

**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
100 Montgomery St., Suite 800
San Francisco, CA 94104**

In the Matter of)
)

Luis Otavio Pinheiro Coelho)
)

In Removal Proceedings)
)
_____)

File No. A. 245-928-989

Immigration Judge: Seminerio, Frank A.

Next Hearing Date: April 23, 2026, at 10:30 AM

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



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) 245928989	2. U.S. Social Security Number (if any) N/A	3. USCIS Online Account Number (if any) N/A	
4. Complete Last Name PINHEIRO COELHO	5. First Name Luis Otavio	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 981 Harness Dr			Apt. Number 15
City San Ramon	State CA	Zip Code 94583	Telephone Number (415) 9647147
<i>(NOTE: You must be residing in the United States to submit this form.)</i>			
9. Mailing Address in the U.S. (if different than the address in Item Number 8)			
In Care Of (if applicable): Otavio 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 <input checked="" type="checkbox"/> Male <input 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) 01/30/2011	13. City and Country of Birth Palmas, Brazil		
14. Present Nationality (Citizenship) Brazilian	15. Nationality at Birth Brazilian	16. Race, Ethnic, or Tribal Group Latino	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>03/24/202</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>03/24/2024</u>	Place <u>Tecate CA</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>GD238158</u>	22. Expiration Date (mm/dd/yyyy) <u>11/10/2026</u>
		Travel Document Number <u>N/A</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. Sex <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: _____.

(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) 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			



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

1. Alien Registration Number (A-Number) <i>(if any)</i> N/A	2. Passport/ID Card Number <i>(if any)</i> N/A	3. Marital Status (<i>Married, Single, Divorced, Widowed</i>) N/A	4. U.S. Social Security Number <i>(if any)</i> 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 <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. (<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
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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? (<i>mm/dd/yyyy</i>) 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) <i>(if any)</i> N/A	2. Passport/ID Card Number <i>(if any)</i> N/A	3. Marital Status (<i>Married, Single, Divorced, Widowed</i>) N/A	4. U.S. Social Security Number <i>(if any)</i> 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 <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. (<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
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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? (<i>mm/dd/yyyy</i>) 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) <i>(if any)</i> N/A	2. Passport/ID Card Number <i>(if any)</i> N/A	3. Marital Status (<i>Married, Single, Divorced, Widowed</i>) N/A	4. U.S. Social Security Number <i>(if any)</i> 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 <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. (<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
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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? (<i>mm/dd/yyyy</i>) 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)
406 Norte Alameda L02	Palmas	Tocantins	Brazil	07/2022	03/2024
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)
981 Harness Dr apt 15	San Ramon	California	United States	08/2025	PRESENT
335 Serrano Dr 3B	San Francisco	California	United States	03/2024	08/2025
406 Norte Alameda L02	Palmas	Tocatins	Brazil	07/2022	03/2024
405 Sul, L09, Lote 2	Palmas	Tocatins	Brazil	01/2019	07/2022
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)
California High School	High School	9870 Broadmoor Dr, San Ramon CA	03/2026	PRESENT
Balboa High School	High School	1000 Cayuga Ave, San Francisco CA	08/2024	03/2026
Marina Middle School	Middle School	3500 Filmore St, San Francisco CA	04/2024	06/2025
Madre Celia Merloni	Middle School	Quadra 110 Norte, Alameda 21 lote 33, Palmas, Brazil	02/2022	03/2024

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)
N/A	N/A	N/A	N/A
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 Kavya Morganna Soares Pineiro	Paraiso do Tocantins/Brazil	<input type="checkbox"/> Deceased	San Ramon/CA
Father Elber Silva Coelho	Miranorte/Brazil	<input type="checkbox"/> Deceased	Bahia/Brazil
Sibling N/A	N/A	<input type="checkbox"/> Deceased	N/A
Sibling N/A	N/A	<input type="checkbox"/> Deceased	N/A
Sibling N/A	N/A	<input type="checkbox"/> Deceased	N/A
Sibling N/A	N/A	<input type="checkbox"/> 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.

