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Non-Detained

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
100 Montgomery St., Suite 800
San Francisco, CA 94104**

	)	
In the Matter of	)	
	)	
Zilmar Caçula da Silva	)	File No. A. 245-598-114
Ilze Araújo Silva Caçula	)	File No. A. 245-598-023
	)	
In Removal Proceedings	)	
	)	
	)	

Immigration Judge: Visiting Judge 5.

Next Hearing Date: **August 25, 2027 at 8:30 AM**

**RESPONDENT'S APPLICATION FOR ASYLUM AND WITHHOLDING OF
REMOVAL – FORM I-589**

Exhibit list

Exhibits:

Pages:

Exhibit 1

Ilze Araujo Silva Caçula's Application for Asylum and 1-13
Withholding of Removal (Form I-589)

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.

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) 245598023		2. U.S. Social Security Number (if any) 738-75-83		3. USCIS Online Account Number (if any)	
4. Complete Last Name ARAÚJO SILVA CAÇULA		5. First Name Ilze		6. Middle Name N/A	
7. What other names have you used (include maiden name and aliases)? Ilze Araújo Silva					
8. Residence in the U.S. (where you physically reside)					
Street Number and Name 1715 Marina Court				Apt. Number B	
City San Mateo		State CA		Zip Code 94403	
				Telephone Number (650) 7976596	
(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): Otávio Haverroth Silva				Telephone Number (510) 2419336	
Street Number and Name PO BOX 90487				Apt. Number N/A	
City San Diego		State CA		Zip Code 92169	
10. Sex ☐ Male ☒ Female		11. Marital Status: ☐ Single ☒ Married ☐ Divorced ☐ Widowed			
12. Date of Birth (mm/dd/yyyy) 05/03/1967		13. City and Country of Birth Acari, 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. ☐ 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) 12/07/2023 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 12/14/2023 Place San Luis Arizona Status EWI Date Status Expires N/A Date N/A Place N/A Status N/A Date N/A Place N/A Status N/A					
20. What country issued your last passport or travel document? Brazil		21. Passport Number GG723847 Travel Document Number N/A		22. Expiration Date (mm/dd/yyyy) 04/19/2033	
23. What is your native language (include dialect, if applicable)? Portuguese		24. Are you fluent in English? ☐ Yes ☒ 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, if applicable: _____ 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) 245598114	2. Passport/ID Card Number (if any) GG723259	3. Date of Birth (mm/dd/yyyy) 03/22/1966	4. U.S. Social Security Number (if any)
5. Complete Last Name CAÇULA DA SILVA	6. First Name Zilmar	7. Middle Name N/A	8. Other names used (include maiden name and aliases) N/A
9. Date of Marriage (mm/dd/yyyy) 11/24/1990	10. Place of Marriage Goiania, Brazil	11. City and Country of Birth Caturai Brazil	
12. Nationality (Citizenship) Brazilian		13. Race, Ethnic, or Tribal Group Latino	14. Sex ☒ Male ☐ Female
15. Is this person in the U.S.? ☒ Yes (Complete Blocks 16 to 24.) ☐ No (Specify location): _____			
16. Place of last entry into the U.S. San Luis Arizona	17. Date of last entry into the U.S. (mm/dd/yyyy) 12/14/2023	18. I-94 Number (if any) N/A	19. Status when last admitted (Visa type, if any) EWI
20. What is your spouse's current status? No legal status	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? ☒ Yes ☐ 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.) ☒ 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: 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) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (Married, Single, Divorced, Widowed) Single	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name RAMOS SANTOS JUNIOR	6. First Name Reinaldo	7. Middle Name N/A	8. Date of Birth (mm/dd/yyyy) 12/06/1986
9. City and Country of Birth Goiania Brazil	10. Nationality (Citizenship) Brazilian	11. Race, Ethnic, or Tribal Group Latino	12. Sex ☒ Male ☐ Female
13. Is this child in the U.S.? ☐ Yes (Complete Blocks 14 to 21.) ☒ No (Specify location): Goiania Brazil			
