

HS Law Corp.
Non-Detained
Otavio Haverroth Silva, SBN#343486
P.O. Box 90487
San Diego, CA 92169
(510) 241-9336

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
333 South Miami Ave., Ste. 700
Miami, FL 33130

In the Matter of

Lissa Azucena Alonso Molina

In Removal Proceedings

File No. A. 203-751-244

Immigration Judge: **Ayze, Thomas**

Next Hearing Date: **August 19, 2026, at 10:30 AM**

RESPONDENTS' MOTION TO TERMINATE

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
333 South Miami Ave., Ste. 700
Miami, FL 33130**

In the Matter of

Lissa Azucena Alonso Molina

In Removal Proceedings

File No. A. 203-751-244

RESPONDENT'S MOTION TO TERMINATE

Respondent, through counsel, respectfully moves this Honorable Court to terminate these removal proceedings without prejudice. In support thereof, Respondent states as follows:

I. BACKGROUND

1. Respondent Lissa Azucena Alonso Molina was first placed into removal proceedings following her entry into the United States on May 20, 2019.
2. She was twelve years old at that time and accompanied by her father, Carlos Alfonso Alonso Perez (lead Respondent).
3. These proceedings remained pending while consolidated with her father's case.
4. However, around December 18, 2019, the Respondent left the United States and regressed to Guatemala on her own. Later, on or about November 21, 2023, she re-entered the United States with her mother, Julia Azucena Molina Paniagua, at sixteen years old. *See* Notice to Appear, attached hereto as Exhibit 1.
5. Subsequently, she was issued a new Notice to Appear, assigned a different A-Number (245-487-998) and placed in removal proceedings consolidated with her mother as the lead Respondent, currently pending before the San Francisco Immigration Court. *See* Exhibit 1.
6. The Respondent is represented by undersigned counsel in the San Francisco proceedings.

7. Those proceedings are well advanced, and currently scheduled for an Individual Hearing, to take place on June 7, 2027. *See* Notice of In-Person Hearing, attached hereto as Exhibit 2.

8. In those proceedings, Respondent's mother filed an Application for Asylum and for Withholding of Removal, which included Ms. Alonso Molina as a derivative. *See* Form I-589, Application for Asylum and for Withholding of Removal, attached hereto as Exhibit 3. That application has already established Respondent's prima facie eligibility for relief, and the Court has already issued a determination regarding removability. *See* Scheduling Order, attached hereto as Exhibit 4.

9. The Respondent has been issued employment authorization and a Social Security number under the second A-Number. *See* Employment Authorization Document, attached hereto as Exhibit 5.

10. Since her most recent entry into the United States, Respondent has continuously resided in California, where her most recent removal proceedings are currently pending. Accordingly, she has appeared at all scheduled hearings and has diligently complied with all obligations before that Court.

11. Recently, however, Respondent became aware that she is also a Respondent in removal proceedings before the Miami Immigration Court arising from her first entry into the United States, together with her father. Upon learning of this matter, the Respondent, now of age, promptly sought legal assistance to address and resolve the issue.

12. Given the proximity of the Master Hearing in these proceedings, On July 13, 2026, Respondent filed a Motion to Change Venue seeking transfer of these proceedings to the Immigration Court in San Francisco, California, where she resides. That motion remains pending.

13. Thereafter, Respondent filed a Motion to Sever her proceedings from those of her father, Carlos Alfonso Alonso Perez, in order to permit the proper adjudication of the present Motion to Terminate. Similarly, the Court has not issued a decision on that motion to date.

14. In summary, Respondent currently is subject to two separate removal proceedings pending simultaneously before two different Immigration Courts: one initiated before the Miami Immigration Court when Respondent was twelve years old, following her first entry into the United States, despite the fact that she has not resided in Miami or maintained any connection to that jurisdiction for approximately seven years and that she subsequently departed the United States while still a child; and another pending before the San Francisco Immigration Court following her subsequent entry into the United States, which corresponds to her current residence and family circumstances, where the proceedings are in a more advanced stage,

removability has already been established, and Respondent is included on an asylum application that is scheduled for adjudication on the merits.

II. LEGAL FRAMEWORK

The Attorney General has promulgated regulations granting Immigration Judges broad authority to take actions “consistent with their authorities” as “appropriate and necessary for the disposition or alternative resolution” of cases. 8 CFR § 1003.10(b). This authority encompasses several mechanisms for resolving or managing removal proceedings, including administrative closure, termination, and dismissal.

An immigration judge has the authority to resolve or dispose of removal proceedings through an order of dismissal or termination. 8 CFR § 1239.2(b). The regulations governing termination further recognize the Immigration Judge’s discretionary authority to terminate proceedings when appropriate under the circumstances of the case. 8 CFR. § 1003.18(d). In particular, § 1003.18(d)(1)(ii)(F) expressly authorizes termination, in the exercise of discretion and upon the motion of a party, when it is “necessary or appropriate for the disposition or alternative resolution of the case.” The regulation therefore does not confine termination to a fixed or exhaustive list of circumstances; rather, it recognizes the Immigration Judge’s authority to determine, based on the particular circumstances before the Court, whether termination is necessary or appropriate to achieve a fair and efficient resolution of the proceedings. It therefore preserves the Immigration Judge’s discretion to determine whether termination is warranted based on the particular circumstances presented.

This discretionary authority is consistent with EOIR’s stated commitment to fairness and efficiency in the administration of removal proceedings. In promulgating the current regulatory framework, EOIR expressly recognized that termination may be appropriate where doing so advances the fair and efficient adjudication of cases. *See Efficient Case and Docket Management in Immigration Proceedings*, 89 FR 46757 (May 29, 2024). The importance of these considerations is likewise reflected in the case law. *See Stone v. INS*, 514 U.S. 386, 398 (1995) (recognizing “[u]nderlying considerations of administrative administrative and judicial efficiency, as well as fairness to the alien” as important considerations in interpreting the INA); *Meza-Morales v. Barr*, 973 F.3d 656, 665 (7th Cir. 2020) (explaining that “cases must be disposed of fairly, and granting a noncitizen the opportunity to pursue relief to which she is entitled may be appropriate and necessary for a fair disposition”); *Matter of Coronado Acevedo*,

28 I&N Dec. 648, 651-52 (A.G. 2022) (indicating that precluding termination of proceedings in certain common situations not contemplated by the regulations “would undermine fair and efficient adjudication” in some cases).

