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Attorneys for Plaintiffs Fernando Gomez Ruiz, Fernando Viera Reyes, Jose Ruiz Canizales, Yuri Alexander Roque Campos, Sokhean Keo, Gustavo Guevara Alarcon, Alejandro Mendiola Escutia and all others similarly situated

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

FERNANDO GOMEZ RUIZ; FERNANDO
 VIERA REYES; JOSE RUIZ CANIZALES;
 YURI ALEXANDER ROQUE CAMPOS;
 SOKHEAN KEO; GUSTAVO GUEVARA
 ALARCON; and ALEJANDRO MENDIOLA
 ESCUTIA, on behalf of themselves and all
 others similarly situated,

Plaintiffs,

v.

Case No. 3:25-cv-09757-MMC

**DECLARATION OF ALEJO JUAREZ
 RUIZ IN SUPPORT OF PLAINTIFFS'
 MOTION FOR PRELIMINARY
 INJUNCTION**

Date: January 9, 2026
 Time: 9:00 a.m.
 Dept.: Ctrm 7 – 19th Floor
 Judge: Hon. Maxine M. Chesney

Date Filed: November 12, 2025

1 U.S. IMMIGRATION AND CUSTOMS
2 ENFORCEMENT; TODD M. LYONS,
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; SERGIO
5 ALBARRAN, Acting Director of San
6 Francisco Field Office, Enforcement and
7 Removal Operations, U.S. Immigration and
8 Customs Enforcement; U.S. DEPARTMENT
9 OF HOMELAND SECURITY; KRISTI
10 NOEM, Secretary, U.S. Department of
11 Homeland Security,

12 Defendants.

Declaration of Alejo Juárez Ruiz, 072985450

1. I, Alejo Juárez Ruiz, am currently detained at the California City Detention Facility.
2. I arrived to California City Detention Facility around September 2025, from Golden State Annex, where I was detained since March 12, 2024.
3. I am currently housed in Unit G-200, Cell 116 in a double cell with one other detained person.
4. Prior to coming to California City, I was at Golden State Annex about 18 months. Soon after my arrival at Golden State Annex, I received medication for my heart condition, high cholesterol, diabetes, and high blood pressure. The doctor at Golden State Annex explained to me that I was receiving the proper treatment there and my condition was being managed.
5. I am currently prescribed: METFORMIN HCL 1000 MG Tab (taken twice a day) (likely for high cholesterol), GLIPIZIDE 10 MG (by mouth twice daily) (for high blood sugar/diabetes), and LISINOPRIL 40 MG (high blood pressure).
6. While at the Golden State Annex, my right knee was dislocated when two guards pulled me away while I was sitting down and I was observing a chaotic incident involving other people who were fighting in the mess hall, but I was not involved. My knee twisted out of its socket. My knee was injured for about three months. I received about one or two months of physical therapy. Then I was transferred here but I have not received any additional treatment for my knee. I have not received any physical therapy, but ICE told me that they are not going to give me any additional therapy here at California City because this is a new facility run by a different company.
7. Around October 3, 2025, I requested to get a cane to walk, but I was denied, in the morning. I spoke to the guard and requested a walking cane, but the guard told me that I was not entitled to get one because this is a prison. When I explained to the guard that this is not a prison, this is a civil detention center, the guard said that didn't matter because I was not going to get a walking cane anyway.
8. About three days later, the same guard who made the comment about this being a prison asked me if I had a problem with him. I told him that my only problem is that I cannot walk. The guard then responded that this was not his problem. I responded that I just wanted to get out so that I could go to my family.

