are removable.

IF YOUR ADDRESS IS NOT LISTED ON THE NOTICE TO APPEAR, OR IF IT IS NOT CORRECT, WITHIN FIVE DAYS OF THIS NOTICE YOU MUST PROVIDE TO THE IMMIGRATION COURT SAN FRANCISCO, CA THE ATTACHED FORM EOIR-33 WITH YOUR ADDRESS AND/OR TELEPHONE NUMBER AT WHICH YOU CAN BE CONTACTED REGARDING THESE PROCEEDINGS. EVERYTIME YOU CHANGE YOUR ADDRESS AND/OR TELEPHONE NUMBER, YOU MUST INFORM THE COURT OF YOUR NEW ADDRESS AND/OR TELEPHONE NUMBER WITHIN 5 DAYS OF THE CHANGE ON THE ATTACHED FORM EOIR-33. ADDITIONAL FORMS EOIR-33 CAN BE OBTAINED FROM THE COURT WHERE YOU ARE SCHEDULED TO APPEAR. IN THE EVENT YOU ARE UNABLE TO OBTAIN A FORM EOIR-33, YOU MAY PROVIDE THE COURT IN WRITING WITH YOUR NEW ADDRESS AND/OR TELEPHONE NUMBER BUT YOU MUST CLEARLY MARK THE ENVELOPE "CHANGE OF ADDRESS." CORRESPONDENCE FROM THE COURT, INCLUDING HEARING NOTICES, WILL BE SENT TO THE MOST RECENT ADDRESS YOU HAVE PROVIDED, AND WILL BE CONSIDERED SUFFICIENT NOTICE TO YOU AND THESE PROCEEDINGS CAN GO FORWARD IN YOUR ABSENCE.

A list of free legal service providers has been given to you. For information regarding the status of your case, call toll free 1-800-898-7180 or 240-314-1500.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVICED BY: MAIL (M) PERSONAL SERVICE (P)
TO: [X] ALIEN [ ] ALIEN c/o Custodial Officer [ ] ALIEN's ATT/REP [X] DHS
DATE: 12-13-2019 BY: COURT STAFF

Attachments: [X] EOIR-33 [ ] EOIR-28 [X] Legal Services List [ ] Other T3

Exhibit 6

U.S. Department of Homeland Security   Subject ID:365663706   **Record of Deportable/Inadmissible Alien**

Family Name (CAPS) / First / Middle	Passport Number and Country of Issue	File Number	Sex	Hair	Eyes	Cmplxn
SILVA-ANTUNES, GLEIDSON			M	BLK	BRO	MED

Country of Citizenship	Passport Number and Country of Issue	File Number	Height	Weight	Occupation
BRAZIL	FZ337213, BRAZIL	CASE No:EPS1906000355 A203 758 084	69	165	STUDENT

U.S. Address: 375 OXFORD STREET SAN FRANCISCO, CALIFORNIA, 94134

Scars and Marks: None Indicated

Date, Place, Time, and Manner of Last Entry: 06/12/2019, 0015, 0.5 mile(s) W of PDN, PWA (AFOOT)

Passenger Boarded at:

F.B.I. Number: [redacted]   ☐ Single ☐ Divorced ☐ Married ☐ Widower ☐ Separated

Number, Street, City, Province (State) and Country of Permanent Residence: AV. FELIPE CAMARAO 239 L. 40 GOIAS, GOIANIA, BRAZIL

Method of Location/Apprehension: PB

Date of Birth	Date of Action	Location Code	At/Near	Date/Hour
09/16/2001 Age:17	06/12/2019	EPT/EPS	EL PASO, TX	06/12/2019 0020

City, Province (State) and Country of Birth: GOIANIA, GOIAS, BRAZIL

AR ☒   Form: (Type and No.) Lifted ☐ Not Lifted ☐

By: ERNESTO RODRIGUEZ

NIV Issuing Post and NIV Number:

Social Security Account Name:

Status at Entry: PWA Mexico   Status When Found: TRAVEL/SEE KING

Date Visa Issued:

Social Security Number:

Length of Time Illegally in U.S.: WITHIN 72 HOURS

Immigration Record: NEGATIVE

Criminal Record:

Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate):

Number and Nationality of Minor Children:

Father's Name, Nationality, and Address, if Known: See Narrative

Mother's Present and Maiden Names, Nationality, and Address, if Known: See Narrative

Monies Due/Property in U.S. Not in Immediate Possession: None Claimed

Fingerprinted? ☒ Yes ☐ No   Systems Checks: See Narrative   Charge Code Words(s): I6A

Name and Address of (Last)(Current) U.S. Employer: Type of Employment: Salary: Hr   Employed from/to:

Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)

FINS #:1281454068
Family Unit/Group #:FMU1906012416

Left Index Print

Right Index Print

ARREST COORDINATES:

Latitude: 31.7495
Longitude: -106.4911

CONSEQUENCE DELIVERY SYSTEM:

Classification: FMUA

Ex-2A
1/31/20
IJ Chris Phan

Alien has been advised of communication privileges   06/12/19 DR (Date/Initials)

DAKOTA REYNOLDS
Border Patrol Agent
(Signature and Title of Immigration Officer)

Distribution:

Received: (Subject and Documents) (Report of Interview)

Officer: DAKOTA REYNOLDS

on: June 12, 2019 at 2052 (time)

Disposition: Notice to Appear Released (I-862)

Examining Officer: CHRISTIAN CASTRO

U.S. Department of Homeland Security

Continuation Page for Form I213

Alien's Name	File Number	Date
SILVA-ANTUNES, GLEIDSON	A203 758 084 Event No:EPS1906000355	06/12/2019

FATHER NAME AND ADDRESS:

Nationality:BRAZIL ELIAS-ANTUNES, ARILSON
375 OXFORD STREET
SAN FRANCISCO, CALIFORNIA, 94134, UNITED STATES
AV. FELIPE CAMARAO 239 L. 40
GOIAS, GOIANIA, BRAZIL

MOTHER NAME AND ADDRESS:

Nationality:BRAZIL SILVA, MARILEIDI
AV. FELIPE CAMARAO 239 L. 40
GOIAS, GOIANIA, BRAZIL

CUSTODY REDETERMINATION:

ORFU

ACCOMPANIED JUVENILE:

SILVA-ANTUNES, GLEIDSON was accompanied by ARILSON ELIAS-ANTUNES

FUNDS IN POSSESSION:

.00

RECORDS CHECKED:

ABIS Negative
IAFIS Negative

NARRATIVE:

PARENTS:
ELIAS-Antunes, Arilson (A 088-013-049) DOB 11/20/1968
CHILD:
SILVA-Antunes, Gleidson (A 203-758-084) DOB 09/16/2001

All pertinent information needed for child's assigned A-file was provided by the child's parent. All documents were served upon the parent.

Parent in the family unit stated that they WERE NOT part of a Central American caravan.

Parent in the family unit stated that they did not seek asylum in Mexico.

Signature	Title
DAKOTA REYNOLDS	Border Patrol Agent

Alien's Name	File Number	Date
SILVA-ANTUNES, GLEIDSON	A203 758 084 Event No:EPS1906000355	06/12/2019

IMMIGRATION DATA:
The subjects are natives and citizens of Brazil by virtue of birth. The subjects are aliens illegally present in the United States, have no immigration documents in their possession nor have they or anyone else filed a petition on their behalf. Subjects have close family ties or roots in this country yet are likely to abscond.