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? ☐ 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) N/A	2. Passport/ID Card Number (if any) FZ516280	3. Marital Status (<i>Married, Single, Divorced, Widowed</i>) Married	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name ARAÚJO SILVA MENDES	6. First Name Renata	7. Middle Name N/A	8. Date of Birth (<i>mm/dd/yyyy</i>) 05/07/1992
9. City and Country of Birth Goiania Brazil	10. Nationality (<i>Citizenship</i>) Brazilian	11. Race, Ethnic, or Tribal Group Latina	12. Sex ☐ Male ☒ Female
13. Is this child in the U.S. ? ☒ Yes (<i>Complete Blocks 14 to 21.</i>) ☐ No (<i>Specify location:</i> _____)			
14. Place of last entry into the U.S. Miami, Florida	15. Date of last entry into the U.S. (<i>mm/dd/yyyy</i>) 10/21/2017	16. I-94 Number (<i>If any</i>) 296289685A2	17. Status when last admitted (<i>Visa type, if any</i>) B-2
18. What is your child's current status? No legal status	19. What is the expiration date of his/her authorized stay, if any? (<i>mm/dd/yyyy</i>) 04/20/2020	20. Is your child in Immigration Court proceedings? ☐ Yes ☒ No	
21. If in the U.S., is this child to be included in this application? (<i>Check the appropriate box.</i>) ☐ Yes ☒ No			
1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (<i>Married, Single, Divorced, Widowed</i>) 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 (<i>mm/dd/yyyy</i>) N/A
9. City and Country of Birth N/A	10. Nationality (<i>Citizenship</i>) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Sex ☐ Male ☐ Female
13. Is this child in the U.S. ? ☐ Yes (<i>Complete Blocks 14 to 21.</i>) ☐ No (<i>Specify location:</i> N/A)			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (<i>mm/dd/yyyy</i>) N/A	16. I-94 Number (<i>If any</i>) N/A	17. Status when last admitted (<i>Visa type, if any</i>) 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? (<i>mm/dd/yyyy</i>) N/A	20. Is your child in Immigration Court proceedings? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (<i>Check the appropriate box.</i>) ☐ Yes ☐ No			
1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) N/A	3. Marital Status (<i>Married, Single, Divorced, Widowed</i>) 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 (<i>mm/dd/yyyy</i>) N/A
9. City and Country of Birth N/A	10. Nationality (<i>Citizenship</i>) N/A	11. Race, Ethnic, or Tribal Group N/A	12. Sex ☐ Male ☐ Female
13. Is this child in the U.S. ? ☐ Yes (<i>Complete Blocks 14 to 21.</i>) ☐ No (<i>Specify location:</i> N/A)			
14. Place of last entry into the U.S. N/A	15. Date of last entry into the U.S. (<i>mm/dd/yyyy</i>) N/A	16. I-94 Number (<i>If any</i>) N/A	17. Status when last admitted (<i>Visa type, if any</i>) 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? (<i>mm/dd/yyyy</i>) N/A	20. Is your child in Immigration Court proceedings? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (<i>Check the appropriate box.</i>) ☐ 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)
Valentim Capuzzo Q6 L2	Goiania	Goias	Brazil	05/1991	12/2023
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)
1715 Marina Court Apt	San Mateo	California	United States	02/2024	PRESENT
2000 Crystal Springs	San Bruno	California	United States	12/2023	01/2024
Valentim Capuzzo Q6 L2	Goiania	Goias	Brazil	05/1991	12/2023
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)
Borassi	High School	Goiania Brazil	02/1982	12/1984
Arquino de Brito	Middle School	Goiania Brazil	02/1980	12/1979
Borassi	Middle School	Goiania Brazil	02/1978	12/1979
Escola Municipal Vila Maua	Elementary	Goiania Brazil	02/1977	12/1977

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 - California - Various locations	Cleaner	12/2023	PRESENT
Self employed - Goiania Brazil	Seamstress	01/1992	11/2023
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 Terezinha de Araújo Silva	Acari, Brazil	☒ Deceased
Father Francisco de Sales Silva	Acari, Brazil	☒ Deceased
Sibling Inalda Araújo Silva	Acari, Brazil	☒ Deceased
Sibling Ivete Araújo Silva	Acari, Brazil	☒ Deceased
Sibling Itamar Araújo Silva	Acari, Brazil	☒ Deceased
Sibling Estevão Araújo Silva	Acari, Brazil	☒ Deceased



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 | ☒ 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.

