

Afonso Nzuzi Denga A#
Eloy Detention Center
1705 E, Hanna Rd
Eloy, Az 85131

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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY _____

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Afonso Nzuzi Denga
A#
Petitioner

Case No.

CV26-01610-PHX-SPL--JFM

v.

Pam Bondi
ATTORNEY GENERAL

Kristi Noem
SECRETARY OF THE DEPARTMENT
OF HOMELAND SECURITY

John E. Cantu
ICE FIELD OFFICE DIRECTOR OF
THE PHOENIX FIELD OFFICE

WARDEN Rokousouki
CORE CIVIC DETENTION CENTER

Respondent

PETITION FOR WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C SUBSECTION BY A
PERSON SUBJECT TO INDEFINITE
IMMIGRATION DETENTION.

BACKGROUND

Petitioner, Afonso Nzuzi Denga, hereby petitions this Court for a writ of habeas corpus to remedy Petitioner's unlawful detention by Respondents, and to enjoin Petitioner's continued unlawful detention by Respondent. In support of this petition and complaint for injunctive relief, Petitioner alleges as follows:

5. No statutory exhaustion requirements apply to Petitioners claim of unlawful detainment.

PARTIES

6. Petitioner came to America in 1981 as a stateless refugee under the United Nations High Commission for Refugees (UNHCR). Petitioner was admitted into the United States pursuant section 273(c) of the Immigration and Nationality act. Petitioner received a final order of removal on Aug 24th 2022.

7. Respondent Pam Bondi is the Attorney General of the United States and is responsible for the administration of ICE and the implementation and enforcement of the Immigration and Naturalization Act (INA). As such Ms. Bondi has ultimate custodial authority over Petitioner.

8. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. She is responsible for the administration of ICE and the implementation and enforcement of the INA. As such Ms. Noem is the legal custodian of Petitioner.

9. Respondent John E. Cantu the ICE Field Office Director of the Phoenix field office is Petitioners immediate custodian. See Vasquez v. Reno, 233 F.3d 688, 690 (1st Cir. 2000), cert denied, 122 S. Ct. 43 (2001).

10. Respondent Warden Rokousouki Core Civic Eloy Detention Center, where petitioner is currently detained under the authority of ICE, alternatively may be considered to be Petitioners immediate custodian.

STATEMENT OF FACTS

11. Petitioner Afonso Nzuzi Denga was born on [REDACTED] in the Democratic Republic of the Congo under protection of the United Nations High Commissioner for Refugees. The United States Immigration and Naturalization Service listed the Denga family as "stateless" at the time of their admittance to the United States in 1981. They had no passports, neither government of Angola (petitioners parents birthplace) nor Congo would issue them travel documents due to their political beliefs. The Denga family was admitted to the United States under section 207 of the Immigration Naturalization Act. Petitioner was 4 years old when his family entered the United States. Petitioner has never departed from the United States not to mention English is the only language he speaks. Petitioners parents home and village were destroyed and a majority of his relatives were killed in Angola for political reasons. Petitioner has no known family in Angola or the Congo. Petitioners entire family resides in Phoenix, Az, 10 children, 10 grand children wife, 3 brothers, 3 sisters and father.

12. ICE took petitioner into custody on Dec, 2nd 2025 after releasing him on April, 17th 2023. At that time he was detained since October, 22nd 2021.

13. On November, 12th 2022 ICE charged Petitioner with being deportable. Petitioner was ordered deported due to his felony convictions. Petitioner was ordered removed to the country where

his parents were born (Angola) by an immigration judge on August 24th 2022. Petitioners deportation order was made final on that date due to the fact he didn't appeal it. Petitioner was ordered removable under the following sections of the Immigration and Nationality Act (INA):237(a)(2)(E)(i).

14. On December, 2nd 2025 Ice took petitioner into custody after Petitioner went to check in at an ICE field office. Petitioner has been detained since that date.

15. Petitioner has been held well past 6 months after his final order of deportation on August, 24th 2022, at that time he was released almost 8 months after final order on April, 17th 2023. As of December, 2nd 2025 Petitioner is being held indefinitely.

16. To Petitioners knowledge, the governments of Angola or Congo has not issued travel documents for him. Indeed, neither ICE nor Angola or Congo have provided any indication that Angola or Congo. Petitioner is considered stateless so there's no indication he would be removed in the foreseeable future. Petitioner has cooperated fully with all efforts by ICE to remove Petitioner from the United States.