APPREHENSION DATA:
On June 12, 2019, a Border Patrol Agent encountered the subjects in the El Paso, Texas Border Patrol Station's area of responsibility. A Border Patrol Agent determined the subjects had unlawfully entered the United States from Mexico, at a time and place other than designated by the Secretary of the Department of Homeland Security of the United States. After determining that the subjects were aliens whom illegally entered the United States, the subjects were arrested and transported to the Las Cruces Border Patrol Station for processing. The family unit will be released on their own recognizance.

At the station, subjects were enrolled into the E3 system. All subjects age 14 and above were enrolled into the IDENT/NGI systems. Juveniles the age of 13 and below were enrolled into e3 only, due to their age.

IMMIGRATION HISTORY: NEGATIVE

CRIMINAL HISTORY: NEGATIVE

WANTS/WARRANTS: NEGATIVE

DISPOSITION:
The parent was processed as NTA - Release (Forms 862, 286, 220A) and the child was processed as NTA - Release (Forms 862, 286, 220A) and a list of free legal services was provided.

Subjects claim they DO NOT have fear of persecution or torture if returned to their native country.

Subjects were advised of their right to speak with a consulate representative of their native country but declined to do so at this time.

Subjects appear and claim to be in good health, and fluent in the Portuguese language.

PROPERTY:
Subjects retain no property with the United States Border Patrol.

US POINT OF CONTACT:
Joao Carlos Perreira (friend)
375 Oxford Street
(415) 541-2211
San Francisco, CA 94134

Signature	Title
DAKOTA REYNOLDS	Border Patrol Agent

U.S. Department of Homeland Security

Continuation Page for Form I213

Alien's Name	File Number	Date
SILVA-ANTUNES, GLEIDSON	A203 758 084 Event No:EPS1906000355	06/12/2019

The aforementioned address was verified on USPS.com

Signature	Title
DAKOTA REYNOLDS	Border Patrol Agent

Exhibit 7

U.S. Department of Homeland Security Subject ID:365663271 **Record of Deportable/Inadmissible Alien**

Family Name (CAPS)	First	Middle
ELIAS-ANTUNES, ARILSON		

Sex	Hair	Eyes	Cmplxn
M	BLK	BRO	MED

Country of Citizenship	Passport Number and Country of Issue	File Number
BRAZIL	FV355747, BRAZIL	CASE No:EPS1906000355 A088 013 049

Height	Weight	Occupation
70	190	LABORER

U.S. Address: 375 OXFORD STREET SAN FRANCISCO, CALIFORNIA, 94134

Scars and Marks: NONE INDICATED

Date, Place, Time, and Manner of Last Entry: 06/12/2019, 0015, 0.5 mile(s) W of PDN, PWA (AFOOT)

Passenger Boarded at:

F.B.I. Number: [redacted]

☒ Single ☐ Divorced ☐ Married ☐ Widower ☐ Separated

Number, Street, City, Province (State) and Country of Permanent Residence: AV. FELIPE CAMARAO 239 L. 40 GOIAS, GOIANIA, BRAZIL

Method of Location/Apprehension: PB

Date of Birth	Date of Action	Location Code
11/20/1968 Age:50	06/12/2019	EPT/EPS

At/Near	Date/Hour
EL PASO, TX	06/12/2019 0020

City, Province (State) and Country of Birth: GOIAS, GOIANIA, BRAZIL

AR ☒ Form: (Type and No.) Lifted ☐ Not Lifted ☐

By: ERNESTO RODRIGUEZ

NIV Issuing Post and NIV Number:

Social Security Account Name:

Status at Entry	Status When Found
PWA Mexico	TRAVEL/SEEKING

Date Visa Issued:

Social Security Number:

Length of Time Illegally in U.S.: AT ENTRY

Immigration Record: NEGATIVE

Criminal Record: None Known

Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate):

Number and Nationality of Minor Children: 1-BRAZIL

Father's Name, Nationality, and Address, if Known: See Narrative

Mother's Present and Maiden Names, Nationality, and Address, if Known: See Narrative

Monies Due/Property in U.S. Not in Immediate Possession: None Claimed

Fingerprinted? ☒ Yes ☐ No

Systems Checks:

Charge Code Words(s): I6A

Name and Address of (Last)(Current) U.S. Employer:

Type of Employment:

Salary: Hr

Employed from/to:

Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)

FINS #:20211062 I77 #:8483514

Family Unit/Group #:FMU1906012416

Left Index Print

Right Index Print

ARREST COORDINATES:

Latitude: 31.7495

Longitude: -106.4911

Ex-2

1/31/20

IJ Chris Phan

CONSEQUENCE DELIVERY SYSTEM:

Classification: FMUA

Alien has been advised of communication privileges 06/12/19 (Date/Initials)

DAKOTA REYNOLDS
Border Patrol Agent
(Signature and Title of Immigration Officer)

Distribution:

Received: (Subject and Documents) (Report of Interview)

Officer: DAKOTA REYNOLDS

on: June 12, 2019 at 1751 (time)

Disposition: Notice to Appear Released (I-862)

Examining Officer: CHRISTIAN CASTRO

Form I-213 (Rev. 08/01/07) Y

Alien's Name	File Number	Date
ELIAS-ANTUNES, ARILSON	A088 013 049 Event No:EPS1906000355	06/12/2019

FATHER NAME AND ADDRESS:

Nationality:BRAZIL ANTUNES, HUMEBEMO

GOIAS, GOIANIA, BRAZIL

MOTHER NAME AND ADDRESS:

Nationality:BRAZIL MAGALUNES, MARILDA

GOIAS, GOIANIA, BRAZIL

CUSTODY REDETERMINATION:

ORFU

FUNDS IN POSSESSION:

United States Dollar 51.00

X

NARRATIVE:

PARENTS:
ELIAS-Antunes, Arilson (A 088-013-049) DOB 11/20/1968
CHILD:
SILVA-Antunes, Gleidson (A 203-758-084) DOB 09/16/2001

All pertinent information needed for child's assigned A-file was provided by the child's parent. All documents were served upon the parent.

Parent in the family unit stated that they WERE NOT part of a Central American caravan.

Parent in the family unit stated that they did not seek asylum in Mexico.

IMMIGRATION DATA:
The subjects are natives and citizens of Brazil by virtue of birth. The subjects are aliens illegally present in the United States, have no immigration documents in their possession nor have they or anyone else filed a petition on their behalf. Subjects have close family ties or roots in this country yet are likely to abscond.

APPREHENSION DATA:
On June 12, 2019, a Border Patrol Agent encountered the subjects in the El Paso, Texas Border Patrol Station's area of responsibility. A Border Patrol Agent determined the subjects had unlawfully entered the United States from Mexico, at a time and place other

Signature	Title
DAKOTA REYNOLDS	Border Patrol Agent

Alien's Name	File Number	Date
ELIAS-ANTUNES, ARILSON	A088 013 049 Event No:EPS1906000355	06/12/2019

than designated by the Secretary of the Department of Homeland Security of the United States. After determining that the subjects were aliens whom illegally entered the United States, the subjects were arrested and transported to the Las Cruces Border Patrol Station for processing. The family unit will be released on their own recognizance.

At the station, subjects were enrolled into the E3 system. All subjects age 14 and above were enrolled into the IDENT/NGI systems. Juveniles the age of 13 and below were enrolled into e3 only, due to their age.

