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January 19, 2026

**BY ECF**

Hon. Evelyn Padin, U.S.D.J.  
U.S. District Court for the District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: *Moreira Da Silva v. Bondi*, No. 25-17095**  
**Status Report on Return of Personal Documents**

Dear Judge Padin:

Our firm represents Petitioner in this matter. Pursuant to the Court's Order of January 7, 2026 (ECF No. 15), I write to update the Court on the status of Petitioner's request for the return of his vital personal documents, including his Employment Authorization Document (work permit), driver's license, Social Security card, and bank card.

As brief background, on November 13, 2025, the Court had ordered that a bond hearing for Petitioner be held within seven days. (ECF No. 13.) A hearing was held and he was granted bond, which was paid on November 20, 2025. On November 21, 2025, after filing his first motion to enforce, Petitioner was released. He was then placed under onerous monitoring conditions including an ankle monitor. His personal documents were also kept by ICE. On November 24, 2025, Petitioner requested the return of the documents from ICE ERO Newark, which has control over Delaney Hall. *See* Exhibit A, Email Correspondence with ICE.<sup>1</sup> ICE has not responded to that request.

On November 25, 2025, Petitioner filed a renewed motion to enforce and to ameliorate conditions of release, seeking, *inter alia*, the return of his documents. (ECF No. 11.) Respondents filed their response on December 8, 2025. (ECF No. 14.)

Both Petitioner's motion and the government's response cited to ICE ERO *Policy Directive 11311, Confiscation and Return of Original Documents* (Jan. 13, 2023).<sup>2</sup> The parties agree that,

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<sup>1</sup> Counsel for the government was informed of this request by email on November 25, 2025 ("ICE kept his work permit and driver's license and has not responded to my request to return them."), yet still represented in their letter to the Court that "it does not appear that Petitioner has requested ERO return the documents." ECF No. 14.

<sup>2</sup> [https://www.ice.gov/doclib/foia/dro\\_policy\\_memos/11311\\_OrgDocConfiscationReturn.pdf](https://www.ice.gov/doclib/foia/dro_policy_memos/11311_OrgDocConfiscationReturn.pdf) ("ERO will generally retain all confiscated documents of noncitizens in removal proceedings, with some exceptions, and those of noncitizens with final orders of removal released from ERO custody."). The noncitizen can "request access to the

per the policy, ICE should return the document if it “has no operational need to retain the document[.]” *Id.* § 5.2, as cited in Respondents’ Response, ECF No. 14.

The Court’s January 7, 2026, Order stated as follows regarding the documents:

ORDERED that the parties shall meet and confer, within 10 days of this Order, on whether Petitioner retains the opportunity to seek return of his personal documents under ERO Directive 11311; and upon the expiration of the 10-day period, Petitioner shall file a status report. If necessary, the Court will enter a supplemental briefing schedule on Petitioner’s constitutional challenge at that time.

ECF No. 15.

Counsel for the parties spoke by phone on January 12, 2026, and again by email over the next week. *See* Exhibit B, Email Correspondence with Counsel. Counsel for Respondents stated, “ICE has informed me that it put in a request for Petitioner’s A File, which would contain these four documents. ICE is waiting for its records department to send the file back.” Undersigned counsel requested an update on Friday, January 16, 2026, and was told that “ICE is still waiting for the return of the full file.” *Id.*

While appreciating that there may be bureaucratic logistics involved, Petitioner submits that ICE and related agencies were recently allocated \$170,000,000,000 (\$170 billion) for immigration enforcement, detention, and deportation. This means ICE is now the largest federal law enforcement agency and the U.S. immigration enforcement agencies are richer than many nations’ entire military force.

Petitioner, meanwhile, cannot work or drive, although he has been legally authorized to do so by U.S. Citizenship and Immigration Services and the New Jersey Motor Vehicle Commission. It has now been nearly two months since he was released from custody. ICE has cited no operational need to retain his documents. Respondents should return his vital personal documents at once.

I thank the Court for its attention to this request.

Respectfully submitted,

*s/ Karen L. Hoffmann*  
Karen L. Hoffmann, Esq.  
Law Offices of Stanley J. Ellenberg,  
Esq., PC

*Attorneys for Petitioner*

cc: Counsel of record (by ECF)

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documents in ERO’s possession,” and ERO “shall make a determination on a case-by-case basis” weighed against “ICE’s operational and evidentiary need for the document[.]” *Id.* at § 2.3.