LEGAL FRAMEWORK FOR RELIEF

17. In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the U.S. Supreme Court held that 8 U.S.C. subsection 1231(a) (6), when "read in light of the Constitution demands, limits an aliens post-removal-period detention to a period reasonably necessary to bring about the aliens removal from the United States." 533 U.S. at 689. A "habeas court [first] ask whether the detention exceeds a period reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by statute." *Id.* at 699-700.

18. In determining the length of a reasonable removal period, the Court adopted a "presumptively reasonable period of detention" of six months. *Id.* at 701. After six months, the government bears the burden of disproving an aliens "good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future." See *Zhou v. Farquharson*, 2001 U.S. Dist. LEXIS 18239, *2- *3 (D. Mass. Oct. 19 2001) (quoting and summarizing *Zadvydas*). Moreover, "for detention to remain reasonable, as the period of prior post-removal confinement grow, what count as the reasonably foreseeable future conversely would have to shrink." *Zadvydas*, 533 U.S. at 701. ICE's administrative regulations also recognize that the HQPDU has a six-month period for determining whether there's significant likelihood of an alien's removal in the reasonably foreseeable future. See 8 C.F.R subsection 2414 (k) (2) (ii).

19. Evidence showing successful reparation of other persons to the country at issue is not sufficient to meet the governments burden to establish that an alien petitioner will be deported in the reasonably foreseeable future. See *Thompson v. INS*, 2002 U.S. Dist. LEXIS 23936 (E.D. La September 16, 2002) (government failed to show that aliens deportation to Guyana was reasonably foreseeable where the government offered statistics of reparation to Guyana, but failed to show any response from Guyana on the application for travel documents that INS and the petitioner had requested).

Rather for the government to meet its burden of showing that an alien's repatriation is reasonably foreseeable, it must provide some meaningful evidence particular individual case.

An Alien who has been detained beyond the presumptive 6 months should be released where the government is unable to present documented confirmation that the foreign government at issue will agree to accept the particular individual in question. See *Agbada v. John Ashcroft*, 2002 U.S. Dist LEXIS 15797 (D. Mass. August 22, 2002) (court will likely grant habeas petition after fourteen months if ICE is "unable to present document confirmation that Nigerian government has agreed to [petitioner's] repatriation"; Zhou, 2001 U.S. dist. LEXIS 19050 at *7 (W.D. Wash. February 28, 2002) (government's failure to offer specific information regarding how or when it expected to obtain the necessary documentation or cooperation from the foreign government indicated that there was no significant likelihood of petitioner's removal in the reasonably foreseeable future).

CLAIMS FOR RELIEF
COUNT ONE
STATUTORY VIOLATION

20. Petitioner re-alleges and incorporates by reference paragraphs 1 through 19 above.

21. Petitioner's continued detention by Respondents is unlawful and contravenes 8 U.S.C. subsection 123(a)(6) as interpreted by the U.S. Supreme Court in *Zadvydas*. The six-month presumptively reasonable period for continued removal efforts has expired. Petitioner still has not been removed, and for the reasons outlined above in paragraphs 1 to 20, Petitioner's removal to Angola or Congo is not reasonably foreseeable. The Supreme Court held in *Zadvydas* and *Martinez* that ICE's continued detention of someone after six months where deportation is not reasonably foreseeable is unreasonable and in violation of 8 U.S.C. subsection 1231(a). 533 U.S. at 701.

COUNT TWO
SUBSTANTIVE DUE PROCESS VIOLATION

22. Petitioner re-alleges and incorporates by reference paragraphs 1 through 22 above.

23. Petitioner's continued detention violates Petitioner's right to substantive due process through a deprivation of the core liberty interest in freedom from bodily restraint. See e.g., *Tam v. INS*, 14 F. Supp.2d 1184 (E.D. Cal. 1998) (aliens retain due process rights).

24. The Due Process Clause of the Fifth Amendment requires that deprivation of Petitioner's liberty narrowly tailored to serve as compelling government interest. While respondents would have interest in detaining Petitioner in order to effectuate removal, that interest does not justify the indefinite detention of Petitioner, who is not significantly likely to be removed in the reasonably foreseeable future. The U.S. Supreme Court in *Zadvydas* thus interpreted 8 U.S.C. 1231(a) to allow continued detention only for a period reasonably necessary to secure the alien's removal, because any other reading would go beyond the government's articulated interest- to effect the alien's removal. See *Kay v.*

Reno, 94 F. Supp.2d. 546, 551 (M.D. Pa. 2000) (granting writ of habeas corpus, because petitioner's substantive due process rights were violated, and noting that "If deportation can never occur, the government's primary legitimate purpose in detention- executing removal- is nonsensical.")

