

Non-Detained

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**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
915 2nd Avenue, Suite 613
Seattle, WA 98174**

_____)	
In the Matter of)	
)	
Mirian Raimundo)	File No. A 221-290-315
Patrick Raimundo Santana)	File No. A 221-290-316
Pablo Henrique Raimundo Santana)	File No. A 221-290-343
)	
In Removal Proceedings)	
)	
_____)	

Immigration Judge: Tisocco, Michael **Next Hearing Date:** July 16, 2027, at 08:30 AM

RESPONDENT'S AMENDMENT OF FORM I-589

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RESPONDENT’S AMENDMENT OF FORM I-589

COMES NOW, Respondent Mirian Raimundo, by and through undersigned counsel, and respectfully moves this Honorable Court to **accept the attached amendment to her Form I-589, Application for Asylum and for Withholding of Removal, and to include her son, Pablo Henrique Raimundo Santana, as a derivative beneficiary of her application.** In support thereof, Respondent states as follows:

1. Respondent has a pending Form I-589 before this Court.
2. Respondent seeks to amend her application to include her son, Pablo Henrique Raimundo Santana, as a derivative beneficiary pursuant to section 208(b)(3)(A) of the Immigration and Nationality Act (“INA”) and applicable regulations.
3. Pablo Henrique Raimundo Santana is the biological son of Respondent and is under twenty-one (21) years of age. He is unmarried and therefore meets the statutory definition of a “child” under INA 101(b)(1).
4. Pursuant to INA 208(b)(3)(A) and 8 C.F.R. § 208.21, a spouse or child of an asylee may be granted the same status as a derivative beneficiary if accompanying or following to join.
5. At the time Respondent initially filed her Form I-589, Pablo Henrique Raimundo

Santana was not included as a derivative because his proceedings were not consolidated with Respondent's case, and he maintained a separate protection claim, having filed an independent I-589.

6. The Immigration Court has since consolidated proceedings under Respondent Mirian Raimundo as the lead Respondent. In light of this procedural posture, Respondent now seeks to include her son as a derivative on her asylum application.
7. The requested amendment is essential to safeguard the Respondents' eligibility for relief, given a positive adjudication of the lead Respondent's asylum claim will effectively extend derivative asylum status to her sons, who are rightfully entitled to such relief under the law.
8. Furthermore, Respondent amended the form to reflect Pablo's factual background and the persecution suffered by the family on account of their familial association with him, in order to ensure a comprehensive resolution of the family's claims,
9. The amendment will thus promote judicial efficiency, avoid duplicative proceedings, and is consistent with governing law and policy permitting the inclusion of qualifying derivatives.
10. The Department of Homeland Security will not be prejudiced by this amendment, as it merely aligns the application with the current consolidated posture of the case.

WHEREFORE, Respondent respectfully requests that this Honorable Court:

- (1) Accept the attached amended Form I-589;
- (2) Permit the inclusion of Pablo Henrique Raimundo Santana as a derivative beneficiary; and
- (3) Grant such other and further relief as the Court deems just and proper.

Respectfully,



Otavio Haverroth Silva (Bar N.343486)
Attorney at Law
P.O. Box 90487, San Diego, CA 92169
(510) 241-9336
Counsel for Respondents

Exhibit list

Exhibits:

Pages:

Exhibit 1

Mirian Raimundo's Amended Form I-589

1-14

Exhibit 1



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. There is no filing fee for 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) 221290315	2. U.S. Social Security Number (if any) 659-27-3763	3. USCIS Online Account Number (if any) N/A	
4. Complete Last Name RAIMUNDO	5. First Name Mirian	6. Middle Name 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 12107 Northeast 134th Street			Apt. Number N/A
City Kirkland	State WA	Zip Code 98034	Telephone Number (425) 5606061
(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): HS LAW CORP			Telephone Number (510) 2419336
Street Number and Name PO Box 90487			Apt. Number N/A
City San Diego	State CA	Zip Code 92169	
10. Gender: <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female		11. Marital Status: <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed	
12. Date of Birth (mm/dd/yyyy) 07/08/1988	13. City and Country of Birth Ariquemes, Brazil		
14. Present Nationality (Citizenship) Brazilian	15. Nationality at Birth Brazilian	16. Race, Ethnic, or Tribal Group Latina	17. Religion Catholic
18. Check the box, a through c, that applies: a. <input type="checkbox"/> I have never been in Immigration Court proceedings. b. <input checked="" type="checkbox"/> I am now in Immigration Court proceedings. c. <input type="checkbox"/> 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) <u>09/25/2024</u> b. What is your current I-94 Number, if any? <u>N/A</u>			
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 <u>10/09/2024</u>	Place <u>Unknown</u>	Status <u>EWI</u>	Date Status Expires <u>N/A</u>
Date <u>N/A</u>	Place <u>N/A</u>	Status <u>N/A</u>	
Date <u>N/A</u>	Place <u>N/A</u>	Status <u>N/A</u>	
20. What country issued your last passport or travel document? Brazil	21. Passport Number <u>YF067507</u>		22. Expiration Date (mm/dd/yyyy) <u>12/11/2028</u>
	Travel Document Number <u>YF067507</u>		
23. What is your native language (include dialect, if applicable)? Portuguese	24. Are you fluent in English? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	25. What other languages do you speak fluently? N/A	



