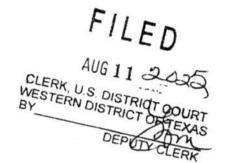
JUDGE KATHLEEN CARDONE

Pro Se

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS EL PASO, TEXAS



Michely Paiva Alves Plaintiff-Petitioner,

٧.

U.S. DEPARTMENT OF JUSTICE; U.S. ATTORNEY GENERAL PAMELA BONDI; U.S. DEPARTMENT OF HOMELAND SECURITY; KRISTI NOEM SECRETARY OF UNITED STATES DEPARTMENT OF HOMELAND SECURITY; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; TODD LYONS, ICE ACTING DIRECTOR; MARY DE ANDAYBARRA, FIELD OFFICE DIRECTOR OF EL PASO ICE FIELD OFFICE; ANGEL GARITE, ASSISTANT FIELD OFFICE DIRECTOR OF EL PASO ICE FIELD OFFICE:

Defendant-Respondents

EP 25CV0306

No.____

PLAINTIFF-PETITIONER'S PETITION FOR WRIT OF HABEAS CORPUS AND PETITION FOR WRIT OF MANDAMUS

INTRODUCTION

- 1. Michely Paiva Alves, a 38-year-old native and citizen of Brazil, presented herself to immigration officials at the border on January 21, 2025. She expressed fear of returning to her home country to immigration officials who processed her for expedited removal under 8 U.S.C. § 1225 and transferred her to U.S. Immigration and Customs Enforcement (ICE) Custody. She was found to possess a credible fear of persecution or torture by an asylum officer and was permitted to seek asylum before an immigration judge, who ultimately granted her application for withholding of removal under the U.N. Convention Against Torture (CAT).
- Despite this, Michely has been detained at the El Paso Processing Center in El Paso, Texas, a contract detention center managed by Core Civic.

PARTIES

- Petitioner, Michely Paiva-Alves, is a 38-year-old native and citizen of Brazil. She is currently detained by Defendant-Respondents at the El Paso Processing Center in El Paso, Texas.
- 4. Defendant-Respondent Pamela Jo Bondi is the Attorney General of the United States and the head of the Department of Justice, which encompasses the Board of Immigration Appeals and Immigration Courts

as a subunit, as the Executive Office of Immigration Review. Ms. Bondi shares responsibility for the implementation and enforcement of immigration laws along with Defendant-Respondent Krisit Noem. Ms. Bondi is a legal custodian of Plaintiff-Petitioner. Ms. Bondi is sued in her official capacity.

- 5. Defendant-Respondent U.S. Department of Homeland Security (DHS) is the parent agency of U.S. Immigration and Customs Enforcement (ICE) and U.S. Citizenship and Immigration Services (USCIS). Kristi Noem is the secretary of the DHS and is being sued in her official capacity.
- Defendant-Respondent U.S. Immigration and Customs and Enforcement
 ("ICE") is the division of DHS charged with detaining and removing aliens
 under U.S. immigration laws.
- Defendant-Respondent Todd Lyons is the ICE Acting Director in Washington, D.C. Mr. Lyons is sued in his official capacity.
- 8. Defendant-Respondent Mary De Anda Ybarra is the Field Office Director of ICE El Paso Field Office, Texas. Ms. De Anda Ybarra has physical custody of Plaintiff-Petitioner and is sued in her official capacity.
- Defendant-Respondent Angel Garite is the Assistant Field Office Director
 of ICE El Paso Field Office, under whose authority Plaintiff-Petitioner is



currently being detained. Thus, Defendant-Respondent has physical custody of Plaintiff-Petitioner. Mr. Garite is sued in his official capacity.

JURISDICTION

- 10. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241 (habeas corpus); 28 U.S.C. § 1651 (All Writs Act); 28 U.S.C. § 1331 (federal question); 28 U.S.C. §§ 2201-02 (declaratory relief); and the U.S. Constitution, art. I, § 9, cl. 2 (Suspension Clause).
- 11. Plaintiff-Petitioner has exhausted any and all administrative remedies. She has undergone a credible fear interview (CFI) with the Asylum Office, and was granted relief under the U.N. Convention Against Torture.
- 12. While the courts of appeals have jurisdiction to review removal orders directly through petitions for review, see 8 U.S.C. § 1252(a)(1), (b), the federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear habeas claims by non-citizens challenging the lawfulness or constitutionality of their detention by ICE. See, e.g., Demore v. Kim, 538 U.S. at 516-17; Zadvydas, 533 U.S. at 687; Jennings v. Rodriguez, 583 U.S., 138 S.Ct. 138, L.Ed. 2d., 2018 WL 1054878 at *8, No. 15-1204 (Feb. 27, 2018) (plurality opinion); see also id. at *44, 128 S.Ct. 2307 (Breyer, J., dissenting) ("8 U.S.C. § 1252(b)(9), ... by its terms applies only with

