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

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	)	
Luis Heriberto Disho Sisa	)	**File No. A. 221-442-166**
In Removal Proceedings	)	

Immigration Judge: Johnson-Papillo, Carrie C. **Next Hearing Date:** October 19, 2026 at 8:30 AM

RESPONDENT'S APPLICATION FOR ASYLUM AND WITHHOLDING OF REMOVAL

Application for Asylum and for Withholding of Removal

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-589
OMB No. 1615-0067
Expires 09/30/2027

START HERE - Type or print in black ink. See the instructions for information about eligibility and how to complete and file this application.

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

Part A.I. Information About You

1. Alien Registration Number(s) (A-Number) *(if any)*	**2.** U.S. Social Security Number *(if any)*	**3.** USCIS Online Account Number *(if any)*
221442166	N/A	N/A

4. Complete Last Name	**5.** First Name	**6.** Middle Name
DISHO SISA	Luis Heriberto	N/A

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	Apt. Number
4250 Federal Drive (Buffalo Federal Detention Center)	N/A

City	State	Zip Code	Telephone Number
Batavia	New York	14020	(N/A) N/A

(**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):*	Telephone Number
Otavio Haverroth Silva	(510) 2419336

Street Number and Name	Apt. Number
PO Box 90487	N/A

City	State	Zip Code
San Diego	California	92169

10. Sex ☒ Male ☐ Female

11. Marital Status: ☐ Single ☒ Married ☐ Divorced ☐ Widowed

12. Date of Birth *(mm/dd/yyyy)*	**13.** City and Country of Birth
04/03/1980	Riobamba, Ecuador

14. Present Nationality *(Citizenship)*	**15.** Nationality at Birth	**16.** Race, Ethnic, or Tribal Group	**17.** Religion
Ecuadorian	Ecuadorian	Indigenous Kichwa	Christian

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)* 04/11/2026 **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	Place	Status	Date Status Expires
06/11/2016	Texas	EWI	N/A
N/A	N/A	N/A	
N/A	N/A	N/A	

20. What country issued your last passport or travel document?	**21.** Passport Number / Travel Document Number	**22.** Expiration Date *(mm/dd/yyyy)*
Ecuador	Passport Number B1135694 Travel Document Number B1135694	10/18/2035

23. What is your native language *(include dialect, if applicable)?*	**24.** Are you fluent in English?	**25.** What other languages do you speak fluently?
Spanish	☐ Yes ☒ No	N/A

Part A.II. Information About Your Spouse and Children

For EOIR use only.	For USCIS use only.	Action:	Decision:
		Interview Date, if applicable:	Approval Date:
		Asylum Officer ID No.:	Denial Date:
			Referral Date:

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

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Date of Birth *(mm/dd/yyyy)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	04/30/1983	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Other names used *(include maiden name and aliases)*
CUJILEMA LEMA	Rosa Maria	N/A	N/A
9. Date of Marriage *(mm/dd/yyyy)*	**10.** Place of Marriage	**11.** City and Country of Birth	
07/29/2003	Pallatanga, Ecuador	Colta, Ecuador	
12. Nationality *(Citizenship)*	**13.** Race, Ethnic, or Tribal Group	**14.** Sex	
Ecuadorian	Indigenous Kichwa	☐ Male ☒ Female	

15. Is this person in the U.S.?
☐ Yes *(Complete Blocks 16 to 24.)* ☒ No *(Specify location):* Quito, Ecuador

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)*
N/A	N/A	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)*
N/A	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: 3.

(**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) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	Single	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
DISHO CUJILEMA	Jorge Luis	N/A	08/24/2004
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
Pallatanga, Ecuador	Ecuadorian	Indigenous Kichwa	☒ Male ☐ Female

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☒ No *(Specify location)*: Quito, Ecuador

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)*
N/A	N/A	N/A	N/A
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?	
N/A	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)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	Single	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
DISHO CUJILEMA	Shirley Alexandra	N/A	04/08/2006
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
Quito, Ecuador	Ecuadorian	Indigenous Kichwa	☐ Male ☒ Female

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☒ No *(Specify location)*: Quito, Ecuador

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)*
N/A	N/A	N/A	N/A

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?
N/A	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

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	Single	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
CELI CUJILEMA	Jandri Dario	N/A	08/31/2016
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
Loja, Ecuador	Ecuadorian	Indigenous Kichwa	☒ Male ☐ Female

