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

Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
1855 Gateway Blvd., Suite 850
Concord, CA 94520

In the Matter of	
Denis Enrique Tapia Maltez	**File No. A. 240-744-477**
In Removal Proceedings	

Immigration Judge: Arrache, Stephanie **Next Hearing Date:** May 4, 2027 at 8:30 a.m

RESPONDENT'S ADDITIONAL DOCUMENTS IN SUPPORT OF ASYLUM AND WITHHOLDING OF REMOVAL

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Exhibit 1

Managua, Nicaragua
Date: May 27, 2026

To whom it may concern,

I, Justo Tapia, father of Denis Tapia, identity number 406-280846-0001A. I hereby declare the following:

My son, Denis Tapia, was forced to leave Nicaragua due to the political persecution he has faced since 2018. From that moment on, groups identified as Sandinistas began to harass, intimidate, and threaten him constantly because he didn't agree with the government.

The situation was so serious that they intended to strip him of his home. As a protective measure against this risk, he made the decision to transfer the property to my name so that it wouldn't be taken by these people.

Additionally, my son has lived through high-risk situations in his work environment, when had to stay locked inside out of fear of being assaulted. In the streets, Sandinista groups attacked those who didn't share their ideology, robbing, beating, and causing them harm.

Due to constant threats and danger he faced, my son made the decision to leave the country to protect his life and integrity, looking for a place where he could live in peace and safety.

I declare that the information above is true and correct to the best of my knowledge and personal experience.

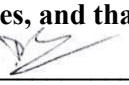
Sincerely,

Justo Tapia

Father of Denis Tapia

Signed: 

I, Teodoro Daniel Larsen, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Spanish 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 10, 2026.

Managua, Nicaragua
Fecha: 27 de Mayo de 2026

A quien corresponda:

Yo, Justo Tapia, padre de Denis Tapia, con número de identificación de: 406-280846-0001A. Por medio de la presente declaro lo siguiente:

Mi hijo, Denis Tapia, se vio obligado a abandonar Nicaragua debido a la persecución política que enfrentó a partir del año 2018. Desde ese momento, grupos identificados como sandinistas comenzaron a acosarlo, hostigarlo y amenazarlo por no estar de acuerdo con el gobierno.

La situación llegó a ser tan grave que incluso existía la intención de despojarlo de su vivienda. Como medida de protección ante este riesgo, se tomó la decisión de poner la propiedad a mi nombre, con el fin de evitar que fuera tomada por estas personas.

Asimismo, mi hijo vivió situaciones de alto riesgo en su lugar de trabajo, donde tuvo que permanecer encerrado por temor a ser agredido. En las calles, los grupos sandinistas atacaban a quienes no compartían su ideología, robándoles, golpeándolos y causándoles daño.

Debido a las constantes amenazas y al peligro que enfrentaba, mi hijo tomó la decisión de salir del país para proteger su vida y su integridad, buscando un lugar donde pudiera vivir en paz y seguridad.

Declaro que la información anteriormente expuesta es verdadera según mi conocimiento y experiencia personal.

Atentamente,

Justo Tapia
Padre de Denis Tapia

Firma: Tapia

REPUBLIC OF NICARAGUA
CENTRAL AMERICA

REPUBLIC OF NICARAGUA
SUPREME ELECTORAL COUNCIL

ID CARD

406-280846-0001A



Names

JUSTO PASTOR

Last Names

TAPIA ZAMBRANA

Date of Birth

08-28-1946

Birthplace

NIQUINOHOMO

Sex

M

General Director

Issuance Date **04-10-2025**

Expiry date **04-10-2035**

Address

BO. ENRIQUE LORENTE

TERMINAL DE RUTA 108-109

1C. N. ½C. E. CA. Nº A-9

Municipality

MANAGUA

Department

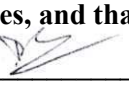
MANAGUA

Rep. **01**

AHK366295

IDNIC<4060001A7<<<<<<<<<<<<<<<
4608286M3504107NIC<<<<<<<<<<<0
TAPIA<ZAMBRANA<<JUSTO<PASTOR<<

I, Teodoro Daniel Larsen, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Spanish 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 10, 2026.