respect to review of an order of removal") (internal quotation marks and brackets omitted); INS v. St. Cyr, 533 U.S. 289, 121 S. Ct. 2271 (2001).

VENUE

- 13. Venue is proper in Western District of Texas pursuant to 28 U.S.C. § 2241(d) because Plaintiff-Petitioner is being detained at the El Paso Processing Center in El Paso, Texas.
- 14. A copy of this motion is being served on all parties.

EXHAUSTION

15. "Where Congress has not clearly required exhaustion, sound judicial discretion governs." *McCarthy v. Madigan*, 503 U.S. 140, 144, 112 S.Ct. 1081 (1992); *Haitian Refugee Ctr., Inc. v. Nelson*, 872 F.2d 1555, 1561 (11th Cir. 1989) ("We note at the outset that the application of the judicial exhaustion doctrine is subject to the discretion of the trial court.") (citing *Panola Land Buyers Ass'n v. Shuman*, 762 F.2d 1550, 1556-57 (11th Cir. 1985); *Haitian Refugee Center v. Smith*, 676 F.2d 1023, 1034 (5th Cir. 1982) ("the exhaustion requirement is not a jurisdictional prerequisite but a matter committed to the sound discretion of the trial court"). In the instant case, Petitioner has exhausted all available administrative remedies. She has expressed fear of returning to Brazil, and was granted withholding of removal under the U.N. Convention Against Torture.

FACTS AND PROCEDURAL HISTORY

- Michely Paiva Alves, a 38-year-old native and citizen of Brazil, entered this country on or about January 21, 2025. She expressed fear of returning to his home country upon apprehension by U.S. Customs and Border Patrol (CBP) officials who processed her for expedited removal under 8 U.S.C. § 1225 and transferred him to U.S. Immigration and Customs Enforcement (ICE) Custody. Based on this fear, she was granted withholding of removal to Brazil by immigration officials on or about February 20, 2025.
- 17. In Brazil, Petitioner was an active political supporter of former president Jair Bolsonaro and participated in widespread protests of the challenged election results. See Exhibit A, Statement of Petitioner. Petitioner was arrested for participating in the protests and charged criminally for her participation in the protest. See Exhibit B, Criminal Records. While detained, she was tortured, provided food laced with broken glass, deprived of medical attention and basic hygiene measures. See Exhibit A.
- 18. Petitioner was granted withholding of removal under the U.N. Convention

 Agaisnt Torture under the Biden-era Asylum Officer Rule, which

 permitted asylum officers to adjudicate fear-based claims in place of the

 general process by which applicants found to possess a credible fear of

- persecution or torture were routed through the immigration courts where an immigration judge would adjudicate the claim.
- 19. Petitioner has remained in detention since her arrival into United States in January 2025 and was recently informed by a deportation officer that her grant of relief would be revoked due to "policy changes."
- 20. There is no authority known to Petitioner that would permit immigration officials to revoke a prior grant of withholding of removal.
- 21. Petitioner has now been held in detention for over six months, most of which is post-removal as she was granted withholding under the U.N Convention Against Torture. She suffers liver disease, insulin insufficiency, and thyroid disease.
- 22. Since she was recently informed that her relief will be revoked, Petitioner believes that she is at imminent risk of being physically removed from the United States, back to the dangerous situation that prompted her to abandon everything she has ever known and seek refuge in the first place.
- 23. Plaintiff-Petitioner thus respectfully requests that this Court issue a writ of habeas corpus, declare Defendants' actions unlawful and order Defendants to refrain from administratively revoking her grant of relief absent Due Process.

24. Accordingly, pursuant to 28 U.S.C. § 2241, Plaintiff-Petitioner respectfully requests that the Court immediately order Defendant-Respondents to show cause why the writ of habeas corpus should not be granted. Plaintiff-Petitioner also requests that the Court set a prompt hearing on this matter upon Defendant-Respondents' return on the order to show cause.