Part A.II. Information About Your Spouse and Children

For EOIR use only.	For USCIS use only.	Action: Interview Date: _____ Asylum Officer ID No.: _____	Decision: Approval Date: _____ Denial Date: _____ Referral Date: _____
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Your spouse I am not married. (Skip to **Your Children** below.)

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Date of Birth (mm/dd/yyyy) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Other names used (include maiden name and aliases) N/A
9. Date of Marriage (mm/dd/yyyy) N/A	10. Place of Marriage N/A	11. City and Country of Birth N/A	
12. Nationality (Citizenship) N/A	13. Race, Ethnic, or Tribal Group N/A	14. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female	
15. Is this person in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 16 to 24.) <input type="checkbox"/> No (Specify location): N/A			
16. Place of last entry into the U.S. N/A	17. Date of last entry into the U.S. (mm/dd/yyyy) N/A	18. I-94 Number (if any) N/A	19. Status when last admitted (Visa type, if any) N/A
20. What is your spouse's current status? N/A	21. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	22. Is your spouse in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	23. If previously in the U.S., date of previous arrival (mm/dd/yyyy) N/A
24. If in the U.S., is your spouse to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes <input type="checkbox"/> 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: 2

(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) 221290343	2. Passport/ID Card Number (if any) GK040855	3. Marital Status (Married, Single, Divorced, Widowed) Single	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name RAIMUNDO SANTANA	6. First Name Pablo Henrique	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) 06/26/2005
9. City and Country of Birth Ji-Parana, Brazil	10. Nationality (Citizenship) Brazilian	11. Race, Ethnic, or Tribal Group Latino	12. Gender <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input checked="" type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location): _____			
14. Place of last entry into the U.S. Unknown	15. Date of last entry into the U.S. (mm/dd/yyyy) 10/09/2024	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) EWI
18. What is your child's current status? No legal status	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			



Part A.II. Information About Your Spouse and Children (continued)

1. Alien Registration Number (A-Number) (if any) 221290316	2. Passport/ID Card Number (if any) GK040855	3. Marital Status (Married, Single, Divorced, Widowed) Single	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name RAIMUNDO SANTANA	6. First Name Patrick	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) 08/28/2007
9. City and Country of Birth Alvorada D'Oeste, Brazil	10. Nationality (Citizenship) Brazilian	11. Race, Ethnic, or Tribal Group Latino	12. Gender <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female

13. Is this child in the U.S.? Yes (Complete Blocks 14 to 21.) No (Specify location): _____

14. Place of last entry into the U.S. Unknown	15. Date of last entry into the U.S. (mm/dd/yyyy) 10/09/2024	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) EWI
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18. What is your child's current status? No legal status	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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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) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> 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. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
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18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No
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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) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> 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. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
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18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No
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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)
Rua José de Alencar 1271	Ji-Parana	Rondonia	Brazil	05/2014	09/2024
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)
12107 Northeast 134th Street	Kirkland	Washington	United States	02/2025	Present
1701 121st St SE	Everett	Washington	United States	10/2024	02/2025
Rua José de Alencar 1271	Ji-Parana	Rondonia	Brazil	05/2014	09/2024
N/A	N/A	N/A	N/A	N/A	N/A
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.)

