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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	)	
Alberto Rodrigues Castillo	)	**File No. A. 249-307-473**
Claudia Isabel Tamayo Bravo	)	**File No. A. 249-307-474**
Josefina Navarro Tamayo	)	**File No. A. 249-307-475**
In Removal Proceedings	)	

Immigration Judge: N/A

Next Hearing Date: N/A

RESPONDENTS' WRITTEN PLEADINGS

UNITED STATES DEPARTMENT OF JUSTICE
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1855 Gateway Blvd., Suite 850
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In the Matter of	)	
Claudia Isabel Tamayo Bravo	)	**File No. A. 249-307-474**
Alberto Rodrigues Castillo	)	**File No. A. 249-307-473**
Josefina Navarro Tamayo	)	**File No. A. 249-307-475**
In Removal Proceedings	)	

RESPONDENTS' WRITTEN PLEADINGS

COMES NOW, Natalia Vieira Santanna, counsel for the above-referenced respondents, and makes the following representations:

1. The Respondents concede proper service of the Notices to Appear, dated December 16, 2023.
2. I have explained to the respondents:
    a. The rights set forth in 8 C.F.R. § 1240.10(a);
    b. The consequences of failing to appear in court as set forth in INA § 240(b)(5);
    c. The limitation on discretionary relief for failure to appear is set forth in INA § 240(b)(7);
    d. The consequences of knowingly filing or making a frivolous application as set forth in INA § 208(d)(6);
    e. The consequences of failing to follow the DHS biometrics instructions within the time allowed, as set forth in 8 C.F.R. § 1003.47(d);
    f. The requirement to notify the court within five days of any change of address or telephone number, using Form EOIR-33/IC pursuant to 8 C.F.R. § 1003.15(d).

3. The Respondents admit the charge of removability under **212(a)(7)(A)(i)(l)** of the Immigration and Nationality Act (INA), as amended, as immigrants who, at the time of application for admission, are not "*in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act*".

4. The Respondents admit the factual allegations 1 through 5 in the Notices to Appear, corresponding to:

a) The Respondents are not citizens or nationals of the United States;

b) The Respondents are natives of Mexico and citizens of Mexico;

c) The Respondents applied for admission into the United States of America at the San Luis, Arizona Port of Entry, on or about December 16, 2023;

d) The Respondents are immigrants not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document as required by the Immigration and Nationality Act;

e) The Respondents were paroled into the United States of America Pursuant to Section 212(d)(5) of the Immigration and Nationality Act, on December 16, 2023.

5. The Respondents concede the charge of removability.

6. In the event of removal, the Respondents decline to designate a country of removal. The Respondents will be applying for the following forms of relief from removal:

a) Asylum, Withholding of Removal, and protection under the Convention Against Torture;

b) Josefina Navarro Tamayo will apply for Special Immigrant Juvenile Status (SIJS), Form I-360, as a qualifying child under INA § 101(a)(27)(J);

c) Any other relief for which the Respondents may be eligible.

The Respondents estimate that the individual merits hearing will take approximately three (3) hours. Accordingly, they respectfully request that the Court reserve sufficient time for the conduct of the hearing.

8. The Respondents speak Mexican Spanish as their first language. Therefore, the Respondents respectfully request a Mexican Spanish interpreter for all future hearings.

9. Based on the foregoing, counsel respectfully requests that the Court accept these Written Pleadings.

Respectfully,

Natalia Vieira Santanna (Bar N. 337502)
Attorney at Law
P.O. Box 7528
Oakland, CA 94601
(510) 922-0154
Counsel for Respondents

Exhibit list

Exhibits:	Pages:
Exhibit 1	
Respondents' Pleading Declaration with English Translation	1-5

Exhibit 1

RESPONDENT'S PLEADING DECLARATION

I, Claudia Isabel Tamayo Bravo (A-Number 249-307-474), declare, under penalty of perjury, that I am a native of Mexico and my native language is Spanish. I am not fluent in English and cannot fully and adequately understand communication in the language.

I, Claudia Isabel Tamayo Bravo, have been advised of my rights in these proceedings by my attorney and representative. I understand those rights. I waive a further explanation of those rights by this court.

I have been advised by my attorney and representative of the consequences of failing to appear for a hearing. I have also been advised by my attorney of the consequences of failing to appear for a scheduled date of departure or deportation. I understand those consequences.

I have been advised by my attorney and representative of the consequences of knowingly filing a frivolous asylum application. I understand those consequences.

I have been advised by my attorney and representative of the consequences of failing to follow the DHS biometrics instructions within the time allowed. I understand those consequences.

I understand that if my address changes, I must notify the court within 5 days of such change by completing an Alien's Change of Address Form (Form EOIR-33/IC) and filing it with this court.

Finally, my attorney or representative has explained to me what this Written Pleading says. I understand it, I agree with it, and I request that the court accept it as my pleading.

/ SIGNATURE/

_____ Date: 06/22/2026

CLAUDIA ISABEL TAMAYO BRAVO

I, André Vinicius Inacio 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 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.