STATUTORY SCHEME: EXPEDITED REMOVAL AND ASYLUM OFFICER RULE

- 25. Since the enactment of IRRIRA in 1996, most non-citizens seeking entry at U.S. ports of entry and borders who are deemed inadmissible are subject to summary removal by DHS without a hearing. See INA § 235(a)(2); § 235 (b)(1); 8 U.S.C. § 1225. Those expressing a fear of harm upon removal are detained and subject to a "credible fear interview" by a USCIS asylum officer. Id. The purpose of the interview is a screening rather than a full out asylum interview. See INA § 235(a)(1); 8 C.F.R. § 208.30.
- 26. The standard is intended to be a low threshold—that is whether a detainee establishes; (1) a "significant possibility" that they could establish in a hearing before an Immigration Judge that they have been persecuted or have a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political

- opinion, or (2) a significant possibility of establishing in a hearing before an Immigration Judge that they would be subject to torture if returned to their country. 8 C.F.R. § 208.30(e)(3).
- 27. If the asylum officer screening a non-citizen makes a negative credible fear finding, the sole means of review of that decision is by an immigration judge. 8 C.F.R. § 1003.42.
- 28. The Office of the Chief Immigration Judge's Practice Manual provides that an alien in the credible fear review process is not entitled to legal representation. See Ch. 7.4(d)(iv)(C) of the Immigration Court Practice Manual.
- 29. The regulations provide that no appeal lies from an immigration judge's affirmance of a DHS officer's negative fear finding. 8 C.F.R. § 1208.30(g)(2).
- 30. The Asylum Officer Rule or Asylum Processing Rule (formally named the "Procedures for Credible Fear Screening and Consideration of Asylum, Withholding of Removal, and CAT Protection Claims by Asylum Officers") alters the processing pathway for asylum relief.
- 31. Under the rule, after passing a credible fear interview, individuals are referred to meet with an asylum officer in an Asylum Merits Interview (AMI), instead of going before an immigration judge for full removal



proceedings. In this process, individuals meet the same legal burden for asylum, withholding of removal, or CAT relief as they would in immigration court, but they present their case to a USCIS asylum officer who adjudicates the claim.

- 32. Under 8 U.S.C. § 1231(a)(2), immigration officials have a 90-day window in which to remove non-citizens ordered removed from the country. During this period, detention is mandatory.
- 33. Following the expiration of this initial period, post-removal detention is discretionary. 8 U.S.C. § 1231(a)(6).
- 34. In Zadvydas v. Davis, 533 U.S. 678 (2001), the Supreme Court addressed the post-removal period noting due process concerns with prolonged and potentially indefinite detention where there was "no significant likelihood of removal in the reasonably foreseeable future." Id. at 690-91. The Zadvydas court imposed an implicit temporal limitation to such detention and applied a burden-shifting regime by which once the petitioner makes a showing that continued detention is unreasonable, the burden shifts to the government to justify the non-citizen's continued detention. Zadvydas, 533 U.S. at 693.

CLAIMS FOR RELIEF:

FIRST CLAIM UNCONSITUTIONAL APPLICATION OF 8 U.S.C. § 1225 VIOLATION OF SUSPENSION CLAUSE U.S. Const. art. I, § 9, cl. 2.

- Plaintiff-Petitioner re-alleges and incorporates by reference paragraphs 1 through 34 above.
- 36. The U.S. Constitution's Suspension Clause provides that "[t]he Privilege of the Writ of Habeas Corpus shall not be suspended, unless when in Case of Rebellion or Invasion the public Safety may require it." U.S. Const. art. I, § 9, cl. 2.
- 37. The unabashedly stringent jurisdictional bar found at 8 U.S.C. § 1252 acts as an unconstitutional suspension of the writ of habeas corpus as applied to Petitioner, as the limited review provided by this statute fails to satisfy the requirements of the Suspension Clause—that is it fails to provide Petitioner with a meaningful opportunity to demonstrate that he is being detained pursuant to an erroneous application of the law. See Boumediene v. Bush, 533 U.S., 723, 779, 128 S.Ct. 2229, 171 L.Ed.2d 41 (2008).
- 38. The Supreme Court has held that constesting the constitutionality of of statutory detention authority halls beyond the scope of 8 U.S.C. 1226(e)'s jurisdictional bar. *Jennings v. Rodriguez*, 138 S.Ct. 830, 841 (2018).



