

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

LAURIEDSON GONCALVES RUFO,
Petitioner,

v.

ERIK ROKOSKY,
in his official capacity as Director/Warden of
Elizabeth Contract Detention Facility;

JOHN TSOUKARIS,
in his official capacity as Field Office Director,
New Jersey Field Office, U.S. Immigration &
Customs Enforcement;

PAMELA BONDI,
in her official capacity as Attorney General,
U.S. Department of Justice;

KRISTI NOEM,
in her official capacity as Acting Secretary,
U.S. Department of Homeland Security; and

TODD M. LYONS,
in his official capacity as Acting Director, U.S.
Immigration & Customs Enforcement;

Respondents.

Civil Action No.:

**MOTION FOR TEMPORARY
RESTRAINING ORDER/INJUNCTIVE
RELIEF
&
PETITION FOR WRIT OF
HABEAS CORPUS PURSUANT
TO 28 U.S.C. § 2241**

MOTION FOR TEMPORARY RESTRAINING ORDER/INJUNCTIVE RELIEF

Petitioner, Lauriedson Goncalves Rufo (“Mr. Rufo”), respectfully moves before this Honorable Court for a Temporary Restraining Order and Injunctive Relief, to enjoin the Respondents from continuing his unlawful detention during the pendency of his habeas corpus petition filed under 28 U.S.C. § 2241 and upon any grant in release, through the instant request for restraining order and/or habeas corpus petition, the issuance of an injunction to prevent further rearrest.

On November 13, 2025, Mr. Rufo was detained by U.S. Immigration and Customs

Enforcement (“ICE”). The corresponding habeas petition challenges his unlawful detention with his pending I-130 family-based petition, filed by his U.S. Citizen wife, the September 2024 Order entered by Immigration Judge John Carle reopening his removal proceedings based on a complete lack of notice as a minor, and unjustified lack in bond hearing.

To obtain a temporary restraining order and injunction, a movant must demonstrate that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest." *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008). *Hope v. Warden York Cnty. Prison*, 972 F.3d 310, 320 (3d Cir. 2020).

First, Mr. Rufo is likely to succeed on the merits being that he has raised substantial constitutional and statutory claims in his habeas petition that demonstrate his continued detention, with his meritorious I-130 family-based petition, which Immigration Judge John Carle’s Order deemed successful, and lack in bond hearing violates the Fifth Amendment Due Process Clause.

Second, absent the preliminary relief requested, Mr. Rufo will suffer irreparable harm due to his unlawful confinement. Such harm includes not only the deprivation of his liberty, but also the imminent threat of losing his diligently maintained business and transfer to a detention facility located in a remote jurisdiction, thereby severely impairing his ability to communicate with and receive effective assistance from the undersigned counsel. Moreover, and it is of particular concern, that numerous undocumented individuals recently detained within the State of New Jersey have been promptly transferred to out-of-state facilities, often without prior notice to counsel or family members. Disturbingly, the ICE Online Detainee Locator System has frequently failed to update or accurately reflect such individuals’ locations, effectively obscuring their whereabouts. This pattern of transfers, coupled with ICE’s deficient notification practices,

underscores the grave and imminent threat that Mr. Rufo's access to counsel and the Court will be unconstitutionally curtailed absent immediate judicial intervention.

Third, the harm endured by Mr. Rufo full-heartedly outweighs any purported burden on the government by continuing his unlawful detention; any asserted hardship to the government is minimal, speculative, and self-inflicted. If anything, and by improperly detaining Mr. Rufo, the government is imposing unnecessary fiscal and administrative costs upon itself and the judiciary. Continuing to detain Mr. Rufo serves no legitimate governmental interest and instead constitutes an inefficient expenditure of public resources and judicial time.

Fourth, the public interest is served by ensuring compliance with the Constitution, preserving judicial review under 28 U.S.C. § 2241, and preventing further unlawful re-arrest.

For the foregoing reasons, Petitioner respectfully requests that this Court: 1. Issue a Temporary Restraining Order enjoining Respondents from continuing Petitioner's detainment until resolution of the habeas petition; 2. Enter a preliminary and permanent injunction restraining Respondents from re-arresting Petitioner; 3. In the alternative, enter a temporary restraining order prohibiting Respondents from transferring Mr. Rufo, while in custody, outside this Honorable Court's jurisdiction; and 4. Grant any further relief the Court deems just and proper.

**PETITION FOR WRIT OF HABEAS CORPUS PURSUANT
TO 28 U.S.C. § 2241**

Petitioner, Lauriedson Goncalves Rufo, respectfully petitions this Honorable Court for a writ of habeas corpus to remedy his unlawful detention by Respondents, as follows:

INTRODUCTION

1. Petitioner Lauriedson Goncalves Rufo ("Mr. Rufo") is a citizen of Brazil who, as a seventeen-year-old minor, came to the United States ("U.S.") in July 2016 with his father and has lived here ever since. Mr. Rufo is a loving husband of five years to his U.S. Citizen wife, a dedicated

business owner, and a cherished pillar of his community.

2. On November 13, 2025, during a mandated U.S. Immigration and Customs Enforcement (“ICE”) check-in, Mr. Rufo was taken into custody; it should be noted for this Honorable Court that Mr. Rufo had an original scheduled ICE check-in on October 25, 2025. Mr. Rufo, who has always fully complied with his immigration processes, was prepared to attend, however, Mr. Rufo was hospitalized that same day. *See Exhibit E: ICE Notice & Medical Report (“Exhibit E”)*.
3. Presently, and pursuant to the recent BIA decision *Matter of Yajure-Hurtado*, 29 I&N Dec. 216 (BIA 2025), Mr. Rufo is mandatorily detained under 8 U.S.C. § 1225(b)(2)(A) by ICE. In addition, he has a pending I-130 petition, which was filed by his U.S. Citizen wife in July 2022, a September 2024 Order entered by Immigration Judge John Carle reopening his removal proceedings based on a complete lack of notice as a minor, and a pending I-589 Application for Asylum, Withholding of Removal, and Convention Against Torture. Further, Mr. Rufo has not, and due to *Matter of Yajure-Hurtado*, will not be afforded a bond hearing without a grant in the instant sought relief. *See, Exhibit B: I-130 Petition & Receipt Notice (“Exhibit B”) & Exhibit C: 09/30/24 Order Granting Motion to Reopen (“Exhibit C”); Exhibit D: I-589 Application (“Exhibit D”)*.
4. Mr. Rufo’s detention is unlawful and being held without the opportunity to be heard and punitive confinement conditions violates the Due Process Clause of the Fifth Amendment.
5. Mr. Rufo respectfully requests that this Court grant him immediate release from detention, or, in the alternative, the Court should order an immediate bond hearing to ensure Mr. Rufo’s detention bears a reasonable relation to the government’s interests.

