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

Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
1855 Gateway Boulevard, Suite 850,
Concord, CA 94520

In the Matter of	)	
Jose Carlos Pereira dos Santos	)	**File No. A 240-169-089**
Jaqueline das Neves Dantas Maia	)	**File No. A 240-169-090**
Jose Carlos Pereira dos Santos Junior	)	**File No. A 240-169-091**
In Removal Proceedings	)	

Immigration Judge: **Espana, Patrick A.** Next Hearing: **October 27, 2026 at 1:00 PM**

RESPONDENTS' AMENDMENT OF FORM I-589

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

Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
1855 Gateway Boulevard, Suite 850,
Concord, CA 94520

In the Matter of	)	
Jose Carlos Pereira dos Santos	)	**File No. A 240-169-089**
Jaqueline das Neves Dantas Maia	)	**File No. A 240-169-090**
Jose Carlos Pereira dos Santos Junior	)	**File No. A 240-169-091**
In Removal Proceedings	)	

RESPONDENTS' AMENDED FORM I-589, APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL

Respondent Jose Carlos Pereira dos Santos respectfully submits the attached Amended Form I-589, Application for Asylum and for Withholding of Removal, on behalf of himself and of his wife, Jaqueline das Neves Dantas Maia, and their minor son, Jose Carlos Pereira dos Santos Junior, who are included as derivative beneficiaries.

The initial Form I-589 was filed on April 14, 2023, within one year of Respondent's last arrival in the United States on December 22, 2022. The present filing is an amendment and supplement to that same timely application rather than a new application. The one-year period under INA § 208(a)(2)(B) is therefore satisfied by the original filing date, and the amendment does not disturb it.

The amendment updates information that has changed or become newly available since the initial filing, including Respondent's employment history in the United States and the Social Security numbers subsequently issued to Respondent and the family members included in this application. It also supplies certain information that Respondent was unable to provide at the

time of the initial filing, given the recency of the events underlying his claim and the effects of post-traumatic stress on his recollection at that time.

This filing is made in advance of the deadline established by the Court's Pre-Hearing Order for the individual merits hearing scheduled for October 27, 2026. Respondent respectfully requests that this Court accept the attached Amended Form I-589.

Respectfully submitted,



_____

Otavio Haverroth Silva (Bar No. 343486)
Attorney at Law
P.O. Box 90487
San Diego, CA 92169
Counsel for Respondents

Exhibit list

Exhibits: Pages:

Exhibit 1

Jose Carlos Pereira dos Santos' Amendment of I-589 1-15

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)*	**2.** U.S. Social Security Number *(if any)*	**3.** USCIS Online Account Number *(if any)*
240169089	127-65-2048	N/A

4. Complete Last Name	**5.** First Name	**6.** Middle Name
PEREIRA DOS SANTOS	Jose Carlos	N/A

7. What other names have you used *(include maiden name and aliases)?*
N/A

8. Residence in the U.S. *(where you physically reside)*

Street Number and Name	Apt. Number
1018 White Birch Drive	N/A

City	State	Zip Code	Telephone Number
Hercules	CA	94547	(707) 2099483

(**NOTE:** *You must be residing in the United States to submit this form.*)

9. Mailing Address in the U.S. *(if different than the address in Item Number 8)*

In Care Of *(if applicable):*	Telephone Number
Otavio Haverroth Silva	(510) 2419336

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

City	State	Zip Code
San Diego	CA	92169

10. Sex ☒ Male ☐ Female

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

12. Date of Birth *(mm/dd/yyyy)*	**13.** City and Country of Birth
12/13/1974	Joao Pessoa - Brazil

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

18. *Check the box, a through c, that applies:* **a.** ☐ I have never been in Immigration Court proceedings.
b. ☒ I am now in Immigration Court proceedings. **c.** ☐ I am **not** now in Immigration Court proceedings, but I have been in the past.