39. Petitioner has been subject to unreasonable post-removal detention and removability is not reasonably foreseeable, based on the nearly six months that she has already been detained in the post-removal period.

SECOND CLAIM VIOLATION OF CONSTITUTIONALLY VALID INTERPRETATION OF 8 U.S.C. § 1225 – SUBSTANTIVE AND PROCEDURAL DUE PROCESS

- Plaintiff-Petitioner re-alleges and incorporates by reference paragraphs 1 through 39 above.
- 41. Procedural due process imposes constraints on governmental decisions that deprive individuals of "liberty" interests within the meaning of the Due Process Clause of the Fifth Amendment. See Mathews v. Eldridge, 424 U.S. 319, 332 (1976).
- 42. The need for specific procedural protections under the Due Process Clause is evaluated by balancing the following factors: the private interest affected by official action; the risk of erroneous deprivation of that interest and the probable value, if any, of additional or substitute procedural safeguards; and the government's interest, including the function involved and the fiscal and administrative burdens that additional procedural requirements would entail. See id. at 335.



- 43. Petitioner's private interest is her right of non-refoulment in accordance with the Convention Against Torture. The risk of erroneous deprivation of these rights are high when the government is informing her that her grant of withholding of removal under the U.N. CAT is being revoked contrary to statutory and regulatory procedures.
- 44. The government's interest in expeditiously removing non-citizens is far outweighed by the risk of erroneous deprivation of this private interest. The fiscal and administrative burden of providing a constitutionally and statutorily adequate process is negligible.

THIRD CLAIM VIOLATION OF FIFTH AMENDMENT SUBSTANTIVE DUE PROCESS

- 45. Plaintiff-Petitioner re-alleges and incorporates by reference paragraphs 1 through 39 above.
- 46. Substantive due process principles forbid the infringement of fundamental liberty interests, unless the infringement is narrowly tailored to serve a compelling government interest. See Moore v. East Cleveland, 431 U.S. 494, 503 (plurality opinion).
- 47. Interpreting 8 U.S.C. § 1225 as foreclosing review of the agency's violating Petitioner's right to nonrefoulment violates the requirements of substantive due process.



- 48. Freedom from persecution and torture (life itself) is a liberty interest protected by substantive due process.
- 49. The agency's act of attempting to revoke Petitioner's lawfully adjudicated CAT claim with subsequent prohibition on review thereof, is not narrowly tailored to serve a compelling government interest. Interpreting 8 U.S.C. § 1225 as authorizing Petitioner's inability to seek review of such violates her substantive due process rights.

PRAYER FOR RELIEF

Wherefore, Plaintiff-Petitioner prays the Honorable Court grant the following relief:

- (1) Assume jurisdiction over this matter;
- (2) Issue a Stay of Removal pending the resolution of this Petition;
- (3) Enter a judgment declaring that Defendant-Respondents' detention of Plaintiff-Petitioner is unauthorized by statute, contrary to law, and unconstitutional;
- (4) Enter a judgement declaring that Defendant-Respondents' revocation of Plaintiff-Petitioner's grant of withholding of removal is unauthorized by statute, contrary to law and unconstitutional;



(5) Issue a Writ of Habeas Corpus requiring Defendant-Respondents to provide Petitioner a constitutionally valid bond hearing;

(6)Order Defendant-Respondents to refrain from transferring Plaintiff-Petitioner out of the jurisdiction of the Court during the pendency of this proceeding and while Plaintiff-Petitioner remains in Defendant-Respondents' custody; and

(7) Grant such other relief as the Court may deem just and proper.

I swear, under penalty of perjury that the foregoing factual information is true and correct to the best of my knowledge.

DATED: August 7, 2025 in El Paso, Texas.

/s/ Michely Paiva Alves

Plaintiff-Petitioner Pro Se January 16, 2025

To the Immigration Department.

Para o Departamento de Imigração.

Political Asylum

Asilo Político

I am Michely Paiva Alves, holder of ID number businesswoman from the city of Limeira, state of São Paulo, born on married for almost 20 years and mother of 2 children.

Sou Michely Paiva Alves, portadora do RG no empresária natural de Limeira, estado de São Paulo, nascida em casada há quase 20 anos e mãe de 2 filhos.