The 2024 Federal Register notice further underscores that the exercise of termination authority may conserve adjudicatory resources and avoid unnecessary duplication. Specifically, EOIR explained that the regulatory framework serves fairness and efficiency “by saving adjudicatory resources for other cases that are ready for resolution in removal proceedings and by limiting the issues to be resolved by EOIR adjudicators should DHS initiate new proceedings.” *See Efficient Case and Docket Management in Immigration Proceedings*, 89 FR 46757 (May 29, 2024).

Thus, § 1003.18(d)(1)(ii)(F) expressly preserves the Immigration Judge’s discretion to terminate proceedings when doing so is necessary or appropriate for the disposition or alternative resolution of the case. This is precisely the case at hand.

III. ARGUMENT

A. Maintaining Both Proceedings Would Create Unnecessary Duplication and Undermine Judicial Efficiency

Immigration Judges possess broad authority to regulate proceedings and take actions necessary for the orderly disposition of cases pursuant to 8 C.F.R. §§ 1003.10(b) and 1003.18. The exercise of that authority is particularly appropriate where maintaining parallel proceedings would unnecessarily consume adjudicatory resources and undermine the efficient administration of the immigration docket

Here, the continued existence of two simultaneous proceedings would require Respondent, the Department of Homeland Security, and two Immigration Courts to expend resources on parallel cases involving the same Respondent. This duplication is particularly unnecessary where one proceeding is already substantially advanced and capable of resolving Respondent’s claims.

Maintaining the Miami case would potentially require duplicative filings, hearings, and adjudication before a Court with which Respondent has had no meaningful connection for approximately seven years. It could also create unnecessary procedural complications as the two cases proceed independently, including the possibility of inconsistent procedural developments

or conflicting case-management decisions.

The pending Motion to Change Venue further illustrates the inefficiency of maintaining the earlier proceeding. Even if venue were transferred from Miami, Respondent would nevertheless remain subject to two separate removal proceedings before the same Immigration Court, arising from different entries, under different A-Numbers, and involving substantially overlapping issues.

Termination would eliminate these inefficiencies without preventing adjudication of Respondent's claims. To the contrary, it would streamline the proceedings by allowing Respondent's immigration case to proceed through the existing San Francisco proceedings. This directly advances the fairness and efficiency considerations underlying 8 C.F.R. §§ 1003.10(b) and 1003.18(d)(1)(ii)(F), as well as EOIR's stated objective of conserving adjudicatory resources and avoiding unnecessary duplication. *See Efficient Case and Docket Management in Immigration Proceedings*, 89 FR 46757 (May 29, 2024).

B. Termination Is Appropriate Because Respondent Is Already Proceeding Before the Immigration Court With the Strongest Connection to Her Current Case

Respondent is currently subject to two separate removal proceedings arising from different entries into the United States and pending before two different Immigration Courts. The Miami proceedings were initiated when Respondent was only twelve years old, following her first entry into the United States. Respondent subsequently departed the United States while still a child and has not resided in, or maintained a meaningful connection to, Miami for approximately seven years.

By contrast, Respondent's proceedings before the San Francisco Immigration Court arise from her subsequent entry into the United States and correspond to her present residence and family circumstances. *See* Exhibit 1. Those proceedings are also substantially more advanced. Removability has already been established, and Respondent is included on an asylum application that is pending adjudication on the merits. *See* Exhibits 2-4.

Thus, the San Francisco proceedings already provide a proper and substantially advanced procedural vehicle for resolving Respondent's immigration claims. Maintaining the separate Miami proceedings serves no corresponding adjudicatory purpose. Terminating these proceedings would allow Respondent's claims to proceed in the forum that is connected to her current circumstances and in which her case is already being actively adjudicated.

C. Termination Would Promote a Fair and Orderly Resolution of Respondent's Immigration Claims

Termination is also warranted because it would promote a fair and orderly resolution of Respondent's claims. Respondent was only twelve years old when the Miami proceedings were initiated and subsequently left the United States while still a child. She has since established her present life and family circumstances elsewhere, and her current immigration proceedings are pending before the San Francisco Immigration Court. *See* Exhibits 3 and 5.

Importantly, terminating these proceedings would not deprive Respondent of an opportunity to seek relief. Her claims remain pending in San Francisco, where removability has already been established and where her asylum application is proceeding toward a merits adjudication. *See* Exhibits 3 and 4. Termination would therefore eliminate a duplicative proceeding while preserving the substantive adjudication of Respondent's claims.

This is consistent with the principle that removal proceedings should be resolved fairly and efficiently. *See Stone v. INS*, 514 U.S. 386, 398 (1995); *Meza-Morales v. Barr*, 973 F.3d 656, 665 (7th Cir. 2020); *Matter of Coronado Acevedo*, 28 I&N Dec. 648, 651–52 (A.G. 2022).

Furthermore, nothing in this request prejudices DHS, as Respondent remains in active removal proceedings before another Immigration Court under the later-issued A-Number.

Accordingly, this is not a case in which termination would merely delay or avoid adjudication. Rather, termination would eliminate an unnecessary parallel proceeding and allow Respondent's immigration claims to proceed in the already-pending San Francisco proceedings.

IV. CONCLUSION

The continued maintenance of duplicate removal proceedings concerning the same individual serves no legitimate administrative purpose. The later proceedings encompass Respondent's current immigration status, pending applications for relief, and all future adjudications involving Respondent. On the other hand, continuation of these proceedings risks inconsistent adjudications, conflicting scheduling obligations, unnecessary expenditure of judicial and governmental resources, and confusion concerning Respondent's immigration record. Termination would promote judicial economy and efficient docket management.