19. *Complete 19 a through c.*

a. When did you last leave your country? *(mm/dd/yyyy)* 12/21/2022 **b.** What is your current I-94 Number, if any? N/A

c. List each entry into the U.S. beginning with your most recent entry. *List date (mm/dd/yyyy), place, and your status for each entry. (Attach additional sheets as needed.)*

Date	Place	Status	Date Status Expires
12/22/2022	San Francisco/CA	Parole	03/18/2024
10/23/2017	Orlando/FL	B-2 Visitor	
N/A	N/A	N/A	

20. What country issued your last passport or travel document?	**21.** Passport Number FT731160	**22.** Expiration Date *(mm/dd/yyyy)*
Brazil	Travel Document Number FT731160	07/27/2027

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

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

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Date of Birth *(mm/dd/yyyy)*	4. U.S. Social Security Number *(if any)*
240169090	FT788545	11/07/1977	724-73-3942
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Other names used *(include maiden name and aliases)*
DAS NEVES DANTAS MAIA	Jaqueline	N/A	
9. Date of Marriage *(mm/dd/yyyy)*	**10.** Place of Marriage	**11.** City and Country of Birth	
03/15/2023	Martinez, United States	Joao Pessoa - Brazil	
12. Nationality *(Citizenship)*	**13.** Race, Ethnic, or Tribal Group	**14.** Sex	
Brazilian	Latina	☐ 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.	17. Date of last entry into the U.S. *(mm/dd/yyyy)*	18. I-94 Number *(if any)*	19. Status when last admitted *(Visa type, if any)*
San Francisco/CA	12/22/2022		Parole
20. What is your spouse's current status?	**21.** What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	**22.** Is your spouse in Immigration Court proceedings?	**23.** If previously in the U.S., date of previous arrival *(mm/dd/yyyy)*
No Legal Status	03/18/2024	☒ Yes ☐ No	01/23/2018

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)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
242443586	FT788548	Single	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
MAIA DOS SANTOS	Emmily Haielle	N/A	05/09/1998
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
Joao Pessoa - Brazil	Brazilian	Latina	☐ Male ☒ 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.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
Los Angeles, CA	01/23/2018	N/A	B-2
18. What is your child's current status?	**19.** What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	**20.** Is your child in Immigration Court proceedings?	
No Legal Status	N/A	☐ Yes ☒ No	

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

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

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
240169091	GF585275	Single	052-35-9316
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
PEREIRA DOS SANTOS JUNIOR	Jose Carlos	N/A	01/26/2012
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
Joao Pessoa - Brazil	Brazilian	Latino	☒ Male ☐ 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.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
San Francisco, CA	12/22/2022	N/A	Parole

18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings?
No Legal Status	03/18/2024	☒ Yes ☐ No

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*

☒ Yes

☐ No

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

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☐ No *(Specify location)*: N/A

14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A

18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings?
N/A	N/A	☐ Yes ☐ No

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*

☐ Yes

☐ No

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

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☐ No *(Specify location)*: N/A

14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A

18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings?
N/A	N/A	☐ Yes ☐ No

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*

☐ Yes

☐ No

Part A.III. Information About Your Background

1. List your last address where you lived before coming to the United States. If this is not the country where you fear persecution, also list the last address in the country where you fear persecution. *(List Address, City/Town, Department, Province, or State and Country.)*
*(***NOTE:** *Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)*

Number and Street *(Provide if available)*	City/Town	Department, Province, or State	Country	Dates From *(Mo/Yr)*	To *(Mo/Yr)*
600, R. Paulo Gomes de Almeida, José Américo de Almeida	Joao Pessoa	Paraiba	Brazil	08/2021	12/2022
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)*
1018 White Birch Drive	Hercules	California	United States	01/2023	PRESENT
600, R. Paulo Gomes de Almeida, José Américo de Almeida	Joao Pessoa	Paraiba	Brazil	08/2021	12/2022
200, Helio Rodrigues Ferreira, Ernersto Geisel	Joao Pessoa	Paraiba	Brazil	02/2020	08/2021
3019 Gulf Dr	Fairfield	California	United States	01/2018	01/2020
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)*
Escola Municipal Davi Trindade	Middle School	R. José Mendonça de Araújo, 88, Mangabeira I, João Pessoa - PB, Brazil	01/1986	12/1992
Instituto Rio Branco	Elementary School	855, Av Julia Freire, Expedicionarios, João Pessoa - PB, Brazil	01/1982	12/1985
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)*
Logtracker Corp., 15333 Burgtheater Drive, Winter Garden, Florida, United States	Car Hauler (Vehicle Transport Driver)	12/2025	PRESENT
Self employed, 1018 White Birch Drive, Hercules, California, United States	Construction (occasional work)	05/2023	12/2025
DoorDash, Inc., 303 2nd Street, San Francisco, California, United States	Delivery Driver (Independent Contractor)	05/2023	12/2025