The reason I left my country was due to political persecution. As long as there is political persecution and censorship, I will not be able to return to Brazil.

O motivo pelo qual deixei meu país foi por perseguição política. Enquanto houver perseguição política e censura, não poderei retornar ao Brasil.

The parliamentary authorities of Congress were appealed together with the lawyers of the (Asfav) Association of Relatives and Victims of January 8, where they took to the International Court the abuse of authority and non-compliance with the rights that govern the democratic regime that is set out in our Constitution.

As autoridades parlamentares do Congresso apelaram juntamente com os advogados da Associação de Familiares e Vítimas (Asfav) de 8 de janeiro, onde EXHIBIT A

levaram ao Tribunal Internacional o abuso de autoridade e o descumprimento dos direitos que regem o regime democrático previsto em nossa Constituição.

In the current political conditions of my country it was impossible to stay in another city or state.

Nas atuais condições políticas do meu país era impossível ficar em outra cidade ou estado.

I'll tell you a little about my political persecution, because our Brazilian nation, 70% of the electorate, was holding peaceful demonstrations for 70 days in the barracks of every city in Brazil.

Vou contar um pouco sobre minha perseguição política, porque a nossa nação brasileira, 70% do eleitorado, fez manifestações pacíficas durante 70 dias nos quartéis de todas as cidades do Brasil.

Where on January 8, 2023 I participated in the peaceful demonstration in front of the Army Headquarters in the city of Brasília. On that date there was nothing atypical of political persecution, as there was a group organizing for a peaceful walk to Praça dos Três Poderes on January 9, 2023.

Onde no dia 8 de janeiro de 2023 participei da manifestação pacífica em frente ao Quartel General do Exército na cidade de Brasília. Naquela data não houve nada atípico de perseguição política, pois havia um grupo se organizando para uma caminhada pacífica até a Praça dos Três Poderes no dia 9 de janeiro de 2023.

in front of the Army Barracks, when in the early hours of the morning we were approached by soldiers who formed a human cordon to prevent anyone from leaving the place.

Estava em barraca acampados na frente do Quartel do Exército, quando na madrugada fomos surpreendidos por militares que na madrugada fizeram um cordão humano para que não houvesse saída de nenhuma pessoa do local.

All the buses were taken to a Federal Police warehouse where elderly people, children, young people and middle-aged people like me were held hostage for three days, without food, without a shower and with a very important factor, there was not even any report or declaration of arrest.

Todos os ônibus foram encaminhados para um galpão da Política Federal onde idosos, crianças, jovens e pessoas de média idade como eu ficaram sequestrados por três dias, sem alimentação, sem banho e com um fator muito importante, não houve sequer algum informe ou declaração de voz de prisão.

I was scared and afraid of not knowing what they were going to do with everyone who was there, many people were feeling sick and trying to commit suicide.

Fiquei assustado e com medo de não saber o que fariam com todos que estavam lá, muitas pessoas estavam se sentindo mal e tentando cometer suicídio.

Where we were searched in this warehouse, and all they found were flags of our country, water, a Bible, tents, chairs to rest on and fruit. After three days, I was taken with everyone to the IML, and later to prison without having committed any crime. I remained in prison for two months, in an inappropriate situation in terms of bathing, food, hygiene and without even contact with my family, in a totally dictatorial regime.

Onde nesse galpão fomos revistados, e somente o que encontraram foram bandeiras de nosso país, água, Bíblia, barracas, cadeiras de assento para descanso e frutas.

Após os três dias fui levada com todos ao IML, e posterior para prisão sem ter cometido nenhum crime, permaneci em situação de cárcere durante dois meses, situação inapropriada em banho, alimentação, higiene e sem sequer contato com minha família, em um regime totalmente ditador.

In those two months I lost seventeen kilos, because the food came with broken glass, maggots and pieces of plastic gloves. I fainted due to weakness and injured my foot and did not receive immediate medical attention. It took more than 5 hours for them to treat me inside the prison. Unable to put my foot on the ground after two days, I was escorted out. I remember that I could not get into the police van, I had to roll over. I cried a lot that day and was very humiliated.