Under 8 C.F.R. § 1003.18(d)(1)(ii)(F), termination is therefore both necessary and appropriate for the fair and efficient disposition of Respondent's case.

For these reasons, Respondent respectfully requests that the Court exercise its discretion, following severance from her father's consolidated case, to terminate these proceedings and permit Respondent's immigration claims to proceed solely before the San Francisco Immigration Court.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'OS', is positioned above a horizontal line.

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

Exhibit list

Exhibits:

Pages:

Exhibit 1

Notice to Appear issued on November 22, 2023 1-3

Exhibit 2

Notice scheduling Individual Hearing before the San Francisco Immigration Court 4-5

Exhibit 3

Form I-589 filed by Respondent's mother with the San Francisco Immigration Court on August 5, 2024, which includes the Respondent as a derivative 6-17

Exhibit 4

Scheduling Order determining Respondent's removability in contemporaneous proceedings and demanding prima facie evidence of eligibility for relief 18-19

Exhibit 5

Copy of Employment Authorization Document (EAD), issued on new A-Number 20

Exhibit 1

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

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

Subject ID: 389636612

FINS #: 1349694925

DOB: 01/14/2007

File No: A245 487 998

Event No: TUS2411000200

In the Matter of:

Respondent:

LISSA AZUCENA ALONSO-MOLINA

currently residing at:

FAILED TO PROVIDE ADDRESS EOIR-33 DOCKET SAN FRANCISCO, CALIFORNIA, 94112-

+1 (415) 684-0900

(Number, street, city, state and ZIP code)

(Area code and phone number)

- ☐ You are an arriving alien.
- ☒ You are an alien present in the United States who has not been admitted or paroled.
- ☐ You have been admitted to the United States, but are removable for the reasons stated below.

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 GUATEMALA and a citizen of GUATEMALA ;
3. You arrived in the United States at or near SASABE, AZ , on or about November 21, 2023 ;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

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.

- ☐ 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 ☐ 8CFR 235.3(b)(5)(iv)

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

630 SANSOME ST, 4TH FL, RM 475 SAN FRANCISCO CA 94111

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

on April 04, 2025 at 10:30 AM to show why you should not be removed from the United States based on the

(Date)

(Time)

charge(s) set forth above.

Acting/Patrol Agent in Charge

MATTHEW J GROEKE

Date: 2023.11.22 09:48 -07:00

0985767453.CBP

(Signature and Title of Issuing Officer)

Date: November 22, 2023

TUCSON, ARIZONA

(City and State)

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 in 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 1003.16. 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 that 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, including that you are inadmissible or removable. 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 voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS 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 your local DHS office, listed on the internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 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 your 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 Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

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 **November 22, 2023**, in the following manner and in compliance with section 239(a)(1) of the Act.

- ☒ in person ☐ by certified mail, returned receipt # _____ requested ☐ by regular mail
☐ Attached is a credible fear worksheet.
☒ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the **SPANISH** 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.

(Signature of Respondent if Personally Served)

LAURA L. GRAHAM, BORDER PATROL
AGENT

LAURA L. GRAHAM
Date: 2023.11.22 09:47:03 -07:00
0134238700 CBP 3

(Signature and Title of officer)

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

Exhibit 2

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

LEAD FILE: 245-487-992
IN REMOVAL PROCEEDINGS
DATE: Aug 22, 2024

TO: HS LAW
Silva, Otavio Haverroth
5051 La Jolla BLVD
Suite 202
San Diego, CA 92109

RE: 245-487-992 MOLINA-PANIAGUA, JULIA AZUCENA
245-487-994 ALONSO-MOLINA, DIEGO ANDRE
245-487-998 ALONSO-MOLINA, LISSA AZUCENA

Notice of In-Person Hearing

Your case has been scheduled for a INDIVIDUAL hearing before the immigration court on:

Date: Jun 7, 2027
Time: 1:00 P.M. PT
Court Address: 630 SANSOME ST, 4TH FL, RM 475
4TH FLOOR, COURTROOM 2, SAN FRANCISCO, CA 94111

Representation: You may be represented in these proceedings, at no expense to the Government, by an attorney or other representative of your choice who is authorized and qualified to represent persons before an immigration court. If you are represented, your attorney or representative must also appear at your hearing and be ready to proceed with your case. Enclosed and online at <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers> is a list of free legal service providers who may be able to assist you.

Failure to Appear: If you fail to appear at your hearing and the Department of Homeland Security establishes by clear, unequivocal, and convincing evidence that written notice of your hearing was provided and that you are removable, you will be ordered removed from the United States. Exceptions to these rules are only for exceptional circumstances.

Change of Address: The court will send all correspondence, including hearing notices, to you based on the most recent contact information you have provided, and your immigration proceedings can go forward in your absence if you do not appear before the court. If your contact information is missing or is incorrect on the Notice to Appear, you must provide the immigration court with your updated contact information within five days of receipt of that notice so you do not miss important information. Each time your address, telephone number, or email address changes, you must inform the immigration court within five days. To update your contact information with the immigration court, you must complete a Form EOIR-33 either online at <https://respondentaccess.eoir.justice.gov/en/> or by [completing the enclosed paper form](#) and mailing it to the immigration court listed above.

Internet-Based Hearings: If you are scheduled to have an internet-based hearing, you will appear by video or telephone. If you prefer to appear in person at the immigration court named above, you must file a motion for an in-person hearing with the immigration court at least fifteen days before the hearing date provided above. Additional information about internet-based hearings for each immigration court is available on EOIR's website at <https://www.justice.gov/eoir/eoir-immigration-court-listing>.

In-Person Hearings: If you are scheduled to have an in-person hearing, you will appear in person at the immigration court named above. If you prefer to appear remotely, you must file a motion for an internet-based hearing with the immigration court at least fifteen days before the hearing date provided above.

For information about your case, please call **1-800-898-7180** (toll-free) or **304-625-2050**.

