

Request for Inspection

Request for Inspection

We the undersigned, representing 202 families who reside in the communities and neighborhoods known as Afonso Mafrense and São Joaquim, part of the area designated for the program entitled **Parque Lagoas do Norte, Teresina, Piauí**, specifically Phase 2 of the Resettlement Action Plan, take this opportunity to make a statement about the PRI that the city government of Teresina, capital of the state of Piauí, presented to us.

We do not agree with and do not accept the resettlement of our families that results in our departure from our current places of residence. According to the draft RAP, there are 119 affected families in the Phase 2 area, 34 of them will be partially affected and 85 will be completely affected. We are part of that latter target group, along with other families who live in the same area but are not considered in the records (stamp) of the city government, i.e., new residences and families arriving after the stamp [sic] was conducted in 2014 and the resettlement plan developed.

We emphasize that those families are being drastically impacted in terms of social, political, cultural and economic conditions. The project being executed lacks transparency and there is no dialogue between the city and the residents. The Resettlement Action Plan was not made available to us until after we were able to obtain the assistance of a prosecutor and public defender.

We are submitting this request for inspection and asking for an investigation of the area that comprises the Lagoas do Norte Park, giving priority to the area of the aforementioned phase. We also request a determination as to whether the construction works are being carried out according to World Bank policy.

We ask: For whom is the Lagoas do Norte Park? This project requires the resettlement of more than 70 percent of the homes during the present phase. Some families have lived there for 40 years. Their homes have great sentimental value. Others support their families by work performed at their own homes. Furthermore, there are needy people who depend on the help from others, such as their closest neighbors, since they have lived for so long in that area. There are elderly people who are part of the history of the community. Now, with the arrival of the park, we thought that we would benefit from the wonders of the project adopted by the city hall since we have been waiting for so long for improvements, but now we are not given the choice of staying in order to enjoy the benefits of the park.

We believe that, in accordance with Bank policy, involuntary resettlement is the option of last resort for a project, but the truth is that it's not happening that way. Residents are not being given the option of staying in their homes because the city requires residents to leave the location; there is no need for that because there is sufficient space in which to build the park without displacing the families. *What we want is to stay in our homes and in the future enjoy the beauty of the park.*

Given the actions being taken by the city hall, we residents have formed protest groups in order to strengthen the movement toward allowing families to remain in our communities. These groups have received help from institutions such as the Ferreira de Sousa Defense Center (mobilizing families impacted in other communities, movements, and researchers), the Movement of Persons Affected by Dams/MAB, the Public Prosecutor's Office of the state of Piauí (record of hearing attached), the Federal Public Defender's Office and those of the state of Piauí (a committee of public defenders has been formed – see attached), the Archdiocese of Teresina, through its human rights commission, parishes, and pastors (letter of support from the Archdiocese attached), the Architecture and Urbanism Council of Piauí, the State Council of Engineering and Agronomy, and the Zonal Coordinating Group/GAZ of the North. We also recognize support from many civilian volunteers.

We will persevere in the expectation of being heard, so that our families may be considered as part of the existence of the Lagoas do Norte Park, staying in the places where we now live and are making history.

The involuntary resettlement being carried out by the City of Teresina violates the document entitled World Bank Operational Manual – 2001, inasmuch as it does not consider the following:

1. The serious economic, social, and environmental risks caused by involuntary resettlement and the breakdown of production systems;
2. Impoverishment associated with loss of property or sources of income;
3. The conditions offered for production of goods and services when moved from their places of origin and relocated to more disadvantaged sites;
4. Effect on community-based social networks and institutions now serving families that will be displaced, leading to dispersion of family groups and launching an attack on the cultural identity of the people who founded the city of Teresina;
5. Alternatives to avoid involuntary resettlement;
6. Possibilities for participation in the benefits afforded by the project;

7. Opportunities for participation in planning and implementation of the resettlement program, to have their demands be heard and responded to so that they are assisted in their efforts to restore their living conditions if the alternative of improving those conditions prevails;

5. [sic] The conditions under which the affected population lives, used as basis for finding ways to recover their livelihood;

6. Participation by the involved families, considering the principle of shared property between women and men, in the assets and in negotiations concerning the alternative modes of compensation inherent in the planning and implementation of any kind of resettlement;

7. Mandatory payment of compensation prior to resettlement;

8. Need for legal advisory services during negotiation of compensation; lack thereof has resulted in unfair appraisals of property and real estate that were not even conducted in advance. The replacement cost method, which should include transaction costs, was not adopted.