COUNT THREE
PROCEDURAL DUE PROCESS VIOLATION

25. Petitioner- re alleges and incorporates by reference paragraphs 1 through 24 above.

26. Under the Due Process Clause of the fifth Amendment, an alien is entitled to a timely and meaningful opportunity to demonstrate that he should not be detained. Petitioner in this case has been denied that opportunity. ICE does not make decisions concerning aliens' custody status in a neutral impartial manner. The failure of Respondents to provide a neutral decision-maker to review the continued custody of Petitioner violates Petitioner's right to procedural due process. Further, Respondents have timely manner. There is no administrative mechanism in place for the Petitioner to demand a decision, ensure that a decision will ever be made, or appeal a custody that violates Zadvydas.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

- 1) Assume jurisdiction over this matter;
- 2) Grant Petitioner a writ habeas corpus directing the Respondent to immediately release Petitioner from custody, under reasonable conditions of supervision:
- 3) Order Respondent to refrain transferring the Petitioner out of the jurisdiction of the Phoenix ICE field office Director during the pendency of these proceedings and while the Petitioner remains in Respondents custody; and
- 4) Award Petitioner attorneys fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 5 U.S.C subsection 2412, and any other basis justified under the law; and
- 5) Grant any other further relief that this Court deems just and proper.

I affirm, under penalty of perjury, that the foregoing is true and correct.

Respectfully submitted this 4th day of March

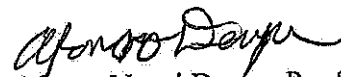

Afonso Nzuzi Denga, Pro Se
Eloy Detention Center

EXHIBIT A

Supporting Release and Consular Correspondence Documents

1. Release Notification – dated June 12, 2023
2. Notice of Revocation of Release
3. Request for Release from Detention and Supporting Letter
4. Letter to the Congolese Consulate

Office of Enforcement and Removal Operations

U.S. Department of Homeland Security
500 12th Street, SW
Washington, D.C. 20536



**U.S. Immigration
and Customs
Enforcement**

DENGA, Afonso N.
C/O Immigration and Customs Enforcement
Phoenix Field Office

Release Notification

Upon review of your case, U.S. Immigration and Customs Enforcement (ICE) has concluded that you will be released from ICE custody pending your removal from the United States. This release does not affect your removal order and does not constitute an admission to the United States.

Your release will be subject to certain written conditions that will be provided to you shortly on the Order of Supervision and Addendum to the Order of Supervision forms, and by which you must abide. You may be required to participate in an Alternatives to Detention (ATD) Program which may include the use of Active/Passive GPS monitoring, monthly reporting, and telephonic reporting.

A violation of one of these conditions, or of any local, state, or federal law may result in you being taken back into custody and any bond that you may have posted being forfeited. Your release from custody is also conditioned upon you maintaining proper behavior while sponsorship and placement efforts for you are being undertaken. At any time, you may be taken back into ICE custody should your removal become practicable.

Prior to your release from custody, an immigration officer may verify the sponsorship or employment offers presented during your review. Please forward any additional information regarding potential sponsoring family members or non-governmental organizations that may be willing to assist you upon release.

It is particularly important that you keep ICE advised of your address at all times. ICE will continue to make efforts to obtain your travel document that will allow the United States government to carry out your removal pursuant to your order of deportation, exclusion, or removal. In addition, you are required by law to continue to make good faith efforts to secure a travel document on your own and provide proof of your efforts to ICE.

PAUL L

CAPICCHIONI

Paul Capicchioni
Unit Chief

Digitally signed by PAUL L
CAPICCHIONI

Date: 2023.04.14 13:34:47 -04'00'

Date

www.ice.gov

Revised 6/19/2018

U.S. Department of Homeland Security
2035 N. Central Ave
Phoenix, Arizona 85004



U.S. Immigration
and Customs
Enforcement

DENGA, Afonso Nzuzi
IN US ICE Custody
2035 N. Central Ave.
Phoenix, Arizona 85004

A

Notice of Revocation of Release

This letter is to inform you that your order of supervision has been revoked and you will be detained in the custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has been made based on a review of your official alien file and a determination that there are changed circumstances in your case.

ICE has determined that you can be expeditiously removed from the United States pursuant to the outstanding order of removal against you. On August 24, 2022, you were ordered removed to Democratic Republic of the Congo (DRC) or alternative Angola by an Immigration Judge and you are subject to a final order of removal. Your case will be presented to the government of Democratic Republic of the Congo or Angola for the issuance of a travel document.