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☒ No *(Specify location)*: Quito, Ecuador

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)*
N/A	N/A	N/A	N/A

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?
N/A	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

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	N/A	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
N/A	N/A	N/A	N/A
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
N/A	N/A	N/A	☐ 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)*
N/A	N/A	N/A	N/A

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?
N/A	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.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)*
Calle C., Lote 240, Ciudad Futura	Quito	Pichincha	Ecuador	06/2004	04/2026
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)*
4250 Federal Drive	Batavia	New York	United States	09/2026	PRESENT
26 Cloverwood Drive	Brockport	New York	United States	05/2026	09/2026
71 Bonney Street	Brockton	Massachusetts	United States	02/2025	05/2026
88 Fuller Street	Brockton	Massachusetts	United States	08/2021	02/2025
N/A	N/A	N/A	N/A	N/A	N/A

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)*
Escuela Antonio Flores Jijon	Elementary School	El Guapo, Pallatanga, Ecuador	05/1986	02/1994
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
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)*
Great Lakes Roofing Inc. - various addresses, NY	Roofer	05/2026	09/2026
Self-employed - various addresses, MA	Roofer	08/2021	05/2026
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
Mother Maria Rosa Sisa Shunta	Riobamba, Ecuador	☐ Deceased Quito, Ecuador
Father Juan Alfonso Disho Lluglla	Riobamba, Ecuador	☐ Deceased Quito, Ecuador
Sibling Anita Maria Disho Sisa	Riobamba, Ecuador	☐ Deceased Brockton, United States
Sibling Jose Maria Disho Sisa	Riobamba, Ecuador	☐ Deceased Seattle, United States
Sibling Maria Graciela Disho Sisa	Riobamba, Ecuador	☐ Deceased Madrid, Spain
Sibling Maria Fabiola Disho Sisa	Riobamba, Ecuador	☐ Deceased Riobamba, Ecuador

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.

USCIS may adjudicate your application without conducting an interview and without issuing a request for evidence. Your application and any supporting evidence that you provide now may be your only opportunity to meet your burden of proof to establish eligibility for asylum before USCIS.

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
- ☐ Religion
- ☒ Nationality
- ☒ Political opinion
- ☒ Membership in a particular social group
- ☒ 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:

1. What happened;
2. When the harm or mistreatment or threats occurred;
3. Who caused the harm or mistreatment or threats; and
4. Why you believe the harm or mistreatment or threats occurred.

I belong to the indigenous Kichwa people. At the age of 14, my family and I moved from the rural area of Pallatanga to Quito seeking better opportunities. My family and I suffered systematic racial discrimination and harassment due to our ethnic origin and indigenous identity, which intensified in Quito. Neighbors and locals insulted us by calling us "indios," telling us we were not welcome in the city, demanding that we go back to the countryside, and even denying us access to drinking water. When I was around 14 to 15 years old, while walking to the store with my family, local residents violently attacked us by throwing stones at us while yelling racial slurs. Due to severe racial prejudice, my father was denied formal employment, forcing me to work from age 14 collecting fallen fruit in local markets for resale and doing temporary construction work to help us survive. Racial discrimination was a constant part of our daily lives. As members of the Indigenous Kichwa community, we faced not only social prejudice and harassment but also institutional discrimination that deprived us of access to basic services and fundamental rights. Institutions that should have provided essential services and equal protection instead denied us access to resources and opportunities available to others due to our race and indigenous ethnicity. My wife was denied necessary medical care, and my children were denied enrollment in schools, obstructing their access to education. These incidents were not isolated occurrences but reflected the persistent discrimination we experienced as an Indigenous family. Continued on additional information.