9. Families who do not have legal title to the property (squatters) and families or individuals who have no legal right to the land (renters, assignors, lace makers, street vendors or informal salespeople) are going to lose the right to access and use a portion of the land (because of the start of construction).

Let the Lagoas do Norte Park be devoted to those who already live near its space!

We are certain that this will involve less financial cost and produce greater social value.

Following are some contact points for continuation of dialogues via e-mail, always copied to all:

Thays: thaysbeatryce@ gmail. com; Morais: franciscomototaxi 1307@gmail.com; and Lúcia Araújo: luciateresina@yahoo.com.br.

Other individuals are mentioned in other attached documents.

Teresina/Piauí, August 13, 2019

ATTACHED PETITIONS SIGNED BY 202 FAMILIES

ANNEX

I, the undersigned, being responsible for the family and residence at the address that also appears below, situated in the area of construction of the Lagoas do Norte Park, do not agree and do not accept the resettlement of my family away from its current place of residence. I am protesting against the World Bank in the expectation of being heard, so that my family will have the opportunity to enjoy the benefits brought about by the environmental park.

NAME

ADDRESS

NEIGHBORHOOD

STREET

NUMBER

Pedido de Inspeção

Nós, abaixo-assinados, representando 202 famílias moradoras das comunidades e bairros Afonso Mafrense e São Joaquim, da área do **Programa Parque Lagoas Do Norte, Teresina, Piauí**, da etapa 2 do plano de reassentamento involuntário/PRI, através desta carta, vimos nos manifestar sobre esse PRI, que a prefeitura de Teresina, capital do Piauí, Brasil, nos apresentou.

Não concordamos e não aceitamos o reassentamento de nossas famílias com a consequente saída do atual local de residência. Segundo a minuta do PRI, nessa área da etapa 2 existem 119 famílias afetadas, sendo previsto 34 remoções parciais e 85 remoções totais. Nós somos parte dessa última meta, se somando a outras famílias que moram na mesma área mas não estão consideradas nos registros(selos) da Prefeitura, ou seja, novas moradias e famílias pós realização do selo em 2014 e plano de reassentamento.

Ressaltamos que essas famílias estão sendo impactadas, de forma brutal, nas suas condições sociais, política, cultural e econômica. Não existe transparência no projeto que está em execução e nem diálogo entre a prefeitura e moradores. O Plano de reassentamento involuntário só foi disponibilizado para nós quando conseguimos a ajuda de um promotor e um defensor público.

Vimos apresentar este pedido de inspeção e solicitamos uma investigação na área que compõe o parque lagoas norte, prioritariamente na área que consiste a etapa supra citada, também para verificar se as obras estão sendo executadas de acordo com a política do banco mundial.

O que nós questionamos: parque lagoas do norte para quem? Neste projeto a ser executado requer a remoção de mais de 70% das moradias da etapa atual, existem famílias que moram há 40 anos de residência nesse local, já existe um grande valor sentimental pela sua moradia, já outros, possuem meios de trabalho na sua própria residência para garantir o sustento da família, e além do mais, existem pessoas necessitadas que dependem da ajuda de outras pessoas, como no caso os vizinhos mais próximos, já que moram a tanto tempo nessa área. Essas pessoas mais antigas, fazem parte da história da comunidade. Agora, com a vinda do parque, pensávamos que iríamos nos beneficiar com as maravilhas do projeto da prefeitura, já que estamos tanto

tempo à espera de uma benfeitoria, pois agora não nos dão escolha de ficar, para usufruir dos benefícios do parque.

