

**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**

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

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:

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Letter of Support from James and Nancy Hart

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# **Exhibit 1**

Adan Martins

12 Gallagher Acres Ext

Waterbury, VT 05676

802-735-5002

adan.h.martins@gmail.com

6/17/2026

U.S. Citizenship and Immigration Services

To Whom It May Concern,

**Re: Character Reference for Douglas Santos Goncalves**

My name is Adan Martins, and I am writing this letter in support of Douglas Santos Goncalves's application for U.S. citizenship. I met Douglas through a mutual professional connection, as we both work in the janitorial industry, and I have come to know him over the past couple of years through that connection.

Although I have not known Douglas for an extended period, I have had enough opportunity to observe his character directly, and what I have seen has consistently impressed me. He is honest and straightforward in his dealings, disciplined in how he approaches his responsibilities, and dependable in following through on his commitments. He is a hard worker who takes pride in doing things properly, and these are qualities that have come through clearly even in the relatively short time I have known him

What stands out to me most, though, is Douglas's dedication to his family. He speaks about his children's education with real seriousness and care, and it is evident that he is working hard to give his family a good life and a strong foundation for the future. He strikes me as a responsible, family-oriented man who takes his obligations, to his work and to his children, very seriously

I believe he reflects the kind of honesty, discipline, and responsibility that this process looks for, and I am glad to support his application. Please feel free to contact me if any further information would be helpful

Sincerely,



**Adan Martins**

# **Exhibit 2**

Ella Margaret Hart

1296 Chase Ave

Binghamton, NY 13901

[ellamargarehart@gmail.com](mailto:ellamargarehart@gmail.com)

6/03/2026

Dear United States Asylum Authorities

My name is Ella Hart, and I am writing this letter to support Bianca Santos Andrade and her family.

I have known Bianca for 2 years. I first met her when she moved to the Chenango Valley District in February 2024. From the first time I met her, she stood out to me because of her kindness and positive mindset and her willingness to help others. She introduced herself to classmates, treated everyone with respect and quickly became someone people could rely on.

Over the past two years, Bianca has become one of my closest friends. Through our friendship, I have had the chance to become close not only with her but with her family as well. I would always spend time at her house every weekend and have always been welcomed with kindness and respect. Their home always felt safe, and family oriented. They always treated me as if I were part of their family and always demonstrated strong values, responsibility, and compassion.

Bianca is one of the most hardworking and determined people I know. Despite being young, she graduated from high school early and is now preparing for college. She prioritizes her education and works hard to build a successful future for herself. She cares very deeply for her family as well and has helped care for and raise her two younger siblings. Her maturity and sense of responsibility is truly admirable.

Throughout our friendship, Bianca has always been dependable, honest and supportive. She always encourages others to succeed to the best of their ability, and she is always willing to help when someone is struggling. She has had such a positive impact on my life, and I am grateful for her friendship.

While I am not directly involved in Biancas immigration case and do not know every detail, I have personally seen the fear that her and her family have experienced regarding their immigration situation. During conversations over the past two years. Bianca has told me her concerns about the possibility of returning to Brazil. I remember times when Bianca would become emotional while discussing the thought of having to leave and being separated from the life she has built in the United States.

I have seen how hard Bianca and her family have worked to build their lives in the United States. They are respectful, law-abiding and dedicated individuals who contribute lots of care and effort to their community. I sincerely believe Bianca deserves the opportunity to continue her education and pursue her goals while remaining with her family in the United States.

I ask that Bianca Santos Andrade and her family's application receive full and fair consideration. Based off everything I have personally witnessed, they are people of strong character who are working hard to create a safe, stable and productive future.

Thank you for your time and consideration, if additional Information is needed, I would be more than willing to provide it.

Sincerely,

Ella Margaret Hart

# **Exhibit 3**

06/03/2026

To Whom it May Concern,

Bianca has asked that we write a letter of recommendation based on our relationship as her friend and as a testament towards her character.

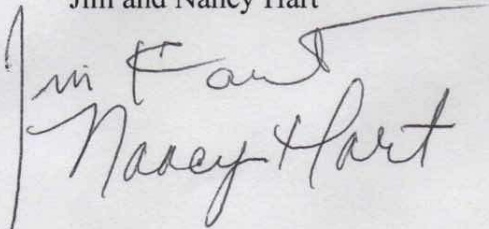
We first met Bianca over 2 years ago. My daughter and Bianca became friends quickly. For their first activity outside of school, Bianca invited Ella to a Youth Group at a church she and her family were attending. Prior to that, Bianca felt she should introduce herself to us before Ella was to attend this function. In our first encounter, it was apparent that she was intelligent, outgoing, upbeat and helpful to others. In truth, most of Ella's friends are not much for conversation. That is not the case with Bianca. We then met her mother and siblings who were waiting patiently. It was then that we realized, in addition to these great qualities she possesses, she was also responsible for interpreting for her mother, quite the task for a girl her age.

As the years went on, our daughter attended many Youth Group sessions with Bianca and her family. Her positive personality was infectious and remained consistent. We further noticed the closeness of her family and how they did many activities together and Bianca's role as big sister was a family responsibility she gladly took on. Our daughter spent much of her free time at Bianca's house and had outings normal for young teens. Even after her move, she continues to be a positive influence on our daughter. Many times, when she calls Ella, she asks to talk to us, to ask us how we are and gives us an update on her life. She appears grateful for what she has and works hard for her achievements. We understand that her values, thoughts, and goals for her future are clear and she is consistently working towards them. Bianca has a passion for success.

We feel very comfortable recommending Bianca, and we are pleased to have the opportunity of providing a reference on her behalf.

Cordially,

Jim and Nancy Hart

Handwritten signature of Jim and Nancy Hart in cursive script.

NEW YORK STATE <sup>USA</sup>  
DRIVER LICENSE



*And It Matters*  
DEPARTMENT OF REALM SERVICES

ID 124 931 518

Class D

HART  
JAMES, W

1296 CHASE AVE  
BINGHAMTON, NY 13901

DOB 03/23/1964

Issued 02/03/2026

Expires 03/23/2029

E NONE

R B

Sex M Height 5'-10" Eyes BLU

♥  
Organ  
Donor

MAR  
64

*James W Hart*  
M A R 64

# NEW YORK STATE <sup>USA</sup> DRIVER LICENSE

*Mark J. Schneider*  
Commissioner of Motor Vehicles



ID **182 677 374**

Class **D**

**HART  
NANCY, L**

**1296 CHASE AVE  
BINGHAMTON, NY 13901**

DOB **07/04/1965**

Issued **02/03/2026**

Expires **07/04/2027**

♥  
Organ  
Donor

E **NONE**

R **B**

Sex **F** Height **5'-08"** Eyes **HAZ**

**Douglas Santos Gonçalves**  
**Debora Do Carmo Andrade Santos**  
**Bianca Santos Andrade**  
**Beatriz Santos Andrade**  
**Benicio Santos Andrade**

**A 220-762-085**  
**A 220-762-086**  
**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:

<b>Office Location:</b>  Office of the Principal Legal Advisor Department of Homeland Security 250 Delaware Avenue, Suite 773 Buffalo, NY 14202	<b>Mailing Address:</b>  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*