REPÚBLICA DE NICARAGUA

CONSEJO SUPREMO ELECTORAL

CÉDULA DE IDENTIDAD

406-280846-0001A



Nombres

JUSTO PASTOR

Apellidos

TAPIA ZAMBRANA

Fecha de Nacimiento Lugar de Nacimiento

28-08-1946 NIQUINOHOMO

Sexo

M

Director General Emision 10-04-2025 Expiracion 10-04-2035

AHK366295

Domicilio

BO. ENRIQUE LORENTE

TERMINAL DE RUTA 108-109

1C. N. ½C. E. CA. Nº A-9

Municipio

MANAGUA

Departamento

MANAGUA

Rep. 01

IDNIC<4060001A7<<<<<<<<<<<<<<<

4608286M3504107NIC<<<<<<<<<<<0

TAPIA<ZAMBRANA<<JUSTO<PASTOR<<

Exhibit 2

Managua, Nicaragua
Date: May 27, 2026

To whom it may concern,

I, Gabriel Tapia, son of Denis Tapia, identity number 001-010607-1014X. I hereby declare the following:

My father, Denis Tapia, was born in Nicaragua and was forced to leave his country due to the political persecution he has faced since 2018. After this year, pro-government groups, known as Sandinistas, began to harass, intimidate, and threaten him constantly because he shared neither the ideas nor the conduct of the current government.

These actions were not limited to verbal threats, but also included more serious intimidation attempts, like stripping him of his home. As a result of this risky situation, he made decision to transfer his home to his father's name, Justo Tapia, as a protective measure against any possible removals.

The harassment was such that, on one occasion, on his way back home from work, my father was a victim of robbery and ended up wounded by a group of Sandinista supporters. Using a bladed weapon, they wounded and beat him in order to rob him of his belongings, seriously endangering his physical integrity.

Additionally, my father lived through times of much fear in his work environment. On some occasions he had to remain locked inside his workplace because groups of Sandinistas in the streets attacked people who disagreed with the government. These people were victim of robbery, assault, and other harm.

Due to constant threats and fear for his safety and physical integrity, my father made a hard decision, leaving Nicaragua in order to protect his life and live in a safe environment where he could feel at peace.

I declare that the information above is true and correct to the best of my knowledge and personal experience.

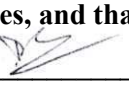
Sincerely,

Gabriel Tapia

Son of Denis Tapia

Signed: 

I, Teodoro Daniel Larsen, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Spanish 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 10, 2026.

Managua, Nicaragua
Fecha: 27 de Mayo de 2026

A quien corresponda:

Yo, Gabriel Tapia, hijo de Denis Tapia, con número de identificación de: 001-010607-1014X. Por medio de la presente declaro lo siguiente:

Mi padre, Denis Tapia, es originario de Nicaragua y se vio obligado a abandonar el país debido a la situación de persecución política que enfrentó a partir del año 2018. Después de ese año, grupos afines al gobierno, conocidos como sandinistas, comenzaron a acosarlo, hostigarlo y amenazarlo constantemente debido a que él no compartía las ideas ni el actuar del gobierno actual.

Estas acciones no solo se limitaron a amenazas verbales, sino que también incluyeron intentos de intimidación más graves, como el querer apropiarse de su vivienda. Debido a esta situación de riesgo, se tomó la decisión de poner la casa a nombre de su padre, Justo Tapia, como medida de protección ante posibles despojos.

Fue tanto el nivel de acoso que, en una ocasión, regresando a su casa desde su lugar de trabajo, mi padre fue víctima de un robo y resultó lesionado por un grupo de simpatizantes sandinistas. Estas personas, utilizando un arma blanca, lo hirieron y golpearon con el fin de despojarlo de sus pertenencias, poniendo en grave riesgo su integridad física.