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

☐ No ☒ Yes

If "Yes," explain in detail:

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

As a member of the Indigenous Kichwa community from the rural area of Pallatanga, Ecuador, I fear continued racial persecution, discrimination, social marginalization, and severe physical harm because of my Indigenous identity. Throughout my life, my family and I have been subjected to racial hostility and denied access to basic services and rights because we are Indigenous people from the countryside. We were physically attacked with stones, denied drinking water, my wife was refused emergency medical care, and my children were denied access to education. My indigenous ethnicity is a core part of my identity and makes me a permanent target in my home country. If I return, I fear that I will once again face discrimination, exclusion, mistreatment, and severe harm because of my Kichwa identity. In addition to this, I fear being threatened, kidnapped, beaten or murdered by members of the gang "Los Lobos". After they ransacked my home in Quito and injured my 14-year-old son when we refused to let him join their gang, they continued to harass and threaten us. If I were in Ecuador speaking out about what they did, they would immediately have me kidnapped, forced into doing things against my will, or killed. Los Lobos operate throughout Ecuador with total impunity, and I do not believe I could find a place in the country where I would be safe from them. As my past experience has shown, reporting Los Lobos would expose my family and me to further violence rather than protection, especially given the corruption and collusion between the police and criminal gangs. My distinct facial scar makes it impossible for me to hide anywhere in Ecuador without being recognized and targeted. Further details are incldued in my declaration.

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.

I, my parents, my siblings, my children and my other immediate family are members of the Indigenous Kichwa ethnic group in Ecuador. I have been a member of the Kichwa ethnic group since birth and I will continue to carry this identity throughout my life. My identity is deeply rooted in the traditions, values and history of the Kichwa people, and this connection is an integral part of who I am.

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.

I, my parents, my siblings, my children and my other immediate family members will always be members of the Indigenous Kichwa ethnic group. The connection to its values, traditions and history is a core part of our identity and will remain so for the rest of our lives.

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.

Indigenous Kichwa people have historically been subject to State-sanctioned torture in Ecuador. When my family moved to Quito, we were constantly targeted with racial hostility. When I was a teenager, a hostile crowd and local gang members attacked my family and me in the street, throwing heavy stones at us while shouting racial slurs and demanding that we leave the city. We were nearly killed. Throughout my life in Ecuador, I have always faced this constant danger of racial violence, institutional rejection, and denial of basic services. The State itself perpetrates violence against my community by denying us the exercise of our civil rights, restricting our freedom, and subjecting us to arbitrary detention and physical abuse. If I am forced to return, I will face heightened, severe levels of ethnic discrimination and physical violence that amount to torture, as racial violence against indigenous people in urban centers continues to escalate without state protection. These acts of state-inflicted harm constitute torture.

In addition to racial persecution, I face an immediate threat of torture and execution by the criminal gang "Los Lobos". "Los Lobos" previously invaded and ransacked my home, repeatedly threatened my family, and severely beat my 14-year-old son when we refused to allow him to be forcibly recruited into their gang. Because I reported their act, defied their extortion and recruitment, and subsequently fled the country, returning to Ecuador puts me at direct risk of being kidnapped, beaten or executed in retaliation. Criminal organizations operate with near-total impunity in Ecuador, and the State is unwilling to protect those who oppose their operations and further denies protection to people like me because of our Indigenous origin. And my prominent facial scar from a 2012 accident makes me easily identifiable and unable to hide or safely relocate anywhere in the country. Further details are included in my declaration.

Part C. Additional Information About Your Application

You should ensure that your explanations are complete and detailed. An asylum officer may adjudicate your application without conducting an interview or requesting additional evidence.

(**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 siblings Anita Maria Disho Sisa, Jose Maria Disho Sisa, Flavio Orlando Disho Sisa, Edison Manuel Disho Sisa, and Habraan Ilbay Sisa have filed Applications for Asylum and Withholding of Removal (Form I-589). They entered the United States individually and filed their applications separately. To the best of my knowledge, all of their asylum applications remain pending a final decision.

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.

On April 11, 2016, I fled Ecuador alone. I traveled overland by bus from Quito, Ecuador to the border town of Ipiales, Colombia. From Ipiales, I took a 24-hour bus ride to Bogotá, Colombia. I stayed in Bogotá for approximately 15 days, where I met up with other migrants heading north. From Bogotá, Colombia, we flew by airplane to Nicaragua. The flight made a brief 1-hour layover in El Salvador for an airplane transfer. Upon arriving in Nicaragua, I stayed at a hotel for approximately 10 days. From Nicaragua northward, we traveled overland using buses, trucks, cars, and walking. We transited through Honduras quickly in 1 to 2 days. We then entered Guatemala, where I stayed for some weeks. From Guatemala, we entered Mexico, where I spent approximately 1 month. There, we were hidden in a sugarcane field (cañaverales) for 15 days with no food, surviving only on water, sugarcane, and mandarins. We were also crammed into enclosed trailers under extreme heat. From Mexico, I crossed the desert on foot, walking for some days. I finally entered the United States on or about June 11, 2016, through Texas. I did not hold legal status or am entitled to return for lawful residence purposes in any of these countries. I did not apply for refugee status or asylum in these countries because I was not safe there. This entire journey was marked by constant insecurity and danger. My only real option for protection was to reach the United States. Indigenous people face severe discrimination and mistreatment in those countries, and I feared being targeted because of my ethnicity. In addition, "Los Lobos" have connections in these countries, and could locate and target me, making any attempt to seek protection futile. Further details are included in my declaration.

