

**Zaia Law LLC
Castilho Zaia, Guilherme Borcelli
11810 Grand Park Ave
Ste 500
North Bethesda, MD 20852**

Non-detained

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
130 Delaware Avenue, Suite 300
Buffalo, NY 14202**

_____)	
In the Matter of)	
)	
Douglas Santos Gonçalves,)	File No. A 220-762-085
Debora Do Carmo Andrade Santos,)	File No. A 220-762-086
Bianca Santos Andrade,)	File No. A 220-762-087
Beatriz Santos Andrade,)	File No. A 220-762-088
Benicio Santos Andrade,)	File No. A 220-762-089
)	
In Removal Proceedings)	
_____)	

Immigration Judge: **Baumgarten, Mary C.**

Next Hearing Date: **July 31, 2026, at 1:00 PM**

**RESPONDENTS' ADDITIONAL DOCUMENTS IN SUPPORT OF ASYLUM AND
WITHHOLDING OF REMOVAL**

Exhibit list

Exhibits:

Pages:

Exhibit 1 - Proof of Compliance with Biometrics Requirements

Copy of Beatriz Santos Andrade's Stamped Biometrics Notice 1

Copy of Bianca Santos Andrade's Stamped Biometrics Notice 2

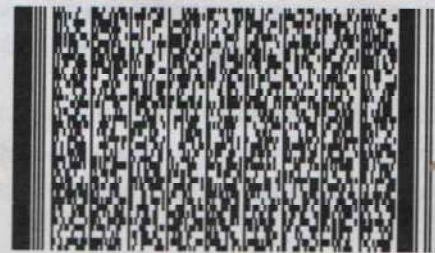
Exhibit 1 - Proof of Compliance with Biometrics Requirements

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

ASC Appointment Notice		APPLICATION/PETITION/REQUEST NUMBER NRN2500267830		NOTICE DATE 05/16/2025
CASE TYPE I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL	ACCOUNT NUMBER	USCIS A# A220 762 088	CODE 3	

BEATRIZ SANTOS ANDRADE
145 E 21ST ST APT 1
ERIE PA 16503

BIOMETRICS PROCESSING STAMP
ASC SITE CODE XBH
BIOMETRICS QA REVIEW BY: KK
TENPRINTS QA REVIEW BY: ON
ON JUN 06 2025



PLEASE READ THIS ENTIRE NOTICE CAREFULLY. To process your application, petition, or request, the U.S. Citizenship & Immigration Services (USCIS) must collect your biometrics. Please appear at the below Application Support Center (ASC) at the date and time specified.

WARNING: Unless USCIS excuses you based on good cause, failure to appear at this biometrics appointment will result in an applicant-caused delay that will impact your eligibility for employment authorization based on your pending asylum application. If you fail to appear at this appointment as scheduled, USCIS may: (1) dismiss your asylum application, if you are in lawful immigration status or paroled; or (2) refer your application to an immigration judge, if you are not in lawful immigration status or paroled. If you fail to appear at this appointment as scheduled, and you are currently in removal proceedings, an immigration judge may deem your asylum application abandoned.

APPLICATION SUPPORT CENTER USCIS BUFFALO 306 Delaware Avenue Buffalo NY 14202	DATE AND TIME OF APPOINTMENT 06/06/2025 09:00AM
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WHEN YOU APPEAR AT THE ASC FOR BIOMETRICS SUBMISSION, YOU MUST BRING:

1. **THIS APPOINTMENT NOTICE**, and
2. **PHOTO IDENTIFICATION** (e.g. passport, valid driver's license, national ID, military ID, State-issued photo ID, or USCIS-issued photo ID). If you do not have photo identification, please expect a delay.

Only those necessary to assist with transportation or completion of the biometrics worksheet should accompany you to your ASC appointment. If you have open wounds, bandages, or casts when you appear for biometrics submission, USCIS may reschedule your ASC appointment if we determine your injuries may interfere with your biometrics submission. Please do not visit a USCIS office if you are sick or feel symptoms of being sick. Follow the instructions on this notice to reschedule your appointment.

You may bring cell phones or electronic devices, but they must be turned off during biometrics collection. No one may photograph or record at an ASC.

For more information regarding your ASC appointment, visit <https://www.uscis.gov/forms/filing-guidance/preparing-for-your-biometric-services-appointment>. If you have questions regarding this notice, please call the USCIS Contact Center at 1-800-375-5283 (TTY 800-767-1833).