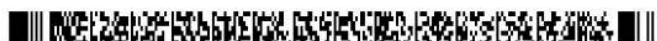
Name of School	Type of School	Location (Address)	Attended	
			From (Mo/Yr)	To (Mo/Yr)
CEEJA	Adult Education Program	Rua Natal 257, Ji-Parana, Brazil	02/2019	12/2021
APP Escola Estadual Beatriz Ferreira Silva	Elementary school	Rua Amazonas 1449, Ji-Parana, Brazil	02/1995	08/2004
N/A	N/A	N/A	N/A	N/A
N/A	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)
Self-employed - various addresses	Manicure and Eyebrow Designer	07/2014	Present
N/A	N/A	N/A	N/A
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 Aparecida	Conselheiro Pena, Brazil	<input checked="" type="checkbox"/> Deceased
Father João Delfino Raimundo	Conselheiro Pena, Brazil	<input checked="" type="checkbox"/> Deceased
Sibling Valter Raimundo da Silva	Vitoria, Brazil	<input type="checkbox"/> Deceased Ji-Parana, Brazil
Sibling Wanderley Raimundo da Silva	Vitoria, Brazil	<input type="checkbox"/> Deceased Urupa, Brazil
Sibling Daniel Raimundo da Silva	Vitoria, Brazil	<input type="checkbox"/> Deceased Ji-Parana, Brazil
Sibling Volnei Raimundo da Silva	Unknown, Brazil	<input type="checkbox"/> Deceased Ji-Parana, Brazil



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.

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
- Political opinion
- Religion
- Membership in a particular social group
- Nationality
- 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 was persecuted in my country of origin, Brazil, due to my stance against my ex-partner's violent control and the LGBTQ+phobia directed at my children. This persecution was not merely personal but systematic, reflecting the structural failure of the Brazilian State to guarantee our safety and dignity. For years, I was a victim of multiple forms of domestic violence—physical, psychological, economic, and sexual—perpetrated by my ex-partner, Jonas Paulino Santana. He threatened me, raped me, and controlled my finances by preventing me from working. After 15 years together, he began drinking daily and became increasingly possessive and aggressive. He would not let me go anywhere without him and would become angry without any apparent reason. Most of the time, I chose to remain silent in an attempt not to worsen the situation. I even submitted to sexual relations with him just to avoid more severe consequences. 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.

I am deeply afraid to return to Brazil, as I seriously fear being threatened, harmed, raped, tortured, or even killed by my ex-partner, Jonas. I was the victim of intense physical and psychological abuse. Jonas was extremely controlling and violent. During our relationship, I lived under constant threats to my safety and the safety of my sons, Patrick and Pablo. This fear is not—and has never been—unfounded. I'm afraid that he will carry out his threats to kill me and my children. In 2024, we experienced one of the most traumatic episodes of our lives: I was brutally attacked and feared for my life. Although I filed a police report, no serious investigation was ever conducted due to the structural failure of the Brazilian state to provide effective protection to victims of domestic and to the LGBTQ+ population. Continued on additional information.



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.

- 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.

- 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.

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.

I am deeply afraid that my children and I will be subjected to torture if we are forced to return to Brazil. This fear is entirely based on the persecution we have already endured in the past and the real and ongoing threats of future harm— threats that the Brazilian authorities, including the police and the judicial system, are not equipped to protect us from. On multiple occasions, we were brutally subjected to physical and psychological violence, and the Brazilian State failed to provide any legal protection. For years, we have been victims of violence and discrimination —myself as a woman in an abusive relationship marked by domestic violence, and my sons for being gay in a country where homophobia remains extremely strong and pervasive.

Continued on additional information.



Part C. Additional 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 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.

- 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.

Before arriving in the United States, my sons and I traveled through the Dominican Republic, El Salvador, Guatemala, and Mexico, and stayed only a few days in each country. We did not hold any status while there and are not entitled to return for lawful residence purposes. We did not remain in any of those countries, nor did we apply for asylum, because the protection offered was insufficient to guarantee my safety or that of my children. These countries face high crime rates and human rights violations, specially towards women and LGBTQTIA+ persons. In addition to this, while in Mexico, my children and I were kidnapped and held captive for three days without access to food or water. We were extorted, harmed, and threatened at gunpoint, and I was raped. During the time I was held captive, and even until we reached the border, I feared constantly for my life and for the lives of my family members. The United States represented our last thread of hope, the only place where we believed we could finally find safety. Remaining in Mexico could cost us our lives. 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.



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. 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.

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.

Yes, upon entering the United States on October 9, 2024, my children and I were detained at the border by immigration officers. My son Patrick Raimundo Santana and I were held for two days, while my older son, Pablo Henrique Raimundo Santana, remained in detention for 21 days. This entry occurred out of an urgent need to seek safety and refuge. The detention was part of the immigration process, and we have not committed any other crime in the United States. Our sole purpose in seeking entry into this country was to escape serious threats and persecution suffered in our country of origin. Further details are included in my declaration.