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

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).)

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. Your written explanation may be your only opportunity to have an asylum officer consider your reason(s). If you are scheduled for an asylum interview or a hearing with an immigration judge, 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.

I did not file my application for asylum within my first year in the United States because I did not know I could seek protection, and I faced overwhelming barriers of language, isolation, and trauma that kept me from understanding or accessing the legal system.I come from a rural indigenous Kichwa family in Ecuador, and I only completed primary school. I do not speak any English at all. When I arrived in the United States in June 2016, my sole motivation was to escape the death threats, gang violence, and physical abuse that my family and I were suffering in Quito. I never encountered immigration officers who explained my rights or informed me of the possibility of applying for asylum. I was never informed about the one-year deadline to apply. My life in the United States was also shaped by deep physical and emotional trauma. As an indigenous man, and because of a severe construction accident in 2012 that left a large, deep scar on the left side of my face and damaged my vision, people have always treated me with hostility and prejudice. It was only when I was recently arrested by immigration officers and received legal guidance for the first time that I was informed that I had the right to apply for asylum to protect me from removal to Ecuador. As soon as I received this guidance, I immediately worked as fast as I could to submit this application. I respectfully request the court to consider these extraordinary circumstances and accept this late filing, as I am now prepared to present my case and provide all supporting evidence needed. Further details are included in my declaration.

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.

I was apprehended by U.S. Immigration and Customs Enforcement on September 15, 2026, while working in a construction site in New York, solely for an immigration law violation after entering the United States without inspection. Following this arrest, I was issued a Notice to Appear charging me under sections 212 (a) (6) (A) (i) e 212 (a) (7) (A) (i) (I) of the Immigration and Nationality Act (INA). I am currently detained at the Buffalo Federal Detention Facility. This arrest and detention occurred solely in connection with my immigration status. I have never committed any crime in the United States, nor have I ever been arrested, charged, or convicted of any criminal offense.

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, and even if USCIS does not conduct an interview on the application. 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.	Write your name in your native alphabet.
Luis Heriberto Disho Sisa	N/A

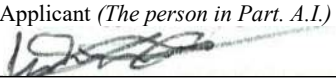
Did your spouse, parent, or child(ren) assist you in completing this application? ☒ No ☐ Yes *(If "Yes," list the name and relationship.)*

N/A	N/A	N/A	N/A
(Name)	*(Relationship)*	*(Name)*	*(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.)*

➡ [] 10/09/2026

Sign your name so it all appears within the brackets — 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	Address of Preparer: Street Number and Name
(510) 2419336	PO Box 90487

Apt. Number	City	State	Zip Code
N/A	San Diego	California	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)	**Attorney or Accredited Representative USCIS Online Account Number** (if any)
		343486	0 0 7 4 9 2 6 2 5 4 3 8

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

NOTE: You will be asked to complete this part if 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

Application for Asylum and for Withholding of Removal Supplement A

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-589
OMB No. 1615-0069
Expires 09/30/2027

A-Number *(If available)*	Date
221442166	10/09/2026
Applicant's Name	Applicant's Signature
LUIS HERIBERTO DISHO SISA	

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)*	**2.** Passport/ID Card Number *(if any)*	**3.** Marital Status *(Married, Single, Divorced, Widowed)*	**4.** U.S. Social Security Number *(if any)*
N/A	N/A	N/A	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
N/A	N/A	N/A	N/A
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
N/A	N/A	N/A	☐ 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)*
N/A	N/A	N/A	N/A