André Penna Mello **Date:** 06/22/2026

DECLARACIÓN DE PETICIONES FINALES

Yo, Claudia Isabel Tamayo Bravo (A-Number 249-307-474), declaro, bajo pena de perjurio, que soy originaria de Mexico y que mi idioma nativo es el español. No soy fluida en inglés y no puedo comprender plena y adecuadamente las comunicaciones en ese idioma.

Yo, Claudia Isabel Tamayo Bravo, he sido informada sobre mis derechos en este proceso por mi abogada y representante. Entiendo estos derechos. Renuncio a una explicación adicional de estos derechos por parte de este Tribunal.

He sido informada por mi abogada y representante sobre las consecuencias de no comparecer a una audiencia. También fui informada por mi abogada sobre las consecuencias de no comparecer en una fecha programada de salida o deportación. Entiendo estas consecuencias.

Fui informada por mi abogada y representante sobre las consecuencias de presentar conscientemente una solicitud de asilo frívola. Entiendo estas consecuencias.

Fui informada por mi abogada y representante sobre las consecuencias de no seguir las instrucciones biométricas del DHS dentro del plazo permitido. Entiendo estas consecuencias.

Entiendo que, si cambia mi dirección, debo notificar al Tribunal dentro de 5 días de dicho cambio, llenando el Formulario de Cambio de Dirección de Extranjero (Formulario EOIR-33/IC) y presentándolo ante este Tribunal.

Finalmente, mi abogada y representante me explicó lo que dice esta Declaración Escrita. Entiendo, estoy de acuerdo y solicito que el Tribunal acepte mi declaración.



Fecha: 06/22/2026

CLAUDIA ISABEL TAMAYO BRAVO

RESPONDENT'S PLEADING DECLARATION

I, Alberto Rodriguez Castillo (A-Number 249-307-473), declare, under penalty of perjury, that I am a native of Mexico and my native language is Spanish. I am not fluent in English and cannot fully and adequately understand communication in the language.

I, Alberto Rodriguez Castillo, have been advised of my rights in these proceedings by my attorney and representative. I understand those rights. I waive a further explanation of those rights by this court.

I have been advised by my attorney and representative of the consequences of failing to appear for a hearing. I have also been advised by my attorney of the consequences of failing to appear for a scheduled date of departure or deportation. I understand those consequences.

I have been advised by my attorney and representative of the consequences of knowingly filing a frivolous asylum application. I understand those consequences.

I have been advised by my attorney and representative of the consequences of failing to follow the DHS biometrics instructions within the time allowed. I understand those consequences.

I understand that if my address changes, I must notify the court within 5 days of such change by completing an Alien's Change of Address Form (Form EOIR-33/IC) and filing it with this court.

Finally, my attorney or representative has explained to me what this Written Pleading says. I understand it, I agree with it, and I request that the court accept it as my pleading.

/ SIGNATURE/

_____ Date: 07/30/2026

ALBERTO RODRIGUEZ CASTILLO

I, André Vinicius Inacio 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 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.



André Penna Mello **Date:** 07/30/2026

DECLARACIÓN DE PETICIONES FINALES

Yo, Alberto Rodriguez Castillo (A-Number 249-307-473), declaro, bajo pena de perjurio, que soy originaria de Mexico y que mi idioma nativo es el español. No soy fluida en inglés y no puedo comprender plena y adecuadamente las comunicaciones en ese idioma.

Yo, Alberto Rodriguez Castillo, he sido informada sobre mis derechos en este proceso por mi abogada y representante. Entiendo estos derechos. Renuncio a una explicación adicional de estos derechos por parte de este Tribunal.

He sido informada por mi abogada y representante sobre las consecuencias de no comparecer a una audiencia. También fui informada por mi abogada sobre las consecuencias de no comparecer en una fecha programada de salida o deportación. Entiendo estas consecuencias.

Fui informada por mi abogada y representante sobre las consecuencias de presentar conscientemente una solicitud de asilo frívola. Entiendo estas consecuencias.

Fui informada por mi abogada y representante sobre las consecuencias de no seguir las instrucciones biométricas del DHS dentro del plazo permitido. Entiendo estas consecuencias.

Entiendo que, si cambia mi dirección, debo notificar al Tribunal dentro de 5 días de dicho cambio, llenando el Formulario de Cambio de Dirección de Extranjero (Formulario EOIR-33/IC) y presentándolo ante este Tribunal.

Finalmente, mi abogada y representante me explicó lo que dice esta Declaración Escrita. Entiendo, estoy de acuerdo y solicito que el Tribunal acepte mi declaración.

Alberto Rodriguez castillo

ALBERTO RODRIGUEZ CASTILLO

Fecha: 07/30/2026

Alberto Rodriguez Castillo — **File No. A. 249-307-473**
Claudia Isabel Tamayo Bravo — **File No. A. 249-307-474**
Josefina Navarro Tamayo — **File No. A. 249-307-475**

Proof of Service

On this day, I, Natalia Vieira Santanna, served a copy of the following documents:

RESPONDENTS' WRITTEN PLEADINGS

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.

_____

Natalia Vieira Santanna (Bar N. 337502)
Attorney at Law
P.O. Box 7528
Oakland, CA 94601
Counsel for Respondents