IMMIGRATION HISTORY: POSTIVE A#088-013-049 Subject has previous encounters.
12/27/2006 Port of Miami -Alien Inadmissibility.
12/28/2006 ICE/ERO Miami - Fraud-Passport and visa. 1-29-2007 time served imprisonment, 1 yr supervised release. 02/12/2007-supervised release

CRIMINAL HISTORY: NEGATIVE

WANTS/WARRANTS: NEGATIVE

DISPOSITION:
The parent was processed as NTA - Release (Forms 862, 286, 220A) and the child was processed as NTA - Release (Forms 862, 286, 220A) and a list of free legal services was provided.

Subjects claim they DO NOT have fear of persecution or torture if returned to their native country.

Subjects were advised of their right to speak with a consulate representative of their native country but declined to do so at this time.

Subjects appear and claim to be in good health, and fluent in the Portuguese language.

PROPERTY:
Subjects retain no property with the United States Border Patrol.

US POINT OF CONTACT:
Joao Carlos Perreira (friend)
375 Oxford Street
(415) 541-2211
San Francisco, CA 94134

The aforementioned address was verified on USPS.com

Signature	Title
DAKOTA REYNOLDS	Border Patrol Agent

Exhibit 8

FZ337213

FZ337213

Gleidson silva antunes

Assinatura do titular / Signature du titulaire
Bearer's signature / Firma del titular

Este passaporte deve ser assinado pelo titular, salvo em caso de incapacidade.

Ce passeport doit être signé par le titulaire, sauf en cas d'incapacité.

This passport must be signed, except where the bearer is unable to do so.

Este pasaporte debe ser firmado por el titular, salvo en caso de incapacidad.

REPÚBLICA FEDERATIVA DO BRASIL

PASSAPORTE
PASSPORT

TIPO / TYPE
P

PAÍS EMISSOR / ISSUING COUNTRY
BRA

PASSAPORTE Nº / PASSPORT No
FZ337213

SOBRENOME / SURNAME
SILVA ANTUNES

NOME / GIVEN NAMES
GLEIDSON

NACIONALIDADE / NATIONALITY
BRASILEIRO(A)

DATA DO NASCIMENTO / DATE OF BIRTH
16 SET/SEP 2001

IDENTIDADE Nº / PERSONAL No

SEXO / SEX
M

NATURALIDADE / PLACE OF BIRTH
ARINOS/MG

FILIAÇÃO / FILIATION
ARILSON ELIAS ANTUNES

MARILEIDE FONTES SILVA

O titular, enquanto menor, está autorizado pelos genitores, pelo prazo deste documento, a viajar apenas com um dos pais, indistintamente. Res. CNJ 131/11, Art. 13.

DATA DE EXPEDIÇÃO / DATE OF ISSUE
17 MAI/MAY 2019

AUTORIDADE / AUTHORITY
DPF/GMI/RO

VÁLIDO ATÉ / DATE OF EXPIRY
16 MAI/MAY 2024

P<BRASILVA<ANTUNES<<GLEIDSON<<<<<<<<<<<<<<<<
FZ337213<3BRA0109165M2405160<<<<<<<<<<<<<<00

Exhibit 9

Judiciary Rondônia State
Electronic Inspection Seal
B9AAC11882-18E18
Check the validity at:
www.tjro.jus.br/consultaselo/

FEDERATIVE REPUBLIC OF BRAZIL
CIVIL REGISTRY OF NATURAL PERSONS

BIRTH CERTIFICATE

Name

GLEIDSON RODRIGUES DA SILVA

CPF: 055.956.922-00 **

REGISTRATION

096263 01 55 2002 1 00006 080 0001580 25

Date of birth in full	DAY	MONTH	YEAR
September sixteenth, two thousand one **	16	09	2001

Time of birth	City of origin
6:08 PM	MONTE NEGRO-RO **

City of registration and federation unit	Place, City of Birth and State	Sex
Buritis-RO **	IRMÃ DULCE MIXED UNIT, Avenida Francisco Prestes, no number, MONTE NEGRO – RO **	Male

Filiation
ADALTO PEREIRA DA SILVA and **MARILEIDE FONTES SILVA**, born in Ouro Preto D'Oeste, State of Rondônia, residing and domiciled at Santa Luzia D'Oeste Street, no number, Sector 04, in this city **

Grandparents
JOSÉ FRANCISCO PEREIRA DA SILVA, ESMERALDA PEREIRA DA SILVA, IRES PEREIRA DA SILVA AND MARIA DE JESUS FONTES SILVA **

Twin	Name and registration number of twin(s)
No	-- **

Date of registration in full	DNV/Live birth registration number
September thirtieth, two thousand one **	10563297

ANNOTATIONS/NOTES TO BE ADDED
This certificate contains marginal annotations to the record. Fees: R$22.74, Fuju: R$4.55, Seal: R$1.44, Fundep: R$0.91, Fundimper: R$1.71, Fumorpge: R$0.68, Total: R$32.03.**2nd Copy**

Registration notes
No record. **

Office Name
Civil Registry Service of Natural Persons and Notary Public

Registrar
Guilherme José de Almeida

City/State
Municipality and Judicial District of Buritis – State of Rondônia

Address
Rua Theobroma, 1361, Sector 02
ZIP Code 76.880-000- Phone: (69)3238-2615
Email: civilenotas_buritis @ujro.jus.br

The content of this certificate is true. I certify.

Buritis-RO, June 21, 2024.

----//signature//----

Aislan Rodrigues de Souza
Deputy Registrar

04.693.557/0001-06
CIVIL REGISTRY OFFICE OF NATURAL PERSONS AND NOTARY PUBLIC
Rua Theobroma, 1381, Sector 02
ZIP Code: 76.880-000
BURITIS - RO

BA 026057032 BRP

ANOREG
Association of Notaries and Registrars of Brazil

ARPENBRASIL
NATIONAL ASSOCIATION OF NATURAL PERSONS REGISTRARS

I, Carolina Favero da Silva, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Portuguese to English has been performed by myself, a qualified translator fluent in both languages, and that the following is an accurate and complete translation of the document.

____ Date: June 02, 2025.

REPÚBLICA FEDERATIVA DO BRASIL
REGISTRO CIVIL DAS PESSOAS NATURAIS

Poder Judiciário do Estado de Rondônia
Selo Digital de Fiscalização
B9AAC11882-18E18
Confira a validade em
www.tjro.jus.br/consultaselo/

CERTIDÃO DE NASCIMENTO

Nome
GLEIDSON RODRIGUES DA SILVA

CPF: 055.956.922-00 ••

Matrícula
096263 01 55 2002 1 00006 080 0001580 25

Data do nascimento por extenso	Dia	Mês	Ano
Dezesseis de setembro de dois mil e um ••	16	09	2001

Hora	Naturalidade
18h 08min	MONTE NEGRO-RO ••

Município de registro e unidade de federação	Local, Município de Nascimento e UF	Sexo
Buritis-RO ••	UNIDADE MISTA IRMÃ DULCE, Avenida Francisco Prestes, s/nº, MONTE NEGRO-RO ••	Masculino

Filiação
ADALTO PEREIRA DA SILVA e **MARILEIDE FONTES SILVA**, naturais de Ouro Preto D'Oeste-Estado de Rondônia, residentes e domiciliados na Rua Santa Luzia D'Oeste, s/nº, Setor 04, nesta cidade ••