Naqueles dois meses, perdi dezessete quilos, porque a comida veio com cacos de vidro, larvas e pedaços de luvas de plástico. Desmaiei devido à fraqueza e machuquei meu pé e não recebi atendimento médico imediato. Demorou mais de 5 horas para me tratarem dentro da prisão. Incapaz de colocar meu pé no chão depois de dois dias, fui escoltado para fora. Lembro que não consegui entrar na van da polícia, tive que rolar. Chorei muito naquele dia e figuei muito humilhada.

The doctor gave me a prescription for medicine and asked me to use an ice pack. I only received the medicine in prison and I was unable to set foot on the ground for more than 15 days and in pain. The police yelled at me and said I was faking it.

O médico me deu uma receita de remédio e me pediu para usar uma bolsa de gelo. Só recebi o remédio na prisão e fiquei mais de 15 dias sem poder pisar no chão e com dor. A polícia gritou comigo e disse que eu estava fingindo.

After I was released from prison, my life was completely destroyed, wearing an electronic ankle bracelet without having a conviction, I lost my company, my children with traumas and also my husband and I.

My lawyer informed me that the dictatorial government would be sending innocent people back to prison, so I decided to leave my country.

Após a minha saída do cárcere, minha vida ficou totalmente destruída usando uma tornozeleira eletrônica sem ter uma condenação, perdi minha empresa, meus filhos com traumas e bem como eu e meu esposo.

Meu advogado informou que o governo ditador estaria recolhendo novamente as pessoas inocentes ao cárcere, então resolvi sair do meu país.

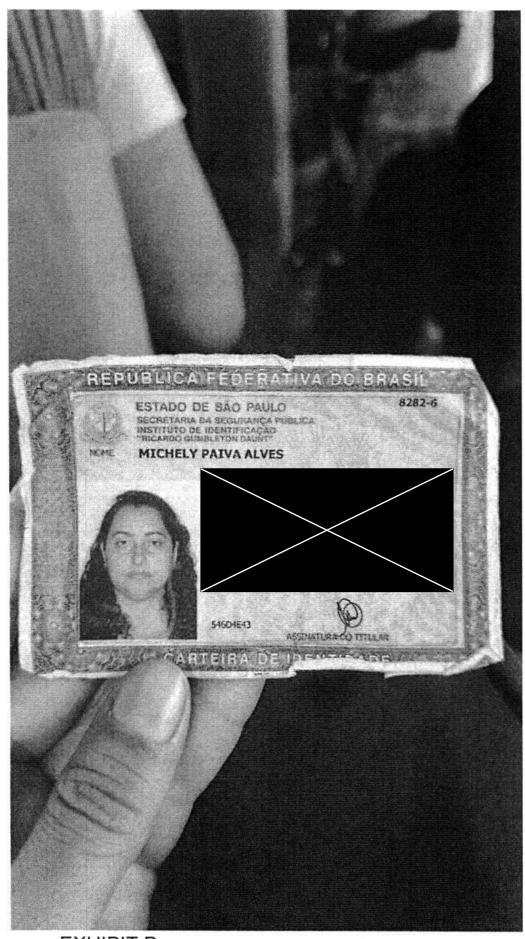
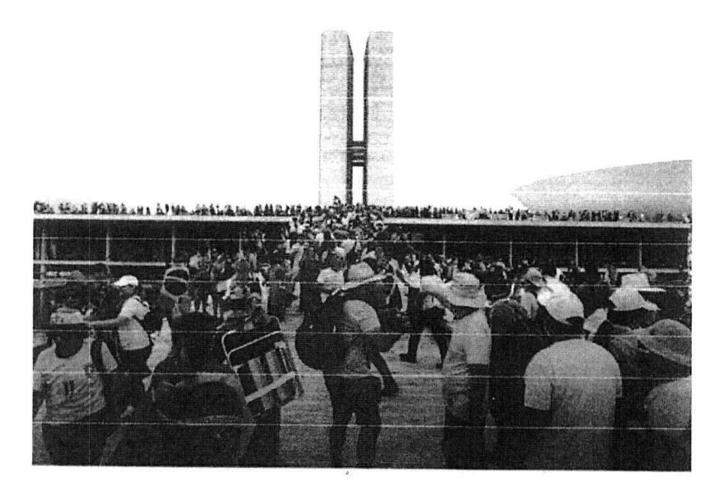