PARTIES

6. Mr. Rufo has been detained by Respondents since November 13, 2025, at Elizabeth Contract Detention Facility (“Elizabeth”).
7. Respondent Eric Rokosky is named in his official capacity as the Director/Warden of Elizabeth. Mr. Rokosky is responsible for the operation of Elizabeth, where Mr. Rufo is currently detained.
8. Respondent John Tsoukaris is named in his official capacity as the Director of the New Jersey Field Office for ICE. Mr. Tsoukaris is responsible for arrests, processing, detention, production, transfer, and release of individuals in removal proceedings. He is a legal custodian of Mr. Rufo.
9. Respondent Pamela Bondi is named in her official capacity as the U.S. Attorney General (“AG”). AG Bondi is responsible for the administration of the immigration laws pursuant to 8 U.S.C. § 1103(g) and oversees the Executive Office for Immigration Review (“EOIR”). She is a legal custodian of Mr. Rufo.
10. Respondent Kristi Noem is named in her official capacity as the Acting Secretary of the U.S. Department of Homeland Security (“DHS”). Ms. Noem is responsible for the administration of immigration laws under 8 U.S.C. § 1103(a) and oversees ICE. She is a legal custodian of Mr. Rufo.
11. Respondent Todd M. Lyons is named in his official capacity as the Acting Director of ICE. Mr. Lyons is responsible for the administration of federal immigration law and the execution of detention and removal determinations. He is a legal custodian of Mr. Rufo.

JURISDICTION

12. This Court has proper jurisdiction over Mr. Rufo’s Petition for Writ of Habeas Corpus. As per

28 U.S.C. § 2241, this Court has the discretion to evaluate and grant the instant writ of habeas corpus. Under 28 U.S.C. § 1331, this Court has original jurisdiction over the federal issue arising in this matter. Article I, § 9, cl. 2 of the United States Constitution, the Suspension Clause, protects the privilege of habeas corpus. The All-Writs Act, 28 U.S.C. § 1651, grants this Court with remedial authority to issue this necessary writ. The Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, specifically allows this Court to grant injunctive and declaratory relief if it sees fit.

13. Federal district courts have jurisdiction to hear habeas corpus claims by noncitizens challenging the lawfulness or constitutionality of their detention by DHS; as well as claims by noncitizens seeking to protect their due process rights. *See, Jennings v. Rodriguez*, 138 S. Ct. 830, 840-41 (2018).
14. Mr. Rufo's current detention as enforced by Respondents constitutes a "severe restraint [on his] individual liberty," such that he is "in custody in violation of the Constitution or laws ... of the United States." *Hensley v. Municipal Court*, 411 U.S. 345, 351 (1973); 28 U.S.C. § 2241(c)(3).


VENUE

15. Venue is proper in the District of New Jersey. Pursuant to 28 U.S.C. § 2241(d), a writ of habeas corpus may be filed in the district where the Petitioner is held in custody. Under 28 U.S.C. § 1391 (b) (2), a proper venue is where a substantial part of the events and omissions gave rise to the claim.
16. Mr. Rufo is currently in ICE custody at Elizabeth, where a substantial part of the events giving rise to his habeas claim occurred. Due to custody location and occurrence in events, it is proper to file in the District of New Jersey.

EXHAUSTION

17. No statutory exhaustion requirements exist as to Mr. Rufo's unlawful detention claims. *Callwood v. Enos*, 230 F.3d 627, 634 (3d Cir. 2000).
18. Although exhaustion is not statutorily required when challenging detention under 28 U.S.C. §2241, many courts still require proof of exhaustion largely to the appropriate agency's benefit. *Id.*
19. There are several exceptions that courts consider when evaluating exhaustion requirements. An immigrant detainee advancing a due process claim is likely to be exempt because "the Board of Immigration Appeals ("BIA") does not have jurisdiction to adjudicate constitutional issues." *Khan v. United States AG*, 448 F.3d 226, 228 (3d Cir. 2006).
20. Mr. Rufo is not required to prove exhaustion because he is advancing due process claims in the instant habeas petition.

STATEMENT OF FACTS

21. Mr. Rufo was born on  in Virginopolis, Brazil. While in Brazil not only did Mr. Rufo, along with his father, face continual threats of crime and economic hardship, but his home life was also wildly difficult due to his mother's extreme abuse; as an adolescent, Mr. Rufo woke every day in fear of the verbal and physical mistreatment. *See, Exhibit A: Declaration of Lauriedson Goncalves Rufo in Support of his Habeas Petition*, ¶¶ 1, 4 ("Exhibit A").
22. Under his father's guide, who sought a safer future for Mr. Rufo, the two immigrated to the U.S. in July 2016 – Mr. Rufo was only seventeen years old at the time. *Id.* at ¶ 4-5.

23. Through close friends, in 2018, Mr. Rufo met his U.S. Citizen wife, Mariana Alves Nunez, at their shared church in Newark, New Jersey. After several years of dating, the happy couple were married on September 13, 2020, and have been together ever since – the two hope to further build their little family in the future. *Id.* at ¶ 6. *Exhibit G: Petitioner’s Marriage Certificate (“Exhibit G”)*.
24. While in the United States, Mr. Rufo dedicatedly worked as a barber for six years and now has his very own barbershop, quickly learned English, consistently paid his taxes, joined the CANNA church, is regarded by neighbors and friends as extended family, and is well-respected by law enforcement. *Exhibit A*, ¶ 7. *Exhibit F: Letters from the Community (“Exhibit F”)*.¹
25. For over nine years, Mr. Rufo has lived in United States without any criminal record; while in the U.S., he became a husband, a business owner, and a cherished pillar of his community.

Mr. Rufo’s Proceedings

¹ Letter, dated November 6, 2025, from *Jose Zacarias Dias, Senior Pastor of CANAA Church*, evidencing Mr. Rufo’s membership since 2016 and good moral character. Letter, dated November 12, 2025, from *Detective Fabio Medeiros of Newark Police Department*, who has known Mr. Rufo for six years, evidencing Mr. Rufo’s love and commitment to the community, aid to law enforcement whenever sought, and acknowledgment that Mr. Rufo is a law-abiding individual with high values. Letter, dated November 11, 2025, from *Deputy Mayor of Newark Ligia De Freitas*, evidencing Mr. Rufo as a valued member of his community that persistently gives back, whether through free haircuts for children or economic vitality, and that his removal from this nation would be a significant loss to the community he serves. Letter dated, November 10, 2025, from the *Captain of the New York City Police Department and Pastor at CANAA Church*, Kenneth O. Fernandez, evidencing his strong moral character, willingness to serve others, and respect for authority. Letter from *friend, Margaret Kirwan*, evidencing Mr. Rufo’s kindness, honesty, and deep sense of commitment to the community. Letter from *friend, Wallace De Oliveira*, evidencing Mr. Rufo is a good person with strong character, a stable life, and genuine commitment of doing what is right. Letter, dated February 12, 2024, from *neighbor Ms. Moutinho* providing Mr. Rufo is wildly trustworthy, always looking out for her, and that he was by her side when she lost one of her own sons. Letter, dated January 23, 2023, from *neighbor Elsie Ferreirina*, who suffers with vertigo and heart problems, provided Mr. Rufo drives her to doctor’s appointments, helps translate whenever needed, buys her groceries, checks on her daily, and helps move things around the house. Letter, dated March 3, 2024, from *friend, Jimmy Freitas*, evidencing Mr. Rufo as dedicated, hardworking, and having unwavering moral integrity. Letter from friend, dated February 20, 2025, *friend, Luana P. Da Silva*, evidencing Mr. Rufo has dedicated personal time and funds to helping people in need of meals and other resources. Letter, dated March 6, 2024, from *friend, Gabriel Belvedere De Goes*, evidencing as a loving, genuine individual, who embodies the “American Dream”