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:

- | | |
|--------------------------------------|---|
| <input type="checkbox"/> Race | <input checked="" type="checkbox"/> Political opinion |
| <input type="checkbox"/> Religion | <input checked="" type="checkbox"/> Membership in a particular social group |
| <input type="checkbox"/> Nationality | <input checked="" type="checkbox"/> 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 have been targeted by a criminal group known as the Comando Vermelho since October 2015, when my grandfather was murdered. My grandfather was a military police officer in Tocantins, Brazil, and he financially supported me. The individual responsible for killing him was later killed by police. That person had ties to the Comando Vermelho, and following these events, members of the group began threatening my family and me. They said they would take revenge by killing the men in our family because they believed we were responsible for his death. After the threats began, members of this group started going to the front of my house and would remain there for hours watching us. They followed us in cars, including when I was going to school with my mother, and they repeatedly made threatening phone calls to me and my family. On March 23, 2020, my uncle, my mother's brother, was abducted while on his way to work. A witness saw him being forced into the trunk of a gray car. Our family hired private investigators to search for him, but he was never found. When we reported everything to the police, they told us to stop looking for him because it was too dangerous and that they could not protect us. Because I am the next male in the family, I became the primary target. I was transferred to different schools so I would not be found, and my family moved homes several times to try to keep me safe, but nothing worked. I lived in constant fear of being found, kidnapped, and killed. Knowing that the Comando Vermelho operates across all of Brazil and that there was no safe place for me, my mother decided we had to leave the country. We left Brazil on March 19, 2024, and crossed into the United States on March 24, 2024. I know that I am being targeted because of who I am. My grandfather was a military police officer, and after his murder, the Comando Vermelho made it clear they were coming after the men in my family. As the next male, I am their next target. The Brazilian government and police were unable to protect me, and I had no safe place left in Brazil.

- 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.

If I return to Brazil, I believe I would be seriously harmed or killed. I fear being subjected to beatings, mutilation, burning, kidnapping, and execution-style killings by the Comando Vermelho. The Comando Vermelho has already shown what they are capable of doing to my family. They murdered my grandfather, and when the person responsible was killed by police, they threatened to come after every man in our family. My uncle, the next male in the family, was later abducted and never found. I am now the next male in the family, and I have every reason to believe they would come after me. My family tried everything to stay safe in Brazil. We moved multiple times, changed my schools, and avoided drawing attention to ourselves. None of it was enough. The Comando Vermelho is present throughout the entire country, and no matter where we went, the danger followed. When we turned to the police for help, they told us they could not protect us and advised us to stop looking for my uncle because doing so was too dangerous. The government was unable to offer us any real protection. If I return to Brazil, I fear I would be found by members of the Comando Vermelho simply because I am a male member of my family. I am afraid of being kidnapped and held against my will, the same way my uncle was. I am afraid of being tortured and kept in captivity before being killed. I did not choose to be born into this family, and I cannot change that. The threats against us were never about anything I personally did, they were about who I am and who my family is. That has not changed, and I have no reason to believe it ever will. I do not believe the Brazilian government can or will keep me safe from the Comando Vermelho's search.



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.

My grandfather was a military police officer for many years until he was murdered on October 29, 2015. He joined the Military Police of the State of Goiás in 1985 and was later transferred to the Military Police of the State of Tocantins in 1989. He rose through the ranks, serving as private, corporal, sergeant, warrant officer, and second lieutenant, and was promoted to first lieutenant in 2015, the same year he was killed. My grandfather was also the person who financially supported our family. Neither I nor my mother have ever belonged to or been associated with any political party, organization, or 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.

My grandfather is no longer a member of the Military Police, as he was murdered on October 29, 2015.

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 afraid of being tortured if I am returned to Brazil. The Comando Vermelho is a powerful and violent criminal faction that has been targeting my family for years. They murdered my grandfather and later abducted my uncle, who was never found. When my family sought help from the police, we were told they could not protect us and that it was too dangerous to even search for my uncle. This showed me how brutal and unreachable this group is. Because I am the next male in my family, I believe the Comando Vermelho would find me, kidnap me, and subject me to torture before killing me, the same way they did to my uncle. Their history of violence against my family makes clear that these are not empty threats. The Brazilian government and police have already shown they are unable to stop them or protect us. I will provide a complete declaration before my Individual Hearing.