Además, mi padre vivió momentos de mucho temor en su entorno laboral. Hubo ocasiones en las que tuvo que permanecer encerrado en su lugar de trabajo, ya que en las calles se encontraban grupos sandinistas que agredían a las personas que no estaban de acuerdo con el gobierno. Estas personas eran víctimas de robos, agresiones físicas y otros daños.

Debido a las constantes amenazas y al miedo por su seguridad e integridad física, mi padre tomó la difícil decisión de salir de Nicaragua, con el objetivo de resguardar su vida y poder vivir en un ambiente seguro, donde pudiera sentirse tranquilo.

Declaro que la información anteriormente expuesta es verdadera según mi conocimiento y experiencia personal.

Atentamente,

Gabriel Tapia
Hijo de Denis Tapia

Firma: Gabriel Tapia

IDENTITY CARD

REPUBLIC OF NICARAGUA

ID Number

001-010607-1014X



Names

GABRIEL ENRIQUE

Last Names

TAPIA SANCHEZ

Date of Birth

06-01-2007

Sex

M

AHL 132884

Birthplace

MANAGUA

Expiry Date

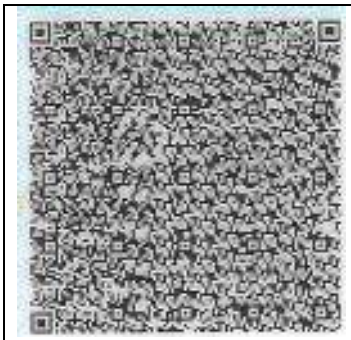
04-14-2036

Signature











Home Address

BO. ENRIQUE LORENTE

TERMINAL RUTA 108

1C. N. ½C. E. CASA Nº A-9

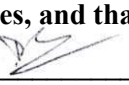
Municipality of Residence

MANAGUA

6C11DEA2



I, Teodoro Daniel Larsen, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Spanish 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 10, 2026.

CÉDULA DE IDENTIFICACIÓN

REPÚBLICA DE NICARAGUA

Número de Identificación

001-010607-1014X



Nombres

GABRIEL ENRIQUE

Apellidos

TAPIA SANCHEZ

Fecha de Nacimiento

01-06-2007

Sexo

M

AHL132884

Lugar de Nacimiento

MANAGUA

Fecha de Expiración

14-04-2036

Firma

Gabriel Tapia



Dirección Domiciliar

BO. ENRIQUE LORENTE
TERMINAL RUTA 108
1C. N. ½C. E. CASA N° A-9

Municipio de Residencia

MANAGUA



6C11DEA2

IDNIC<0011014X2<<<<<<<<<<<<<<<
0706014M3604144NIC<<<<<<<<<<<2
TAPIA<SANCHEZ<<GABRIEL<ENRIQUE

Exhibit 3

Managua, Nicaragua May 27, 2026

To whom it may concern,

I, **Katy Massiel Rivas Maltez**, of age, domiciled in **Managua**, **identity card** 001-280586-0027X, declare the following,

I've known **Denis Enrique Tapia Maltez** for approximately **39** years as we are relatives.

I know that during his last years in Nicaragua he lived through some difficult situations due to his political opinions and involvement in civic and social activities.

I know that he was involved in or expressed opinions relating to the country's political situation, especially after the events that have taken place since 2018. As a result, he began to experience apprehension and concerns relating to comments, surveillance, and being targeted by pro-government people or local authorities.

Due to these circumstances, I noticed that **Denis** was feeling concerned about his safety and possible consequences he might face in Nicaragua. Over the time, he decided to leave the country in search of peace and stability.

I believe his decision to request asylum in the United States was made out of fear of facing further problems related to his political opinions or political background.

I declare that the information above is true to the best of my knowledge and personal experience.