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 Irany Pereira dos Santos	Goiania, Brazil	☐ Deceased Joao Pessoa, Brazil
Father Davi Pereira Dos Santos	Belem de Caicara, Brazil	☒ Deceased N/A
Sibling Joelma Pereira Dos Santos	Joao Pessoa, Brazil	☐ Deceased Joao Pessoa, Brazil
Sibling Joselha Pereira Dos Santos	Joao Pessoa, Brazil	☐ Deceased Joao Pessoa, Brazil
Sibling N/A	N/A	☐ Deceased N/A
Sibling N/A	N/A	☐ Deceased N/A

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.

I suffered death threats and gunfire attacks in Brazil because of my political opinion. During the 2022 presidential election, I supported the ideas of candidate Jair Bolsonaro, particularly his positions on public security, although I was never affiliated with any political party nor did I hold any party position. My support for Jair Bolsonaro was public and well known in my neighborhood. Because my work delivering household appliances took me through several neighborhoods of João Pessoa, my customers, friends, and neighbors knew my political views. I participated in demonstrations held in the city in support of him. My political views often led to heated arguments with supporters of candidate Luiz Inácio Lula da Silva, of the PT political party.In October 2022, during the election period, I began receiving anonymous phone calls containing death threats related to my political involvement. The callers never identified themselves. They would use profanity, tell me to mind my own business and stay out of politics, and, in several of these calls, they clearly stated that if I did not remain silent, I would die.On December 1, 2022, at approximately 10:00 p.m., I was returning home from work in my vehicle near my residence in João Pessoa when two men on a motorcycle opened fire at me. They shouted that they were affiliated with the PT political party and that "Bolsonaro supporters" had to die. Fortunately, I was not hit. I was unable to identify the perpetrators. During that moment of desperation, all I could think about was escaping and saving my life. I did not report the attack immediately because I was unable to identify anyone and I already knew, from a previous burglary at my home, that the police would tell me nothing could be done without an identified suspect. After I was already in the United States, I reported the attack through the Online Police Station of the Civil Police of Paraíba, on January 25, 2023. Continued in Supplement B.

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 I will be shot and killed if I return to Brazil, or seriously wounded in another armed attack, and I fear renewed death threats and armed attacks against my home and against my wife and my son. On December 1, 2022, two men on a motorcycle fired at me on a public road and I survived only because I was not hit. On May 9, 2023, individuals fired several gunshots at the front wall of my house. I fear those same men and others acting for the same political reason. They never identified themselves personally, but they announced a political affiliation while attacking me: as they shot at me they shouted that they were connected to the political party PT and that "bolsonaristas" had to die, and the individuals who attacked my house painted that party's acronym in red on my wall. I believe they are PT supporters in João Pessoa, Paraíba, who target people known to support the opposing political side. Continued in Supplement B.

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.

The only organization I was ever a member of was the Brazilian Army, where I completed my mandatory military service. I completed the mandatory enlistment process in the year I turned 18. I was inducted into the Brazilian Army in 1993, at the age of 18, and completed the full period of one year and one month of service, being discharged with the last group of my class in 1994. I did not hold any rank or leadership position and performed only the duties ordinarily assigned to a recruit. I had no further affiliation with the Brazilian Armed Forces after my discharge. Further details are provided in my declaration.

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.