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.

My mother, Kavya Morganna Soares Pinheiro (A-Number: 240-379-018), filed an affirmative asylum application (Form I-589) with the U.S. Citizenship and Immigration Services (USCIS). Her application was received on January 30, 2025, and a receipt notice was issued under receipt number LGL2590085625. Her case is currently pending, and she is awaiting the scheduling of her asylum interview. My stepfather, Aleksandro Cavalcanti Barros Junior, is included as a derivative beneficiary in my mother's application. I was not included as a dependent in my mother's application because I am in removal proceedings; accordingly, I am filing this independent application for asylum before this Court.

- 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 mother and I traveled through Mexico before entering the United States. We departed Brazil on March 19, 2024, arrived in Mexico, and crossed into the United States on foot through Tecate, California, on March 24, 2024. Our stay in Mexico lasted approximately five days and was solely for transit purposes. We did not apply for asylum in Mexico for the following reasons: First, Mexico was not a safe country for us, as the Comando Vermelho maintains ties with criminal organizations operating throughout Mexico, and we feared we could be located and harmed there. Second, Mexico's government has been unable to effectively protect foreign nationals from organized crime. Third, as a minor child specifically targeted by a criminal faction, I required the highest level of protection available. Fourth, we never established residence or any ties in Mexico, and we did not receive any lawful immigration status there. For these reasons, we continued to the United States, the first country where we believed we could find genuine and effective protection.

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.

Upon arrival, my mother, Kavya Morganna Soares Pinheiro, filed an affirmative asylum application with USCIS, received on January 30, 2025. My mother genuinely and in good faith believed that I was included as a derivative beneficiary in her application, and that my protection was secured through her filing. She had every intention of ensuring my safety through that process. Upon discovering that I was not covered by her application, my mother immediately took all available measures to protect my rights and secure my asylum protection, including the filing of this independent application. Furthermore, I am a minor child, currently fifteen years old. I was entirely dependent on my mother to navigate the asylum process on my behalf and had no independent legal capacity to file or monitor any application. The delay in filing this independent application was not the result of any intentional delay or neglect, but solely the result of circumstances entirely beyond my control as a minor.

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.

Upon entering the United States through Tecate, California, on March 24, 2024, I was detained by U.S. Customs and Border Protection as part of the standard immigration processing procedures. I was held briefly and released the following day. No criminal charges were filed against me, and I was not convicted or sentenced for any offense. My detention was solely related to my entry into the United States without authorization, which occurred as a direct result of my urgent need to flee persecution in Brazil. I have not been arrested, charged, convicted, or sentenced for any crime in the United States or in any other country



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. Luiz Otavio Pinheiro Coelho	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.)

(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.)

→ [Luiz Otavio Pinheiro Coelho] 04/17/2026
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



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) 245928989	Date 04/17/2026
Applicant's Name Luis Otavio Pinheiro Coelho	Applicant's Signature Luis Otavio Pinheiro Coelho

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) 245928989	Date 04/17/2026
Applicant's Name Luis Otavio Pinheiro Coelho	Applicant's Signature Luis Otavio Pinheiro Coelho

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

Part A. III
Question 2

Colegio COC
Quadra 202 Sul, Rua NS B, lote 05, Palmas, Brazil
Elementary School
From 02/2019 to 12/2021

Colegio Dom Bosco
Quadra 1002 Sul Av Joaquim Teotonio Segurado Lote 02, Palmas, Brazil
Elementary School
From 02/2017 to 12/2018

Colegio Albert Einstein
Elementary School
Quadra 706 Sul Alameda 21, Palmas, Brazil
From 02/2016 to 12/2016

Colegio Eden
Preschol
Avenida Princesa Isabel, 129, Miranorte, Brazil
From 02/2015 to 10/2015



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:	Mailing Address:
Office of the Principal Legal Advisor Department of Homeland Security 100 Montgomery Street, Suite 200 San Francisco, CA 94104	Office of the Principal Legal Advisor Department of Homeland Security Office of the Chief Counsel P.O. Box 26449 San Francisco, CA 94126-644

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