9. Since I arrived here, I have filed medical requests to help with my knee pain and to get additional therapy, but I have been told to wait. I filed one around October 7, 2025. Medical staff came to see my knee, but the doctor told me that they would only help me with my diabetes and cholesterol and that they would treat my knee later. At that time, my knee was very swollen and is still very swollen to this day.
10. Around October 15, 2025, I filed a second medical request, via the tablet, but, to date, I have not received any response.
11. I have severe walking problems because I can only walk a few steps and then I get serious pain, and I cannot walk more than a few steps. I cannot go out to the yard and I cannot walk around the facility like the other detainees.
12. I have not had my eyes checked. My left eye has 70% vision and my right eye is at 80%. At Golden Annex, I got my eyes checked once a month. When my blood sugar levels spike, my vision gets blurry. I cannot see even 3 feet away from me.
13. I also have not gone to the dentist. I have some pain because of a molar that needs to be checked and possibly removed. I get headaches because of this. I have filed a medical request to see a dentist and I have not heard back.
14. I have difficulty hearing from my left side, but they have not checked my hearing. I have complained about this here too, but they have not checked this.
15. There are many times that I feel anxious, depressed, and sad. I have communicated this to the medical staff, but they have not provided any treatment.
16. The food I get here is not good for my diabetes, cholesterol, and blood pressure because it's all unhealthy food that worsens my diabetes. Every day at 6am, we get potatoes with butter and pepper and cornbread. At lunch, we get the same but with a chocolate cake. On the weekends, we get a small glass of milk. Things at the commissary are very expensive—almost twice as much as what it cost in Golden Annex.
17. We do not get enough food to eat. The portion sizes are small and I am still hungry after I eat. I have lost about six pounds since I got here. When I got here, the portions were good for about 15 days, but then more people got here, and the portions went down significantly.

18. I have verbally complained about the food here with the guards, but they have told me that this is not a restaurant. My doctor has said that I should go on a diet, but this would be impossible because the food here is the same and bad for my diabetes.
19. The water smells and tastes like tap water that is not clean. When we microwave the water to purify it, there is a white residue that stays in the cup. We have complained about the quality of the water and were told by staff that it is normal, and it's just the chemicals they use to clean it. Now they have started to put ice in the water to prevent us from boiling the water. There is a jug of about 25 gallons of water for about 80 people.
20. It's incredibly difficult to get a haircut. They only provide one machine to two barbers once a week who have to share it.
21. I requested to work picking up trash or to work as a janitor around September 20, 2025. They told me no because I have diabetes and because I cannot walk because of my knee.
22. When I arrived, around September 20, 2025, a guard told me that if I complained they would write me up or send me to segregation. The guard told me that I could not request any special food. I responded that I only wanted to ensure that I was receiving my proper diet because of my diabetes.
23. I get my mail open. There is a support group who sends me supportive letters. I received a Bible, but they did not allow me to keep it because I had to pay for it, but I could not. On October 3, 2025, a guard told me not to receive more cards, like Christmas cards or holiday cards, from this organization because this is a prison.
24. I am Catholic. But there is no mass service or prayer rooms. There is a prayer service, but it's run by a guard and people do not go.
25. There are areas in the prison where animals and insects come into prison. There was a time when people came to inspect the prison and I said out loud that they should inspect the water pipes because they are oxidized and there is mold. In my cell, the water is dirty.
26. On October 29, 2025, we were locked down and the staff came and threw out our blankets, water cups, sugar packets, food, and soap. They threw it in the trash. For my cellmate, they threw away his Bible in the trash. Then in the middle of the night, they provided us with new blankets.

27. Around October 3, 2025 around 10:00 AM, there was an Asian man here who was very sick, and he did not speak English. I told the guard that the Asian man was sick, and he did not speak English. The guard told me that I would be next to go into the “hole.” The guard tried to pepper spray the Asian detainee but accidentally sprayed another guard. They turned on the fans to disperse the pepper spray.
28. On that day, I filed a complaint against that guard explaining that I did not want to be around that guard because he threatened me with going to the hole simply for me speaking up for the other detained person.

I, Alejo Juárez, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration is executed at California City, California this 31 day of October 2025.

Alejo Juárez

ATTESTATION OF TRANSLATOR

I am a native Spanish speaker. On October 31, 2025, I reviewed the above declaration with Alejo Juárez Ruiz in Spanish, which Alejo Juárez Ruiz represented to me was his preferred and/or native language, and witnessed his signature.

Felipe Hernandez

Felipe Hernandez, Staff Attorney
ACLU NATIONAL PRISON PROJECT

11/21/25

Date