I fear being shot and injured by gunfire, being beaten, and being captured and tortured, held under control while harm is inflicted upon me before I am killed. I also fear receiving further death threats directed at me, my wife, and my son, as well as imminent threats to my life, such as those I previously experienced when two men fired at me at close range on a dark road on December 1, 2022. The harm would be inflicted upon me because of my political opinion and in order to force me to abandon it. The men who attacked me acted openly and with impunity, shooting at me on a public road and later firing at my home and painting the initials of a political party on my wall in a residential neighborhood, without any action being taken against them. I believe that this harm would be inflicted with the consent or acquiescence of Brazilian public officials. The Brazilian police knew what was being done to me and did nothing. I formally reported both attacks to the Civil Police of Paraíba, on January 25, 2023, and May 11, 2023, and neither report resulted in an investigation, the identification of a suspect, or any protective measures for me or my family that I am aware of. I do not believe that the authorities would intervene if I were captured, beaten, or shot upon my return. I believe they would ignore the situation, as they did previously. I could not avoid this harm by relocating to another part of Brazil. The police response would be the same anywhere in the country, and anyone looking for me could find me through my mother and my sisters, who still live in João Pessoa, through social media, or through acquaintances. Further details are provided in my declaration.

Part C. Additional Information About Your Application

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

(**NOTE:** *Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part C.*)

1. Have you, your spouse, your child(ren), your parents or your siblings ever applied to the U.S. Government for refugee status, asylum, or withholding of removal?

☐ No ☒ Yes

If "Yes," explain the decision and what happened to any status you, your spouse, your child(ren), your parents, or your siblings received as a result of that decision. Indicate whether or not you were included in a parent or spouse's application. If so, include your parent or spouse's A-number in your response. If you have been denied asylum by an immigration judge or the Board of Immigration Appeals, describe any change(s) in conditions in your country or your own personal circumstances since the date of the denial that may affect your eligibility for asylum.

My daughter, Emmily Haielle Maia dos Santos, A 242-443-586, filed her own affirmative application for asylum with U.S. Citizenship and Immigration Services. That application remains pending. She is an adult, she is not included in this application, and I am not included in hers. Apart from the present application, in which my wife and my youngest son are included as derivative beneficiaries, neither I nor any of my parents or siblings has ever applied to the U.S. Government for refugee status, asylum, or withholding of removal.

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.

N/A

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.

My initial asylum application was filed on April 14, 2023, within one year of my last arrival in the United States on December 22, 2022. This current filing is an amendment and supplement to that timely application, submitted to provide the detailed account of the events and the supporting documentation that were expressly reserved in the original filing.

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.

On December 22, 2022, upon arriving at San Francisco International Airport, California, I was inspected and paroled into the United States under section 212(d)(5) of the Immigration and Nationality Act, and I was served with a Notice to Appear. I was not detained. I was charged as an arriving alien inadmissible on two grounds: under section 212(a)(7)(A)(i)(I) of the Immigration and Nationality Act, as an immigrant not in possession of a valid unexpired immigrant visa or other valid entry document; and under section 212(a)(9)(B)(i)(II) of the Immigration and Nationality Act, as a person who was unlawfully present in the United States for one year or more and who again seeks admission within ten years of the date of departure, following my overstay of a B-2 admission granted on October 23, 2017. Neither I nor any member of my family included in this application has ever been arrested, charged, convicted, or sentenced for any crime in the United States.

Part D. Your Signature

I certify, under penalty of perjury under the laws of the United States of America, that this application and the evidence submitted with it are all true and correct. Title 18, United States Code, Section 1546(a), provides in part: Whoever knowingly makes under oath, or as permitted under penalty of perjury under Section 1746 of Title 28, United States Code, knowingly subscribes as true, any false statement with respect to a material fact in any application, affidavit, or other document required by the immigration laws or regulations prescribed thereunder, or knowingly presents any such application, affidavit, or other document containing any such false statement or which fails to contain any reasonable basis in law or fact - shall be fined in accordance with this title or imprisoned for up to 25 years. I certify that I am physically present in the United States or seeking admission at a Port of Entry when I execute this application. I authorize the release of any information from my immigration record that U.S. Citizenship and Immigration Services (USCIS) needs to determine eligibility for the benefit I am seeking.