My family and I were targeted by police officers in Goiás, Brazil, after my husband, Zilmar Caçula da Silva, sought answers and accountability for the killing of our son-in-law, Felipe Eduardo Mendes dos Santos. Felipe was shot and killed by police officers on a road near Abadia de Goiás in September 2016. He had no criminal involvement of any kind. I went with my husband and our daughter, Renata, to the police station in Abadia de Goiás to request the police report. The officers ignored us, attended people who had arrived after us, and the delegado ultimately refused to receive us. We were never given the report or any explanation of how Felipe died. Beginning that same day, our home in Goiânia, where we had lived peacefully for more than thirty years, was placed under surveillance. Police vehicles began driving slowly past our house, which had never happened on our street before. Unfamiliar men, some in plain clothes and on motorcycles, repeatedly passed by, watched the house, turned around and came back. On one occasion a police officer in a patrol car displayed his firearm out of the window and stared directly at my husband, without saying a word. A few days later, one evening at about seven o'clock I walked to the supermarket on our corner and saw a white car parked there with three men dressed as street sweepers, pretending to sweep. In our sector the street sweepers only work in the morning and had never worked at night. I understood they were watching our house, and I told my husband. Where we lived, that is how the message is delivered, and we understood it: because my husband was seeking accountability for Felipe's death, or our family would suffer the consequences. I believe we were targeted because my husband insisted on holding police officers accountable for an unlawful killing, and because those officers treated that insistence as opposition to them. I was targeted as his wife and as a member of our family: I was at his side throughout, I live in the same house, and any harm directed at him reaches me.

- 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 fear that the same police officers who targeted and intimidated my family – after my husband, Zilmar Caçula da Silva, sought accountability for the killing of our son-in-law, Felipe Eduardo Mendes dos Santos – would seriously harm, torture, or kill me. I fear them because I belong to the family that refused to let that killing go unanswered. I was with my husband at the police station, I lived in the house that was watched, and I have never stopped being his wife. I also believe those officers understood our insistence on holding them accountable as opposition to them, and treated us accordingly. I do not believe there is anyone in Brazil who could protect me, because the people I am afraid of are the police themselves. We already tried. We went to the police station and they refused to receive us. We were never given the report, never given an explanation, and no one has ever been held responsible for Felipe's death. The surveillance of our house began that same day. There is no separate authority I could turn to. In Goiás the civil police and the military police work with one another, and both have connections to the criminal factions. Any complaint I made would have to pass through the same institution I am afraid of, and would tell them exactly where I am. I also do not believe I would be safe anywhere else in Brazil. The police operate throughout the whole country and the factions are connected across it. If I moved to another state they would know. That is why we never relocated within Brazil, and why we left the country instead.



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.

My husband, Zilmar Caçula da Silva, was affiliated with the political party Partido dos Trabalhadores (PT) in 2000/2001. In recent years, following the killing of our son-in-law, he became involved with Partido Liberal (PL); although he was not a registered party member. I have not belonged to or held a position in any particular group.

- 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.

N/A

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.

Yes. I am afraid that I would be tortured in Brazil by police officers or by people who work with them, because of what my family did after our son-in-law, Felipe Eduardo Mendes dos Santos, in September 2016. The people I am afraid of are public authorities. They are the police. After Felipe was killed, they refused to give us any report or explanation, and when my husband kept insisting on an answer they began watching our house, following us and letting us see their weapons. What I fear is not an accident or common crime. It is something these officers would do deliberately, in order to punish our family for refusing to let Felipe's death go unanswered and to make sure that we never speak about it again. I fear being seized by these men, held where no one could find me, and made to suffer before I died. In our region, people who are taken by the police or by the groups the police work with are beaten, tortured and killed, and their families are never told what happened to them, exactly as we were never told what happened to Felipe. I also fear this for my husband, and living with that fear is itself a form of suffering I have carried since 2016. There is nowhere in Brazil I could go and no authority I could ask for help, because the authority is the danger. Any complaint I made would go to the same institution I am afraid of and would tell them where I am.



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.