Acreditamos que reassentamento involuntário seja a última opção para o projeto, de acordo com a política do banco, mas na verdade não é dessa forma que está acontecendo, os moradores não estão tendo a opção de ficar nas suas residências, pois a prefeitura obriga os moradores a sair do local sem necessidade, por que tem área suficiente para construção parque sem a remoção das famílias. *O que queremos, é permanecer em nossas residências e desfrutar da beleza do parque futuramente.*

Com a movimentação da prefeitura, nós moradores criamos grupos de resistência para fortalecer a permanência das famílias nas nossas comunidades, os grupos de resistência tem recebido o apoio de algumas instituições como: Centro de Defesa Ferreira de Sousa (mobilizando famílias impactadas de outras comunidades, movimentos e pesquisadores), Movimento de Atingidos por Barragens/MAB, Ministério Público do Estado do Piauí (anexado termo de audiência), a Defensoria Pública da União e também do Estado do Piauí (constituído comissão de defensores públicos – ver anexo), a Arquidiocese de Teresina, através de sua comissão direitos humanos, paróquias e pastorais(anexada carta de apoio da Arquidiocese), Conselho de Arquitetura e Urbanismo do Piauí, Conselho Estadual de Engenharia e Agronomia e Grupo de Articulação Zonal/GAZ do Norte. Ressaltamos também muitas adesões de parcerias civis voluntárias.

Vamos continuar perseverando na expectativa de atendimento, que nossas famílias sejam contempladas na participação da existência do parque lagoas do norte, ficando no mesmo lugar em que estamos morando e fazendo história.

O reassentamento involuntário promovido pela Prefeitura de Teresina descumpre o documento Manual Operacional do Banco Mundial de 2001 em razão de não considerar:

1. os graves riscos econômicos, sociais e ambientais provocados pelo reassentamento involuntário e desagregação dos sistemas de produção;
2. o empobrecimento pela perda de patrimônio ou fontes de renda;
3. as condições ofertadas para produção de bens e serviços do local de origem com realocação em locais menos favorecidos;

4. as redes sociais e instituições comunitárias das famílias deslocadas, o que leva à dispersão de grupos familiares e promove ataque à identidade cultural de um povo que deu origem à cidade de Teresina;
5. formas alternativas de evitar o reassentamento involuntário;
6. as possibilidades de participação nos benefícios providos pelo projeto;
7. oportunidades de participação no planejamento e implementação do programa de reassentamento, sendo ouvidas e atendidas suas demandas, de modo a serem assistidas nos seus esforços de restauração das condições de vida, prevalecendo a alternativa de melhoria dessas condições;
5. as condições em que vive a população afetada e com isso buscar recuperar seu modo de vida;
6. a participação das famílias envolvidas, considerando o princípio de partilha conjunta da mulher e do homem nos bens e nas negociações de alternativas de compensação inerentes ao planejamento e na efetivação de qualquer atividade de reassentamento;
7. a obrigatoriedade das compensações antes das remoções;
8. a necessidade de assessoria jurídica no âmbito de negociação da compensação, o que tem resultado em avaliação não justa e nem prévia dos bens e imóveis, sem adotar o método de custos de substituição, que deve incluir os custos de transação;
9. as famílias que não têm regularização fundiária (posseiros) e às famílias ou indivíduos que não têm qualquer direito legal sobre a terra (arrendatários, cedentes, rendeiros, vendedores ambulantes ou informais) e que vão perder o direito de acesso e uso de uma parte da mesma (em virtude da implantação da obra).

Que o Parque Lagoas do Norte seja para quem já mora junto e próximo ao seu espaço!

Temos a certeza que será de menor custo financeiro e maior valor social.

Apresentamos alguns contatos para referência de continuidade dos diálogos, via e-mail e sempre copiados: Thays: thaysbeatryce@gmail.com, Morais: franciscomototaxi1307@gmail.com e Lúcia Araújo: luciateresina@yahoo.com.br.

Além desses contatos, observar outros citados em outros documentos anexados.

Teresina/Piauí, 13 de agosto de 2019.

ABAIXO-ASSINADOS EM ANEXO DE 202 FAMÍLIAS

ANEXO

Eu, abaixo assinado, responsável pela família e residência com o endereço também informado abaixo, localizado em área das obras do Parque Lagoas Do Norte, não concordo e não aceito o reassentamento da minha família do atual local de residência. Venho a reclamar junto ao Banco Mundial, na expectativa de atendimento, e da oportunidade de minha família ser beneficiada pelos bens trazidos pelo parque ambiental.