Based on the above, and pursuant to 8 C.F.R. § 241.4 / 8 C.F.R. § 241.13, you are to remain in ICE custody at this time. You will promptly be afforded an informal interview at which you will be given an opportunity to respond to the reasons for the revocation. You may submit any evidence or information you wish to be reviewed in support of your release. If you are not released after the informal interview, you will receive notification of a new review, which will occur within approximately three months of the date of this notice.

You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 U.S.C. Section 1253(a).

Digitally signed by KOSTAS
PAPAKONSTANTINO
Date: 2025.12.02 15:17:13
-05'00'

(A) Unit Chief

Date

PROOF OF SERVICE

(1) Personal Service

(a) I R. BOONE DO
Name of ICE Officer Title
certify that I served DENGA, ALFONSO with a copy of
Name of detainee
this document at Phoenix Field Office on 12/2/25 at 1515 HRS.
Institution Date Time

Detainee Signature:  Date: 12-2-25

- () cc: Attorney of Record or Designated Representative
() cc: A-File

Request for Release from DetentionName: Denga
LastAlonso
FirstNzuzi
MiddleAlien Number: A Detention Location: Eloy Detention Center
1705 E. Hanna Rd
Eloy, AZ 85131**Immigration and Naturalization Service:**

Pursuant to interpretation of the opinion of the Supreme Court of the United States of America in the case Zadvydas v. Davis, I request release from the custody of the Attorney General, in that I have been ordered removed/deported from the United States by an Immigration Judge [or in another lawful manner], but due to circumstances beyond my control, my removal/deportation cannot be effected in the reasonable foreseeable future, due to an absence of a formal repatriation agreement between my country of citizenship and the United States, or due to the fact that my country of citizenship has not or will not issue identity and travel documents necessary for my departure.

The Following additional information is provided:

1. I am a citizen of: Stateless (Born in The Democratic Republic of the Congo)
Country of Citizenship
2. I have/have not applied for a travel document.
Date request submitted Jan 26th 2026
3. My birth certificate and passport [valid or expired] are in the possession of:

I do not own a birth certificate
Name

Address

Phone Number

4. If released from custody, I plan to reside at the following location:


Address

Under Penalty of law, I certify that the foregoing information provided by herein is true.

Denga
Last NameAlonso
First NameNzuzi
Middle NameAlfonso Denga
SignatureFeb 22nd 2026
Date

AFONSO NZUZI DENG
A# 
ELOY DETENTION CENTER
1705 E. HANNA RD
ELOY, AZ 85131

FEBRUARY 20TH, 2026

ICE PHOENIX FIELD OFFICE
2035 N. CENTRAL AVE
PHOENIX, ARIZONA 85004

Dear Immigration Officer:

I request ICE review my custody status while taking the following information into consideration, because I believe I qualify for release under an order of supervision. I have been in detention longer than 90 days after removal order became final, and it's unlikely that I will be deported to Democratic Republic of the Congo or Angola (my parents place of birth) in the foreseeable future. I am not a danger to public safety and nor am I a flight risk.

My family entered the United States back in 1981. The country I was born in will not accept my deportation because I am considered stateless, I was born in a United Nations refugee camp in 1977. Angola also doesn't view me as a citizen, when I last spoke to a consulate representative I was told I wasn't born there so they can't help me. I've attempted several times to be issued travel documents but been denied since 2022, 2023. The most recent attempt was on January 25th of 2026. I also have met with the Angolan consulate earlier this month and was told I would not be issued travel documents.

I am not a danger to the public, I've been on state probation and also ICE probation for almost the past 3 years. My state probation officer is Rachelle Tran her number is 602-290-7423. I've taken classes and I am remorseful for my previous actions that landed me in the custody of ICE.

I am not a significant flight risk due to the fact I've been on supervised release since April 17, 2023 and checked in routinely with the ICE Phoenix field office. As a matter of fact I was detained on Dec 2nd, 2025 while checking in with the field office. If released a plan on to continue to check in. I've been residing with my father Pedro Denga since my release in 2023 and plan on to continue to reside at 10139 W. Highland rd in Phoenix, Arizona 85037.

I have cooperated with ICE's efforts to remove me from the United States. I've signed paperwork to get travel documents, I've sent letters to The Democratic Republic of the Congo requesting travel documents. I've taken passport pictures, I've also met with the Angolan consulate twice both times they've decided not to issue me travel documents.

I will comply with all conditions placed on my release. for these reasons, I respectfully request that I be released under an order of supervision so that I may join my family, return to lawful employment, and no longer be a financial burden to my family or society.