26. On July 22, 2022, Mr. Rufo's U.S. Citizen wife, Mariana A. Nunez, filed an I-130, Petition for Alien Relative; the I-130 application is still pending before USCIS. *See, Exhibit B.* Mr. Rufo also has a pending I-589 Application for Asylum, Withholding of Removal, and Convention Against Torture. *Exhibit D.*
27. To Mr. Rufo's, as well as his prior counsel's, surprise, a final order of removal was entered against Mr. Rufo and his father in 2016. Upon learning of said removal order, Mr. Rufo, through prior counsel, filed a motion to reopen based on the improper Notice to Appear, which failed to provide a time and date, as well as his father handling the immigration matter being that Mr. Rufo was a minor at the time. On September 30, 2024, Immigration Judge John Carle granted Mr. Rufo's motion to reopen and in doing so, found Mr. Rufo, who was minor at the time of entry, was not adequately provided with notice/apprised by his father, and noted Mr. Rufo is married to a U.S. Citizen, has no criminal record, and is prima facie eligible for an I-601A waiver. *Exhibit C.*
28. On November 13, 2025, Mr. Rufo attended a required ICE check-in and during said check-in, he was taken into ICE custody. Mr. Rufo is currently detained at Elizabeth.

LEGAL FRAMEWORK

I. MR. RUFO IS LIKELY TO SUCCEED ON THE MERITS OF HIS CLAIMS THAT HIS DETENTION IS UNLAWFUL & VIOLATES HIS DUE PROCESS RIGHTS.

29. The Due Process Clause of the Fifth Amendment is applicable to all individuals in the United States; moreover, every immigrant, regardless of status or lack thereof, is entitled to due process protections. *Zadydas v Davis*, 533 US 678, 682 (2001); *Demore v. Kim*, 538 U.S. 510, 523 (2003); *Reno v. Flores*, 507 U.S. 292, 3061 (1993); *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). Even further, individuals navigating our immigration system in pursuit of lawful status have a right to be noticed, meaningfully heard and protected from governmental

constraints, which deprive them of any liberty or property interests. *Landon v. Plasencia*, 459 US 21, 34 (1982). Specifically concerning detainment, the Supreme Court has held that civil detention “for any purpose constitutes a significant deprivation of liberty that requires due process protection.” *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992).

A. The BIA’s Interpretation of INA 235(b) (2)(A), in the *Matter of Yajure-Hurtado*, Violates Mr. Rufo’s 5th Amendment Due Process Rights.

30. On September 5, 2025, the BIA made the disturbingly, unconstitutional decision in the *Matter of Yajure-Hurtado*, 29 I&N Dec. 216 (BIA 2025), which ignored decades of legal precedent, the Constitution, and stripped away the well-established due process rights for a plethora of non-citizens. Moreover, the *Matter of Yajure-Hurtado* established the dangerous sweeping rule that any non-citizen present in the United States without having been inspected and admitted who is arrested with or without a warrant is subject to mandatory detention under INA § 235(b)(2), rather than the typical discretionary detention under INA § 236 (a), this is without regard of where the non-citizen was apprehended or how long the non-citizen has resided in the United States. *Id.*
31. Again, the BIA’s decision directly conflicts with significant U.S. Supreme Court decisions including but not limited to *Zadvydas v. Davis*, 533 U.S. 678 (2001), *Demore v. Kim*, 538 U.S. 510 (2003), *Boumediene v. Bush*, 553 U.S. 723 (2008), *Mathews v. Eldridge*, 424 U.S. 319 (1976), and *United States v. Salerno*, 481 U.S. 739 (1987).
32. The BIA’s ruling of restrictions on the Due Process Clause and mandated, unchecked detentions under INA § 235(b)(2), instead of INA § 236(a), has already been refuted by a myriad of Federal District Courts across the nation, including the New Jersey Federal District Court, through the re-enforcement of INA § 236(a), not INA § 235(b)(2), and further, many grants in habeas petition reliefs based on the resounding due process violations set forth by

the *Matter of Yajure-Hurtado. De Fatima Lomeu v. Soto, et al.*, No. 2:25-cv-16589 (D.N.J. Oct. 23, 2025); *Zumba v Bondi*, 2025 US Dist LEXIS 167666 [DNJ Aug. 28, 2025, No. 25-cv-14626 (KSH)]; *Benitez v. Francis*, 2025 US Dist LEXIS 153952 [SDNY Aug. 8, 2025]); *Samb v. Joyce*, 2025 US Dist LEXIS 161109 [SDNY Aug. 19, 2025]); *Sampiao v. Hyde*, 2025 US Dist LEXIS 175513 [D Mass Sep. 9, 2025, No. 1:25-cv-11981-JEK]); *Leal-Hernandez v. Noem*, 2025 US Dist LEXIS 165015 [D Md Aug. 24, 2025, No. 1:25-cv-02428]); *Kostak v. Trump*, 2025 US Dist LEXIS 167280 [WD La Aug. 27, 2025, No. 3:25-1093]); *Zaragoza Mosqueda v. Noem*, 2025 US Dist LEXIS 174828 [CD Cal Sep. 8, 2025, No. 5:25-cv-02304]).

33. Due to the BIA's decision in *Matter of Yajure-Hurtado*, Mr. Rufo is currently being detained under INA § 235(b)(2) without any opportunity to be heard, which is a blatant infringement on his due process rights as established by a long-line of U.S. Supreme Court decisions and the U.S. Constitution itself. For almost a decade, Mr. Rufo has resided in this nation as a law-abiding individual, who contributes to his community. *Exhibit A & F*. Pursuant to this nation's Supreme Court precedent and Due Process Rights of the Fifth Amendment, Mr. Rufo respectfully requests this Court find his detention as discretionary under INA § 236(a) and provide Mr. Rufo with the opportunity to be heard, as many Federal Districts, including the New Jersey Federal District Court, have already done across the country for individuals similarly situated to Mr. Rufo.