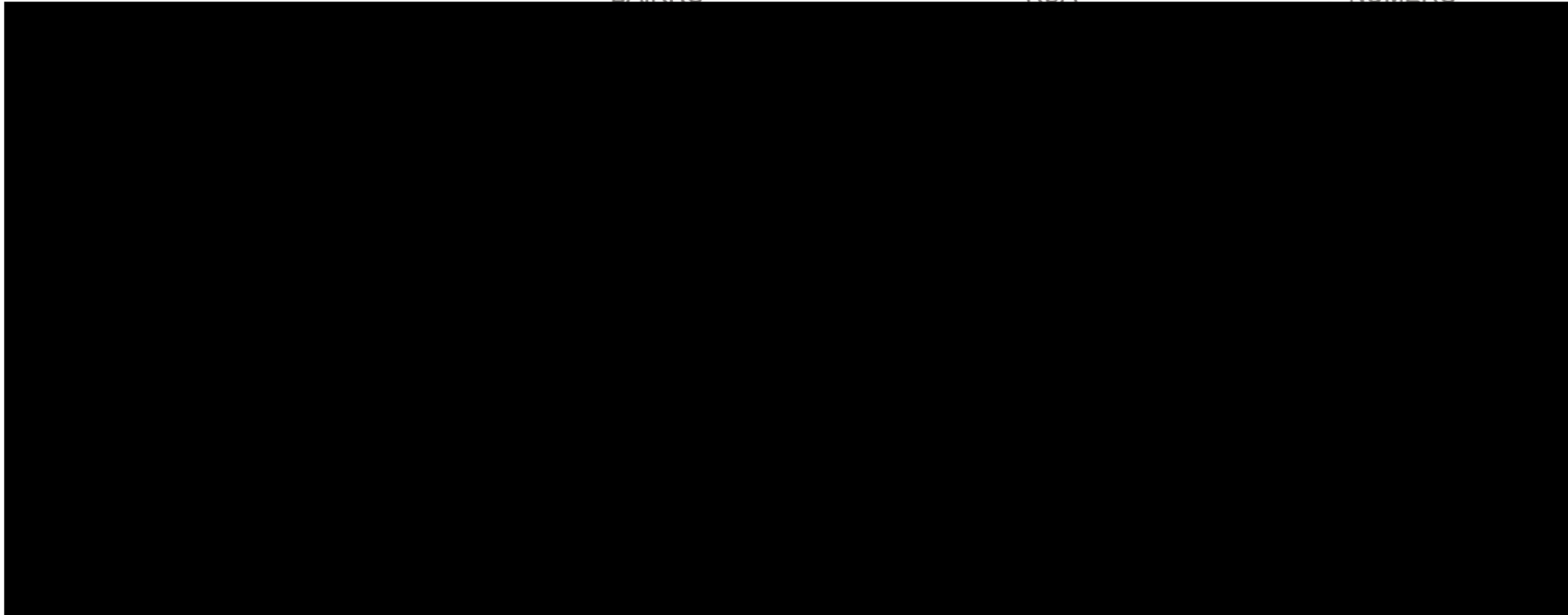
NOME

ENDEREÇO

BAIRRO

RUA

NUMERO



MANIFESTO OF A PEOPLE'S DIALOGUE!

Referring to the Lagoas do Norte Park!!!

We, the undersigned, hereby constitute ourselves as representatives of families from the communities of Poty Velho, Afonso Mafrense and São Joaquim (also including the region of the pottery factories, Avenida Boa Esperança), all situated in the area encompassed by construction of the Lagoas do Norte Park.

First, we want to thank the World Bank for its attention and the opportunity to have the requested dialogue today.

We emphasize that this dialogue is very valuable and is accompanied by many others now in progress with other institutions such as the Federal Office of Public Defenders, the State Prosecutor's Office, the Archdiocese of Teresina (through its human rights commission and the two parishes that serve the area of these communities), university study and research groups, the city government of Teresina, the Regional Council of Engineering and Agronomy (CREA), the Architecture and Urbanism Council of Piauí (CAUPI), the Ferreira de Sousa Defense Center, and associations of residents.

