



## **REQUEST FOR ORAL ARGUMENT**

The Petitioners state their desire a fifteen-minute oral argument in this case. Oral argument should be heard because the issues in this case involve fundamental questions regarding the definition of past and future persecution and will affect future claims for asylum heard in the Eight Circuit.

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ARGUMENT

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## **STATEMENT OF THE ISSUES**

**I.**





## **STATEMENT OF THE FACTS**





Remberto Alvarado was in the office of one of the “bosses” of the Death

























The BIA in the case at the bar was clearly wrong when they held that “we do

However the applicant must provide evidence from which it is reasonable to

member of an activist family. It would appear to a reasonable fact finder that the



Using any of the above definitions, the Ramirez's have established that they had suffered from past persecution at the hands of the Salvadoran government.

Mrs. Ramirez returned briefly to gather left behind items at their abandoned







presumption of a well-

fears ...” (CAR 106:16-

*Squads*

ninety two *because the persecution against his person did not  
cease...*

(CAR 191-192)(*emphasis* added by the Petitioners). The governmeliff5iTdid ( ) Tj3 -70.5 3

requested that Remberto Alvarado (the member of the death squad that initially







and destroyed by government forces, they were forced to leave their home and community, they were forced to live in fear and hiding and they provided specific

## **CONCLUSION**

For the foregoing reasons, the Petitioners, Santos Andres Ramirez, Maria Luz Ramirez, Maria Del Carmen Ramirez-Alvarado, Yasmin Ramirez-Alvarado, Ana Ramirez-Alvarado, Santos Ramirez-Alvarado, Melvin Ramirez-Alvarado respectfully request that decision of the Board of Immigration Appeals be reversed and the Attorney General be directed to approve their application for asylum and that their motion for withholding of deportation be granted therefore allowing them to remain in the safety8o



**CERTIFICATE OF COMPLIANCE**

Pursuant to Federal Rules of Appellate Procedure 32(a)(7)(C), I hereby certify that this brief complies with the type-volume limitation provided in Rule 32(a)(7)(B)(i) and pursuant to the Court's Order allowing 16,000 words, relying on the word processor word count feature, contains \_\_\_\_\_ words.

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