WARNING: **Applicants who are in the United States unlawfully are subject to removal if their asylum or withholding claims are not granted by an asylum officer or an immigration judge. Any information provided in completing this application may be used as a basis for the institution of, or as evidence in, removal proceedings even if the application is later withdrawn, and even if USCIS does not conduct an interview on the application. Applicants determined to have knowingly made a frivolous application for asylum will be permanently ineligible for any benefits under the Immigration and Nationality Act. You may not avoid a frivolous finding simply because someone advised you to provide false information in your asylum application. If filing with USCIS, unexcused failure to appear for an appointment to provide biometrics (such as fingerprints) and your biographical information within the time allowed may result in an asylum officer dismissing your asylum application or referring it to an immigration judge. Failure without good cause to provide DHS with biometrics or other biographical information while in removal proceedings may result in your application being found abandoned by the immigration judge. See sections 208(d)(5)(A) and 208(d)(6) of the INA and 8 CFR sections 208.10, 1208.10, 208.20, 1003.47(d) and 1208.20.**

Print your complete name.	Write your name in your native alphabet.
Jose Carlos Pereira dos Santos	N/A

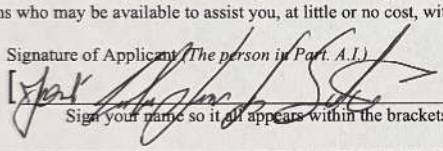
Did your spouse, parent, or child(ren) assist you in completing this application? ☒ No ☐ Yes *(If "Yes," list the name and relationship.)*

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.1.)*

➡ []

Sign your name so it all appears within the brackets

09/08/2026

Date (mm/dd/yyyy)

Part E. Declaration of Person Preparing Form, if Other Than Applicant, Spouse, Parent, or Child

I declare that I have prepared this application at the request of the person named in Part D, that the responses provided are based on all information of which I have knowledge, or which was provided to me by the applicant, and that the completed application was read to the applicant in his or her native language or a language he or she understands for verification before he or she signed the application in my presence. I am aware that the knowing placement of false information on the Form I-589 may also subject me to civil penalties under 8 U.S.C. 1324c and/or criminal penalties under 18 U.S.C. 1546(a).

Signature of Preparer	Print Complete Name of Preparer
	Otavio Haverroth Silva

Daytime Telephone Number	Address of Preparer: Street Number and Name
(510) 2419336	PO Box 90487

Apt. Number	City	State	Zip Code
N/A	San Diego	CA	92169

To be completed by an attorney or accredited representative (if any).	☐ **Select this box if Form G-28 is attached.**	**Attorney State Bar Number** (if applicable)	**Attorney or Accredited Representative USCIS Online Account Number** (if any)
		343486	0 0 7 4 9 2 6 2 5 4 3 8

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

NOTE: You will be asked to complete this part if you appear for examination before an asylum officer of the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS).

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered ____ to ____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant	Date *(mm/dd/yyyy)*
Write Your Name in Your Native Alphabet	Signature of Asylum Officer

Part G. To Be Completed at Removal Hearing, if Applicable

NOTE: *You will be asked to complete this Part when you appear before an immigration judge of the U.S. Department of Justice, Executive Office for Immigration Review (EOIR), for a hearing.*

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered ____ to ____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant	Date *(mm/dd/yyyy)*
Write Your Name in Your Native Alphabet	Signature of Immigration Judge

Application for Asylum and for Withholding of Removal Supplement A

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

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

A-Number *(If available)*	Date
240169089	09/08/2026
Applicant's Name	**Applicant's Signature**
Jose Carlos Pereira dos Santos	

List All of Your Children, Regardless of Age or Marital Status

(NOTE: Use this form and attach additional pages and documentation as needed, if you have more than four children)

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

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☐ No *(Specify location)*: N/A

14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A

18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings?
N/A	N/A	☐ Yes ☐ No

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

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

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☐ No *(Specify location)*: N/A

14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A

18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings?
N/A	N/A	☐ Yes ☐ No

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

Application for Asylum and for Withholding of Removal Supplement B

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

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

Additional Information About Your Claim to Asylum

A-Number *(if available)*	Date
240169089	09/08/2026
Applicant's Name	Applicant's Signature
Jose Carlos Pereira dos Santos	

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

Part A.III

Question 3

The dates provided for Item 3 are approximate. Respondent completed his schooling more than thirty years ago and does not recall the exact months and years in which he began and ended his studies at each school. He recalls that he attended Instituto Rio Branco, a private school in the Expedicionários neighborhood of João Pessoa, before transferring to Escola Municipal Davi Trindade in the Mangabeira neighborhood, where he repeated one school year and completed the seventh grade. He did not attend secondary school. He left school before being inducted into the Brazilian Army in 1993.

