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Non-Detained

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

In the Matter of)
)
Michelle Quintao Ferreira Luna)
Weverton Silva Moreira)
)
In Removal Proceedings)
)
_____)

**File No. A. 226-096-303
File No. A. 226-096-234**

Immigration Judge: N/A

Next Hearing Date: N/A

**RESPONDENTS' ADDITIONAL DOCUMENTS IN SUPPORT OF ASYLUM AND
WITHHOLDING OF REMOVAL**

Exhibit list

Exhibits:

Pages:

Exhibit 1

Michelle Quintao Ferreira Luna's Psychological
Evaluation

1-6

Exhibit 1

John Hanig, LMFT #97209
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March 10, 2026

To: Whom It May Concern

From: John Hanig, LMFT #97209
Psychotherapist

Re: Mrs. Michelle Quintão Ferreira Luna
DOB: 03/31/2003

This letter summarizes a comprehensive mental health evaluation of Mrs. Michelle Quintão Ferreira Luna. Mrs. Quintão Ferreira Luna suffers from Post-Traumatic Stress Disorder (PTSD), and her conditions require immediate, on-going treatment to resolve. This statement was prepared at the request of the client's legal representative, and with the client's voluntary consent. Any questions regarding this statement should be directed to the contact information provided above.

I. Statement of professional capacity

I am a licensed California Marriage and Family Therapist (LMFT), working as a multilingual psychotherapist in private practice in San Francisco, California, performing psychological assessments and psychotherapy in English, Spanish, and Portuguese with a variety of individuals, couples, and families, many of whom identify as Latinx. I worked as a multilingual clinical case manager at the Mission Neighborhood Health Center from 2014 to 2017 in San Francisco's Mission District with a variety of people from various backgrounds, among many of whom were immigrants to the United States or raised in immigrant families, many of whom were survivors of traumatic, life threatening experiences. In 2013, I received a Master's in Counseling Psychology from the California Institute of Integral Studies where I extensively studied cross-cultural psychology and psychopathology. From 2012 to 2013, I served as a Marriage and Family Therapist (MFT) trainee at Bay Area Community Resources in Richmond, California, providing bilingual school-based student and family counseling at a middle school with an 83% Latinx immigrant population. Furthermore, from 2013 to 2014, I participated in an MFT internship at the San Francisco AIDS Foundation in San Francisco, California, providing bilingual substance use counseling for a variety of cultures, immigration statuses, and socioeconomic backgrounds. Additionally, from 2013 to 2014, I served as a bilingual residential counselor at Larkin Street Youth Services in San Francisco, California, providing supportive counseling for homeless transitional aged youth from a variety of backgrounds, including Latinx who were recent immigrants or raised in immigrant families.

Additionally, starting in 2010 with the Master's in Counseling Psychology program at the California Institute of Integral Studies and through continuing education credits following graduation, I have received extensive training related to diagnosing and treating trauma-related mental health conditions, such as Post-traumatic Stress Disorder (PTSD), dissociation, depressive disorders, and anxiety disorders. In 2017, I participated in a four-month program to learn how to conduct Eye Movement Desensitization and Reprocess-

ing (EMDR), an empirically studied treatment method clinically proven to significantly decrease PTSD symptoms in people of a wide diversity of ages and cultural backgrounds. Furthermore, since 2016, I have provided trainings about trauma-informed client care and processing vicarious (secondhand) trauma from direct client contact to various community-based organizations in San Francisco, including Mission Neighborhood Health Center and the LGBT Asylum Project.

Both my experience conducting therapy in Portuguese and Spanish and my knowledge of how trauma and other complex issues affect Latinx and South American people living in the United States give me a deep familiarity with assessing, diagnosing and treating individuals from these or similar backgrounds. It is this experience and expertise that gives me confidence in making the following report and assertions about Mrs. Quintão Ferreira Luna, her mental health, and her application for asylum in the United States.

II. Description of evaluation

I met with Mrs. Quintão Ferreira Luna on 2/27/2026 for a 1.5-hour session. The evaluatory/psychotherapeutic interview took place in person at my private practice office in San Francisco. The interviews consisted of a series of questions soliciting information about Mrs. Quintão Ferreira Luna's past and present symptoms, and discussions of strategies on how to cope with these symptoms. Additionally, I administered three empirical tests to support with assessing Mrs. Quintão Ferreira Luna's mental health and diagnostic criteria, including the Trauma Symptom Checklist 40 (TSC-40), Beck's Depression Inventory, and Beck's Anxiety Inventory.

Mrs. Quintão Ferreira Luna participated in this evaluation voluntarily and was willing to share information openly. She consistently expressed sincere desire to manage her mental health needs effectively in order to ensure a productive, peaceful life. Mrs. Quintão Ferreira Luna demonstrates motivation to continue in treatment despite how uncomfortable the therapeutic process can be.