B. Mr. Rufo's unlawful detention, without a bond hearing and pending I-130 Petition, violates the Fifth Amendment.

34. Upon an individual evidencing a liberty or property interest, a Court must determine whether constitutionally sufficient procedures were provided by balancing: First, the private interest that will be affected by the official action; Second, the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or

substitute procedural requirement would entail; and Finally, the government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail. *Mathews*, 424 U.S. at 335.

35. Immigrants facing deportation and removal proceedings have a deep-rooted liberty interest – **“the right to stay and live and work in this land of freedom.”** *Bridges v. Wixon*, 326 U.S. 135, 154 (1945).

36. Mr. Rufo is entitled to the protections of the 5th Amendment Due Process Clause. First, Mr. Rufo has a significant liberty interest in remaining the United States – his loving wife, his business, beloved friends that have turned into family, and essentially all he has, is within the United States. The government has failed to evidence any reason to continue confinement: Mr. Rufo is not a flight, Mr. Rufo has no criminal record, and Mr. Rufo is not a danger to the community.

37. Second, in light of the Constitution, the INA and its applicable regulations, Respondents have procedurally deprived and continue to risk deprivation of Mr. Rufo's due process rights. When evaluating the second *Mathews* prong “the only interest to be considered . . . is that of the detained individuals—not the government.” *Black v. Director Thomas Decker*, 103 F.4th 133, 152 (2d Cir. 2024). Without any regards, Respondents have violated Mr. Rufo's due process rights tenfold: While attempting to lawfully comply with his immigration proceedings, Mr. Rufo was wrongfully detained at an ICE check in; ICE's efforts to prematurely deport and confine Mr. Rufo before USCIS may adjudicate his I-130 petition, which Immigration Judge John Carle's Order deemed successful, constitutes a deprivation in his liberty interest to stay in the United States with his loved ones; and Mr. Rufo was discretionarily thrown in a detention center without the opportunity to be heard for bond –

upon a bond hearing, Mr. Rufo would demonstrate he is neither a flight risk nor a danger to community. Due to Respondent's unjustified arrest of Mr. Rufo, an astonishing snowball effect of due process violations have occurred and will continue to occur so long as Mr. Rufo is detained.

38. Third, the interest of enforcing immigration policies would be valid if the government was even following said policies – Mr. Rufo was improperly detained. Regardless, any additional or substitute procedural requirement would not burden the government whatsoever - if anything, the government is burdening itself by fiscally detaining Mr. Rufo and wasting judicial resources. ICE, easily, could have continued its enforcement measures through less restrictive and more financially sound means.

39. All three Mathews factors, weigh heavily in Mr. Rufo's favor. Moreover, Mr. Rufo has established that Respondents violated his due process rights, which warrants his immediate release from ICE custody or in the alternative, an immediate bond hearing.

C. Mr. Rufo's detention violates his right to substantive due process because he is neither a flight risk nor a danger to the community.

40. Immigration detention is civil and must “bear a reasonable relation to the purpose for which the individual [is] [detained]” so that it remains “nonpunitive in purpose and effect.” *Id.* at 690. Further, and to comport with due process, there are only two legitimate regulatory purposes for immigration detention to ensure the appearance of noncitizens at future hearings and to prevent danger to the community pending the completion of removal. *Zadvydas*, 533 U.S. at 690-691; *Diop v. ICE*, 656 F.3d 221, 233–234 (3d Cir. 2011).

41. Mr. Rufo is not a flight risk and will appear at all future immigration proceedings. For almost a decade, Mr. Rufo has lived in the United States – this is his home. Moreover, his loving

wife, his business, beloved friends that have turned into family, and essentially all he has, is within the United States. Everything he loves, owns, and works for is right here in New Jersey.

42. Mr. Rufo is not a danger to the community – he has no criminal record, whatsoever. In fact, Mr. Rufo is a significant member of the community as evidenced by his business and the myriad of community members that respect and love him as family. *Exhibit F*.
43. No legitimate interests exist as to Mr. Rufo’s detention, rather the government is detaining Mr. Rufo along with countless others swept up in its courthouse arrests, ICE check-ins, and USCIS arrests, for the understandable but illegitimate reason that he was easy to locate. At the time of his arrest, Mr. Rufo was attempting to lawfully navigate our immigration system by completing his ICE check-in. Due to pure accessibility, Mr. Rufo was detained without any opportunity to heard.
44. Because Mr. Rufo’s detention has been unaccompanied by the procedural protections that such a significant deprivation of liberty requires under the Due Process Clause of the Fifth Amendment to the U.S. Constitution, his continued detention without a bond hearing is unlawful and therefore, he should be released.
45. In the alternative, the Court should order an immediate bond hearing to ensure Mr. Rufo’s detention bears a reasonable relation to the government’s interests.

CLAIMS FOR RELIEF

COUNT ONE

VIOLATION OF THE DUE PROCESS CLAUSE OF THE FIFTH AMENDMENT TO THE UNITED STATES CONSTITUTION (SUBSTANTIVE DUE PROCESS)

1. Petitioner re-alleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

2. Mr. Rufo is not a flight risk nor is he a danger to the community. Respondents' detention of Mr. Rufo is therefore unjustified and unlawful. Accordingly, Mr. Rufo is being detained in violation of his Constitutional right to Due Process under the Fifth Amendment.

COUNT TWO

VIOLATION OF THE DUE PROCESS CLAUSE OF THE FIFTH AMENDMENT TO THE UNITED STATES CONSTITUTION (PROCEDURAL DUE PROCESS)

3. Petitioner re-alleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.
4. The Due Process Clause of the Fifth Amendment protects all "person[s]" from deprivation of liberty "without due process of law."
5. Mr. Rufo is entitled to the protections of the 5th Amendment Due Process Clause. First, Mr. Rufo has a significant liberty interest in remaining the United States. Second, in light of the Constitution, the INA and its applicable regulations, Respondents have procedurally deprived and continue to risk deprivation of Mr. Rufo's due process rights.
6. Third, any additional or substitute procedural requirement would not burden the government whatsoever - if anything, the government is burdening itself by fiscally detaining Mr. Rufo and wasting judicial resources.
7. Accordingly, Mr. Rufo is being detained without sufficient process in violation of his Constitutional right to Due Process under the Fifth Amendment.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Assume jurisdiction over the instant matter;

2. Issue a Writ of Habeas Corpus ordering the immediate release of Petitioner from Respondents custody;
3. In the alternative, grant a Writ of Habeas Corpus ordering an immediate bond hearing to ensure Petitioner's detention bears a reasonable relation to the government's interests; and
4. Enter a preliminary and permanent injunction restraining Respondents from re-arresting Petitioner;
5. Order any such other relief as this Court deems just and proper.