The Certificate of Service on this document allows the immigration court to record delivery of this notice to you and to the Department of Homeland Security.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL [M] PERSONAL SERVICE [P] ELECTRONIC SERVICE [E]
TO: [] Noncitizen | [] Noncitizen c/o Custodial Officer |
[E] Noncitizen ATT/REP | [E] DHS
DATE: 8-22-2024 BY: COURT STAFF JZN
Attachments: [] EOIR-33 [] Appeal Packet [] Legal Services List [] Other NH



Use a smartphone's camera to scan the code on this page to read the notice online.

Usa la cámara de un teléfono inteligente para escanear el código de esta página y leer el aviso en línea.

Use a câmara do smartphone para digitalizar o código nesta página e ler o manual de instruções online.

使用智能手机摄像头扫描本页面的代码，即可在线阅读该通知。

ਠੇਠਿਸ ਠੂੰ ਅੰਨਲਾਈਨ ਪੜ੍ਹਨ ਲਈ ਫਿਸ ਪਨੇ 'ਤੇ ਕੋਡ ਠੂੰ ਸਕੈਨ ਕਰਨ ਲਈ ਸਮਾਰਟਫੋਨ ਦੇ ਕੈਮਰੇ ਦੀ ਵਰਤੋਂ ਕਰੋ।

অনলাইনে নোটিশ পড়ার জন্য এই পজেরে কোডটি স্ক্যান করত্রে স্মার্টফোনের ক্যামেরা ব্যবহার করুন

सूचना अनलाइनमा पढ्न यस पृष्ठमा कोड स्क्यान गर्न स्मार्टफोनको क्यामेरा प्रयोग गर्नुहोस्।

Sèvi ak kamera yon telefòn entèlijan pou eskane kòd ki nan paj sa a pou li avi a sou entènèt.

استخدم كاميرا الهاتف الذكي لمسح الرمز الموجود في هذه الصفحة لقراءة الإشعار على الإنترنت

Чтобы прочитатъ уведомление онлайн, отсканируйте код на этой странице с помощью камеры вашего смартфона.

Utilisez l'appareil photo d'un téléphone intelligent pour scanner le code sur cette page afin de lire l'avis en ligne.

Exhibit 3

I-589, Application for Asylum and for Withholding of Removal

NOTE: ☒ Check this box if you also want to apply for withholding of removal under the Convention Against Torture.

1. Alien Registration Number(s) (A-Number) (if any) 245487992		2. U.S. Social Security Number (if any) N/A		3. USCIS Online Account Number (if any) N/A	
4. Complete Last Name Molina Paniagua		5. First Name Julia		6. Middle Name Azucena	
7. What other names have you used (include maiden name and aliases)? N/A					
8. Residence in the U.S. (where you physically reside)					
Street Number and Name 936 Hollister Avenue				Apt. Number N/A	
City San Francisco		State California		Zip Code 94124	
				Telephone Number (628) 2874205	
(NOTE: You must be residing in the United States to submit this form.)					
9. Mailing Address in the U.S. (if different than the address in Item Number 8)					
In Care Of (if applicable): Otávio Silva				Telephone Number (510) 241-9336	
Street Number and Name P.O. Box 90487				Apt. Number N/A	
City San Diego		State CA		Zip Code 92169	
10. Gender: ☐ Male ☒ Female		11. Marital Status: ☐ Single ☒ Married ☐ Divorced ☐ Widowed			
12. Date of Birth (mm/dd/yyyy) 04/14/1986		13. City and Country of Birth Patulul, Guatemala			
14. Present Nationality (Citizenship) Guatemalan		15. Nationality at Birth Guatemalan		16. Race, Ethnic, or Tribal Group Latina	
				17. Religion Christian evangelical	
18. Check the box, a through c, that applies: a. ☐ I have never been in Immigration Court proceedings. b. ☒ I am now in Immigration Court proceedings. c. ☐ I am not now in Immigration Court proceedings, but I have been in the past.					
19. Complete 19 a through c. a. When did you last leave your country? (mm/dd/yyyy) 11/17/2023 b. What is your current I-94 Number, if any? N/A c. List each entry into the U.S. beginning with your most recent entry. List date (mm/dd/yyyy), place, and your status for each entry. (Attach additional sheets as needed.) Date 11/21/2023 Place Sasabe, Arizona Status No Legal Status Date Status Expires N/A Date N/A Place N/A Status N/A Date N/A Place N/A Status N/A					
20. What country issued your last passport or travel document? Guatemala		21. Passport Number 111014166237736 Travel Document Number 111014166237736			22. Expiration Date (mm/dd/yyyy) 10/29/2028
23. What is your native language (include dialect, if applicable)? Spanish		24. Are you fluent in English? ☐ Yes ☒ No		25. What other languages do you speak fluently? N/A	
For EOIR use only.		For USCIS use only.		Action: Interview Date: _____ Asylum Officer ID No.: _____ Decision: Approval Date: _____ Denial Date: _____ Referral Date: _____	

Part A.II. Information About Your Spouse and Children

Your spouse
 ☐
 I am not married. (Skip to **Your Children** below.)

1. Alien Registration Number (A-Number) <i>(if any)</i>	2. Passport/ID Card Number <i>(if any)</i>	3. Date of Birth (mm/dd/yyyy)	4. U.S. Social Security Number <i>(if any)</i>
203751241	111014162881541	11/18/1986	N/A
5. Complete Last Name	6. First Name	7. Middle Name	8. Other names used (include maiden name and aliases)
Pérez	Carlos	Alfonso	N/A
9. Date of Marriage (mm/dd/yyyy)	10. Place of Marriage		11. City and Country of Birth
12/04/2023	San Francisco, United States		Patulul, Guatemala
12. Nationality (Citizenship)		13. Race, Ethnic, or Tribal Group	14. Gender
Guatemalan		Latino	☒ Male ☐ Female
15. Is this person in the U.S.?			
☒ Yes (Complete Blocks 16 to 24.) ☐ No (Specify location): N/A			
16. Place of last entry into the U.S.	17. Date of last entry into the U.S. (mm/dd/yyyy)	18. I-94 Number (if any)	19. Status when last admitted (Visa type, if any)
Antelope Wells, NM	05/20/2019	N/A	N/A
20. What is your spouse's current status?	21. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	22. Is your spouse in Immigration Court proceedings?	23. If previously in the U.S., date of previous arrival (mm/dd/yyyy)
No Legal Status	N/A	☒ Yes ☐ No	N/A
24. If in the U.S., is your spouse to be included in this application? (Check the appropriate box.)			
☐ Yes			
☒ No			

Your Children. List all of your children, regardless of age, location, or marital status.