All these dialogues have been held primarily to promote guarantees of the families' rights and safety with respect to the "involuntary resettlement" being carried out by the city government.

We have highlighted questions that we believe are important for the exchange of opinions during this dialogue. In our reflections we considered the following:

- 1) The families have an understanding and they appreciate and are publicizing the **value of the construction work and the park**, both for the city and for themselves;
- 2) **The families also have tremendous value to offer to the construction and sustainability of the park**, as they have been able to offer the city and, especially, to the history of this region. The great majority of families have a long history of living in these communities to which they have lasting ties.¹
- 3) **The "involuntary resettlement"** has proceeded with the dynamics of a negotiation of real estate, but it is important to stress that what is involved is not merely negotiation and dislocation of buildings to make way for the Park, but a change in the living conditions of those families;

¹ Handwritten notation in the margin *Note – in the copy* [initials]

4) **The dialogues** have taken the form of debates, studies and proposals and have moved in the direction of reaffirming commitments associated with construction of the park, provided consideration is given to the key role of the families and their ability to remain in the place where they now live.

5) To that end, we have held various **meetings with city government** and agreed in March 2019 to **establish a technical working group** of varied membership including professionals, in order to revise the size of the project (this has not yet been done). To that end, we have formed partnerships with those who are predisposed to participate and lend support, such as the CREA and CAUPÍ and independent professionals in engineering, architecture, anthropology, etc.

The families and communities are ready and available to participate.

It is our fervent desire that the World Bank, as a follow-up to this meeting, join and support the consolidation of these dialogues and the decisions being made as to the direction of future actions in order to promote guarantees of the families' rights and safety with respect to involuntary resettlement, always keeping in mind the key role played by the families.

Teresina/PI/Brazil, June 16, 2019.

[*handwritten*] Hand-delivered to [REDACTED] of the "Piauí Pillars of Growth and Social Inclusion" Project being carried out in Teresina/PI/Brazil.

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OFFICE OF THE PUBLIC DEFENDER
OF THE STATE OF PIAUÍ

GDPG ADMINISTRATIVE RULING No. 750/2019

THE ACTING PUBLIC DEFENDER-GENERAL OF THE STATE OF PIAUÍ, using his legal authority under Art. 13, Section XX of State Complementary Law No 059, dated November 30, 2005.

CONSIDERING: The content of the Official Communication from the Archdiocesan Commission on Human Rights issued by the Archdiocese of Teresina;

HEREBY RESOLVES:

Art. 1. **TO ESTABLISH A COMMISSION for construction of planned actions in order to respond to demands pertaining to the Lagoas do Norte Project**, such commission to be composed as follows:

I – **CHAIRMAN:** Dr. Alessandro Andrade Spindola;

II - **MEMBERS:** Dra. Patrícia Ferreira Monte Feitosa, Dr. Igo Castelo Branco de Sampaio, Dra. Karla Araújo de Andrade Leite, Dra. Sheila de Andrade Ferreira, Dr. Marcelo Moita Pierot and Dr. Gerson Henrique Silva Sousa.

Art. 2. This Administrative Ruling enters into force on the date of its publication.

TO BE PUBLICIZED, RECORDED, AND FULFILLED.

OFFICE OF THE PUBLIC DEFENDER-GENERAL, in Teresina, Piauí, August 12, 2019.

[signed]

CRISVALDO MARQUES DOS REIS

Public Defender-General of the state of Piauí

Rua Nogueira Tapety, 138, Bairro dos Noivos |64.046-020 - Teresina - Piauí
defensoriapublica@defensoria.pi.def.br | www.defensoria.pi.def.br | (86) 3232-0350

ODPU
OFFICE OF THE FEDERAL PUBLIC DEFENDER IN PIAUÍ
3RD GENERAL CIVIL OFFICIAL COMMUNICATION

LETTER OF SUPPORT – DPU/PI S/N/2019

Teresina – PiauÍ – Brazil, August 14, 2019

TO THE WORLD BANK

SUBJECT: LETTER OF SUPPORT FOR THE REQUEST FOR INVESTIGATION BY THE WORLD BANK FORMULATED BY THE COMMUNITIES IMPACTED BY THE LAGOAS DO NORTE PROJECT – TERESINA – PIAUÍ – BRAZIL