Dated: 11/13/25

Respectfully Submitted,



Alexandra Minogue, Esq.
NJ Bar ID: 479582024
Nova Law Group
21 Fulton Street
Newark, NJ 07102
E: aminogue@nova.law
P: 844-844-6682
Counsel for Petitioner

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this Motion for Temporary Restraining Order and Injunctive Relief and Petition for Writ of Habeas Corpus with all attachments using the PACER system.

Dated: 11/13/25

Respectfully Submitted,



Alexandra Minogue, Esq.

NJ Bar ID: 479582024
Nova Law Group
21 Fulton Street
Newark, NJ 07102
E: aminogue@nova.law
P: 844-844-6682
Counsel for Petitioner

EXHIBIT A

Declaration of Lauriedson Goncalves Rufo in Support of his Habeas Petition

1. My name is Lauriedson Goncalves Rufo, and I was born on [REDACTED] in Virginopolis, Brazil. For almost a decade, I have lived in United States without any criminal record; while in the U.S., I proudly became a husband, a dedicated business owner, and a friend to many in my community.
2. My immigration detention started on November 12, 2025, and I was placed in Elizabeth Contract Detention Center in Elizabeth, New Jersey.
3. In the United States, I have built a family and home, I have respected the laws, and I have loved this country for all it has permitted me to achieve, but I am being treated as a prisoner for wanting to stay.

LIFE PRIOR TO MY IMMIGRATION DETENTION

4. Back in Brazil, life was far from easy for my father and I. Not only did we face continual threats of crime and deeply struggled financially, but my mother was extremely abusive – every day, I woke up in fear of what she would physically do and/or say to me. In 2016, my father sat me down and explained he wanted a safer and more financially sound life for me, which is why he was planning on taking me to the United States – I was just a kid, so I was nervous, but also excited for what the U.S. could offer my father and me.
5. In July 2016, when I was only seventeen years old, my father and I came to the United States.
6. In November 2018, my close church friends Igor and Rachel, introduced me to my beautiful U.S. Citizen wife, Mariana Alves Nunez, at our shared church in Newark, New Jersey – we instantaneously hit it off. It didn't take long for me to realize Mariana was my person. On September 13, 2020, Mariana and I got married – we've been together ever since and hope to further build our little family in the future.

7. I am beyond grateful for the opportunities this nation has provided me this past decade – I had the privilege of working at an amazing barbershop for six years, I started my own barbershop business, I have built ever-lasting friendships with my neighbors, I became a member of my church, and I have created a life that would never have been attainable if I remained in Brazil.
8. Navigating my lawful status in the United States has been very confusing and difficult. Again, I came here in July 2016 under my father's guidance. On July 22, 2022, my wife, and through my previous counsel, filed a family-based petition, which is still pending. After the filing, I learned a final order of removal was entered against me, however, and again with the assistance of my prior counsel, my removal proceedings were reopened on September 30, 2024.
9. On November 13, 2025, I attended an ICE check-in, which resulted in my arrest. After being arrested, I was transferred to Elizabeth and processed.

PLEA FOR RELEASE

10. If released, I will cooperate with any release conditions and will continue to work with Nova Law Group on my pending I-130 petition. Further, I also understand that my case will be ongoing. I intend to fully participate in the case but would like to do so while being united with my family and friends.
11. Upon my release and if given the opportunity to remain in the U.S., I will continue to be a law abiding individual, I will continue to work at my business and serve my community in doing so, I will continue to be a loving, grateful, and proud husband, *I will continue to love and respect this country, as I have since the day I entered it.*

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Lauriedson Goncalves Rufo

LAURIEDSON GONCALVES RUFO

DATED: 11/13/25

EXHIBIT C

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
900 MARKET STREET, SUITE 504
PHILADELPHIA, PA 19107

GONCALVES-RUFO, LAURIEDSON



In the matter of
GONCALVES-RUFO, LAURIEDSON

File A



DATE: Sep 30, 2024

- ___ Unable to forward - No address provided.
- ___ Attached is a copy of the decision of the Immigration Judge. This decision is final unless an appeal is filed with the Board of Immigration Appeals within 30 calendar days of the date of the mailing of this written decision. See the enclosed forms and instructions for properly preparing your appeal. Your notice of appeal, attached documents, and fee or fee waiver request must be mailed to: Board of Immigration Appeals
Office of the Clerk
5107 Leesburg Pike, Suite 2000
Falls Church, VA 22041
- ___ Attached is a copy of the decision of the immigration judge as the result of your Failure to Appear at your scheduled deportation or removal hearing. This decision is final unless a Motion to Reopen is filed in accordance with Section 242b(c)(3) of the Immigration and Nationality Act, 8 U.S.C. § 1252b(c)(3) in deportation proceedings or section 240(b)(5)(C), 8 U.S.C. § 1229a(b)(5)(C) in removal proceedings. If you file a motion to reopen, your motion must be filed with this court:
IMMIGRATION COURT
900 MARKET STREET, SUITE 504
PHILADELPHIA, PA 19107
- ___ Attached is a copy of the decision of the immigration judge relating to a Reasonable Fear Review. This is a final order. Pursuant to 8 C.F.R. § 1208.31(g)(1), no administrative appeal is available. However, you may file a petition for review within 30 days with the appropriate Circuit Court of Appeals to appeal this decision pursuant to 8 U.S.C. § 1252; INA §242.
- ___ Attached is a copy of the decision of the immigration judge relating to a Credible Fear Review. This is a final order. No appeal is available.

Other: Motion to reopen

S. Jankanish
COURT CLERK
IMMIGRATION COURT

FF

cc: DHS OFFICE OF THE CHIEF COUNSEL
900 MARKET STREET, SUITE 346
PHILADELPHIA, PA, 19107

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
UNITED STATES IMMIGRATION COURT
PHILADELPHIA, PENNSYLVANIA

IN THE MATTER OF:) IN REMOVAL PROCEEDINGS
)
LAURIEDSON GONCALVES RUFO) File No: [REDACTED]
Respondent)

CHARGES: Section 212(a)(6)(A)(i) of the Act, as amended, as an alien present in the United States without being admitted or paroled, or who has arrived in the United States at any time or place other than as designated by the Attorney General.

APPLICATION: Respondents' Motions to Reopen

APPEARANCES

ON BEHALF OF RESPONDENT: Anita Mignone, Esq.
ON BEHALF OF THE GOVERNMENT: Nicole Pedicino, Esq.

INTERLOCUTORY DECISION AND ORDER OF THE IMMIGRATION JUDGE

I. Procedural History

Respondent is a male, citizen of Brazil, born [REDACTED]. Respondent entered the United States without inspection on or about July 10, 2016, with his father. Exh. 1. Respondent was apprehended by Immigration and Customs Enforcement ("ICE") and personally served a Notice to Appear, dated July 13, 2016. The NTA did not provide a date, time or location of hearing. See Exh. 1. The NTA was filed with the Philadelphia Court on August 10, 2016. Id. On August 16, 2016, the Philadelphia Immigration Court mailed a hearing notice to the address [REDACTED]. The hearing notice ordered Respondent to appear at the Philadelphia Immigration Court for his master calendar hearing on September 6, 2016, at 8:30 a.m. Exh. 2. Respondent failed to appear for that hearing. To establish alienage and removability the DHS served an I-213. Exh. 3. The Court found he had proper notice of the hearing

and sustained the charge of removability and ordered him removed to Brazil. See Exh. 4. The removal order was mailed to Respondent's father, Antonio.