NOTE: If an ASC closes due to inclement weather or unforeseen circumstances, USCIS will automatically reschedule your ASC appointment for the next available date and time. For the latest information on the status of an office, visit <https://www.uscis.gov/about-us/uscis-office-closings>. Please check this page on the day of your ASC appointment. If USCIS reschedules your ASC appointment, you will receive a new ASC appointment notice.

You must update your address within 10 days if you move. For instructions, visit <https://www.uscis.gov/addresschange>. If you are in removal proceedings, you must also notify the Executive Office for Immigration Review (EOIR or Immigration Court) within five working days of any change of address or telephone number by filing a completed Form EOIR-33, Alien's Change of Address/Phone Number Form/Immigration Court. For instructions, visit <https://www.justice.gov/eoir/form-eoir-33-eoir-immigration-court-listing>.

WARNING: Failure to update your mailing address with USCIS, and, if applicable, EOIR may result in dismissal of your asylum application, referral of your asylum application to an immigration judge, or if you are already in removal proceedings, an entry of a removal order in your absence if you fail to appear at a hearing before an immigration judge.

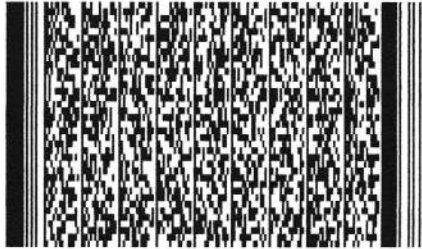
USCIS may use your biometrics to check the criminal history records of the FBI, for identity verification, to determine eligibility, to create immigration documents (e.g., Green Card), and for other purposes authorized by the Immigration and Nationality Act, including the requirements outlined within Title 28 C.F.R., Section 16.32. For information, please visit: <https://www.fbi.gov/how-we-can-help-you/more-fbi-services-and-information/identity-history-summary-checks>. For Privacy Act information, please visit <https://www.fbi.gov/how-we-can-help-you/more-fbi-services-and-information/compact-council/privacy-act-statement>.

If you cannot attend your scheduled appointment, you may request to reschedule at <https://my.uscis.gov/accounts/biometrics/overview> or by calling the USCIS Contact Center at 1-800-375-5283 (TTY 800-767-1833). You must make your request before the date and time of the original appointment, and you must establish good cause for rescheduling. If you fail to make a request before your scheduled appointment or fail to establish good cause, and you do not appear at your appointment, USCIS may consider your application, petition, or request abandoned and, as a result, it may be denied. For more information about rescheduling, see <https://www.uscis.gov/forms/filing-guidance/preparing-for-your-biometric-services-appointment>.

If you cannot leave your home/hospital due to a serious ongoing medical condition, you may request a mobile biometrics appointment by following the instructions on the back of this notice under "Notice for People with Disabilities," or by visiting [uscis.gov/accommodations](https://www.uscis.gov/accommodations).

For questions about this notice call 1-800-375-5283. For questions about your application, contact the Asylum Office or Immigration Court with jurisdiction over your case.