Respectfully Submitted,

Afonso Denga
Afonso Nzuzi Denga
A# 

CONGO CONSULATE

TO WHOM IT MAY CONCERN,

MY NAME IS Afonso Denga. I AM 45 YEARS OLD AND I WAS BORN IN CONGO (REFUGEE CAMP) ON [REDACTED], MY FAMILY CAME TO THE U.S AS REFUGEES. I ARRIVED AT THE AGE OF Four. I AM WRITING THIS LETTER TO MY CONSULATE AND COUNTRY OF CITIZENSHIP IN REGARDS TO THE ISSUANCE OF IDENTITY AND TRAVEL DOCUMENTS. I AM CURRENTLY DETAINED UNDER CUSTODY OF I.C.E AT THE Florence Detention Center AT 1155 N. Pinal Parkway Avenue, Florence, AZ 85132, UNDER THE ORDER OF THE DEPARTMENT OF HOMELAND SECURITY. MY ALIEN NUMBER IS A [REDACTED] I HAVE BEEN ORDERED TO DEPART FROM THE UNITED STATES BY AN IMMIGRATION JUDGE IN PHOENIX ARIZONA. THE ORDER OF DEPORTATION IS EFFECTIVE IMMEDIATELY. THANK YOU FOR CONSIDERATION IN THIS MATTER OF SERIOUS URGENCY. PLEASE PROVIDE ME A RESPONSE LETTER AS SOON AS POSSIBLE.

RESPECTFULLY,

Afonso Denga

A# ALIEN NO;
BIRTH DATE:



1155 N. Pinal Pkwy Ave.
Florence, Arizona 85132

P.O. Box 6300
Florence, Arizona 85132

EXHIBIT B

Detainee Request Forms Submitted to ICE Officers

DEPARTMENT OF HOMELAND SECURITY

Immigration and Customs Enforcement

Department:

Deportation

Housing Unit:

Log Number:

Detainee Request Form

Facility Name

(CAFCC) Central Arizona
Detention Center

Detainee "A" Number:

DENGA

Detainee Last Name:

AFONSO

First Name:

Angola

Nationality:

Your Question

ITS GOING ON A MONTH SINCE MY 180 DAY REVIEW WAS SUPPOSED TO BE DETERMINED. IM STILL WAITING TO HEAR WHAT WAS DECIDED. I WOULD LIKE TO SPEAK TO A SUPERVISOR AT THIS POINT.

Date Recieved:

3/17/2023

Entered By

2087

ICE Response

Your case is being reviewed you have to wait.

Reply Date:

3/17/2023

ICE officer:

DO K. LIVINGSTON

DEPARTMENT OF HOMELAND SECURITY
Immigration and Customs Enforcement

Department:
Deportation

Log Number

Detainee Request Form

Facility Name

(CAFCC) Central Arizona
Detention Center

Detainee "A" Number

DENGA

Detainee Last Name:

AFONSO

First Name:

Angola

Your Question

Nationality:

I FEEL LIKE MY CIVIL RIGHTS ARE BEING VIOLATED. I AM A STATELESS
REFUGEE WHOS BEEN HELD OVER 180 DAYS AFTER BEING ORDERED DEPORTED
MU 180TH DAY WAS FEB 20TH I GANE YET TO GET AN UPDATED STATUS ON MY
DETAINMENT PLEASE ADVISE ME OF MY SITUATION SO I CA KNOW HOW TO
PROCEED

Date Recieved:

3/15/2023

Entered By

2144

ICE Response

YOUR CASE IS BEING REMOVED

Reply Date:

3/16/2023

ICE officer:

DO K. LIVINGSTON

DEPARTMENT OF HOMELAND SECURITY

Department:

Immigration and Customs Enforcement

Deportation

Log Number

Housing Unit:

Detainee Request Form

Facility Name

(CAFCC) Central Arizona
Detention Center

Detainee "A" Number:

A

DENGA

Detainee Last Name:

AFONSO

First Name:

Your Question

Angola

Nationality:

I SIGNED TO GET DEPORTED OVER 6 MONTHS AGO. IM ON 195TH DAY AND I
HAVENT HEARD ANYTHING CONCERNING MY PROLONGED DETAHMENT. IM
REQUESTING SOME COMMUNICATION. IAM A STATELESS REFUGEE NO COUNTRY
RECONIZES ME AS A CITIZEN WHY AM I STILL HERE?