Respondent, *through counsel*, filed a Motion to Reopen and Rescind *In Absentia* Order on August 26, 2024. Exh. 5. DHS filed its opposition on August 28, 2024. Exh. 6. DHS argues that Respondent did not exercise due diligence in filing the MTR, given his removal order was entered 8 years ago and he was aware that he was in removal proceedings. Further, DHS notes Respondent has not provided "exceptional circumstances to warrant sua sponte reopening.

II. Exhibits List

- Exhibit 1: NTA
- Exhibit 2: Hearing Notice
- Exhibit 3: I-213
- Exhibit 4: Respondents' *In Absentia* Removal Order, dated August 10, 2017
- Exhibit 5: Respondent's Motion to Reopen and Rescind *In Absentia* Removal Order for Respondent, filed August 23, 2024
- Exhibit 6: DHS's Opposition to Respondents' Motion to Reopen Removal Order Entered *In Absentia*

III. Discussion

The Court finds that it can most expeditiously address the request to reopen pursuant to its *sua sponte* authority. Under this authority, the Court may reopen any case in which it has decided, unless jurisdiction is vested with the Board. 8 C.F.R. § 1003.23 (b)(1). The *sua sponte* authority to reopen a decision may be exercised only where there are "exceptional situations." Matter of J-J-, 21 I&N Dec. 976, 984 (BIA 1997); see also Quintanilla Suarez v. Att'y Gen., 299 Fed. Appx. 153 (3d Cir. 2008) (unpublished). This requirement promotes finality of decisions, as a Court's *sua sponte* power "is not meant to be used as a general cure for filing defects or to otherwise circumvent the regulations." 21 I&N Dec. at 984. Cases where the Board has found exceptional situations sufficient to warrant reopening typically include cases where there has been a compelling and fundamental change in the law warranting extraordinary intervention; or in cases where reopening would result in a substantial likelihood that the result of the case would be changed if reopening is granted. See Matter of G-D-, 22 I&N Dec. 1216, 1219 (BIA 2000).

Respondent's case constitutes an "exceptional situation" warranting the exercise of the Court's *sua sponte* authority to reopen. Here, Respondent was placed into removal proceedings when he was a seventeen-year-old child. The hearing notice was sent to his father Antonio. There is nothing in the record to indicate this Respondent was ever advised by his father that he had any immigration hearing. As a child, he was reliant on his father to give him information about his case. As a child, he relied on his father to fully apprise him of his responsibility to attend hearings.

attention to her son's case. Given the Court's concern that this child was not adequately provided information about the status of his case and his duty and responsibility to attend hearings and may not have been adequately directed by his father, the Court is not fully convinced that he had adequate notice of his hearing or was apprised by his father as to the status of his immigration case. Overriding all these concerns is the clear fact that Respondent was a child when he was ordered deported in absentia and may not have been aware of his responsibility to attend all hearings or risk being removed and may not have been told by the adults in his life that he needed to be at his hearing. Further, Respondent is married to a U.S. citizen, has no criminal record and is prima facie eligible to see an I-601A waiver.

Accordingly, the following order shall be entered:

ORDER

ORDER: IT IS ORDERED that Respondent's Motion to Reopen and Rescind the *In Absentia* Order be and hereby is GRANTED.

JOHN Digitally signed
by JOHN CARLE
Date:
CARLE 2024.09.30
10:25:12 -04'00'

JOHN B. CARLE
U.S Immigration Judge
Philadelphia, Pennsylvania

EXHIBIT D

Philip J. Velez, Esq.
NOVA LAW FIRM
21 Fulton St.
Newark, NJ 07102

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
NEWARK, NEW JERSEY

_____ X

In the Matter of:

GONCALVES RUFO, Lauriedson

File No.



Respondent

_____ X

United States Immigration Court
970 Broad Street, Room 1200
Newark, NJ 07102

Next Hearing: TBD

RESPONDENT'S APPLICATION FOR ASYLUM, WITHHOLDING OF REMOVAL
AND CAT RELIEF

Philip J. Velez, Esq.
NOVA LAW FIRM
21 Fulton St.
Newark, NJ 07102

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
NEWARK, NEW JERSEY

_____ X

In the Matter of:

GONCALVES RUFO, Lauriedson

File No. 

Respondent

_____ X

United States Immigration Court
970 Broad Street, Room 1200
Newark, NJ 07102

Next Hearing: TBD

RESPONDENT'S APPLICATION FOR ASYLUM, WITHHOLDING OF REMOVAL
AND CAT RELIEF

INDEX

Table of Contents

Index	Pg.2
Certificate of Service	Pg.3
Application	Pgs. 4-15

Philip J. Velez, Esq.
NOVA LAW FIRM
21 Fulton St.
Newark, NJ 07102

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
NEWARK, NEW JERSEY

_____ X

In the Matter of:

GONCALVES RUFO, Lauriedson

File No. 

Respondent

_____ X

United States Immigration Court
970 Broad Street, Room 1200
Newark, NJ 07102

Next Hearing: TBD

CERTIFICATE OF SERVICE

This document was electronically filed through ECAS and both parties are participating in ECAS. Therefore, no separate service was completed.



Philip J Velez

11/13/2025
Date

EXHIBIT E

Department of Homeland Security
US Immigration and Customs Enforcement
970 Broad St, 11th floor
Newark, New Jersey 07102



Lauriedson GONCALVES RUFO



File#:



Date: 10/06/2025

Please come to the office shown below at the time and place indicated in connection with an official matter:

Office Location	970 Broad St, 11 th floor Newark, New Jersey 07102
Date and Hour	October 18, 2025 at 8:00 am
Ask for	Deportation Officer
Reason for appointment	Reporting
Bring with you	All paperwork issued by Immigration & Customs Enforcement

IT IS IMPORTANT THAT YOU KEEP THIS APPOINTMENT AND BRING THIS LETTER WITH YOU.

Warning: Failure to report may result in the issuance of a warrant for your arrest and cause you to be classified as fugitive. Appearance dates generally will not be re-scheduled unless you are able to establish that exceptional circumstances prevent you from reporting on the date set forth above. The term "Exceptional Circumstances" such as your serious illness or the serious illness or death of your spouse, child, or parent, but not including less compelling circumstances beyond your Control.