☐
 I do not have any children. (Skip to Part A.III., Information about your background.)

☒
 I have children. Total number of children: 2

(NOTE: Use Form I-589 Supplement A or attach additional sheets of paper and documentation if you have more than four children.)

1. Alien Registration Number (A-Number) <i>(if any)</i>	2. Passport/ID Card Number <i>(if any)</i>	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number <i>(if any)</i>
245487998	121014277737338	Single	N/A
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
Alonso Molina	Lissa	Azucena	01/14/2007
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	12. Gender
Patulul, Guatemala	Guatemalan	Latina	☐ Male ☒ Female
13. Is this child in the U.S. ? ☒ Yes (Complete Blocks 14 to 21.) ☐ No (Specify location): N/A			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (If any)	17. Status when last admitted (Visa type, if any)
Sasabe, Arizona	11/21/2023	N/A	No Legal Status
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	20. Is your child in Immigration Court proceedings?	
No Legal Status	N/A	☒ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.)			
☒ Yes			
☐ No			

Part A.II. Information About Your Spouse and Children (Continued)

1. Alien Registration Number (A-Number) (if any) 245487994	2. Passport/ID Card Number (if any) 121014275575012	3. Marital Status (Married, Single, Divorced, Widowed) Single	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name Alonso Molina	6. First Name Diego Andre	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) 08/03/2013
9. City and Country of Birth Patulul, Guatemala	10. Nationality (Citizenship) Guatemalan	11. Race, Ethnic, or Tribal Group Latino	12. Gender ☒ Male ☐ Female
13. Is this child in the U.S. ? ☒ Yes (Complete Blocks 14 to 21.) ☐ No (Specify location): N/A			
14. Place of last entry into the U.S. Sasabe, Arizona	15. Date of last entry into the U.S. (mm/dd/yyyy) 11/21/2023	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) No Legal Status
18. What is your child's current status? No Legal Status	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? ☒ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) ☒ Yes ☐ No			

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Gender ☐ Male ☐ Female
13. Is this child in the U.S. ? ☐ Yes (Complete Blocks 14 to 21.) ☐ No (Specify location): N/A			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) ☐ Yes ☐ No			

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Gender ☐ Male ☐ Female
13. Is this child in the U.S. ? ☐ Yes (Complete Blocks 14 to 21.) ☐ No (Specify location): N/A			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) ☐ Yes ☐ No			

Part A.III. Information About Your Background

1. List your last address where you lived before coming to the United States. If this is not the country where you fear persecution, also list the last address in the country where you fear persecution. (List Address, City/Town, Department, Province, or State and Country.)
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Number and Street (Provide if available)	City/Town	Department, Province, or State	Country	Dates	
				From (Mo/Yr)	To (Mo/Yr)
2 Avenida Colonia El Carmen	Patulul	Suchitepéquez	Guatemala	04/2020	11/2023
N/A	N/A	N/A	N/A	N/A	N/A

2. Provide the following information about your residences during the past 5 years. List your present address first.
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Number and Street	City/Town	Department, Province, or State	Country	Dates	
				From (Mo/Yr)	To (Mo/Yr)
936 Hollister Avenue	San Francisco	California	United States	06/2024	PRESENT
452 Ellington Avenue	San Francisco	California	United States	11/2023	06/2024
2 Avenida Colonia El Carmen	Patulul	Suchitepequez	Guatemala	04/2020	11/2023
El Triunfo	Patulul	Suchitepequez	Guatemala	10/2019	04/2020
2 Avenida Colonia El Carmen	Patulul	Suchitepequez	Guatemala	05/1995	10/2019

3. Provide the following information about your education, beginning with the most recent school that you attended.
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Name of School	Type of School	Location (Address)	Attended	
			From (Mo/Yr)	To (Mo/Yr)
Asociación para el Desarrollo Integral y Capacitación Técnica Básica - ADICAPB	Technical Course	Patulul, Guatemala	11/2003	04/2005
Instituto Básico Eduardo Torres	High School	4 Avenida Z.O, Patulul, Guatemala	01/2001	10/2003
Escuela Oficial Rural Mixta Barrio El Triunfo	Elementary School	El Triunfo Z.O, Patulul, Guatemala	01/1995	10/2000
N/A	N/A	N/A	N/A	N/A

4. Provide the following information about your employment during the past 5 years. List your present employment first.
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Name and Address of Employer	Your Occupation	Dates	
		From (Mo/Yr)	To (Mo/Yr)
Clinica Santa Isabel, Primera avenida, Patulul, Guatemala	Nursing Assistant	02/2023	11/2023
Fármacia Mario Paredes - Segunda avenida, Patulul, Guatemala	Customer Service	11/2017	11/2022
N/A	N/A	N/A	N/A

5. Provide the following information about your parents and siblings (brothers and sisters). Check the box if the person is deceased.
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Full Name	City/Town and Country of Birth	Current Location	
<i>Mother</i> Herlinda Paniagua Sajmolo	Guatemala, Guatemala	☐ Deceased	Patulul, Guatemala
<i>Father</i> Miguel Angel Molina Alvarado	Guatemala, Guatemala	☐ Deceased	Patulul, Guatemala
<i>Sibling</i> Oscar Vidal Molina Paniagua	Guatemala, Guatemala	☐ Deceased	Patulul, Guatemala
<i>Sibling</i> Brendis Janeth Molina Paniagua	Guatemala, Guatemala	☐ Deceased	Patulul, Guatemala
<i>Sibling</i> Miguel Alfonso Molina Paniagua	Guatemala, Guatemala	☐ Deceased	Patulul, Guatemala
<i>Sibling</i> José Pablo Molina Paniagua	Guatemala, Guatemala	☐ Deceased	Quetzaltenango, Guatemala

Part B. Information About Your Application

(NOTE: Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part B.)

