Zaia Law LLC
Castilho Zaia, Guilherme Borcelli
11810 Grand Park Ave
Ste 500
North Bethesda, MD 20852

Non-detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
130 Delaware Avenue, Suite 300
Buffalo, NY 14202

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

Immigration Judge: **Baumgarten, Mary C.** Next Hearing Date: **July 31, 2026, at 1:00 PM**

RESPONDENTS' MOTION TO CHANGE VENUE

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
130 Delaware Avenue, Suite 300
Buffalo, NY 14202

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

RESPONDENTS' MOTION TO CHANGE VENUE

Respondents, through counsel, respectfully move to transfer the venue of their ongoing removal proceedings from the Buffalo Immigration Court, located at 130 Delaware Avenue, Suite 300, Buffalo, NY 14202, to the Philadelphia Immigration Court, which has administrative control over the geographic area encompassing Respondents' current place of residence in Erie, Pennsylvania, pursuant to 8 C.F.R. § 1003.20(b), because good cause exists.

1. This matter is currently scheduled for an Individual Hearing on **July 31, 2026, at 1:00 PM.**
2. The Respondent family has established permanent residence in Erie, Pennsylvania, as reflected in the Form EOIR-33 filed with this Court on April 17, 2025. Erie is located in Pennsylvania, which falls entirely within the area of responsibility of the DHS Philadelphia Field Office and the ICE Office of the Principal Legal Advisor, Philadelphia, not the Buffalo DHS District Office, over whose sub-offices the Buffalo Immigration Court

exercises administrative control pursuant to 8 C.F.R. § 1003.11.

3. The Respondents are a family unit of five: Douglas Santos Golçalves (A# 220-762-085), Debora Do Carmo Andrade Santos (A# 220-762-086), Bianca Santos Andrade (A# 220-762-087), Beatriz Santos Andrade (A# 220-762-088), and Benicio Santos Andrade (A# 220-762-089). Their current address is **145 East 21st Street, Apt. 1, Erie, PA 16503.**
4. Good cause for transfer is established by multiple converging factors. The Respondents, a family of five including three minor children, have established permanent residence in Erie, Pennsylvania. Their residence is now within the geographic area of administrative control of the Philadelphia Immigration Court under 8 C.F.R. § 1003.11, and within the area of responsibility of the DHS Philadelphia Field Office and the ICE Office of the Principal Legal Advisor, Philadelphia, which has jurisdiction over Delaware, Pennsylvania, and West Virginia. Maintaining the venue in Buffalo creates a structural misalignment between the court of record and the DHS office geographically responsible for the Respondents' location, a factor of administrative convenience that weighs directly in favor of transfer under Matter of Rahman, 20 I&N Dec. 480 (BIA 1992).

The Respondents' ties to Erie, Pennsylvania extend beyond their residential address. The minor children are currently enrolled in schools within the Erie area, and the adult Respondents are employed locally. These connections to the community further evidence that Erie is, in every meaningful sense, the Respondents' genuine place of residence, not merely a mailing address. Under Matter of Rahman, factors commonly associated with an alien's place of residence are expressly relevant to the good cause determination. The Respondents' established community ties in Erie, including schooling, employment, and family stability, weigh directly in favor of transfer.

Additionally, transfer to the Philadelphia Immigration Court would promote administrative efficiency with respect to counsel's ability to appear and litigate effectively on Respondents' behalf. Counsel of record is located approximately 367 miles from the Buffalo Immigration Court and approximately 141 miles from the Philadelphia Immigration Court. This factor further supports the convenience of transfer and is consistent with Matter of Rahman's recognition that administrative convenience and efficient case management are relevant considerations in the good cause analysis.

Unlike the circumstances in Rahman, where the government opposed the transfer in part because the respondent had acquired out-of-jurisdiction counsel, here the proposed transfer would bring proceedings closer to, not further from, counsel's office, thereby facilitating rather than burdening the orderly conduct of the case.

An Immigration Judge may change venue "for good cause" upon motion by one of the parties. 8 C.F.R. § 1003.20(b). Good cause is determined by balancing relevant factors including administrative convenience, expeditious treatment of the case, and factors commonly associated with the alien's place of residence. Matter of Rahman, 20 I&N Dec. 480 (BIA 1992). While the BIA has cautioned that mere residence in another location, standing alone, may be insufficient, it has also recognized that administrative convenience and structural alignment of venue with the responsible DHS office are independent grounds supporting transfer.

This case presents factors beyond mere relocation. Venue currently lies in Buffalo based on the Respondents' former address in Jamestown, New York, which was within the Buffalo DHS District. Since then, the Respondents have permanently relocated to Erie, Pennsylvania, a jurisdiction within the area of responsibility of the Philadelphia DHS Field Office and OPLA, as confirmed by the ICE Office of the Principal Legal Advisor, Philadelphia (Area of Responsibility: Delaware, Pennsylvania, and West Virginia). Under 8 C.F.R. §§ 1003.11 and 1003.14, jurisdiction and administrative control are tied to the DHS district that issued the charging document or over which the court has geographic responsibility. Transferring venue to Philadelphia restores that structural alignment.

No prejudice will accrue to the Government from this transfer. The DHS attorney responsible for Pennsylvania, the OPLA Philadelphia, will continue to represent the Government and will retain a full and fair opportunity to litigate removability and any applications for relief. The factual record is fully preserved in the Record of Proceedings and will be transferred intact. The transfer does not disrupt the substance of the proceedings; it aligns their administration with the regulatory structure Congress and the Attorney General established. This distinguishes the present case from Matter of Rahman, where the Government demonstrated concrete operational prejudice. Here, transfer serves the Government's own organizational framework as much as it serves the Respondents.

For all of the foregoing reasons, Respondents respectfully submit that good cause has been established for the requested change of venue.

Wherefore, Respondents respectfully request that this Court grant this Motion to Change Venue and transfer these proceedings to the Philadelphia Immigration Court.

Respectfully,

Guilherme Castilho Zaia (Bar N. 334469)
Attorney at Law
11810 Grand Park Ave, Ste 500
North Bethesda, MD 20852
Counsel for Respondent

Douglas Santos Gonçalves	**A 220-762-085**
Debora Do Carmo Andrade Santos	**A 220-762-086**
Bianca Santos Andrade	**A 220-762-087**
Beatriz Santos Andrade	**A 220-762-088**
Benicio Santos Andrade	**A 220-762-089**

PROOF OF SERVICE

On this day, I, Guilherme Castilho Zaia, served a copy of the following documents:

RESPONDENTS MOTION TO CHANGE VENUE

To the following:

Office Location:	**Mailing Address:**
Office of the Principal Legal Advisor Department of Homeland Security 250 Delaware Avenue, Suite 773 Buffalo, NY 14202	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor 250 Delaware Avenue, Suite 773 Buffalo, NY 14202

by:

- Through the EOIR Courts and Appeals System (ECAS), which will automatically send service notification to both parties that a new document has been filed.

Guilherme Castilho Zaia (Bar N. 334469)
Attorney at Law
11810 Grand Park Ave, Ste 500
North Bethesda, MD 20852
Counsel for Respondent