EXHIBIT F

Igreja Evangelica Canaa

D/B/A: CANAA CHURCH

201 – 209 Thomas Street * Newark * New Jersey * 07114
churchcanaan21@gmail.com Ph: 973-465-0226

November 6, 2025

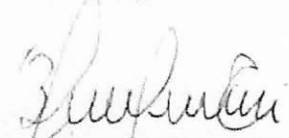
To whom it may concern:

I, Pastor **JOSE ZACARIAS DIAS**, President of Igreja Evangelica Canaa, as above captioned, declare to whom it may concern that **LAURIEDSON GONÇALVES RUFO**, is a Member of our Church and have been in good standing since 2016. He has been active and engaged in our Church vision.

I take this opportunity to confirm with great joy before any authorities that this letter may go so far that brother **LAURIEDSON GONÇALVES RUFO**, is well known and very respected for his solid reputation, diligence and honorable commitment to do his very best, proven throughout his dedication at our church.

Should any further information be deemed necessary, please do not hesitate to contact me at the address, phone number as well as my e-mail information listed above.

Sincerely,


JOZE ZACARIAS DIAS
Senior Pastor

Ligia De Freitas
Mayor Ligia S. De Freitas



CITY OF NEWARK
Mayor Ras J. Baraka
NEW JERSEY

To _____
W _____
ho Mayor's Office of International Relations
m And Diaspora Affairs (MOIRDA)

A CITY WE CAN ALL BELIEVE IN

It Ligia De Freitas
M Deputy Mayor
ay Concern,

As the Deputy Mayor of the City of Newark, I am writing this letter on behalf of a valued resident, **Mr. Lauriedson Goncalves Rufo**. Mr. Rufo has been a resident of the United States since 2016 and has made significant contributions to our city and state through his professional dedication and active community involvement.

Mr. Rufo has worked at **Step Up Barbershop in Newark** from 2018 to 2025, where he has consistently demonstrated a strong work ethic and commitment to service. Through Step Up, he and his colleagues give back to the community by participating in local social events promoted by law enforcement, including annual initiatives to provide free haircuts for children before the school year begins. These efforts have made a meaningful impact on local families and fostered positive community relations.

Mr. Rufo is married to **Mrs. Mariana Nunez**, a full-time student at Eastern International College and a part-time employee at AbraDental in Elizabeth. Together, they contribute to our community's educational and economic vitality and represent the values of hard work, dedication, and compassion that define our city.

Mr. Rufo is a respected and hardworking member of our community—deeply rooted in the principles that make this country strong. Like many immigrants, he has proven his commitment to the United States economically, socially, and culturally. His removal would not only cause emotional and psychological harm to him and his family but would also represent a loss to the community he continues to serve.

I respectfully urge you to consider allowing **Mr. Lauriedson Goncalves Rufo** to remain in this country, where he continues to contribute meaningfully and live peacefully with his family.

Thank you for your time and consideration in this matter.

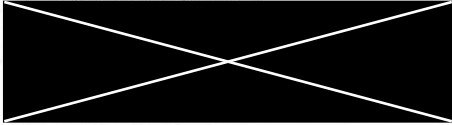
Best Regards,
Deputy Mayor

Ligia De Freitas

920 Broad Street, Room 218A Newark, NJ 07102
PH: 973-733-3309 FAX: 973-353-8440 Email: defreitasl@ci.newark.nj.us

[Signature] 11/11/25
IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/25/2028
COMMISSION: #50208214

Kenneth O. Fernandez
Captain, New York City Police Department
Pastor, Canaan Church



November 10, 2025

Der judge,

It is with great respect and sincerity that I write this letter of recommendation for Mr. Lauriedson Gonçalves Rufo. I have had the honor of serving as Lauriedson's youth pastor for many years, watching him grow from a teenager into a mature, responsible, and devoted man of faith. It has truly been a blessing to see his personal and spiritual growth over the years.

From his youth, Lauriedson stood out for his positive attitude, strong moral character, and willingness to serve others. He was always respectful, eager to learn, and dedicated to his church community. As he grew older, I witnessed him become a devoted husband, a man of integrity, and a reliable presence within our congregation. His humility and consistency reflect genuine values that come from faith and family.

In my dual role as both a Pastor and a Captain in the New York City Police Department, I meet people from all walks of life. Lauriedson stands among the few who consistently demonstrate responsibility, honesty, and compassion in everything they do. He is hardworking and family-oriented, and he lives by principles that make him a role model to others, especially the youth who look up to him.

I have complete confidence in Lauriedson's character and his ability to continue being a positive influence wherever he goes. He is a man who contributes to his community, respects authority, and seeks peace and stability for his family and those around him. I respectfully ask that you take his good character and history of service into strong consideration in your review.

If you require any further information, please do not hesitate to contact me directly.

With respect and blessings,

Kenneth O. Fernandez
Captain, New York City Police Department
Pastor, Canaan Church


11/11/25

IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/25/2028
COMMISSION: #50208214

Margaret Kirwan



November 12, 2025

To Whom It May Concern,


I am writing this letter in reference to Mr. Lauriedson Goncalves Rufo. I met Mr. Rufo through Step Up Barbershop in Newark in 2021. From that time until present day, he has been my barber and has become my friend.

Throughout the time that I have known Mr. Rufo, he has consistently demonstrated kindness, honesty, and a deep sense of responsibility towards others. He is known for his commitment to the community. He has volunteered his time and talent to giving free haircuts to the underserved of our community.

In my personal interactions with Mr. Rufo, he has always demonstrated a high moral compass, commitment to treatment to all individuals with dignity and respect.

I fully support Mr. Rufo for any immigration related matters and stand behind his character. I believe Mr. Rufo will continue to be a law abiding and valuable asset to society.

Thank You for your time and consideration,
Margaret Kirwan

 11/12/2025
IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/25/2028
COMMISSION: #50208214

I met **Lauriedson Gonçalves Rufo** through his work as a barber, and over time we became good friends. He has always shown himself to be a hardworking, honest, and kind-hearted person. He treats everyone with respect, is friendly to his clients, friends, and family, and always acts with responsibility and humility.

We have also had the opportunity to attend church together on a few occasions, which allowed me to see even more of his positive and caring nature. Lauriedson values faith, family, and community, and often encourages his friends to follow a good path in life.

I sincerely believe he is a good person with strong character, a stable life, and a genuine commitment to doing what is right. I have complete confidence in recommending him as a trustworthy and respectable individual.

Wallace De Oliveira



11/12/2025

IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/25/2028
COMMISSION: #50208214

Maria Moutinho



February 12th, 2024

Re: Lauriedson Goncalves Rufo.
Character Reference

TO WHOM IT MAY CONCERN:

On behalf of Mr Rufo, in re above, I can vouch for his character as I have known him for about six years. I was born Maria Moutinho in Portugal, [REDACTED] I have lived in Newark, NJ, since 2003.

I have known Mr. Rufo and his lovely wife, Mariana, who are my next-door neighbors for the last 6 years here at [REDACTED]

Coincidentally, Mr. Rufo and my husband are from the same town back in Brazil. That obviously made our relationship be much closer.