Application for Asylum and for Withholding of Removal Supplement B

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

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

Additional Information About Your Claim to Asylum

A-Number *(if available)*	Date
240169089	09/08/2026
Applicant's Name	Applicant's Signature
Jose Carlos Pereira dos Santos	

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

Part A.III

Question 4

Self-employed, Rua Paulo Gomes de Almeida, 600, Jose Americo, Joao Pessoa, PB, Brazil - Occupation: Freight - From: 01/2020 , To: 12/2022

Fredy Rivera, 3019 Gulf Dr., Fairfield, California, United States - Occupation: Construction - From: 11/2017, To: 01/2020

Application for Asylum and for Withholding of Removal Supplement B

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

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

Additional Information About Your Claim to Asylum

A-Number *(if available)*	Date
240169089	09/08/2026
Applicant's Name	Applicant's Signature
Jose Carlos Pereira dos Santos	José Carlos Pereira dos Santos

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

Part B

Question 1. A.

Because I came to understand that the threats would be carried out, my family and I left Brazil on December 21, 2022, and arrived in the United States on December 22, 2022. In the early morning of May 9, 2023, men went to my home, located at 600 Paulo Gomes de Almeida Street, José Américo neighborhood, in João Pessoa, and fired several shots at the front wall of the residence. They also spray-painted the initials "PT" on the wall using red paint. No one was home because we had already fled the country. I filed a police report regarding this attack through the Online Police Station of the Civil Police of Paraíba, on May 11, 2023, in which I stated that I believed they had done this once again in order to threaten me because I belong to the right-wing political side.

I understood that the December 1, 2022 attack was politically motivated because of what the perpetrators shouted while they were shooting, specifically targeting supporters of the candidate I supported; because, since October of that year, I had been receiving anonymous calls demanding that I remain silent about politics and threatening my life; because the attack occurred shortly after the elections ended, at the height of the political confrontation in the region; and because my political position was public and well known in the neighborhood where I lived and worked.

I was not robbed, nothing was taken from me, and I had no disputes with anyone involving money, property, or personal matters. The harm also affected my family. My wife, Jaqueline, was diagnosed with post-traumatic stress disorder, with severe anxiety and depression, as a result of what we experienced and remains under psychiatric treatment with medication. Further details are provided 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)*	Date
240169089	09/08/2026
Applicant's Name	Applicant's Signature
Jose Carlos Pereira dos Santos	

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

Part B

Question 1.B.

I believe I would be harmed because what they wanted was for me to stop supporting the candidate I supported and to stop sharing my political views, and I have not stopped. I continue to hold the same convictions and will not hide them, and my political position was public and known where I lived and worked. The men who attacked me were never identified, arrested, or prosecuted, and they did not stop when I left: almost five months after we fled, with the house empty, they went to my address to leave a message tying the attack to the political party dispute. I do not believe my family and I would receive adequate protection from the authorities. After I was shot at, a police officer told me that because I could not identify who had shot at me there was nothing the police could do, and neither of the two reports I filed with the Civil Police of Paraíba resulted in any investigation that I am aware of. Relocating to another part of Brazil would not make me safe. The police response would be the same anywhere in the country, and anyone looking for me could find me through my mother and my sisters, who still live in João Pessoa, through social media, or through acquaintances. Shortly before I left, a nephew of mine moved to another city and was killed there, and although his death had its own causes, it showed me that distance inside Brazil does not put a person out of reach. Further details are included in my declaration.

Jose Carlos Pereira dos Santos — **File No. A 240-169-089**
Jaqueline das Neves Dantas Maia — **File No. A 240-169-090**
Jose Carlos Pereira dos Santos Junior — **File No. A 240-169-091**

PROOF OF SERVICE

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

RESPONDENTS' AMENDMENT OF FORM I-589

To the following:

Office Location:	**Mailing Address:**
Office ofthe ChiefCounsel Department of Homeland Security 100 Montgomery Street, Suite 200 San Francisco, CA 94104	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Chief Counsel P.O. Box 26449 San Francisco, CA 94126 -6449

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