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?
N/A	N/A	☐ Yes ☐ No N/A

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*
☐ Yes
N/A
☐ No

1. Alien Registration Number (A-Number) *(if any)*	**2.** Passport/ID Card Number *(if any)*	**3.** Marital Status *(Married, Single, Divorced, Widowed)*	**4.** U.S. Social Security Number *(if any)*
N/A	N/A	N/A	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
N/A	N/A	N/A	N/A
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
N/A	N/A	N/A	☐ 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)*
N/A	N/A	N/A	N/A

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?
N/A	N/A	☐ Yes ☐ No N/A

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*
☐ Yes
N/A
☐ No

Application for Asylum and for Withholding of Removal Supplement B

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-589
OMB No. 1615-0069
Expires 09/30/2027

Additional Information About Your Claim to Asylum

A-Number *(if available)*	Date
221442166	10/09/2026
Applicant's Name	Applicant's Signature
LUIS HERIBERTO DISHO SISA	

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

Part A.III

Question 5

Sibling: Flavio Orlando Disho Sisa
City/town and Country of Birth: Riobamba, Ecuador
Current Location: Brockton, United States

Sibling: Luis David Disho Sisa
City/town and Country of Birth: Riobamba, Ecuador
Current Location: Quito, Ecuador

Sibling: Edison Manuel Disho Sisa
City/town and Country of Birth: Riobamba, Ecuador
Current Location: Brockton, United States

Sibling: Habraan Ilbay Sisa
City/town and Country of Birth: Riobamba Ecuador
Current Location: Brockton, United States

Sibling: Miguel Ilbay Sisa
City/town and Country of Birth: Riobamba, Ecuador
Current Location: Riobamba, Ecuador

Application for Asylum and for Withholding of Removal Supplement B

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-589
OMB No. 1615-0069
Expires 09/30/2027

Additional Information About Your Claim to Asylum

A-Number *(if available)*	Date
221-442-166	10/09/2026
Applicant's Name	Applicant's Signature
LUIS HERIBERTO DISHO SISA	

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

Part B

Question 1.A.

In 2012, while working in construction in Quito, I suffered a catastrophic accident when a grinding machine disc shattered and severely cut the left side of my face. I fell into a coma for three days, suffered massive blood loss, and was hospitalized for six months, followed by an entire year of recovery. The accident left me with a deep, permanent facial scar and impaired vision in my left eye, resulting in a lasting disability.

Following the accident, I faced constant discrimination, harassment, and humiliation because of my appearance and disability. People in my community and on the streets mocked me publicly, calling me a "monster," "Chucky," "Joker" ("Guasón"), and "clown," often in front of my young children, which caused them severe distress. This mistreatment was compounded by the prejudice I already faced as an Indigenous man. My disability and my Indigenous identity combined to make me even more vulnerable to discrimination and rejection. People judged and mistreated me not only because of my visible scars and impaired vision, but also because of my race. This discrimination made it extremely difficult for me to find steady employment and contributed to the eventual breakdown of my marriage.

In 2015, members of the transnational gang "Los Lobos" violently broke into and ransacked my home in the Ciudad Futura neighborhood of Quito while my wife and I were away working. The gang members completely emptied our house, deeply traumatizing my two young children who were home alone. My daughter called the police, but the officers took over an hour to arrive, did not investigate, and took no action to protect us. Following the robbery, "Los Lobos" repeatedly harassed and threatened my family, warning us that they would harm or kidnap my children if we did not comply with their demands. Subsequent to the break-in, members of "Los Lobos" attempted to forcibly recruit my son when he was in middle school. When we firmly refused to let him join the gang, gang members severely beat him. Due to the total lack of police protection and the immediate threat to his life, I was forced to permanently pull my son out of school and send him into hiding in the rural area of Riobamba to live with his grandparents. However, I know that this does not mean he is safe. Los Lobos have a presence throughout Ecuador, and as a member of the Indigenous Kichwa community, he would continue to face discrimination, persecution, and the risk of serious harm in our home country. This ongoing persecution made it impossible for me to live safely in Ecuador, forcing me to flee the country in April 2016.

Further details are included in my declaration.

Luis Heriberto Disho Sisa **File No. A. 221-442-166**

Proof of Service

On October 17, 2026, I, Otavio Haverroth Silva, served a copy of the following documents:

RESPONDENT'S APPLICATION FOR ASYLUM AND WITHHOLDING OF REMOVAL

To the Department of Homeland Security, Office of the Principal Legal Advisor, 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