There are countless times that Mr. Rufo and his wife look after our house and our pets when we are away. This shows how trustworthy he is to us.

As a friend, he and his wife, had been by my side when I lost one of my sons, being a very traumatic period in my life.

He has a lovely disposition and a wonderful big smile. I have also noted that he helped other neighbors and people he doesn't know. He is a caring and giving individual who would be an asset to our country if given his American Citizenship

If I can be of any further assistance, please contact me.

Sincerely Yours,

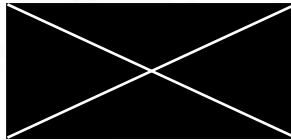
Maria Moutinho

Maria Moutinho

[Signature] 02/21/24
IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/25/2025
COMMISSION #60208274



Luana P. Da Silva



February 20, 2024

Re: Character reference letter for immigration of Lauriedson Gonçalves Rufo

Dear Sir or Madam,

I am writing this immigration letter of support for Lauriedson Gonçalves Rufo D.O.B. [REDACTED] Spouse of Mariana Alves Nunez, residing at [REDACTED] Newark, NJ 07105

My name is Luana Priscilla Da Silva, I Am an American Citizen, passport number [REDACTED] Mr. Rufo is a very good and dear friend of mine, he is also my husband's cousin on his father's side. I have known Mr. Rufo for approximately 7.5 years, he is an excellent and dedicated contribution to our family, church, and society.


Mr. Rufo is very hard working, honest, skillful, kind, and responsible person. Lauriedson and Mariana have spent many holidays and occasions with my family, they are precious to us. Mr. Rufo has also helped my family and I dedicate personal time and funds to helping people in need with meals and other resources. As a friend and extended family, I can attest that it is my honor in writing this letter of recommendation for Lauriedson and that it would be a great contribution to this country if he were allowed to stay, I am privileged in knowing him and sincerely hope and pray this letter helps him.

If there is anything else I can help you with please don't hesitate to contact me, I'm reachable by phone or email, [REDACTED] am happy to answer all your concerns in this regard.

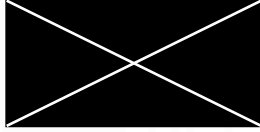
Many thanks for your time.

Sincerely,


Luana Da Silva

 03/06/24
IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/25/2028
COMMISSION #6228274

Gabriel Belvedere De Goes



To Whom It May Concern,

I am writing this letter regarding Lauriedson Goncalves Rufo, to support and advocate for his application to receive lawful permanent resident status in the United States. I have known Lauriedson for 8 years, and his wife Marianna for longer. Throughout our friendship, we've also crossed professional paths as he is my barber at Step Up Salon on Jefferson St. in Newark, and I have performed renovations for him in his apartment on Nichols St. in Newark. Spending time with Lauriedson is always a pleasure whether it is as friends or as a professional and client. In both settings, his character remains upright, kind, generous, and edifying to those around him. Every time I go for a haircut with him, he treats me to lunch, and for the month I was at his home daily doing renovations to his apartment, he and his wife cooked me homemade meals every day. They're very welcoming and hospitable people and have even welcomed my wife and our son to their home on numerous occasions.

Lauriedson is a hard worker in all facets of his life including work and learning English (which he now speaks wonderfully from knowing no English at all), he puts a lot of time and effort into his friendships, and is a helping hand in his community. We used to attend the same church, Igreja Canaã, on South St. in Newark. He would volunteer to help with many of the events in support of the church like garage sales, dinner parties, prayer events, etc. As someone who just recently became a citizen myself, I fully believe that Lauriedson Goncalves Rufo would make a great citizen of the United States of America as he truly embodies the "American Dream," which is to work hard, and through determination and initiative, anyone, regardless of where they were born or what social class they are in, can have an equal chance at their version of success. I am honored to write this letter in support of Lauriedson receiving his green card, and I am even more honored to have him in my life as a dear friend.

Please use the contact information listed above should you require anything else from me, I'd be happy to help in any way possible.

Sincerely,

Gabriel Belvedere De Goes

IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/16/2028
COMMISSION #9229214

Elsie Ferreirinha



January 23, 2024

Re: Lauriedson Goncalves Rufo
Character Reference

TO WHOM IT MAY CONCERN:

On behalf of Mr Rufo, in re above, I can vouch for his character as I have known him for about five years. I was born Elsie Perlatier in Montgomery County, Virginia, [REDACTED] have lived in Newark, NJ, since Thanksgiving 1973

Over the years I have gotten to know Mr. Rufo and his lovely wife, Mariana, who are my neighbors down the street at [REDACTED] I live at [REDACTED] Mr. Rufo, works at Step Up Salon, as a barber on the 1st floor of my building. He speaks English very well and has translated messages to his boss and co-workers many times for me. As a friend, he had helped me carry groceries up the stairs, gone and gotten groceries for me when I have been ill, given me a ride to and from my doctor, checks on me almost every day to see if I am okay. He has helped me move, reach and carry things in and out and climb up for things I can no longer do. He and his wife have even taken me out to eat with them. I have come to think of them as extended family. I am a heart patient and have Vertigo.

He has a lovely disposition and a wonderful big smile. I have also noted that he helped other neighbors and people he doesn't know. He is a caring and giving individual who would be an asset to our country if given his American Citizenship. His wife Mariana, in Dental School, seems to be just like him-- beautiful souls.

If I can be of any further assistance, please contact me.

Sincerely Yours,

Elsie Ferreirinha
Elsie Ferreirinha

[Signature] 02/21/24
IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/05/2028
COMMISSION #50228214



Jimmy Freitas



March 11, 2024

To Whom It May Concern:

I, Jimmy Freitas, born in Newark, New Jersey in 1992, compose this correspondence on behalf of Lauriedson Goncalves Rufo, whose character I wholeheartedly endorse.

My friendship with Mr. Rufo dates back to 2017, when he became my barber. One of the highlights of our friendships is going on road trips. In times of emotional turbulence, Mr. Rufo has consistently offered unwavering support. In 2020, I had the privilege of standing as the best man at the wedding of Lauriedson Goncalves Rufo and Mariana Nunez, further solidifying our bond.

Lauriedson Goncalves Rufo exemplifies dedication and hard work, as well as unwavering moral integrity. He shows a remarkable ability to learn quickly, and this ability is only matched by his exceptional kindness and compassion towards others.

I am firmly convinced that Mr. Rufo constitutes a valuable asset to this nation, and given the opportunity, he will undoubtedly continue to contribute lawfully and meaningfully.

For any additional inquiries or clarifications, please do not hesitate to contact me at [redacted] or via email at [redacted].

Sincerely,

[Handwritten signature]

Jimmy Freitas

Igor N. Perru 03/13/24
IGOR N PERRU
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 03/13/2028
COMMISSION #5028214