When answering the following questions about your asylum or other protection claim (withholding of removal under 241(b)(3) of the INA or withholding of removal under the Convention Against Torture), you must provide a detailed and specific account of the basis of your claim to asylum or other protection. To the best of your ability, provide specific dates, places, and descriptions about each event or action described. You must attach documents evidencing the general conditions in the country from which you are seeking asylum or other protection and the specific facts on which you are relying to support your claim. If this documentation is unavailable or you are not providing this documentation with your application, explain why in your responses to the following questions.

Refer to Instructions, Part 1: Filing Instructions, Section II, "Basis of Eligibility," Parts A - D, Section V, Completing the Form," Part B, and Section VII, "Additional Evidence That You Should Submit," for more information on completing this section of the form.

1. Why are you applying for asylum or withholding of removal under section 241(b)(3) of the INA, or for withholding of removal under the Convention Against Torture? Check the appropriate box(es) below and then provide detailed answers to questions A and B below.

I am seeking asylum or withholding of removal based on:

- ☐ Race
 ☒ Political opinion
- ☒ Religion
 ☒ Membership in a particular social group
- ☐ Nationality
 ☒ Torture Convention

A. Have you, your family, or close friends or colleagues ever experienced harm or mistreatment or threats in the past by anyone?

- ☐ No
 ☒ Yes

If "Yes," explain in detail:

- What happened;
- When the harm or mistreatment or threats occurred;
- Who caused the harm or mistreatment or threats; and
- Why you believe the harm or mistreatment or threats occurred.

I was persecuted in Guatemala because of my evangelical Christian faith and my status as a woman. On October 20, 2023, a man pushed, threatened and raped me because of my faith and my gender. He mocked my religion, asking if my God would save me now, and said he knew my husband was not living with me. He also mentioned knowing that I had a daughter and where we lived, forbidding me from reporting him. He did this because he knew that my husband was not with us and took advantage of his status as a man and his strength to impose his dominance over me because I am a woman. After that, I began to be stalked. In the middle of the night, people would ring my doorbell, and when I saw a car parked and watching me, I feared for our lives. As a result, I constantly feared for the safety of myself and my children, and the psychological, physical, and verbal abuse I endured caused irreversible trauma, making our stay in the country untenable. I will provide a complete declaration before my Individual Hearing.

B. Do you fear harm or mistreatment if you return to your home country?

- ☐ No
 ☒ Yes

If "Yes," explain in detail:

- What harm or mistreatment you fear;
- Who you believe would harm or mistreat you; and
- Why you believe you would or could be harmed or mistreated.

I fear being mistreated, assaulted, raped or killed if I return to my home country. I have received various threats related to my life and my daughter's. Because of this and due to Guatemala's inability to protect women from gender violence and individuals expressing their religion from religious intolerance, I fear that the abuses I suffered in the past may recur in the future. I will provide a complete declaration before my Individual Hearing.

Part B. Information About Your Application (Continued)

2. Have you or your family members ever been accused, charged, arrested, detained, interrogated, convicted and sentenced, or imprisoned in any country other than the United States (including for an immigration law violation)?

☒ No
☐ Yes

If "Yes," explain the circumstances and reasons for the action.

N/A

3.A. Have you or your family members ever belonged to or been associated with any organizations or groups in your home country, such as, but not limited to, a political party, student group, labor union, religious organization, military or paramilitary group, civil patrol, guerrilla organization, ethnic group, human rights group, or the press or media?

☒ No
☐ Yes

If "Yes," describe for each person the level of participation, any leadership or other positions held, and the length of time you or your family members were involved in each organization or activity.

N/A

3.B. Do you or your family members continue to participate in any way in these organizations or groups?

☒ No
☐ Yes

If "Yes," describe for each person your or your family members' current level of participation, any leadership or other positions currently held, and the length of time you or your family members have been involved in each organization or group.

N/A

4. Are you afraid of being subjected to torture in your home country or any other country to which you may be returned?

☐ No
☒ Yes

If "Yes," explain why you are afraid and describe the nature of torture you fear, by whom, and why it would be inflicted.

I fear being subjected to torture if I return to my home country, as I have already experienced several threats and harm in Guatemala, because of my gender and for expressing my faith. The government and the police are not capable or not willing to protect women from gender-based violence or persecution against Evangelical Christians in Guatemala, so they will not protect me. I will provide a complete declaration before my Individual Hearing.

Part C. Additional Information About Your Application

(NOTE: Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part C.)

1. Have you, your spouse, your child(ren), your parents or your siblings ever applied to the U.S. Government for refugee status, asylum, or withholding of removal?

☐ No
☒ Yes

If "Yes," explain the decision and what happened to any status you, your spouse, your child(ren), your parents, or your siblings received as a result of that decision. Indicate whether or not you were included in a parent or spouse's application. If so, include your parent or spouse's A-number in your response. If you have been denied asylum by an immigration judge or the Board of Immigration Appeals, describe any change(s) in conditions in your country or your own personal circumstances since the date of the denial that may affect your eligibility for asylum.

My spouse, Carlos Afonso Alonso Perez (A-Number 203-751-241) is currently in removal proceedings with the immigration court. I will provide a complete declaration before my Individual Hearing.

2.A. After leaving the country from which you are claiming asylum, did you or your spouse or child(ren) who are now in the United States travel through or reside in any other country before entering the United States?

☐ No
☒ Yes

2.B. Have you, your spouse, your child(ren), or other family members, such as your parents or siblings, ever applied for or received any lawful status in any country other than the one from which you are now claiming asylum?