Still, the acuity of Mrs. Quintão Ferreira Luna's mental health condition made participation in psychotherapy emotionally challenging. During most of our conversation, Mrs. Quintão Ferreira Luna presented with an anxious mood as she discussed traumatic life events (relevant background provided below). When prompted to discuss such events, she demonstrated multiple signs of panic. She had difficulty speaking, and her breathing became shallow and rapid. She fidgeted nervously in her chair and expressed intense anxiety and emotional discomfort. This presentation is very consistent with PTSD.

Mrs. Quintão Ferreira Luna ultimately was able to endorse negative alterations in mood and cognition with significant emotional support and the facilitation of therapeutic conversation. Even then, she demonstrated emotional difficulty when participating in interview. As a result, direct observations were particularly useful during this assessment.

In summary, Mrs. Quintão Ferreira Luna was ultimately able to both articulate and demonstrate symptoms consistent with PTSD, and both direct observation and formal psychological testing contributed to the following findings.

III. Relevant trauma history and background

Mrs. Quintão Ferreira Luna's current psychiatric symptoms directly result from a history of reported traumatic events occurring throughout early adulthood, including physical, verbal, and sexual abuses from her ex-boyfriend while living in Ipatinga, Minas Gerais, Brazil.

In August 2023, at age 19, Mrs. Quintão Ferreira Luna reports that she began dating her ex-boyfriend after a female friend introduced them. Soon after beginning to date, Mrs. Quintão Ferreira Luna reports that her ex-boyfriend began exhibiting controlling behavior (e.g. not allowing her to go to the gym).

Mrs. Quintão Ferreira Luna also reports that her ex-boyfriend would physically abuse her by pushing her during arguments (“*Me empurrava. / He would push me.*”) and verbally abuse with misogynistic slurs (e.g. “*vagabunda, puta / whore*”). Additionally, Mrs. Quintão Ferreira Luna reports that her ex-boyfriend would sexually abuse her by making her feel “*obrigada / obligated*” to have sex with him against her will after arguing with her.

In February 2024, at age 19, Mrs. Quintão Ferreira Luna reports that she discovered through her female friend who introduced them that her ex-boyfriend was a member of a local gang known as “*Facção PCC.*” After this discovery, Mrs. Quintão Ferreira Luna reports that she immediately broke up with her ex-boyfriend, however he refused to break up with her and threatened to murder her and her family. As a result, Mrs. Quintão Ferreira Luna reports that she abstained from leaving the house due to fear for her physical safety, only leaving the house to go to college classes accompanied in the street by her parents. Mrs. Quintão Ferreira Luna reports that she was too afraid to tell anyone about her ex-boyfriend’s threats of violence, not even her family due to fear that her ex-boyfriend might find out and she or her family would be at risk of being murdered by his gang. Mrs. Quintão Ferreira Luna reports that she began to experience symptoms of severe PTSD, however she did not look for a psychotherapist for support with decreasing her symptoms due to fear that her ex-boyfriend might discover despite confidentiality.

In March 2024, at around age 20, Mrs. Quintão Ferreira Luna reports that she started dating her current husband. In May 2024, Mrs. Quintão Ferreira Luna reports an incident in which her ex-boyfriend confronted her at the entrance of her college while she was leaving after class and threatened her with a firearm, insinuating that he knew that she was dating another man (“*Se você não vai ser comigo, não pode ser com ninguém mais. / If you aren’t going to be with me, you can’t be with anyone else.*”). Mrs. Quintão Ferreira Luna reports that her parents were in a parked car near the entrance and witnessed the entire incident. After this, Mrs. Quintão Ferreira Luna reports that her and her parents went to the police to file a report about her ex-boyfriend threatening her with a firearm, but the police did not take the case seriously, most likely due to corruption between the “*Facção PCC*” gang and the police, a common occurrence in Brazil. Later, Mrs. Quintão Ferreira Luna reports that she made a police report online, however the police never contacted her to further investigate.

Immediately following this incident, Mrs. Quintão Ferreira Luna reports that she experienced an even further aggravation of her PTSD symptoms including extreme sleep disturbance for which she began taking sleep medication and breaking out in “*manchas / hives*” on her skin due to anxiety.

After her parents witnessed the incident, Mrs. Quintão Ferreira Luna reports that they sold many of their belongings, including their car, to pay the expenses for her to leave Brazil as soon as possible for her safety.

Due to this history of abuse, the general misogynous and hostile environment for women in Brazil, a deep sense of futility and hopelessness over her situation as a woman living in Brazil, as well as due to intensifying conflicts with her ex-boyfriend, Mrs. Quintão Ferreira Luna finally made the difficult decision to leave Brazil definitively and come to live in the United States in June 2024 at age 21.