EXHIBIT B





PGR reconhece falta de provas em caso do 8/1

EXHIBIT B 5

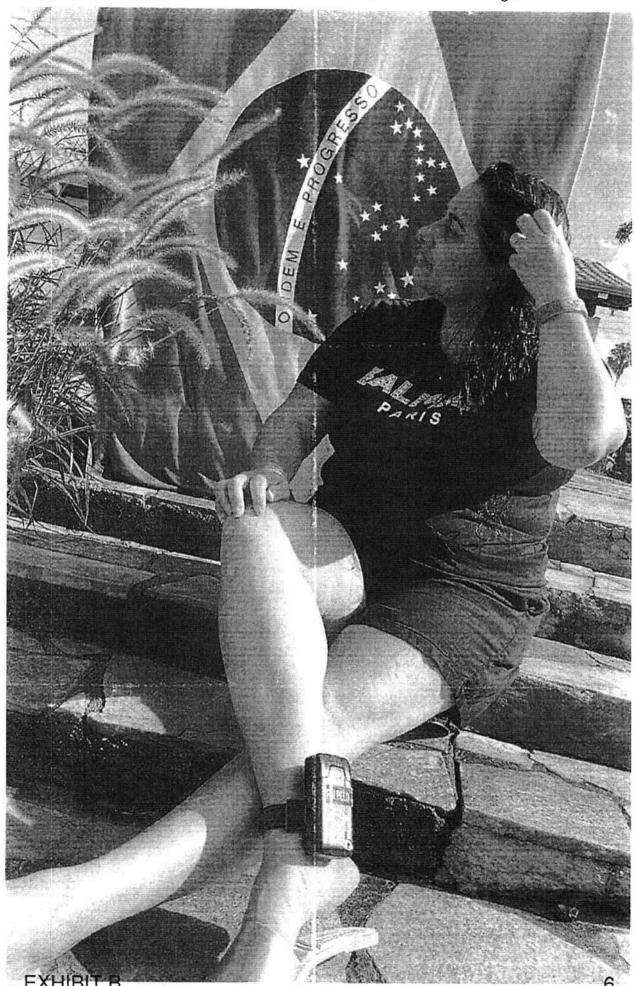
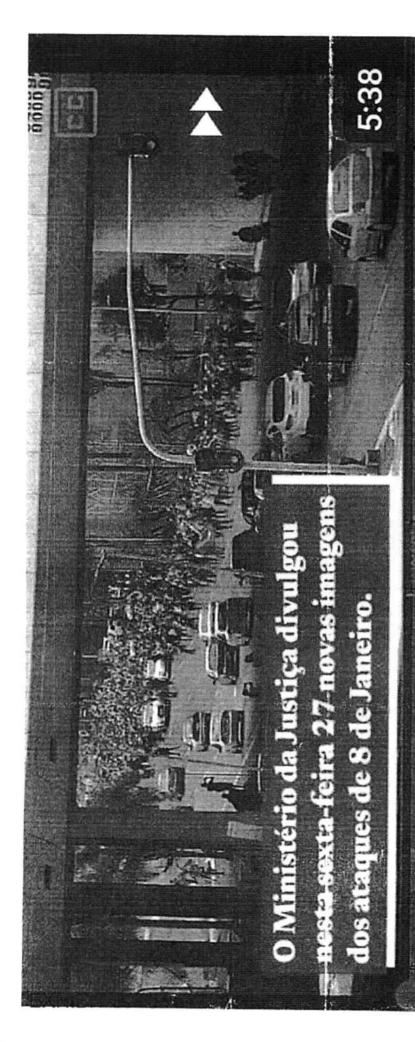