☒ No
☐ Yes

If "Yes" to either or both questions (2A and/or 2B), provide for each person the following: the name of each country and the length of stay, the person's status while there, the reasons for leaving, whether or not the person is entitled to return for lawful residence purposes, and whether the person applied for refugee status or for asylum while there, and if not, why he or she did not do so.

Yes, my children and I traveled to Mexico on November 17, 2023, and on November 21, we arrived in the United States. We didn't stay in Mexico because it wasn't safe for us there, and the protection offered was insufficient. We sought asylum in the United States to escape the ongoing persecution and find a place where we could live without fear for our safety and well-being. I will provide a complete declaration before my Individual Hearing.

3. Have you, your spouse or your child(ren) ever ordered, incited, assisted or otherwise participated in causing harm or suffering to any person because of his or her race, religion, nationality, membership in a particular social group or belief in a particular political opinion?

☒ No
☐ Yes

If "Yes," describe in detail each such incident and your own, your spouse's, or your child(ren)'s involvement.

N/A

Form I-589 Edition 03/01/23
 Page 7

EOIR - 8 of 14

Part C. Additional Information About Your Application (Continued)

4. After you left the country where you were harmed or fear harm, did you return to that country?

☒ No
 ☐ Yes

If "Yes," describe in detail the circumstances of your visit(s) (for example, the date(s) of the trip(s), the purpose(s) of the trip(s), and the length of time you remained in that country for the visit(s).)

N/A

5. Are you filing this application more than 1 year after your last arrival in the United States?

☒ No
 ☐ Yes

If "Yes," explain why you did not file within the first year after you arrived. You must be prepared to explain at your interview or hearing why you did not file your asylum application within the first year after you arrived. For guidance in answering this question, see Instructions, Part 1: Filing Instructions, Section V. "Completing the Form," Part C.

N/A

6. Have you or any member of your family included in the application ever committed any crime and/or been arrested, charged, convicted, or sentenced for any crimes in the United States (including for an immigration law violation)?

☐ No
 ☒ Yes

If "Yes," for each instance, specify in your response: what occurred and the circumstances, dates, length of sentence received, location, the duration of the detention or imprisonment, reason(s) for the detention or conviction, any formal charges that were lodged against you or your relatives included in your application, and the reason(s) for release. Attach documents referring to these incidents, if they are available, or an explanation of why documents are not available.

Yes, upon entering the United States through Sasabe, Arizona, on November 21, 2023, my children and I were detained at the border by Immigration Officers and I remained detained for one day. Also, My husband, Carlos Alfonso Alonso Perez, was detained for four months in Miami, FL, on charges of driving under the influence of alcohol. I will provide a complete declaration before my Individual Hearing.

Part D. Your Signature

I certify, under penalty of perjury under the laws of the United States of America, that this application and the evidence submitted with it are all true and correct. Title 18, United States Code, Section 1546(a), provides in part: Whoever knowingly makes under oath, or as permitted under penalty of perjury under Section 1746 of Title 28, United States Code, knowingly subscribes as true, any false statement with respect to a material fact in any application, affidavit, or other document required by the immigration laws or regulations prescribed thereunder, or knowingly presents any such application, affidavit, or other document containing any such false statement or which fails to contain any reasonable basis in law or fact - shall be fined in accordance with this title or imprisoned for up to 25 years. I certify that I am physically present in the United States or seeking admission at a Port of Entry when I execute this application. I authorize the release of any information from my immigration record that U.S. Citizenship and Immigration Services (USCIS) needs to determine eligibility for the benefit I am seeking.

WARNING: Applicants who are in the United States unlawfully are subject to removal if their asylum or withholding claims are not granted by an asylum officer or an immigration judge. Any information provided in completing this application may be used as a basis for the institution of, or as evidence in, removal proceedings even if the application is later withdrawn. Applicants determined to have knowingly made a frivolous application for asylum will be permanently ineligible for any benefits under the Immigration and Nationality Act. You may not avoid a frivolous finding simply because someone advised you to provide false information in your asylum application. If filing with USCIS, unexcused failure to appear for an appointment to provide biometrics (such as fingerprints) and your biographical information within the time allowed may result in an asylum officer dismissing your asylum application or referring it to an immigration judge. Failure without good cause to provide DHS with biometrics or other biographical information while in removal proceedings may result in your application being found abandoned by the immigration judge. See sections 208(d)(5)(A) and 208(d)(6) of the INA and 8 CFR sections 208.10, 1208.10, 208.20, 1003.47(d) and 1208.20.

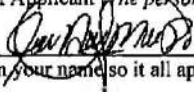
Print your complete name. Julia Azucena Molina Paniagua	Write your name in your native alphabet.
--	--

Did your spouse, parent, or child(ren) assist you in completing this application? ☒ No ☐ Yes (If "Yes," list the name and relationship.)

N/A (Name)	N/A (Relationship)	N/A (Name)	N/A (Relationship)
---------------	-----------------------	---------------	-----------------------

Did someone other than your spouse, parent, or child(ren) prepare this application? ☐ No ☒ Yes (If "Yes," complete Part E.)

Asylum applicants may be represented by counsel. Have you been provided with a list of persons who may be available to assist you, at little or no cost, with your asylum claim? ☐ No ☒ Yes

Signature of Applicant (The person in Part A.I.) → []	07/22/2024 Date (mm/dd/yyyy)
---	---------------------------------

Part E. Declaration of Person Preparing Form, if Other Than Applicant, Spouse, Parent, or Child

I declare that I have prepared this application at the request of the person named in Part D, that the responses provided are based on all information of which I have knowledge, or which was provided to me by the applicant, and that the completed application was read to the applicant in his or her native language or a language he or she understands for verification before he or she signed the application in my presence. I am aware that the knowing placement of false information on the Form I-589 may also subject me to civil penalties under 8 U.S.C. 1324c and/or criminal penalties under 18 U.S.C. 1546(a).