Avós
JOSÉ FRANCISCO PEREIRA DA SILVA, ESMERALDA PEREIRA DA SILVA, IRES PEREIRA DA SILVA E MARIA DE JESUS FONTES SILVA ••

Gêmeo	Nome e Matrícula do(s) gêmeo(s)
Não	-- ••

Data do registro por extenso	Número da D.N.V
Trinta de setembro de dois mil e dois ••	10563297

OBSERVAÇÃO/ANOTAÇÕES A ACRESCER
A presente certidão possui elementos de averbação à margem do termo. Emolumentos: R$22,74, Fuju: R$4,55, Selo: R$1,44, Fundep: R$0,91, Fundimper: R$1,71, Fumorpge: R$0,68, Total: R$32,03. **2ª Via**

Anotações de cadastro
Nada consta. ••

Nome do Ofício
Serviço de Registro Civil das Pessoas Naturais e Tabelionato de Notas

Oficial Registrador
Guilherme José de Almeida

Município e Comarca / UF
Município e Comarca de Buritis - Estado de Rondônia

Endereço
Rua Theobroma, 1361, Setor 02
CEP: 76.880-000 - Fone: (69)3238-2615
e-mail: civilenotas_buritis@tjro.jus.br

O conteúdo da certidão é verdadeiro. Dou fé.

Buritis-RO, 21 de junho de 2024.

Aislan Rodrigues de Souza
Oficial Substituto

04.693.557/0001-06
OFÍCIO DE REGISTRO CIVIL DAS PESSOAS NATURAIS E TABELIONATO DE NOTAS
Rua Theobroma, 1361, St. 02
CEP: 76.880-000
BURITIS - RO

BA 026057032 BRP

ARPENBRASIL

Exhibit 10

CMC **BRASIL**
BRAZIL

CARTEIRA DE MATRICULA
CONSULAR iD CARD

41500093622

Expires 03/10/2025
Issued 03/10/2020

GLEIDSON SILVA ANTUNES
21 36 TH AVENUE APT 138
SAN MATEO, CA 94403

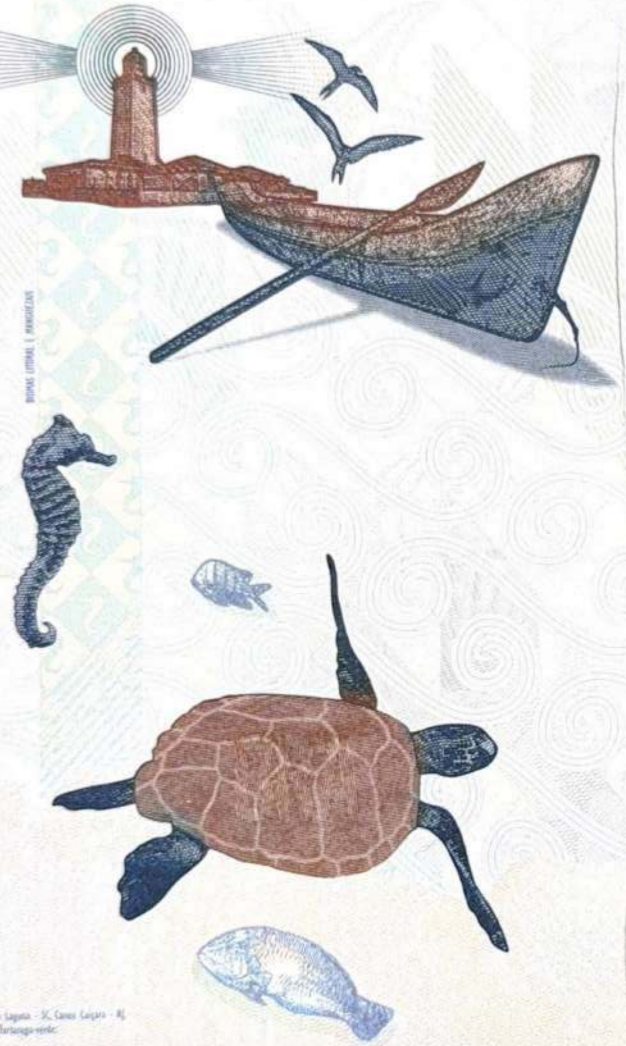
Citizenship BRAZILIAN

Date of Birth	*Sex*	*Hgt*
09/16/2001	M	5'3"

Place of Birth	*Country*
ARINOS, MG	BRAZIL

[illegible] silva antunes

Exhibit 11



Destaque: Farol em Laguna - SC, Canoa Caiçara - RJ, Cavalo-marinho e Tartaruga-verde.

Este documento pertence à

Ce document appartient à la

This document is the property of the

Este documento pertenece a la

REPÚBLICA FEDERATIVA DO BRASIL

PASSAPORTE

PASSEPORT

PASSPORT

PASAPORTE

REPÚBLICA FEDERATIVA DO BRASIL

YF048055

Gleidson Rodrigues

Assinatura do titular / *Signature du titulaire* /
Bearer's signature / *Firma del titular*

Este passaporte deve ser assinado
pelo titular, salvo em caso de incapacidade.

*Ce passeport doit être signé
par le titulaire, sauf en cas d'incapacité.*

*This passport must be signed,
except where the bearer is unable to do so.*

*Este pasaporte debe ser firmado
por el titular, salvo en caso de incapacidad.*

REPÚBLICA FEDERATIVA DO BRASIL

PASSAPORTE
PASSPORT

TIPO / *TYPE*
PP

PAÍS EMISSOR / *ISSUING COUNTRY*
BRA

PASSAPORTE Nº / *PASSPORT No.*
YF048055

SOBRENOME / *SURNAME*
RODRIGUES DA SILVA

NOME / *GIVEN NAMES*
GLEIDSON

NACIONALIDADE / *NATIONALITY*
BRASILEIRO(A)

DATA DE NASCIMENTO / *DATE OF BIRTH*
16 SET/SEP 2001

CPF / *PERSONAL NUMBER*
055956922-00

SEXO / *SEX*
M

NATURALIDADE / *PLACE OF BIRTH*
MONTE NEGRO/RO

FILIAÇÃO / *FILIATION*
MARILEIDE FONTES SILVA

ADALTO PEREIRA DA SILVA

DATA DE EXPEDIÇÃO / *DATE OF ISSUE*
01 MAI/MAY 2025

VÁLIDO ATÉ / *DATE OF EXPIRY*
30 ABR/APR 2029

AUTORIDADE / *AUTHORITY*
SÃO FRANCISCO CG

PPBRARODRIGUES<DA<SILVA<<GLEIDSON<<<<<<<<<<<<
YF048055<5BRA0109165M2904308055956922 00<<<54

Este passaporte contém 32 páginas numeradas.

Ce passeport contient 32 pages numérotées.

This passport contains 32 numbered pages.

Este pasaporte contiene 32 páginas numeradas.

Roga-se às autoridades estrangeiras que prestem ao titular deste passaporte auxílio e assistência em caso de necessidade.

Les autorités des Etats étrangers sont priées de bien vouloir prêter au titulaire de ce passeport aide et assistance au besoin.

Foreign authorities are requested to afford the bearer such assistance and protection as may be necessary.

Se ruega a las autoridades extranjeras que presten al titular de este pasaporte auxilio y asistencia en caso de necesidad.

Este passaporte é válido para todos os países com os quais o Brasil mantém relações diplomáticas.

Ce passeport est valable dans tous les pays avec lesquels le Brésil maintient des relations diplomatiques.

This passport is valid for all countries with which Brazil maintains diplomatic relations.