Date Recieved:

3/12/2023

Entered By

2087

ICE Response

YOU CAS EIS BEING REVIEWED

Reply Date:

3/16/2023

ICE officer:

DO K. LIVINGSTON

EXHIBIT C

Letters of Support

- 1. Pedro Danga – Father of Alfonso Danga**
- 2. Miguel Danga – Brother of Alfonso Danga**
- 3. Rita Hunter – Sister of Alfonso Danga**
- 4. N [REDACTED] – Son of Alfonso Danga**
- 5. Guilhermina Danga – Sister of Alfonso Danga**
- 6. Richard Danga – Brother of Alfonso Danga**
- 7. Bianca Mejia – Former Spouse of Alfonso Danga**
- 8. Curtis Roberson – Current Husband of Bianca Mejia**
- 9. N [REDACTED] a – Son of Alfonso Danga**
- 10. N [REDACTED] – Son of Alfonso Danga**

UNITED STATES DEPARTMENT OF HOMELAND SECURITY
UNITED STATES IMMIGRATION COURT

In the Matter of:
AFONSO DENG
A# A 

DECLARATION OF PEDRO DENG
IN SUPPORT OF AFONSO DENG
(FORMS I-589 AND I-246)

I, **Pedro Deng**, hereby declare as follows:

I am the father of **Afonso Deng**, and I submit this declaration in support of his applications for relief, including asylum-related protection pursuant to Section 208 of the Immigration and Nationality Act (INA), 8 U.S.C. § 1158, withholding of removal pursuant to INA § 241(b)(3), 8 U.S.C. § 1231(b)(3), protection under the Convention Against Torture (8 C.F.R. §§ 1208.16–1208.18), and in support of a Stay of Removal pursuant to 8 C.F.R. § 241.6 (Form I-246).

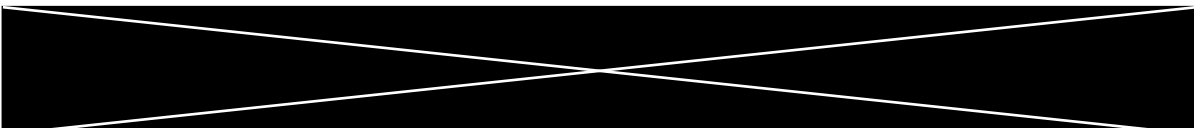
Afonso Deng is not a citizen or national of Angola or the Democratic Republic of the Congo.



After fleeing Angola, our family sought refuge in the Democratic Republic of the Congo under the protection of the United Nations High Commissioner for Refugees (UNHCR). Because of this forced displacement, our children, including Afonso, were born in the Congo; however, they did not acquire citizenship or nationality there.

At the time of our admission to the United States in 1981, the United States Immigration and Naturalization Service classified our family as stateless. We possessed no passports, and neither Angola nor the Congo would issue us travel documents due to our political beliefs. Our family was admitted to the United States pursuant to Section 273(c) of the Immigration and Nationality Act.

Afonso Deng entered the United States at the age of four (4) and has never departed the United States since his arrival. He speaks English exclusively and has lived his entire life in this country. The United States is the only home he has ever known.



Afonso has no family members, social network, or means of support in Angola or the Democratic Republic of the Congo. Removal would result in exceptional and extremely harsh consequences.

I became a naturalized citizen of the United States in 1996. My wife, Adelaide Kutumengwa Denga, passed away on May 25, 1995, in Phoenix, Arizona.

Afonso has demonstrated rehabilitation, maturity, and remorse for mistakes made during his youth and has expressed respect for the laws of the United States.

I respectfully request that Afonso Denga not be deported to Angola or the Democratic Republic of the Congo.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed at Phoenix, Arizona

A handwritten signature in black ink, appearing to read 'P. Denga', is written over a horizontal line.

Pedro Denga

Father of Afonso Denga

RE: Afonso Deng 

My name is Miguel Denga, the younger brother of Afonso Denga. The purpose of this letter is to inform you that I will be able to assist Afonso financially until he has a few checks under his belt upon his release. I am a small business owner and have the means to do so for six months. I have attached my bank statement for your review to show I have the financial means.

Beyond providing him with financial assistance, my family and I will also give him emotional and spiritual help. I currently own a consulting business that provides me with resources to assist in his employment and overall mental health.

Afonso loves his kids, and his kids love him, and I would love for the family to reunite, so future generations are not negatively impacted.

Thank you



Miguel Denga



RE: Afonso Denga [REDACTED]

Hello, my name is Rita Hunter, I'm Afonso's older sister. I just want to share with you who Afonso is at his best. First thing he's a great father to all 10 of his kids. After his first divorce he got custody of four of his children from his first marriage. He did not find out about his daughter J [REDACTED] until she was 15 at that time he took her in immediately.

