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17 **UNITED STATES DISTRICT COURT**
18 **SOUTHERN DISTRICT OF CALIFORNIA**

19 ADONIS CONSTANTINOVICI,

Case No.: 25cv2405-RBM(AHG)

20 Petitioner,

21 v.
22 PAMELA BONDI, Attorney General,
et al.

23 **NOTICE OF SUPPLEMENTAL
DOCUMENTATION**

24 Respondents.

25 Pursuant to the Court's September 25, 2025 Order, Respondents hereby submit
26 the following additional evidence for the Court's consideration in relation to the Petition
27 and motion for temporary restraining order:¹

28

1. The Immigration Judge's April 17, 2001 Order of removal;
2. The December 8, 2010 Order of the Executive Office for Immigration Review
denying Petitioner's motion to reopen and reconsider;

29
30 ¹ The documents listed as items 1-4 are true and correct copies of records received from
31 agency counsel in this matter.

- 1 3. Notice of Revocation of Release dated September 17, 2025, notifying Petitioner
- 2 of the “determination that there are changed circumstances in your case” and “it
- 3 has been determined that you can be expeditiously removed from the United
- 4 States pursuant to the outstanding order of removal against you.”
- 5 4. Warrant for Arrest (I-200), dated August 20, 2025 and signed by the Deportation
- 6 Officer certifying service on August 22, 2025.
- 7 5. Declaration of Denise E. Barroga.

8 Regarding the Court’s inquiry about negotiations, responses, or communications
9 between Respondents and the Romanian

10
11 DATED: September 29, 2025

12 ADAM GORDON
13 United States Attorney

14 *s/Janet A. Cabral*
15 JANET A. CABRAL
16 Assistant United States Attorney
17 Attorneys for Respondents

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18 **UNITED STATES DISTRICT COURT**
19 **SOUTHERN DISTRICT OF CALIFORNIA**

20 ADONIS CONSTANTINOVICI,

21 Case No.: 25-cv-2405-RBM(AHG)

22 Petitioner,

23
24 **DECLARATION OF DENISE E.**
BARROGA IN SUPPORT OF
RESPONDENTS' RESPONSE TO
PETITIONER'S MOTION FOR
TEMPORARY RESTRAINING
ORDER

25 v.
26 PAMELA BONDI, Attorney General,
27 et al.,

28 Respondents.

29
30 I, Denise E. Barroga pursuant to 28 U.S.C. § 1746, hereby declare under penalty of
31 perjury that the following statements are true and correct, to the best of my knowledge,
32 information, and belief:

33 1. I am currently employed by the U.S. Department of Homeland Security (DHS),
34 U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations
35 (ERO), as a Deportation Officer (DO) assigned to the Otay Mesa suboffice of the ICE ERO
36 San Diego Field Office.

1 2. I have been employed by ICE as a law enforcement officer since August 13,
2 2022, serving as an DO since August 13, 2022. I currently remain serving in that position.
3 As a DO, my responsibilities include case management of individuals detained by ICE at
4 the Otay Mesa Detention Center in Otay Mesa, California. I have access to government
5 databases and documentation relating to Petitioner Adonis Constantinovici (Petitioner).

6 3. This declaration is based upon my personal knowledge and experience as a law
7 enforcement officer and information provided to me in my official capacity as a DO for the
8 Otay Mesa suboffice of the ICE ERO San Diego Field Office, as well as my review of
9 government databases and documentation relating to Petitioner Adonis Constantinovici
10 (Petitioner).

11 4. On September 17, 2025, Petitioner was provided with a Romanian-language
12 travel document (TD) application to be completed. Petitioner refused to sign the document,
13 claiming that the Romanian language was lost to him but that he would sign the form if it
14 were translated into English. On September 19, 2025, ERO reached out to the DDO of
15 Romania to ask if they had an English version of the application. No response has been
16 received.

17 5. Ordinarily TDs for Romania are made only for Romanian citizens. ERO would
18 only request TDs for a non-Romanian citizen who had a way of acquiring Romanian
19 citizenship, which would be the following:

20 a. individuals who were born in Romania and currently reside there,
21 b. individuals who resided in Romania for at least 8 years and have been married
22 to a Romanian citizen for 5 years.

23 6. In addition, applicants for Romanian citizenship must be at least 18 years old,
24 have a good understanding of the Romanian language and culture so that they can integrate
25 in the social life, and not have criminal convictions that would make them unworthy of
26 being Romanian citizens.

1 I declare under penalty of perjury of the laws of the United States of America that the
2 foregoing is true and correct.

3

4 Executed this 29th day of September 2025.

5 DENISE E
6 BARROGA

Digitally signed by DENISE E
BARROGA
Date: 2025.09.29 13:33:47 -07'00'

7 Denise E. Barroga
8 Deportation Officer
9 San Diego Field Office