ASC Appointment Notice		APPLICATION/PETITION/REQUEST NUMBER NRN2500168244		NOTICE DATE 02/15/2025
CASE TYPE I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL		ACCOUNT NUMBER	USCIS A# A220 762 087	CODE 3
BIANCA SANTOS ANDRADE 12322 PINK DOGWOOD LN JACKSONVILLE FL 32218				
<p>PLEASE READ THIS ENTIRE NOTICE CAREFULLY. To process your application, petition, or request, the U.S. Citizenship & Immigration Services (USCIS) must collect your biometrics. Please appear at the below Application Support Center (ASC) at the date and time specified.</p> <p>WARNING: Unless USCIS excuses you based on good cause, failure to appear at this biometrics appointment will result in an applicant-caused delay that will impact your eligibility for employment authorization based on your pending asylum application. If you fail to appear at this appointment as scheduled, USCIS may: (1) dismiss your asylum application, if you are in lawful immigration status or paroled; or (2) refer your application to an immigration judge, if you are not in lawful immigration status or paroled. If you fail to appear at this appointment as scheduled, and you are currently in removal proceedings, an immigration judge may deem your asylum application abandoned.</p>				
APPLICATION SUPPORT CENTER USCIS JACKSONVILLE 4121 Southpoint Blvd Jacksonville FL 32216		DATE AND TIME OF APPOINTMENT 03/03/2025 11:00AM		
<p>WHEN YOU APPEAR AT THE ASC FOR BIOMETRICS SUBMISSION, YOU MUST BRING:</p> <ol style="list-style-type: none"> THIS APPOINTMENT NOTICE, and PHOTO IDENTIFICATION (e.g. passport, valid driver's license, national ID, military ID, State-issued photo ID, or USCIS-issued photo ID). If you do not have photo identification, please expect a delay. <p>Only those necessary to assist with transportation or completion of the biometrics worksheet should accompany you to your ASC appointment. If you have open wounds, bandages, or casts when you appear for biometrics submission, USCIS may reschedule your ASC appointment if we determine your injuries may interfere with your biometrics submission. Please do not visit a USCIS office if you are sick or feel symptoms of being sick. Follow the instructions on this notice to reschedule your appointment.</p> <p>You may bring cell phones or electronic devices, but they must be turned off during biometrics collection. No one may photograph or record at an ASC.</p> <p>For more information regarding your ASC appointment, visit https://www.uscis.gov/forms/filing-guidance/preparing-for-your-biometric-services-appointment. If you have questions regarding this notice, please call the USCIS Contact Center at 1-800-375-5283 (TTY 800-767-1833).</p> <p>NOTE: If an ASC closes due to inclement weather or unforeseen circumstances, USCIS will automatically reschedule your ASC appointment for the next available date and time. For the latest information on the status of an office, visit https://www.uscis.gov/about-us/uscis-office-closings. Please check this page on the day of your ASC appointment. If USCIS reschedules your ASC appointment, you will receive a new ASC appointment notice.</p> <p>You must update your address within 10 days if you move. For instructions, visit https://www.uscis.gov/addresschange. If you are in removal proceedings, you must also notify the Executive Office for Immigration Review (EOIR or Immigration Court) within five working days of any change of address or telephone number by filing a completed Form EOIR-33, Alien's Change of Address/Phone Number Form/Immigration Court. For instructions, visit https://www.justice.gov/eoir/form-eoir-33-eoir-immigration-court-listing.</p> <p>WARNING: Failure to update your mailing address with USCIS, and, if applicable, EOIR may result in dismissal of your asylum application, referral of your asylum application to an immigration judge, or if you are already in removal proceedings, an entry of a removal order in your absence if you fail to appear at a hearing before an immigration judge.</p> <p>USCIS may use your biometrics to check the criminal history records of the FBI, for identity verification, to determine eligibility, to create immigration documents (e.g., Green Card, Employment Authorization Document, etc.), or any purpose authorized by the Immigration and Nationality Act. You may obtain a copy of your own FBI record using the procedures outlined within Title 28 C.F.R., Section 16.32. For information, please visit: https://www.fbi.gov/how-we-can-help-you/more-fbi-services-and-information/identity-history-summary-checks. For Privacy Act information, please visit https://www.fbi.gov/how-we-can-help-you/more-fbi-services-and-information/compact-council/privacy-act-statement</p> <p>If you cannot attend your scheduled appointment, you may request to reschedule at https://my.uscis.gov/accounts/biometrics/overview or by calling the USCIS Contact Center at 1-800-375-5283 (TTY 800-767-1833). You must make your request before the date and time of the original appointment, and you must establish good cause for rescheduling. If you fail to make a request before your scheduled appointment or fail to establish good cause, and you do not appear at your appointment, USCIS may consider your application, petition, or request abandoned and, as a result, it may be denied. For more information about rescheduling, see https://www.uscis.gov/forms/filing-guidance/preparing-for-your-biometric-services-appointment.</p> <p>If you cannot leave your home/hospital due to a serious ongoing medical condition, you may request a mobile biometrics appointment by following the instructions on the back of this notice under "Notice for People with Disabilities," or by visiting uscis.gov/accommodations.</p>				
<p>For questions about this notice call 1-800-375-5283. For questions about your application, contact the Asylum Office or Immigration Court with jurisdiction over your case.</p>				

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A 220-762-085
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A 220-762-087
A 220-762-088
A 220-762-089

PROOF OF SERVICE

On this day, I, Guilherme Castilho Zaia, served a copy of the following documents:

**RESPONDENTS' ADDITIONAL DOCUMENTS IN SUPPORT OF ASYLUM AND
WITHHOLDING OF REMOVAL**

To the following:

Office Location: Office of the Principal Legal Advisor Department of Homeland Security 250 Delaware Avenue, Suite 773 Buffalo, NY 14202	Mailing Address: US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor 250 Delaware Avenue, Suite 773 Buffalo, NY 14202
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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.



Guilherme Castilho Zaia (Bar N. 334469)
Attorney at Law
11810 Grand Park Ave, Ste 500
North Bethesda, MD 20852
Counsel for Respondent