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. 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. Mirian Raimundo	Write your name in your native alphabet. N/A
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Did your spouse, parent, or child(ren) assist you in completing this application? No Yes (If "Yes," list the name and relationship.)

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

➔ [Mirian Raimundo] 05/22/2026
 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 (510) 2419336		Address of Preparer: Street Number and Name PO Box 90487	
Apt. Number N/A	City San Diego	State CA	Zip Code 92169

To be completed by an attorney or accredited representative (if any).	<input type="checkbox"/> Select this box if Form G-28 is attached.	Attorney State Bar Number (if applicable) 343486	Attorney or Accredited Representative USCIS Online Account Number (if any) 0 0 7 4 9 2 6 2 5 4 3 8
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Part F. To Be Completed at Asylum Interview, if Applicable

NOTE: You will be asked to complete this part when 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) 221290315	Date 05/22/2026
Applicant's Name Mirian Raimundo	Applicant's Signature <i>Mirian Raimundo</i>

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) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Sex <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location): N/A			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes <input type="checkbox"/> No			

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) N/A	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name N/A	6. First Name N/A	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) N/A
9. City and Country of Birth N/A	10. Nationality (Citizenship) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Sex <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location): N/A			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (mm/dd/yyyy) N/A	16. I-94 Number (If any) N/A	17. Status when last admitted (Visa type, if any) N/A
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) N/A	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes <input type="checkbox"/> 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) 221290315	Date 05/22/2026
Applicant's Name Mirian Raimundo	Applicant's Signature

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

Part B
Question 1.A.

He constantly threatened to set the house on fire and kill us all, specially when I opposed his aggressive behavior.

There were two episodes of physical violence. The first time he violently assaulted me was between late 2019 and 2020. He came home clearly drunk, and when I asked him a simple question, he snapped. He started destroying things in the house. When Pablo yelled at him to stop, Jonas struck him in the face. Fearing he might do something worse, I grabbed a knife, and in the chaos, I accidentally cut Pablo's arm. Patrick was deeply shaken by the event and began having recurring nightmares about his father destroying the house. On another occasion, on August 19, 2024, I was violently assaulted again by my ex-partner after he discovered our children's sexuality. He was drunk at a diner and wanted to talk about the persecution our children had been experiencing. In that moment, I told him that both our children were part of the LGBTQIA+ community. His reaction was immediate and brutal: visibly intoxicated, as he often was, he stood up and struck me in the head with a metal cup, causing a deep wound. After the attack, Jonas returned home alone and, in a fit of rage, threatened to destroy the house, set everything on fire and kill me. When I returned home that night, afraid and injured, my children hid me in their room, fearing their father would kill me. This incident marked a turning point in the escalating violence and persecution we had been enduring.

Because of their sexuality, my sons were repeatedly abused, threatened and discriminated against, inside and outside our home. It hurt me to see them suffer because of who they were, and I would and still do confront anyone who inflicts such suffering on them.

Because of their sexual identity, both my sons and I were persecuted by a man called Douglas Eduardo and his family and associates. Douglas was a classmate of Pablo's and subjected him to constant verbal abuse, threats, and, on two occasions, severe physical harm and torture. After the first episode, Pablo sought the authorities to report the crime, but was humiliated and further discriminated. We later discovered the police chief was Douglas' father: he not only did not record the crime as ensured his son's protection, by paying off the police staff to bury the story. Instead of obtaining relief, the persecution worsened and Douglas began threatening my son for having gone to the authorities. Thus, soon after the first event, Douglas and his friends again brutally assaulted Pablo, subjecting him to extreme torture.

Following these events, and afraid both Jonas and Douglas or his father would come after us and fulfill their threats, we fled and moved to another state. But this was not sufficient: they found us again. I received a phone call filled with insults and threats, saying they knew where we were and that they would come to kill Pablo and his family. The threat was clearly directed not solely at Pablo, but at all that were associated with him. Terrified and with no protection, we fled the country in fear for our lives.

The Brazilian State has failed – and continues to fail – to provide effective protection mechanisms for victims like us. Reports of domestic violence, when made, rarely result in effective protective measures or punishment for the perpetrators. Cases of violence against LGBTQIA+ individuals also remain widely unpunished. The absence of an adequate state response left me exposed, vulnerable, and with no safe option other than to seek refuge in this country. I was persecuted – and face a risk of future persecution – on account of my political opinion (my opposition to LGBTQ+phobia and gender-based violence) as well as my membership in the particular social groups: Brazilian women; Brazilian women viewed as property by virtue of their positions within a domestic relationship; Brazilian women who are unable to leave their domestic relationship; Mothers of LGBTQIA+ youth in Brazil; Immediate family members of Pablo Henrique Raimundo Santana.