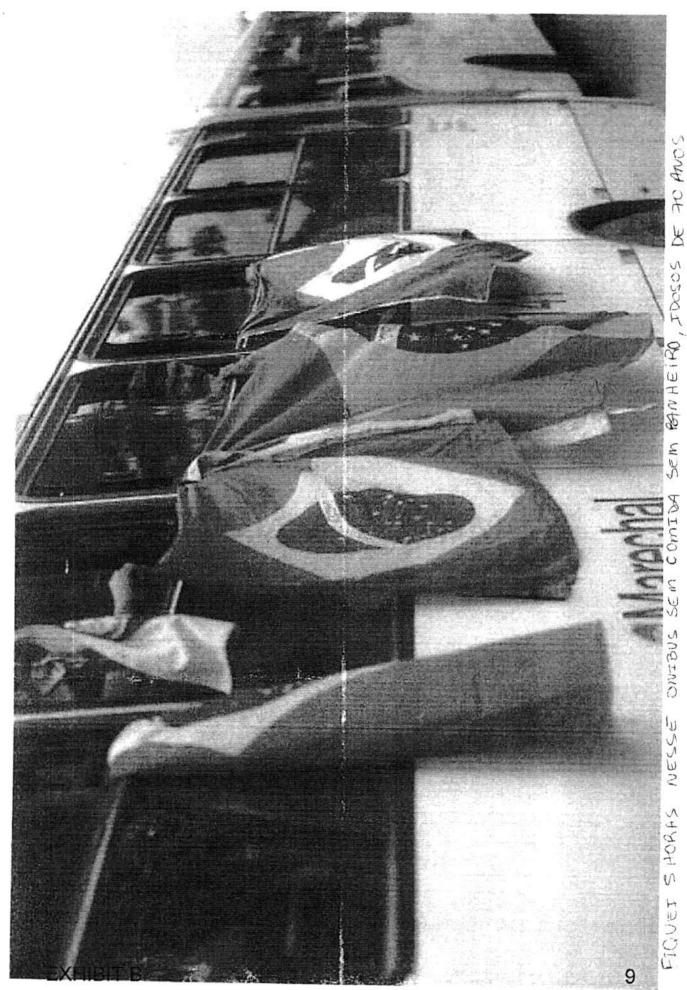
FIGURE PRISES DE TORINOZELETRA ERECEBENDO AMERGAS DE PRISTO

NOS COM FAZER IAM SUE 0 SABER SEM ALTMENTAGAO SER



BOLSONARISTA EM 8 DE JANEIRO | At... **AS NOVAS IMAGENS DO TERRORISMO**

CartaCapital · 62 mil visualizações · há 1 ano



DRINDRAW NO CIVIBUS

This document contains a Brazilian arrest warrant and related information for Michely Paiva Alves.

The arrest warrant, issued by the Cabinet of Minister Alexandre de Moraes of the Supreme Federal Court, is for preventive custody and is valid until September 9, 2040. Michely Paiva Alves (CPF:), born , is accused of crimes under Law 9605, art. 62 (environmental crimes) and Law 2848, art. 288, sole paragraph (criminal association).

The document details the revocation of her provisional release due to non-compliance with precautionary measures, including:

Deactivation of her electronic ankle monitor on August 28, 2024.

Failure to appear for weekly court check-ins.

Discrepancies in her signature on a candidate registration document for the 2024 elections and her weekly appearance sheets.

Her husband's claim of not knowing her whereabouts, suggesting she may have fled.

As a result, the arrest warrant was issued on September 10, 2024. Additionally, the court ordered the immediate blocking of her bank accounts and other financial assets, as well as movable and immovable property (vehicles, real estate, boats, and aircraft).

Despite the arrest warrant, a Criminal Record Certificate from the Federal Police, dated September 4, 2024, states that there is no final conviction against Michely Paiva Alves in the National Criminal Information System (SINIC).

The document also includes what appear to be personal notes or social media posts from Michely Paiva Alves, mentioning:

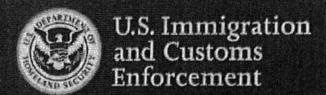
Wearing an ankle monitor for 1 year and 7 months and receiving threats of arrest.

Spending 3 days without food and not knowing what would happen to "us."

Being on a bus for hours without food or a bathroom, with elderly people (over 70) having to relieve themselves on the bus.

Finally, there's a news headline from "revistaoeste" stating "PGR recognizes lack of evidence in 8/1 case," and another image referencing "NEW IMAGES OF BOLSONARIST TERRORISM ON JANUARY 8." These suggest a connection to the January 8, 2023, events in Brazil.

EXHIBIT B 10 Official Website of the Department of Homeland Security



Home

Who We Are

Wha

Search Results: 1

MICHELY PAIVA ALVES

Country of Birth: Brazil

A-Number:

Status: In ICE Custody

State: TX

Current Detention Facility: ELPASO PROCESSING CENTER

* Click on the Detention Facility name to obtain facility contact information

BACK TO SEARCH >

DHS.gov

USA.gov

OIG

Open Gov

FOIA

800088000

Metrics

EXHIBIT C

1

CONTRACT INFORMATION

c/o Silvio Bruana Michely Paiva Alves

Michelypaiva2025@gmail.com