Este pasaporte es válido para todos los países con los que Brasil mantiene relaciones diplomáticas.

REPÚBLICA FEDERATIVA DO BRASIL

BRA

200601MT

CONSULADO-GERAL DO BRASIL EM SÃO FRANCISCO

CONCEDIDO EM SUBSTITUIÇÃO A PASSAPORTE EXTRAVIADO.

01 MAI/MAY 2025
VERIDIANA DA SILVA VELAME
VICE-CÔNSUL

PAGOU
R$-Ouro 120.00
US$ 120.00
TEC 1.01.01.000.005
YF048055

REPÚBLICA FEDERATIVA DO BRASIL

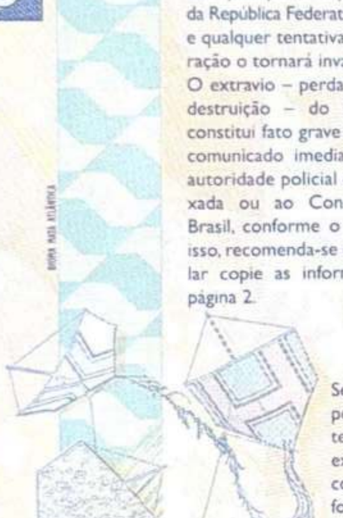
YF048055

INFORMAÇÕES PARA O TITULAR

Este passaporte é propriedade da República Federativa do Brasil e qualquer tentativa de adulteração o tornará inválido.
O extravio – perda, roubo ou destruição – do passaporte constitui fato grave e deve ser comunicado imediatamente à autoridade policial e à Embaixada ou ao Consulado do Brasil, conforme o caso. Para isso, recomenda-se que o titular copie as informações da página 2.

Mico-leão-dourado

Bioma Mata Atlântica



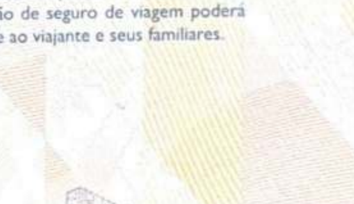
Pipa, papagaio, pandorga, arraia, cafifa. (Não utilize linhas cortantes)

Se o passaporte for entregue a pessoa ou serviço que não pertença ao Governo Brasileiro (por exemplo, para obtenção de visto, compra de passagem, etc.) e não for restituído, o titular deve considerá-lo como extraviado.
A concessão de novo passaporte em substituição ao extraviado depende de investigação.
Apenas o titular do passaporte poderá usá-lo. A utilização fraudulenta ou a cessão a outra pessoa constituem crimes, pela lei brasileira. Para ressalvar sua responsabilidade, o titular deve assinar seu passaporte, no local previsto na página 3, imediatamente após recebê-lo. Este passaporte só é válido com a assinatura do titular, salvo em caso de incapacidade.

Tucano

É recomendável que o brasileiro residente no exterior matricule-se na Embaixada ou Consulado do Brasil mais próximo de seu local de residência. Brasileiros de passagem por região conturbada devem entrar em contato com a Embaixada ou o Consulado do Brasil mais próximo para fornecer nome completo, endereço e número do passaporte. Impossibilitado de comparecer pessoalmente, poderá comunicar-se por outro meio, fornecendo nome completo, endereço e número do passaporte.
O brasileiro que viaje por áreas conturbadas deve ter presente que a assistência do Governo Brasileiro poderá ser limitada e dependerá das autoridades locais. A contratação de seguro de viagem poderá trazer tranquilidade ao viajante e seus familiares.

É responsabilidade do titular verificar, antes da viagem, a validade do passaporte e a necessidade de visto. O titular poderá solicitar a substituição do passaporte mesmo antes do vencimento, em vista que muitos países exigem prazo mínimo de validade.
O menor de idade, não emancipado, viajando desacompanhado de qualquer um dos pais, ou responsável legal, só poderá sair do Brasil munido de documentação pertinente prevista em lei.
O cidadão brasileiro que tenha outra nacionalidade deve ter em conta que a assistência consular brasileira no país de que também é nacional poderá ser consideravelmente limitada.



Museu de Arte de São Paulo - Masp

Consulte/ *Consultez / Consult / Consulte*
www.portalconsular.mre.gov.br ou **www.pf.gov.br**