My case aligns with firmly established jurisprudence. In *Hernandez-Chacon v. Barr*, 948 F.3d 94 (2d Cir. 2020), the court recognized that women who are victims of domestic violence in countries where the State fails to protect them may constitute a "particular social group" for asylum purposes. Likewise, in *Bringas-Rodriguez v. Sessions*, 850 F.3d 1051 (9th Cir. 2017) (en banc), the Ninth Circuit acknowledged that state inaction in the face of homophobic violence against LGBTQ+ youth can constitute persecution, even when perpetrated by non-state actors. My refusal to remain silent in the face of assaults directed at my children because of their sexual identity, combined with the violence I suffered for defying patriarchal and discriminatory norms, are not merely acts of survival – they are acts of resistance that made me a target. These acts reflect my political opinion and my association with the aforementioned groups and expose me to retaliation. U.S. jurisprudence recognizes situations like mine as legitimate grounds for asylum in light of the past persecution I suffered.





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) 221290315	Date 05/22/2026
Applicant's Name Mirian Raimundo	Applicant's Signature

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

Part B
Question 1.B

In addition, I fear that Douglas Eduardo, his family, or his associates will carry out their threats and seriously harm, torture, or kill me and my family. He has repeatedly harmed, humiliated, and abused my son, Pablo. Shortly before we left Brazil, Douglas contacted us and explicitly threatened to kill both Pablo and his family. From that moment on, the threat extended beyond Pablo and encompassed our entire family.

Furthermore, in an effort to protect my children, I relocated within Brazil and ultimately fled to the United States. I fear that Douglas perceives these actions as defiance and now views me as a direct opponent and as the protector of his original target, Pablo. This further increases the risk to my safety.

I also believe that Douglas has both the means and the influence to locate us anywhere in Brazil and carry out his threats. He is the son of a police chief and has significant political connections, including within law enforcement. This has proven to be true in the past, when he found us after an attempt of relocating inside the country. As a result, I have no reasonable expectation of protection from the authorities, which leaves me and my family extremely vulnerable if we are forced to return.

Furthermore, the U.S. Supreme Court, in *INS v. Cardoza-Fonseca*, 480 U.S. 421 (1987), established that a fear of persecution need not be certain, only reasonable and well-founded. Given the attacks we endured, the lack of an effective response from Brazilian authorities, and the history of impunity in similar cases, my fear of returning to Brazil is objectively and legitimately grounded. Finally, according to the precedents *Matter of S-A-*, 22 I&N Dec. 1328 (BIA 2000), and *Matter of AB-*, 27 I&N Dec. 316 (A.G. 2018), asylum may be granted when the government of the applicant's country is unable or unwilling to protect them from persecution by non-state actors. The systematic negligence of the Brazilian state in response to direct attempts of police and judicial response proves its inaction and my complete exposure to further episodes of violence if I am forced to return. In light of all the above, and considering that my personal story aligns with the legal and jurisprudential standards of the United States, I reaffirm my request for asylum and respectfully urge this government to recognize my right to protection in order to preserve my life and that of my children. Further details are included in my declaration.





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) 221290315	Date 05/22/2026
Applicant's Name Mirian Raimundo	Applicant's Signature <i>Mirian Raimundo</i>

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

Part B
Question 4

Based on everything I have experienced, I hereby state, with conviction and urgency, that my case represents a clear and legitimate need for immediate asylum in the United States. This is not merely a matter of subjective fear: it is a concrete and imminent risk of torture, such as rape, threats, beatings and even death, should my children and I be forced to return to Brazil. As previously mentioned, for years we have been persecuted and abused for reasons that directly align with the legal thresholds and grounds for asylum. Our situation worsened even further when I began actively protecting my sons, and this stance resulted in even more violent reprisals against all of us. Given this past experience and the direct credible threats I received, I am deeply afraid to be subjected to extreme forms of torture if I were forced to return to my home country.



Mirian Raimundo
Patrick Raimundo Santana
Pablo Henrique Raimundo Santana

File No. A 221-290-315
File No. A 221-290-316
File No. A 221-290-343

Proof of Service

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

RESPONDENT'S AMENDMENT OF FORM I-589

To the following:

Office Location:	Mailing Address:
Office of the Chief Counsel Department of Homeland Security 915 Second Avenue, Suite 708 Seattle, WA 98174	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Chief Counsel 915 Second Avenue, Suite 708 Seattle, WA 98174

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