THE OFFICE OF THE FEDERAL PUBLIC DEFENDER IN PIAUÍ – DPU/PI, represented herein by the undersigned Federal Public Defender, issues this letter TO STATE his support for the REQUEST FOR INVESTIGATION addressed to the World Bank, particularly in the matter concerning implementation of the Lagoas do Norte Project in the municipality of Teresina, state of PiauÍ, in the Federative Republic of Brazil.

THE OFFICE OF THE FEDERAL PUBLIC DEFENDER IN PIAUÍ – DPU/PI, as a permanent institution of the Brazilian State charged with providing full legal assistance free of charge to the needy, as well as defending human rights pursuant to Art. 134 of the 1988 Constitution of the Federative Republic of Brazil, has since 2016 been following the progress of the installation of the Lagoas do Norte Project sponsored by the Municipality of Teresina – PiauÍ – Brazil and financed by the World Bank, in its role of defending the rights of the communities impacted by that project.

During all these months of observing the actions taken under the Lagoas do Norte Project, the DPU/PI, along with other institutions, both public and private, has continually attempted to establish dialogues and hold negotiations between those responsible for the Lagoas do Norte Project and the communities impacted by that project. However, **the municipal managers responsible for conducting the project never demonstrated any willingness to take into consideration the socioeconomic and cultural aspects that involve the communities impacted by the Lagoas do Norte Project and the locality where they have lived for decades, into which they have integrated their unique cultural identity.**

ODPU
OFFICE OF THE FEDERAL PUBLIC DEFENDER IN PIAUÍ
3RD GENERAL CIVIL OFFICIAL COMMUNICATION

It should be emphasized that those communities never protested the installation of the Lagoas do Norte Project. They understand the importance of its implementation in improving living conditions for residents of the entire northern region of Teresina/PI.

However, the communities have always questioned some of the actions taken during execution of the project, primarily the removal and/or attempt to expel thousands of families from areas that they have occupied for decades. Yet the municipal managers have not effectively listened to the appeals by the communities and the entities that support them to make it feasible for the great majority of those families to remain in the area where they live without impairing the execution of the project. This effort would necessitate effective participation by the communities involved.

We emphasize that an analysis of the documents prepared by the Municipality of Teresina – Piauí – Brazil and sent to the World Bank cites as justification for removal of the families from the affected areas the fact that they are living in an area that is vulnerable to risks. However, for purposes of executing that measure they rely on a different argument (expropriation for reasons of public utility) in order to make the removals feasible under the terms of the internal legal order. This is an argument that, when used in this way, would violate procedural rules established by the World Bank itself.

At this point it is appropriate to quote the Archdiocesan Commission on Human Rights of Teresina – PI, which stated: “*the Constitution of the Federative Republic of Brazil is significantly open in relation to fundamental rights. In that connection cultural rights are considered as included among fundamental rights, thus human rights according to Art. 215 of the Constitution of Brazil. Therefore they must be respected in all their dimensions, even when in conflict with Urban Development Law.*”

‘It should be explained that the region in Teresina – PI, state of Piauí where the Lagoas do Norte Project is being established, is a region that features significant landmarks of cultural identity with the people who live there. Its families date back to the earliest years of the founding of the state capital city, and so although any resettlement procedure associated with the Lagoas do Norte Project must consider technical aspects, it must also consider the persuasive wishes of the families who will be affected to remain in the places where they were born.’

ODPU
OFFICE OF THE FEDERAL PUBLIC DEFENDER IN PIAUÍ
3RD GENERAL CIVIL OFFICIAL COMMUNICATION

In light of the foregoing, **THE OFFICE OF THE FEDERAL PUBLIC DEFENDER IN PIAUÍ** hereby expresses its full support for the REQUEST FOR INVESTIGATION made by the community and accompanied by dozens of collected signatures. We hope that the World Bank will clearly and impartially investigate the installation of the Lagoas do Norte Project, a plan that will bring many benefits to the municipality but must proceed with respect for human rights—especially the cultural rights—of the impacted communities. We remain willing and available to assist with whatever investigative actions may be implemented.