YF040055

8

Bromelia

Praça da Apoteose - Sambódromo - RJ

REPÚBLICA
FEDERATIVA
DO BRASIL

VISTOS / VISAS

9

Beija-flor

Profetas de Aleijadinho -
Congonhas - MG

VISTOS / VISAS

REPÚBLICA
FEDERATIVA
DO BRASIL

Pandeiro e Agogô

Onça-pintada

REPÚBLICA FEDERATIVA DO BRASIL

VISTOS / VISAS

YF048055

Capivara

Parque da Pedra da Cebola – Vitória – ES

REPÚBLICA FEDERATIVA DO BRASIL

VISTOS / VISAS

YF042055

12

Mateu no Jaraguá -
Personagem do Reisado

Mandacaru e suas flores

REPÚBLICA
FEDERATIVA
DO BRASIL

VISTOS / VISAS

Carcará

13

Mateu no Boi -
Personagem do Reisado

VISTOS / VISAS

REPÚBLICA
FEDERATIVA
DO BRASIL

Asa-branca

14

Artesanato em argila - Festa Junina

YF048055

Sagui de tufos brancos

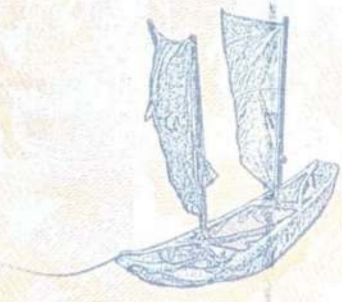
15

Artesanato em argila - Retirantes

YF048055

Artesanato em Madeira - Santeiro de Pena

16



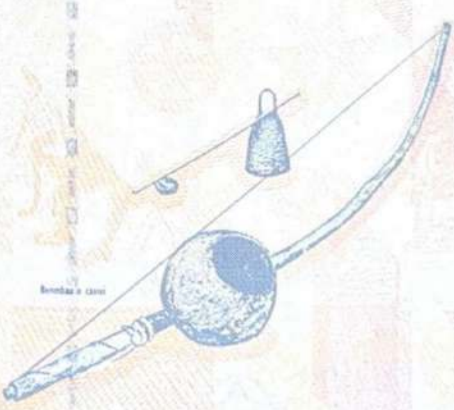
Canoa utilizada no Maranhão

REPÚBLICA FEDERATIVA DO BRASIL

VISTOS / VISAS

Casario em Marechal Deodoro - AL

17



Berimbau e caxixi

VISTOS / VISAS

REPÚBLICA FEDERATIVA DO BRASIL

YF048055

BIOMA AMAZÔNIA

Cerâmica de Icoaraci - PA

Teatro Amazonas - Manaus - AM

18

19

Castanha do Pará

Guaraná

REPÚBLICA FEDERATIVA DO BRASIL

VISTOS / VISAS

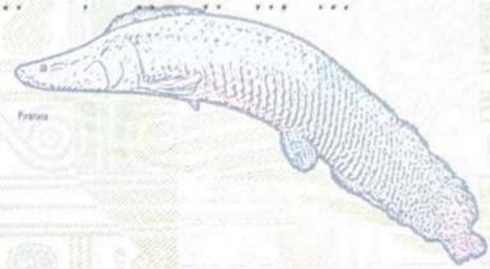
VISTOS / VISAS

REPÚBLICA FEDERATIVA DO BRASIL

Espécime de Rã Amazônica

Palmeira e frutos do babaçu e carnaúba

REPÚBLICA
FEDERATIVA
DO BRASIL



Pirarucu

Boneca de artesanato indígena Karajá

VISTOS / VISAS

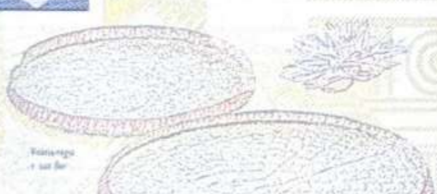
REPÚBLICA
FEDERATIVA
DO BRASIL

YF048055

Instrumentos tradicionais indígenas

Harpia

22



Vitória-régia e sua flor

Artesanato em Capim-dourado - Jalapão - TO

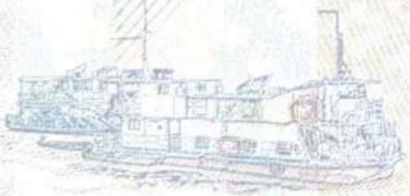
23

REPÚBLICA FEDERATIVA DO BRASIL

VISTOS / VISAS

VISTOS / VISAS

REPÚBLICA FEDERATIVA DO BRASIL



VISTOS / VISAS

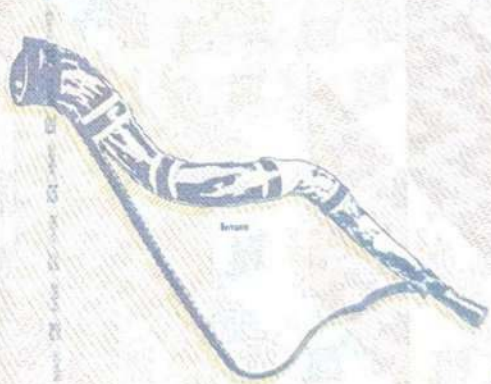
VISTOS / VISAS

REPÚBLICA
FEDERATIVA
DO BRASIL

26

REPÚBLICA
FEDERATIVA
DO BRASIL

VISTOS / VISAS



27

VISTOS / VISAS

REPÚBLICA
FEDERATIVA
DO BRASIL

Pêssankas - artesanato de herança ucraniana

Renda de bilro - artesanato de herança açoriana

REPÚBLICA
FEDERATIVA
DO BRASIL

VISTOS / VISAS

Caxinguelê

Bota e boleadeira gaúchas

VISTOS / VISAS

REPÚBLICA
FEDERATIVA
DO BRASIL

Os campos abaixo devem ser preenchidos pelo titular. Aconselha-se usar lápis preto para possibilitar a atualização dos dados.

ENDEREÇO DO TITULAR / ADRESSE DU TITULAIRE / BEARER'S ADDRESS / DIRECCIÓN DEL TITULAR

Endereço / Address

....

Cidade / City

....

Estado / State

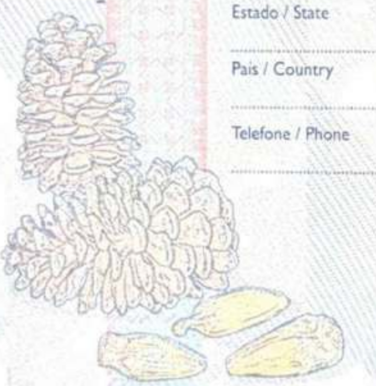
....

País / Country

....

Telefone / Phone

....



Gralha-azul

REPÚBLICA FEDERATIVA DO BRASIL

Em caso de acidente, avisar à Embaixada ou ao Consulado do Brasil mais próximo e à pessoa abaixo indicada:

En cas d'accident, conctacter l'Ambassade ou le Consulat du Brésil le plus proche ainsi que la personne indiquée ci-dessous:

In case of accident, notify the nearest Brazilian Embassy or Consulate and the individual named below:

En caso de accidente, contactar con la Embajada o el Consulado de Brasil más próximo y la persona indicada abajo:

Nome / *Name*

....

Endereço / *Address*

....

Cidade / *City*

....

Estado / *State*

....

País / *Country*

....

Telefone / *Phone*

....

Emas

REPÚBLICA FEDERATIVA DO BRASIL

Cuia de chimarrão

Este passaporte contém um dispositivo eletrônico e elementos de segurança sensíveis.

Não dobre, perfure ou exponha este documento a temperaturas elevadas, umidade e luz excessivas, campos eletromagnéticos intensos ou substâncias químicas.

Além do respeito e dos cuidados normais dispensados a um passaporte, tenha com este documento as mesmas precauções que teria com qualquer outro dispositivo eletrônico portátil, assegurando-se de que ele não ficará úmido, dobrado ou amassado.

Abusos podem afetar adversamente a operação do chip e reduzir sua utilidade para o titular e para o controle de fronteira.

Tamanduá-bandeira

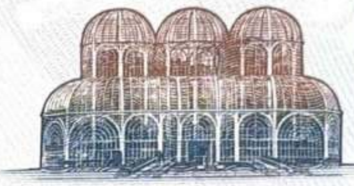
Créditos e informações importantes:

Acesse o endereço eletrônico ou utilize o QR Code abaixo.

https://www.casadamoeda.gov.br/passaportebrasileiro

REPÚBLICA FEDERATIVA DO BRASIL

BRA



Jardim Botânico de Curitiba - PR,
Monumento a Anita Garibaldi em Laguna - SC,
Ruínas de São Miguel das Missões - RS

NÃO GRAMPEAR OU CARIMBAR ESTA PÁGINA

NE PAS AGRAFER OU TAMPONNER CETTE PAGE

DO NOT STAPLE OR STAMP THIS PAGE

NO GRAPAR NI SELLAR ESTA PAGINA

Simbolo Internacional do Passaporte Eletrônico

CASA DA MOEDA DO BRASIL

Exhibit 13

California USA DRIVER LICENSE

FEDERAL LIMITS APPLY

DL Y6765452

CLASS C

EXP 09/16/2029

END NONE

LN SILVA ANTUNES

FN GLEIDSON

670 GELLERT BLVD

DALY CITY, CA 94015

DOB 09/16/2001

RSTR NONE

09162001

SEX M

HAIR BLK

EYES BRN

HGT 5'-06"

WGT 176 lb

DD 10/04/202459307/AAFD/29

ISS 10/04/2024

STATE OF CALIFORNIA
CERTIFICATION OF VITAL RECORD

COUNTY OF SAN MATEO
REDWOOD CITY, CALIFORNIA

LICENSE AND CERTIFICATE OF MARRIAGE
MUST BE LEGIBLE – MAKE NO ERASURES, WHITEOUTS, OR OTHER ALTERATIONS
USE DARK INK ONLY

STATE FILE NUMBER | LOCAL REGISTRATION NUMBER: 4-2026-41-000449

FIRST PERSON DATA (☐ Groom ■ Bride)