After moving to the United States, Mrs. Quintão Ferreira Luna reports that her parents have told her that police officers have driven by their house asking for her, causing her even further fear for her physical and psychological safety if she were to be forced to return to Brazil.

IV. Evaluation

Mrs. Quintão Ferreira Luna meets criteria for a diagnosis of Post-Traumatic Stress Disorder (PTSD). Mrs. Quintão Ferreira Luna reports experiencing an ongoing variety of symptoms including frequent periods of both anxiety and depression that at times negatively affects her current relationships,

flashbacks of painful and overwhelming experiences from the past, and feelings of despair if forced to return to Brazil. Mrs. Quintão Ferreira Luna also reports that she frequently has intrusive memories of the painful experiences with her ex-partner in Brazil. Mrs. Quintão Ferreira Luna also reports a history of negative thoughts about herself and her future, fearfulness of conflicts and difficult situations with others, and social isolation. Mrs. Quintão Ferreira Luna is, at present, also still exploring issues related to building a positive sense of self-esteem, increased socialization, and developing and sustaining intimacy with her current partner. My evaluation and diagnosis of Mrs. Quintão Ferreira Luna is based on clinical observation of both verbal and non-verbal responses to questions regarding her trauma history and how these memories affect her today, to which she responded with consistency and congruency to how an adult from her cultural background and psychological level of functioning would respond in order to sufficiently meet criteria for a diagnosis of PTSD according to the DSM-5.

Mrs. Quintão Ferreira Luna's symptoms of PTSD, especially her sense of intense fear when exposed to external stimuli that remind her of past traumatic memories, have persisted since the first qualifying traumatic event occurred while living in Brazil. These symptoms have caused marked impairment in Mrs. Quintão Ferreira Luna's functioning, including self-care, activities of daily living, time management, and maintaining trust in interpersonal relationships. Given that these symptoms directly correlate with memories associated with living as a young woman in Brazil and the motives for immigrating to the United States to seek safety, Mrs. Quintão Ferreira Luna has frequently become emotionally overwhelmed to the point of preventing her from seeking resources to apply for asylum in the United States knowing that the process would require her to speak explicitly and in depth about her trauma history. If Mrs. Quintão Ferreira Luna were to be forced to return to Brazil, she would be disconnected from her support system and resources for healing from past trauma that she has found here in the United States; her psychological well-being would be gravely endangered by the high probability of re-traumatization.

During our interviews, Mrs. Quintão Ferreira Luna confirmed a diagnosis of PTSD by endorsing the following symptoms/impairments:

Intrusion or Re-experiencing: Mrs. Quintão Ferreira Luna frequently experiences intense and prolonged distress after exposure to traumatic reminders of the sexual, verbal, and physical abuse she experienced from her ex-boyfriend. When she has intrusive thoughts, Mrs. Quintão Ferreira Luna cannot avoid thinking about the incidents in which she felt afraid for her life. These thoughts cause an overwhelming feeling of fear that persists until she has distracted herself to focus on something else. These intrusive thoughts are also associated with physical symptoms of muscle tension and headaches, both of which Mrs. Quintão Ferreira Luna experiences frequently.

Avoidance: Mrs. Quintão Ferreira Luna avoids talking about her traumatic history because, as mentioned above, thinking about the assaults causes significant emotional and cognitive impairment. Mrs. Quintão Ferreira Luna does not disclose the verbal and emotional abuse to other people as a result of the effect it has on her mood, and avoids talking about memories of Brazil in general. When prompted to talk about her experiences in Brazil, Mrs. Quintão Ferreira Luna often changes the subject or ends the conversation.

Negative alterations in cognition and mood: Mrs. Quintão Ferreira Luna also exhibits persistent distorted self-blame for causing the traumatic events and frequently throughout our interview expressed extreme guilt for endangering her parents' safety, despite this being her ex-boyfriend's responsibility. Mrs. Quintão Ferreira Luna most likely did this to create psychological distance be-

tween the perpetrators and her, and to serve as a means to protect herself from imagining a forced return to Brazil where she would be at risk for encountering the same individual who had previously abused and threatened her. Mrs. Quintão Ferreira Luna also scored in the severe depression range on Beck's Depression Inventory, indicating a severe level of depression connected to her distorted self-blame.

Additionally, Mrs. Quintão Ferreira Luna persistently suffers from feeling alienated from others. Mrs. Quintão Ferreira Luna reports a markedly high level of social isolation as a result of feeling misunderstood and unaccepted by others due to her trauma history. She reports very little desire to engage in social relationships outside of work and stays at home as often as possible to avoid situations in which she may have to meet new people or fulfill other social obligations. Mrs. Quintão Ferreira Luna shows insight that she desires to change this behavior, however that her emotional reactivity occurs at such an unconscious level that she sometimes feels hopeless that it will ever change.