Very truly yours,

[signed]

BENONI FERREIRA MOREIRA

Federal Public Defender

Teresina, August 5, 2019

THE COMMISSION ON HUMAN RIGHTS OF THE ARCHDIOCESE OF TERESINA- PI, represented herein by its Chairman and signatory to this **Letter of Support**, hereby announces its **support** for the REQUEST FOR INVESTIGATION addressed to the World Bank, especially as it pertains to the installation of the Lagoas do Norte Project in the municipality of Teresina, state of Piauí, Federative Republic of Brazil.

The Archdiocesan Commission on Human Rights has since 2016 been following the progress of installation of the Lagoas do Norte Project and during that entire time has perceived that some families are opposed to leaving their ancestral lands, primarily because they have strong ties of cultural identity with the locality and, moreover, because they would like to participate in the completed Project and the benefits it will bring to the northern zone of the state capital city.

The Constitution of the Federative Republic of Brazil is significantly open in relation to fundamental rights. In that connection cultural rights are considered as included among fundamental rights, thus human rights according to Art. 215 of the Constitution of Brazil. Therefore they must be respected in all their dimensions, even when in conflict with Urban Development Law.

It should be explained that the region in Teresina – PI, state of Piauí where the Lagoas do Norte Project is being established is a region that features significant landmarks of cultural identity with the people who live there. Its families date back to the earliest years of the founding of the state capital city, and so although any resettlement procedure associated with the Lagoas do Norte Project must consider technical aspects, it must also consider the persuasive wishes of the families who will be affected to remain in the places where they were born.

In light of the foregoing, the Archdiocesan Commission on Human Rights of Teresina – PI issues this letter to express its support for the REQUEST FOR INVESTIGATION made by the community and accompanied by dozens of collected signatures. We hope that the World Bank will clearly and impartially investigate the installation of the Lagoas do Norte Project, one that will bring many benefits to the municipality but must proceed with respect for human rights, especially the cultural rights of the impacted communities.

Very truly yours,

[signed]

CARLOS WAGNER ARAÚJO NERY DA CRUZ

Chairman of the Archdiocesan Commission on Human Rights

Archdiocese of Teresina – state of Piauí

Federative Republic of Brazil

cwanc@uol.com.br

OFFICE OF THE PUBLIC PROSECUTOR OF THE STATE OF PIAUÍ
PUBLIC PROSECUTORS UNIT FOR THE PROTECTION OF PUBLIC HERITAGE AND
ADMINISTRATIVE PROBITY
44th JUDICIAL DISTRICT

RECORD OF HEARING

On the second day of the month of May of 2019, at 9:00 a.m. in Conference Room 04, Mezzanine level of the Office of the Public Prosecutor situated at Rua Lindolfo Monteiro, nº 911, a hearing was held. Present were Dr. Fernando Ferreira dos Santos, Public Prosecutor for the 44th Judicial District; Mr. Raimundo Eugênio Barbosa dos Santos Rocha, representative of the Municipal Secretariat of Government - SEMGOV; Mr. Benoni Ferreira Moreira, Federal Public Defender; and Ms. Dilma Maria Pereira Velante and Mr. Francisco Morais as representatives of the residents. In view of the absence of the Municipal Planning Secretary, who was ill, the hearing was rescheduled for May 8, 2019, at 9:00 a.m. at the Mezzanine level of the Office of the Public Prosecutor situated at Rua Lindolfo Monteiro, nº 911. Then the hearing was adjourned and I, Gabriel Catallini Batista Rosa (Law Intern) drew up this record which, having been read and found to be in order, was duly signed by those in attendance.

_____[signed]_____

Dr. Fernando Ferreira dos Santos
Public Prosecutor for the 44th Judicial District



Raimundo Eugênio Barbosa dos Santos Rocha
Municipal Secretary of the Government

_____[signed]_____

Mr. Benoni Ferreira Moreira
Federal Public Defender