1A. FIRST NAME	SOPHIA
1B. MIDDLE	–
1C. CURRENT LAST	LEHNEN RODRIGUES MIRANDA
1D. LAST NAME AT BIRTH (IF DIFFERENT THAN 1C)	–
2. DATE OF BIRTH (MM/DD/CCYY)	12/20/1999
3. STATE/COUNTRY OF BIRTH	BRAZIL
4. # PREV. MARRIAGES/SRDP	0
5A. LAST MARRIAGE/SRDP ENDED BY: ☐ DEATH ☐ DISSO ☐ ANNULMENT ☐ TERM SRDP ■ N/A	
5B. DATE ENDED (MM/DD/CCYY)	--/--/----
6. ADDRESS	670 GELLERT BLVD
7. CITY	DALY CITY
8. STATE/COUNTRY	CA
9. ZIP CODE	94015
10A. FULL BIRTH NAME OF FATHER/PARENT	TERENCE RODRIGUES MIRANDA
10B. STATE OF BIRTH (IF OUTSIDE U.S. ENTER COUNTRY)	BRAZIL
11A. FULL BIRTH NAME OF MOTHER/PARENT	FRANCINE ZANCANARO LEHNEN
11B. STATE OF BIRTH (IF OUTSIDE U.S. ENTER COUNTRY)	BRAZIL

SECOND PERSON DATA (■ Groom ☐ Bride)

12A. FIRST NAME	GLEIDSON
12B. MIDDLE	–
12C. CURRENT LAST	RODRIGUES DA SILVA
12D. LAST NAME AT BIRTH (IF DIFFERENT THAN 12C)	–
13. DATE OF BIRTH (MM/DD/CCYY)	09/16/2001
14. STATE/COUNTRY OF BIRTH	BRAZIL
15. # PREV. MARRIAGES/SRDP	0
16A. LAST MARRIAGE/SRDP ENDED BY: ☐ DEATH ☐ DISSO ☐ ANNULMENT ☐ TERM SRDP ■ N/A	
16B. DATE ENDED (MM/DD/CCYY)	--/--/--
17. ADDRESS	670 GELLERT BLVD
18. CITY	DALY CITY
19. STATE/COUNTRY	CA
20. ZIP CODE	94015
21A. FULL BIRTH NAME OF FATHER/PARENT	ADALTO PEREIRA DA SILVA
21B. STATE OF BIRTH (IF OUTSIDE U.S. ENTER COUNTRY)	BRAZIL
22A. FULL BIRTH NAME OF MOTHER/PARENT	MARILEIDE FONTES SILVA
22B. STATE OF BIRTH (IF OUTSIDE U.S. ENTER COUNTRY)	BRAZIL

AFFIDAVIT

WE, THE UNDERSIGNED DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT WE ARE UNMARRIED AND THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF. WE FURTHER DECLARE THAT NO LEGAL OBJECTION TO THE MARRIAGE NOR TO THE ISSUANCE OF A LICENSE IS KNOWN TO US. WE ACKNOWLEDGE RECEIPT OF THE INFORMATION REQUIRED BY FAMILY CODE SECTION 358 AND HEREBY APPLY FOR A LICENSE AND CERTIFICATE OF MARRIAGE.

23. SIGNATURE OF PERSON LISTED IN FIELDS 1A-1D: ▸ Sophia Lehnen Rodrigues Miranda

24. SIGNATURE OF PERSON LISTED IN FIELDS 12A-12D: ▸ Gleidson Rodrigues da Silva

LICENSE TO MARRY

I, THE UNDERSIGNED, DO HEREBY CERTIFY THAT THE ABOVE-NAMED PARTIES TO BE MARRIED HAVE PERSONALLY APPEARED BEFORE ME, OR THE PERSON PERFORMING THE CEREMONY HAS PERSONALLY APPEARED BEFORE ME AND PRESENTED AN AFFIDAVIT SIGNED BY THE PARTIES TO BE MARRIED DECLARING THAT ONE OR BOTH OF THE PARTIES ARE PHYSICALLY UNABLE TO APPEAR AND EXPLAINING THE REASONS THEREFOR IN ACCORDANCE WITH FAMILY CODE SECTION 426. THE PARTIES PROVED TO ME ON THE BASIS OF SATISFACTORY EVIDENCE TO BE THE PERSONS CLAIMED, HAVE DECLARED THAT THEY MEET ALL OF THE REQUIREMENTS OF THE LAW, AND HAVE PAID THE FEES PRESCRIBED BY LAW. AUTHORIZATION AND LICENSE IS HEREBY GIVEN TO ANY PERSON DULY AUTHORIZED TO PERFORM A MARRIAGE CEREMONY WITHIN THE STATE OF CALIFORNIA TO SOLEMNIZE THE MARRIAGE OF THE ABOVE-NAMED PERSONS. REQUIRED CONSENTS AND AFFIDAVITS FOR THE ISSUANCE OF THIS LICENSE ARE ON FILE.

25A. ISSUE DATE (MM/DD/CCYY)	02/23/2026
25B. EXPIRES AFTER (MM/DD/CCYY)	05/23/2026
25C. NAME OF COUNTY CLERK	MARK CHURCH
25D. SIGNATURE OF CLERK OR DEPUTY CLERK	BY ▸ [signature]
25E. MARRIAGE LICENSE NUMBER	SM028726
25F. COUNTY OF ISSUE	SAN MATEO
25G. RETURN COMPLETED MARRIAGE LICENSE TO (INCLUDE ADDRESS):	555 COUNTY CENTER, REDWOOD CITY, CA 94063

WITNESS(ES) (ONE REQUIRED, NO MORE THAN TWO ALLOWED)

26A. SIGNATURE OF WITNESS	[signature]
26B. NAME OF PERSON WITNESSING MARRIAGE (TYPE OR PRINT CLEARLY)	Maricela Quijano
26C. ADDRESS, CITY, STATE/COUNTRY, AND ZIP CODE	72 Scott ST #1 San Bruno, CA 94066
27A. SIGNATURE OF WITNESS	
27B. NAME OF PERSON WITNESSING MARRIAGE (TYPE OR PRINT CLEARLY)	
27C. ADDRESS, CITY, STATE/COUNTRY, AND ZIP CODE	

CERTIFICATION OF PERSON SOLEMNIZING MARRIAGE

I, THE UNDERSIGNED, DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA, THAT THE ABOVE-NAMED PARTIES WERE JOINED BY ME IN MARRIAGE IN ACCORDANCE WITH THE LAWS OF THE STATE OF CALIFORNIA. NOTE: THE MARRIAGE CEREMONY MUST TAKE PLACE IN THE STATE OF CALIFORNIA.

28A. DATE OF MARRIAGE (MM/DD/CCYY)	03/21/2026
28B. CITY/TOWN OF MARRIAGE	SAN MATEO
28C. COUNTY OF MARRIAGE	SAN MATEO COUNTY
29A. SIGNATURE OF PERSON SOLEMNIZING MARRIAGE	▸ Jennirose N. Rivera
29B. RELIGIOUS DENOMINATION (IF CLERGY)	NON-DENOMINATIONAL
29C. NAME OF PERSON SOLEMNIZING MARRIAGE (TYPE OR PRINT CLEARLY)	JENNIROSE N. RIVERA
29D. OFFICIAL TITLE	MINISTER
29E. ADDRESS, CITY, STATE/COUNTRY, AND ZIP CODE	43 MORTON DRIVE, DALY CITY CA 94015

NEW NAMES (IF ANY)

NEW MIDDLE AND LAST NAME OF PERSON LISTED IN 1A-1D (IF ANY) FOR USE UPON SOLEMNIZATION OF THE MARRIAGE (SEE REVERSE FOR INFORMATION)