Signature of Preparer		Print Complete Name of Preparer Otavio Haverroth Silva	
Daytime Telephone Number (510) 2419336		Address of Preparer: Street Number and Name P.O. Box 90487	
Apt. Number N/A	City San Diego	State CA	Zip Code 92169
To be completed by an attorney or accredited representative (if any).	☐ Select this box if Form G-28 is attached.	Attorney State Bar Number (if applicable) 343486	Attorney or Accredited Representative USCIS Online Account Number (if any) 007492625438

Part F. To Be Completed at Asylum Interview, if Applicable

NOTE: *You will be asked to complete this part when you appear for examination before an asylum officer of the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS).*

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered ____ to ____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

_____ Signature of Applicant	_____ Date (mm/dd/yyyy)
_____ Write Your Name in Your Native Alphabet	_____ Signature of Asylum Officer

Part G. To Be Completed at Removal Hearing, if Applicable

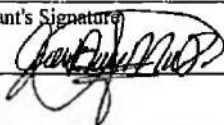
NOTE: *You will be asked to complete this Part when you appear before an immigration judge of the U.S. Department of Justice, Executive Office for Immigration Review (EOIR), for a hearing.*

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered ____ to ____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

_____ Signature of Applicant	_____ Date (mm/dd/yyyy)
_____ Write Your Name in Your Native Alphabet	_____ Signature of Immigration Judge

Supplement A, Form I-589

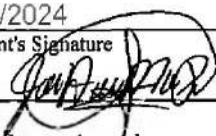
A-Number (If available) 245487992	Date 07/22/2024
Applicant's Name Julia Azucena Molina Paniagua	Applicant's Signature 

List All of Your Children, Regardless of Age or Marital Status
 (NOTE: Use this form and attach additional pages and documentation as needed, if you have more than four children)

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Gender ☐ Male ☐ Female
13. Is this child in the U.S.? ☐ Yes (Complete Blocks 14 to 21.) ☐ No (Specify location): N/A			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) ☐ Yes ☐ No			

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Gender ☐ Male ☐ Female
13. Is this child in the U.S.? ☐ Yes (Complete Blocks 14 to 21.) ☐ No (Specify location): N/A			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) ☐ Yes ☐ No			

Supplement B, Form I-589

Additional Information About Your Claim to Asylum	
A-Number (if available) 245487992	Date 07/22/2024
Applicant's Name Julia Azucena Molina Paniagua	Applicant's Signature 

NOTE: Use this as a continuation page for any additional information requested. Copy and complete as needed.

Part	N/A
Question	N/A

N/A

Exhibit 4



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

Respondent Name:

MOLINA-PANIAGUA, JULIA AZUCENA

To:

Silva, Otavio Haverroth
5051 La Jolla BLVD
Suite 202
San Diego, CA 92109

A-Number:

245487992

Riders:

245487994 ALONSO-MOLINA, DIEGO ANDRE

245487998 ALONSO-MOLINA, LISSA AZUCENA

In Removal Proceedings

Initiated by the Department of Homeland Security

Date:

08/22/2024

ORDER OF THE IMMIGRATION JUDGE

DECISION ON REMOVABILITY

The respondent, through counsel, has submitted written pleadings. Based upon the record presented, including any admissions of factual allegations and concessions to the charge(s) by the respondent, the Court finds the respondent removable from the United States as charged pursuant to

(212)(a)(06)(A)(i) ().

The court hereby directs GUATEMALA as the country of removal in this case.

SCHEDULING ORDER

1. The respondent must file any applications for relief and prima facie evidence of eligibility within 60 days of the date of this order. Legal briefs and supporting documents may be submitted up to 15 days prior to the individual calendar hearing, per § 3.1(b)(2) of the Immigration Court Practice Manual. A copy of the applications and supporting documents must be served on the Department of Homeland Security.
2. Either party may file a dispositive motion, stipulation, or joint motion at any time.
3. The respondent has been provided a copy of a notice and instructions to provide biometrics and other biographical information to DHS. Failure to comply with these instructions or to provide biometrics or other biographical information to DHS may result in a finding that any applications for covered forms of relief have been abandoned, unless good cause for the failure to comply is shown. 8 C.F.R. § 1003.47(c).
4. Failure to abide by the deadlines specified in this order may result in a finding that the opportunity to file applications for relief has been waived. 8 C.F.R. § 1003.31(h); see also Matter of R-R-, 20

I&N Dec. 547, 549 (BIA 1992).

IT IS SO ORDERED.



Immigration Judge: Park, Joseph 08/22/2024

Certificate of Service

This document was served:

Via: ☐ M] Mail | ☐ P] Personal Service | ☐ E] Electronic Service | ☐ U] Address Unavailable

To: ☐] Noncitizen | ☐] Noncitizen c/o custodial officer | ☐ E] Noncitizen's atty/rep. | ☐ E] DHS | ☐]
BIOMETRICS

Respondent Name : MOLINA-PANIAGUA, JULIA AZUCENA | A-Number : 245487992

Riders:

245487994 ALONSO-MOLINA, DIEGO ANDRE

245487998 ALONSO-MOLINA, LISSA AZUCENA

Date: 08/26/2024 By: NUNEZ, JOSE Z., Court Staff

Exhibit 5

UNITED STATES OF AMERICA
EMPLOYMENT AUTHORIZATION

Surname

ALONSO MOLINA

Given Name

LISSA A

USCIS#

245-487-998

Category Card#

C08

IOE0929476876

Terms and Conditions

None

Date of Birth

14 JAN 2007

Sex

F

Country of Birth

Guatemala

Valid From:

02/03/25

Card Expires:

02/02/30

NOT VALID FOR REENTRY TO U.S.



ALONSO MOLINA LISSA A 14 JAN 2007

14 JAN 2007



CERTIFICATE OF SERVICE

On August 17, 2026, I, Otávio Haverroth Silva, served, by fedex, a copy of this **Motion to Terminate** to the **US Department of Homeland Security (Office of the Chief Counsel)** at the following mailing address: 333 S. Miami Avenue, Suite 200, Miami, FL 33130.



Otavio Silva (Bar N. 343486)

Attorney at Law

P.O. Box 90487

San Diego, CA 92169

Counsel for Respondent