

**The Law Offices of Michael Z. Goldman**  
100 Church Street, Suite 800  
New York, NY 10007  
(212) 901-3799  
(646) 247-0012  
michael@mzglaw.com

March 28, 2026

By ECF

The Honorable LaShann DeArcy Hall  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Jamil Ahmed v. Raul Maldonado*, et al. Civil Action No. 26-cv-01555 (LDH)

Dear Honorable Judge Hall:

This Office represents Petitioner in this matter, and we write to clarify the record with respect to a statement made in Your Honor's Minute Order, entered on March 27, 2026 (the "March 27 Order").

In the March 27 Order, Your Honor writes:

Indeed, during the hearing, Respondents conceded that the Board of Immigration Appeals' ("BIA") decision to grant Respondents' motion for a discretionary stay of the Immigration Judge's Order that Petitioner was to be released on bond, which allowed for Petitioner's re-detainment on December 8, 2025, resulted from the BIA considering erroneous information on an *ex parte* basis.

It is Petitioner's position that while the BIA's December 4, 2025 decision granting Respondents' motion for a discretionary stay was made on an expedited, *ex parte* basis, nothing in the record suggests that the BIA's decision considered "erroneous information."

Instead, it was ICE's December 8, 2025 decision to re-detain the Petitioner for being a "danger to person and property" (also made on an expedited, *ex parte* basis) that was based on "erroneous information," specifically, the statement that Petitioner was at the time facing "pending" criminal charges. See ECF No. 8-1, Exhibit I ("Subject has pending charges for intimidation, dangerous drugs, marijuana possession; Possession of weapon; Narcotic equip pos."). This information was false.

Petitioner does not believe this clarification in any way changes Your Honor's ultimate conclusion that Petitioner's re-detention on December 8, 2025 violated his right to Due Process.

Thank you for Your Honor's consideration of this Letter.

Respectfully submitted,

/s/ Michael Goldman  
The Law Offices of Michael Z. Goldman  
100 Church St., Suite 800  
New York, NY 10007  
212 901-3799  
[michael@mzglaw.com](mailto:michael@mzglaw.com)

*Attorney for the Petitioner*