Afonso has one of the biggest hearts I've ever come across. One of his greatest passions is mentoring troubled youth, especially those with a single-parent home. As a friend his loyalty second to none I'm proud of my brother for the man he aspires to be. Unfortunately, he's had to battle a lot of personal issues such as the death of our mother, his twin brother, his fiancée, two best friends and also the death of our nephew his twin brother's son who he is raised as his own after the death of our brother. It's pretty long healing process as a family we really didn't understand the depth of his emotional pain or mental struggles. I am more than prepared to assist my brother in his recovery anyway possible. Afonso is a good man whose life path got foggy. With the help of our family we believe we can clear some of the foggiess and get him back onto the right path.

Rita Hunter
[REDACTED]

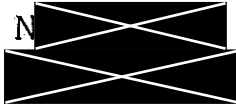
3/6/23

RE Afonso Denga



Dear whoever is reading this, My father is human, and as we know humans make mistakes. I believe he has payed for these mistakes the last 3 years and that he ready to take the next steps to build back up his relationships with his family, Something that we all want in return too. He's currently missing critical phases of life that my lil sister (6 years old) and little brother(13 years old) are going thru, They really need him and a fatherly figure in they life right now.

N



Re: Afonso Denga



U.S. District Court for the District of Columbia

Dear Judge, I am writing this letter on behalf of my brother Afonso Denga. I am writing this letter as his Pastor. I started speaking to Mr. Denga consistently in April of 2020. When we first began I can hear the bitterness, pain, frustration, and brokenness in his voice. We started looking at his spiritual walk with God. I would give him verses to read and meditate on. He wanted change and you can hear the excitement in his voice when I gave him the verses to meditate on. I noticed a change in his voice on how he viewed his circumstance. We would end our conversations in prayer and truly looked forward to our conversations because he sounded so alive again. I remember one particular conversation we had, Mr. Denga expressed how disappointed he was in himself on how he allowed himself back in this type of situation. His disappointment was due to not being able to see his children and not able to support them. I reminded him not to forget the feeling he felt so he doesn't find himself there again. As his Pastors Myself and my Husband commit to helping him on his journey to healing and restoring his life and his family.

To Whom this May Concern,

I'm writing this letter on behalf of Afonso Denga. My name is Guilhermina Denga Afonso's older sister. But writing this letter as his Pastor. I started speaking to Mr. Denga consistently in April of 2020. When we first began I can hear the bitterness, pain, frustration, and brokenness in his voice. We started looking at his spiritual walk with God. I would give him verses to read and meditate on. He wanted change and you can hear the excitement in his voice when I gave him the verses to meditate on. I noticed a change in his voice on how he viewed his circumstance. We would end our conversations in prayer and truly looked forward to our conversations because he sounded so alive again. I remember one particular conversation we had, Mr. Denga expressed how disappointed he was in himself on how he allowed himself back in this type of situation. His disappointment was due to not being able to see his children and not able to support them. I reminded him not to forget the feeling he felt so he doesn't find himself there again. As his Pastors Myself and my Husband commit to helping him on his journey to healing and restoring his life and his family.

As his sister I ask the ICE to please forgive him for all he has done. He sees and realizes how much he hurt his wife, and children. I believe in life one needs to comfort his/her issues to heal and to become a better person. My brother has accepted his mental condition and wants help so he never finds himself in this place again. My family is willing to help him every step of the way. I believe he can become the best husband, father, brother, son, uncle, and grandfather I know him to be. My brother loves his children more than anything, his biggest regret is the time he has spent apart from them. Please have mercy on him so he is able to reunite with his family to start a new journey.

Thank you

Guilhermina Denga- Matelo



RE: Afonso Denga



To Whom It May Concern,

I am writing this letter in support of Afonso Denga. I realize that my brother has made some bad decisions, but I believe he is really in need of help. He wants to do better and is willing to do the work to get there. Afonso is truly a good person. He suffers from internal pain stemming from the loss of his twin brother and many others in his life. I am pleading with the courts to offer Afonso an opportunity to receive treatment. His family really does need him and his children love him. He is their provider and I know he only wants the best for them.

Afonso has so much to offer; he is very smart and articulate. He had desired to mentor young men going through similar traumas as he has experienced in his life. I would really like to see him do that work, after doing the work on himself. Please release him to receive the help he needs, and aid him in becoming an asset to others. I thank you very much for reading these few words.