30A. FIRST – MUST BE SAME AS 1A	30B. MIDDLE	30C. LAST
–	–	–

NEW MIDDLE AND LAST NAME OF PERSON LISTED IN 12A-12D (IF ANY) FOR USE UPON SOLEMNIZATION OF THE MARRIAGE (SEE REVERSE FOR INFORMATION)

31A. FIRST – MUST BE SAME AS 12A	31B. MIDDLE	31C. LAST
–	–	–

LOCAL REGISTRAR

32A. NAME OF LOCAL REGISTRAR	32B. SIGNATURE OF CLERK OR DEPUTY CLERK	32C. DATE ACCEPTED FOR REGISTRATION
MARK CHURCH	BY ▸ [signature]	MAR 30 2026

STATE OF CALIFORNIA, DEPARTMENT OF PUBLIC HEALTH, OFFICE OF VITAL RECORDS — VS-117 (01/01/2010)

000892670

CERTIFIED COPY OF VITAL RECORDS
COUNTY OF SAN MATEO, STATE OF CALIFORNIA

MARK CHURCH
Assessor-County Clerk-Recorder

Page 1 of 1

This is a true and exact reproduction of the document officially registered and placed on file in the office of the San Mateo County Assessor-County Clerk-Recorder.

By KAMILLE SANTOS, Deputy DATE ISSUED 03/30/2026

CASANMAT02

This copy not valid unless prepared on engraved border displaying date, seal and signature of Recorder.

THE GREAT SEAL OF THE STATE OF CALIFORNIA — EUREKA

COUNTY OF SAN MATEO — FOUNDED 1856

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

Exhibit 14

THE UNITED STATES OF AMERICA

No. 44973861

CERTIFICATE OF NATURALIZATION

Personal description of holder as of date of naturalization:

Date of birth: DECEMBER 20, 1999

Sex: FEMALE

Height: 5 feet 11 inches

Marital status: SINGLE

Country of former nationality: BRAZIL

USCIS Registration No. A206 043 656

I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.

Sophia Lehnen Rodrigues Miranda

(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of Homeland Security

at: SAN FRANCISCO, CALIFORNIA

The Secretary having found that:

SOPHIA LEHNEN RODRIGUES MIRANDA

residing at:

DALY CITY, CALIFORNIA

having complied in all respects with all of the applicable provisions of the naturalization laws of the United States, being entitled to be admitted as a citizen of the United States, and having taken the oath of allegiance at a ceremony conducted by

U.S. CITIZENSHIP AND IMMIGRATION SERVICES

at: SAN FRANCISCO, CALIFORNIA on: SEPTEMBER 26, 2023

such person is admitted as a citizen of the United States of America.

Ur M. Jaddo

U. S. Citizenship and Immigration Services

ALTERATION OR MISUSE OF THIS DOCUMENT IS A FEDERAL OFFENSE AND PUNISHABLE BY LAW

DEPARTMENT OF HOMELAND SECURITY

FORM N-550 (REV. 10/17)

Exhibit 15

STATE OF CALIFORNIA
CERTIFICATION OF VITAL RECORD

COUNTY OF SAN MATEO

HEALTH SYSTEM

SAN MATEO, CALIFORNIA

1202441002772

CERTIFICATE OF LIVE BIRTH
STATE OF CALIFORNIA
USE BLACK INK ONLY

STATE FILE NUMBER | LOCAL REGISTRATION NUMBER

THIS CHILD	1A. NAME OF CHILD - FIRST: ARTHUR		1B. MIDDLE: -		1C. LAST: LEHNEN RODRIGUES	
	2. SEX: MALE	3A. THIS BIRTH, SINGLE, TWIN, ETC.: SINGLE	3B. IF MULTIPLE, THIS CHILD 1ST, 2ND, ETC.: -		4A. DATE OF BIRTH - MM/DD/CCYY: 08/08/2024	4B. HOUR - 24 HOUR CLOCK TIME: 2138
PLACE OF BIRTH	5A. PLACE OF BIRTH - NAME OF HOSPITAL OR FACILITY: KAISER FOUNDATION		5B. STREET ADDRESS - STREET AND NUMBER, OR LOCATION: 1100 VETERANS BOULEVARD			
	5C. CITY: REDWOOD CITY		5D. COUNTY: SAN MATEO			
NAME OF PARENT	6A. NAME OF PARENT - FIRST: GLEIDSON	6B. MIDDLE: -	6C. LAST - BIRTH NAME: RODRIGUES DA SILVA	6D. ☐ MOTHER ☒ FATHER ☐ PARENT	7. BIRTHPLACE - STATE/ COUNTRY: BRAZIL	8. DATE OF BIRTH: 09/16/2001
NAME OF PARENT	9A. NAME OF PARENT - FIRST: SOPHIA	9B. MIDDLE: -	9C. LAST - BIRTH NAME: LEHNEN RODRIGUES MIRANDA	9D. ☒ MOTHER ☐ FATHER ☐ PARENT	10. BIRTHPLACE - STATE/ COUNTRY: BRAZIL	11. DATE OF BIRTH: 12/20/1999
INFORMANT AND BIRTH CERTIFICATION	I CERTIFY THAT I HAVE REVIEWED THE STATED INFORMATION AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.	12A. PARENT OR OTHER INFORMANT - SIGNATURE: CATHY SCANLON		12B. RELATIONSHIP TO CHILD: BIRTH CLERK		12C. DATE SIGNED: 08/10/2024
	I CERTIFY THAT THE CHILD WAS BORN ALIVE AT THE DATE, HOUR, AND PLACE STATED.	13A. ATTENDANT/CERTIFIER - SIGNATURE AND DEGREE OR TITLE: KAVITA SEGARAN, CLERK		13B. LICENSE NUMBER: G79287		13C. DATE SIGNED: 08/14/2024
	13D. TYPED NAME, TITLE AND MAILING ADDRESS OF ATTENDANT: ERICA VERNICE BRENEMAN, MD 1100 VETERANS BOULEVARD, REDWOOD CITY, CA 94063			14. TYPED NAME AND TITLE OF CERTIFIER IF OTHER THAN ATTENDANT: KAVITA SEGARAN, CLERK		
LOCAL REGISTRAR	15A. DATE OF DEATH - MM/DD/CCYY:	15B. STATE FILE NO. - STATE USE ONLY:	16. LOCAL REGISTRAR - SIGNATURE: KISMET BALDWIN-SANTANA, MD		17. DATE ACCEPTED FOR REGISTRATION - MM/DD/CCYY: 08/14/2024	

CERTIFIED COPY OF VITAL RECORD
STATE OF CALIFORNIA, COUNTY OF SAN MATEO

001253904

This is a true and exact reproduction of the document officially registered and placed on file in the office of the SAN MATEO COUNTY HEALTH SYSTEM.

DATE ISSUED 08/27/2024 MUNIRE DEMIRCI

K Baldwin-Santana MD K Baldwin-Santana MD
HEALTH OFFICER AND REGISTRAR

Gleidson Rodrigues da Silva **File No. A 203-758-084**

PROOF OF SERVICE

On August 22, 2026, I, Otavio Haverroth Silva, served, by priority mail, a copy of this Motion to Reopen Proceedings and Rescind in Absentia Removal Order, together with all supporting documents, to the US Department of Homeland Security (Office of the Chief Counsel) at the following mailing address: P.O. Box 26449, San Francisco, CA 94126 -6449.

Otavio Haverroth Silva (Bar N. 343486)
Attorney at Law
P.O. Box 90487
San Diego, CA 92169
Counsel for Respondent