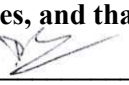
Sincerely,

Katy Rivas

Identity card 001-280586-0027X



I, Teodoro Daniel Larsen, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Spanish 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 10, 2026.

Managua, Nicaragua 26 de Mayo 2026

A quien corresponda:

Yo, **Katy Massiel Rivas Maltez** mayor de edad, con domicilio en **Managua, cédula** 001-280586-0027X declaro lo siguiente:

Conozco a **Denis Enrique Tapia Maltez** desde hace aproximadamente **39** años, ya que somos familiares.

Y tengo conocimiento que sus últimos años en Nicaragua, tuvo algunas situaciones difíciles las que enfrentó debido a sus opiniones políticas y participación en actividades cívicas y sociales.

Sé que participó o expresó opiniones relacionadas con la situación política del país, especialmente después de los acontecimientos ocurridos desde el año 2018. A raíz de eso, comenzó a experimentar incomodidades y preocupaciones relacionadas con comentarios, vigilancia y señalamientos por parte de personas afines al gobierno o autoridades locales.

Debido a estas circunstancias, noté que **Denis** se sentía preocupado por su seguridad y por las posibles consecuencias que pudiera enfrentar en Nicaragua. Con el tiempo decidió salir del país en busca de tranquilidad y estabilidad.

Considero que su decisión de solicitar asilo en Estados Unidos fue tomada por temor a enfrentar más problemas relacionados con sus opiniones o antecedentes políticos.

Declaro que esta información es verdadera según mi conocimiento personal.

Muy atentamente

Katy Rivas

Cédula 001-280586-0027X

Katy Rivas

REPUBLIC OF NICARAGUA
CENTRAL AMERICA

REPUBLIC OF NICARAGUA
SUPREME ELECTORAL COUNCIL

ID CARD

001-280586-0027X



Names

KATY MASSIEL

Last Names

RIVAS MALTEZ

Date of Birth

05-28-1986

Birthplace

MANAGUA

Sex

F

General Director

Issuance Date **05-24-2021**

Expiry date **05-24-2031**

Address

BO. BLANCA SEGOVIA

TERMINAL DE RUTA 108, 1C. N.

CASA Nº 2.

Municipality

MANAGUA

Department

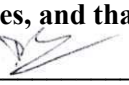
MANAGUA

Rep. **00**

AHH754098

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RIVAS<MALTEZ<<KATY<MASSIEL<<<<

I, Teodoro Daniel Larsen, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Spanish 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 10, 2026.

REPÚBLICA DE NICARAGUA

CONSEJO SUPREMO ELECTORAL

CÉDULA DE IDENTIDAD

001-280586-0027X



Nombres

KATY MASSIEL

Apellidos

RIVAS MALTEZ

Fecha de Nacimiento Lugar de Nacimiento

28-05-1986 MANAGUA

Sexo

F

Director General Emision 24-05-2021 Expiracion 24-05-2031

Domicilio

BO. BLANCA SEGOVIA
TERMINAL RUTA 108, 1C. N.
CASA N° 2.

Municipio

MANAGUA

Departamento

MANAGUA

Rep. 00

AHH754098

IDNIC<0010027X5<<<<<<<<<<<<<<<
8605283F3105249NIC<<<<<<<<<<<2
RIVAS<MALTEZ<<KATY<MASSIEL<<<<

Denis Enrique Tapia Maltez **File No. A. 240-744-477**

Proof of Service

On this day, I, Otavio Haverroth Silva, served a copy of the following documents:

RESPONDENT'S ADDITIONAL DOCUMENTS IN SUPPORT OF ASYLUM AND WITHHOLDING OF REMOVAL

To the following:

Office Location:	**Mailing Address:**
Office of the Principal Legal Advisor Department of Homeland Security 100 Montgomery Street, Suite 200 San Francisco, CA 94104	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor P.O. Box 26449 San Francisco, CA 94126-644

by:

☒Through the EOIR Courts and Appeals System (ECAS), which will automatically send service notification to both parties that a new document has been filed.



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