Yes. My husband, Zilmar Caçula da Silva (A 245-598-114), filed an Application for Asylum and for Withholding of Removal (Form I-589) with the Immigration Court in San Francisco on August 27, 2024. I was included in that application as his spouse, and I am also a respondent in those proceedings under A 245-598-023. No decision has been made on that application. It remains pending before the Immigration Court, and an Individual Hearing is scheduled. Neither of us has ever been granted or denied asylum, withholding of removal, or refugee status by the United States Government. I am now filing this application in my own name so that my claim can be considered on its own facts, in addition to remaining included in my husband's application.

- 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.

My husband, my granddaughter Luíza and I left Brazil on 12/14/2023 and passed through Lima, Peru, only to change planes. We remained inside the airport for approximately three hours. We never officially entered Peru, and never held any status there. We have no right to return to Peru for residence purposes. We did not apply for asylum in Peru because we were never admitted into the country and were in the international transit area of the airport for a few hours. After that we entered Mexico with our granddaughter Luíza and remained approximately two or three days in Cancún, about two or three days in Mexico City, and then Mexicali. We stayed inside where we were lodged and only went out to eat. We knew that Mexico is not a safe country and that the criminal organizations that operate with the police in Brazil have spread through Latin America, including Mexico. We are not entitled to return to Mexico for lawful residence purposes; the visas were temporary visitor visas only.

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).)

N/A

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.

This application is being submitted beyond the one-year filing period because I was originally listed as a derivative in the asylum application of my husband, Zilmar Caçula da Silva (A-Number : 245-598-114) , which she timely filed within one year of our arrival in the United States. As a derivative spouse, I relied on her principal application for protection and did not have a separate obligation to file independently at that time. The necessity to present my own individual application arose only recently, after determining that a separate filing was essential to ensure that the specific threats and persecution directed personally at me are fully documented and to establish my independent eligibility for asylum, withholding of removal, and protection under the Convention Against Torture. The dangers that prompted our family to seek protection remain unchanged, and the threats against us in Brazil. I respectfully ask the Court to recognize these circumstances as justification for an exception to the one-year deadline, given that I was covered under a timely filed principal application and that the conditions giving rise to our fear of persecution have not diminished.

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.

N/A



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. Ilze Araújo Silva Caçula	Write your name in your native alphabet. 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.)

➔ [_____] _____
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 Otávio 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).	☐ 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) <table><tr><td>0</td><td>0</td><td>7</td><td>4</td><td>9</td><td>2</td><td>6</td><td>2</td><td>5</td><td>4</td><td>3</td><td>8</td></tr></table>	0	0	7	4	9	2	6	2	5	4	3	8
		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) 245598023	Date
Applicant's Name Ilze Araújo Silva Caçula	Applicant's Signature

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 ☐ 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. 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? ☐ 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) 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 ☐ 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. 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? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) ☐ Yes ☐ 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) 245598023	Date
Applicant's Name Ilze Araújo Silva Caçula	Applicant's Signature

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

Part **A.III**

Question **3**

Escola Delta Elementary Rio de Janeiro, Brazil 02/1974 12/1976





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) 245598023	Date
Applicant's Name Ilze Araújo Silva Caçula	Applicant's Signature

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

Part A.III
Question 5

Sibling: Itamar Araújo Silva
Place of birth: Acari, Brazil
Current location: Deceased

Sibling: Iedo Araújo Silva
Place of birth: Rio de Janeiro, Brazil
Current location: Rio de Janeiro, Brazil

Sibling: Iêda Araújo Silva
Place of birth: Rio de Janeiro, Brazil
Current location: Rio de Janeiro, Brazil



Zilmar Caçula da Silva
Ilze Araújo Silva Caçula

File No. A 245-598-114
File No. A. 245-598-023

Proof of Service

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

**RESPONDENT'S APPLICATION FOR ASYLUM AND
WITHHOLDING OF REMOVAL – FORM I-589**

To the following:

Office Location: Office of the Chief Counsel Department of Homeland Security 100 Montgomery Street, Suite 200 San Francisco, CA 94104	Mailing Address: US Immigration and Customs Enforcement US Department of Homeland Security Office of the Chief Counsel P.O. Box 26449 San Francisco, CA 94126-644
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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.



Otavio Silva (Bar N. 343486)
Attorney at Law
P.O. Box 90487
San Diego, CA 92169
Counsel for Respondent