Karen Hoffmann <karen@sellenberglaw.com>

**MOREIRA DA SILVA, Ronilton ( [REDACTED] ) - Bond paid but not released**

**Karen Hoffmann** <karen@sellenberglaw.com>  
To: "Newark.Outreach" <Newark.Outreach@ice.dhs.gov>

Mon, Nov 24, 2025 at 11:30 AM

Thank you. Mr. Moreira da Silva states that when he was detained, ICE took the following documents from him and has not returned them:

- His driver's license
- His work permit (Employment Authorization Document)
- His social security card
- His bank card

Please advise on how these vital documents will be returned to him, as he cannot drive or work without them.

Thank you for your time and attention.



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On Mon, Nov 24, 2025 at 11:06 AM Newark.Outreach <Newark.Outreach@ice.dhs.gov> wrote:

Subject was released

**From:** Karen Hoffmann <karen@sellenberglaw.com>

**Sent:** Friday, November 21, 2025 3:26 PM

**To:** Newark.Outreach <Newark.Outreach@ice.dhs.gov>

**Cc:** OPLA-Elizabeth-DutyAttorney, <OPLA-Elizabeth-DutyAttorney@ice.dhs.gov>; Silagi, Alex (USANJ) <Alex.Silagi@usdoj.gov>

**Subject:** Fwd: MOREIRA DA SILVA, Ronilton ( [REDACTED] ) - Bond paid but not released

You don't often get email from [karen@sellenberglaw.com](mailto:karen@sellenberglaw.com). [Learn why this is important](#)

**CAUTION:** This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

I'm writing regarding my client Ronilton Moreira da Silva () who is detained at Delaney Hall. My G-28 is attached.

He was granted bond by an immigration judge pursuant to an order from Judge Evelyn Padin of the District of New Jersey. **His bond was paid yesterday morning** but as of yet he has not been released. Proof of payment is attached.

I called Delaney Hall and they confirmed he was still there but had no information on release and told me to email this address. Could you please advise?

Thank you for your time and attention.

Best,

Karen



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Karen Hoffmann <karen@sellenberglaw.com>

**Moreira Da Silva v. Laforge, et al., / Civil Action No. 25-17095-EP - meet and confer**

**Silagi, Alex (USANJ)** <Alex.Silagi@usdoj.gov>  
To: Karen Hoffmann <karen@sellenberglaw.com>

Fri, Jan 16, 2026 at 4:54 PM

No, sorry, nothing beyond they are still waiting for the return of the full file.

**From:** Karen Hoffmann <karen@sellenberglaw.com>  
**Sent:** Friday, January 16, 2026 4:49 PM  
**To:** Silagi, Alex (USANJ) <Alex.Silagi@usdoj.gov>  
**Subject:** Re: [EXTERNAL] Re: Moreira Da Silva v. Laforge, et al., / Civil Action No. 25-17095-EP - meet and confer

Hi again Alex, I'm assuming no update?

**Karen L. Hoffmann, Esq.**

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On Fri, Jan 16, 2026 at 11:57 AM Silagi, Alex (USANJ) <Alex.Silagi@usdoj.gov> wrote:

Let me follow up with ICE for the latest update on the file request.

**From:** Karen Hoffmann <karen@sellenberglaw.com>

**Sent:** Friday, January 16, 2026 11:53 AM

**To:** Silagi, Alex (USANJ) <Alex.Silagi@usdoj.gov>

**Subject:** [EXTERNAL] Re: Moreira Da Silva v. Laforge, et al., / Civil Action No. 25-17095-EP - meet and confer

Hi Alex, my update to the court is due today, so I just wanted to follow up and see if you had heard anything further from ICE about the return of my client's documents.

Thanks,

Karen



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**Karen L. Hoffmann, Esq.**

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On Mon, Jan 12, 2026 at 1:15 PM Silagi, Alex (USANJ) <Alex.Silagi@usdoj.gov> wrote:

Hi Karen,

Thanks for confirming that ERO removed your client's ankle monitor and unenrolled him from ISAP (or, at least, the offending parts of ISAP such as home confinement).

As to the return of documents, I let ICE know that your client would like back his (1) driver's license, (2) work permit, (3) social security card, and (4) bank card. ICE has informed me that it put in a request for Petitioner's A File, which would contain these four documents. ICE is waiting for its records department to send the file back. I've also asked ICE to let me know when ERO has

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an update on when you will have those documents back in your immediate possession, so that you and I can continue our discussions on what, if any, documents ICE believes it must keep.

Thanks,

Alex

**Alex Silagi**

**Deputy Chief, Civil Division**

United States Attorney's Office, District of New Jersey

970 Broad Street, Ste. 700, Newark, NJ 07102

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