Alterations in arousal and reactivity: Mrs. Quintão Ferreira Luna reports dealing with a markedly high level of hyper-vigilance, in other words an extreme guardedness with others that is based on a fear response. Mrs. Quintão Ferreira Luna's hyper-vigilance was physically apparent throughout our interview as observed by severe body rigidity, hesitation before answering particular questions, and frequently scanning the room despite relative safety and reassurance of confidentiality. Mrs. Quintão Ferreira Luna also reports that her hyper-vigilant behavior sometimes interferes with her social functioning, causing her to prefer to socially isolate, even from situations that do not warrant a need to be guarded and protective. Mrs. Quintão Ferreira Luna also scored in the severe anxiety range on Beck's Anxiety Inventory and in the high range on the Anxiety subscale of the Trauma Symptom Checklist 40 (TSC-40), both indicating a severe level of anxiety connected to her hyper-vigilance.

Mrs. Quintão Ferreira Luna also reports sleep disturbance that has persisted since age 19, including frequent insomnia and nightmares that wake her up and prevent her from receiving an appropriate quantity and quality of sleep. Mrs. Quintão Ferreira Luna also reports experiencing frequent migraines ("*enxaqueca*") as a result of her past trauma that negatively impact her sleep. Mrs. Quintão Ferreira Luna complains that she usually receives very little sleep on nights when she experiences insomnia, even with the use of the sleep aid melatonin, and this can be physically observed by her extremely low energy level. Mrs. Quintão Ferreira Luna also scored in the high range on the Sleep Disturbance subscale of the Trauma Symptom Checklist 40 (TSC-40).

All of these symptoms are common to the diagnosis of PTSD. These symptoms leave Mrs. Quintão Ferreira Luna with painful memories of the past and avoiding important and vital responsibilities in the present. These impairments have diminished Mrs. Quintão Ferreira Luna's ability to make decisions regarding her immigration status as well as other issues of self-development.

V. Explanation

The DSM-V defines Post-Traumatic Stress Disorder (PTSD) as a reaction that comes with the experience of a life-threatening event(s). The diagnosis describes the effect of a traumatic experience on a

person's mood and functioning. In order to meet criteria for PTSD, a client must experience a number of symptoms in the following categories: intrusive thoughts (memories, flashbacks, and/or nightmares), avoidance (emotional numbing, behavioral changes, dissociation), changes in cognition and mood (low self-esteem, hopelessness, distorted blame, loss of interest in activities that previously brought enjoyment), and hyper-arousal (exaggerated startle response, irritable mood, hyper-vigilance, difficulty concentrating).

VI. Malingering

The DSM-V defines malingering as "the intentional production of false or grossly exaggerated physical or psychological symptoms motivated by external symptoms." As Mrs. Quintão Ferreira Luna could potentially stand to obtain a material benefit (asylum) as a result of this evaluation, I took steps to rule out malingering. It is not likely that Mrs. Quintão Ferreira Luna is malingering. Her symptoms and presentation are consistent with the history she presented to me. Throughout the interview, Mrs. Quintão Ferreira Luna had an affect that was consistent with her reports. Mrs. Quintão Ferreira Luna also does not have technical knowledge of mental health disorders to effectively misrepresent her condition.

VII. Summary and Recommendations

In conclusion, I firmly believe that Mrs. Quintão Ferreira Luna would experience extreme psychological suffering if she were forced to return to Brazil and would most likely experience an aggravation of her PTSD symptoms from her trauma history while living as a young woman in Brazil. In my professional opinion, obtaining asylum in the United States would serve as an appropriate measure to ensure Mrs. Quintão Ferreira Luna's psychological well-being, to support her with continuing to develop her sense of identity as an active member of her community, to motivate her with achieving her professional goals in a tolerant environment, and to sustain her current support system and connection to resources that will assist her with effectively healing from the PTSD she acquired from her ex-boyfriend while living in Brazil.

Due to the reasons I have elaborated above I strongly support Mrs. Quintão Ferreira Luna's application for asylum. If you need any more information or have any questions please feel free to call me at (415) 756-6880.

Sincerely,

A handwritten signature in black ink, appearing to be 'John Hanig', written in a cursive style.

John Hanig, LMFT #97209
Psychotherapist

Michelle Quintao Ferreira Luna
Weverton Silva Moreira

File No. A. 226-096-303
File No. A 226-096-234

PROOF OF SERVICE

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

RESPONDENTS' ADDITIONAL DOCUMENTS IN SUPPORT OF ASYLUM AND WITHHOLDING OF REMOVAL

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.



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