Sincerely,

Richard Denga

Richard Denga

I am writing this letter on behalf of my ex-husband, Alfonso Denga, who is currently facing sentencing in your court. Although we are no longer married, he is the father of our four children, and I feel it is important to speak honestly about his character and the role he plays in their lives.

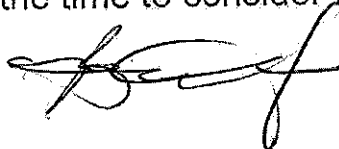
Alfonso has always been a devoted father to our children. He maintains a loving and meaningful relationship with them and has consistently shown care, concern, and commitment to their well-being. Our children rely on him not only for financial support, but also for emotional guidance, stability, and encouragement. He attends important events in their lives, communicates with them regularly, and strives to remain present despite our separation.

While no one is perfect and people can make mistakes, I have seen firsthand his growth and dedication to becoming a better person and father. He understands the seriousness of his situation and the impact it has on our children and all of our life in general. They love their father deeply, and his absence would cause significant emotional hardship for them.

As their mother, my primary concern is always the well-being of our children. I truly believe that keeping their father in their lives is in their best interest. He plays an important role in their development, and they benefit greatly from having both parents involved.

I respectfully ask the Court to consider his character as a father and the effect his removal would have on four innocent children who depend on him. Thank you for taking the time to consider this letter.

Sincerely,



Bianca Mejia

Re: Character Reference for Alfonso Denga

To Whom It May Concern,

I am writing this letter in strong support of my good friend, Alfonso Denga. I have had the privilege of knowing Alfonso for 15 years, and during this time I have come to know him as a person of integrity, kindness, and strong moral character.

Alfonso is a responsible and hardworking individual who consistently demonstrates respect for others and dedication to his community. He is someone who takes his commitments seriously—whether to his work, his friends, or his family. I have personally witnessed his willingness to help others without expecting anything in return. He is dependable, honest, and compassionate.

In addition to his positive character, Alfonso has always shown a deep respect for the laws and values of this country. He strives to contribute in meaningful ways and to build a stable, productive life. His presence has had a positive impact on those around him, including myself.

It is without hesitation that I express my support for Alfonso Denga. I sincerely hope the Court will consider his good character, contributions, and the positive influence he has on his community when making its decision.

If additional information would be helpful, I would be more than willing to provide it.

Respectfully,

Curtis L Roberson,



Curtis L Roberson

My name is Nazarie Denga and I am 19 years old. I am writing this letter in support of my father, Alfonso Denga, who is currently before this court. I respectfully ask that you consider my words as you make your decision about his future.

My father has always been a loving and supportive parent in my life. He has worked hard to provide for our family and has always done his best to guide me and teach me important values such as respect, responsibility, and perseverance. Growing up, I saw firsthand the sacrifices he made to make sure I had what I needed, whether it was food on the table, clothes for school, or encouragement when I felt discouraged.

Beyond being a provider, my father has been emotionally present in my life. He has supported me through challenges, celebrated my achievements, and encouraged me to pursue my goals. His presence in my life has shaped the person I am today. The thought of losing him from our daily lives would be devastating not only to me, but to our entire family.

My father is an important pillar in our family. He helps guide and support us, and his absence would create emotional and financial hardship. I truly believe he deserves the opportunity to remain with his family and continue contributing positively to our lives and our community.

I respectfully ask the court to show compassion and allow my father the chance to stay with his children/ grandchildren and continue being the father we rely on. Thank you for taking the time to read my letter and consider my perspective.

Respectfully,



Nazarie Denga

Dear Honorable Judge,

My name is N [REDACTED] and I am the son of Alfonso Denga. I am writing this letter with deep respect to share what kind of person my father truly is and what he means to our family.

My father is a loving, hardworking, and devoted parent. Throughout my life, he has always put his family first. He has worked tirelessly to provide for us, support us emotionally, and guide us with strong values. He has taught me the importance of honesty, responsibility, faith, and hard work.

He is not only a father but also a positive presence in our community. He is the type of person who helps others without expecting anything in return. My dad has always tried to lead by example and make choices that reflect his commitment to being a better person and provider.

If my father is allowed to remain in the United States, he will continue to support and guide our family. His presence in our lives is essential emotionally and financially. Losing him would cause our family tremendous hardship and pain.

I respectfully ask the Court to consider his character, his dedication to his family, and the positive role he plays in our lives. He is more than a case number — he is a father, a provider, and a man who loves his family deeply.

Thank you for taking the time to read my letter and for considering my father's future.

Respectfully,

N [REDACTED]

([REDACTED]