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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 SOKHEAN KEO 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

DECLARATION OF SOKHEAN KEO IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
 INJUNCTION

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

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 Sokhean Keo, 027351321

1. I, Sokhean Keo, am currently detained at the California City Detention Facility.
2. I arrived to California City Detention Facility on about September 1, 2025, from Mesa Verde. I was originally detained by ICE in January 2023 and brought to Golden State Annex, where I had been for about a month. Then I was transferred to Mesa Verde, where I was detained for about two and a half years, then I was transferred to California City.
3. I am seeking to remain in the United States because my family is all here and because I am afraid of being deported.
4. I am currently housed in Unit G-300, Cell 208 in a double cell with one other person.
5. Before I was detained by ICE, I was in prison in the California Department of Corrections and Rehabilitation (CDCR). I served nine years of my prison term at California City when it was a correctional facility, before it was an immigration detention facility.
6. The conditions in California City are much worse now as an immigration detention facility than they were when it was a prison.
7. When I was at California City prison, I could participate in programs and education classes. I was able to take college courses and get my AA in psychology while in CDCR. I participated in vocational courses such as the 5 Ventures. I held a job as a porter. I knew many people on my prison yard who were in college classes, had paying jobs, learned a skill in a vocation.
8. I also was offered much more time out of my cell in prison. I was able to go to the outdoor recreation yard for four hours every day, and I would otherwise be out much of the day in school and because I was a porter. Now, I get four hours of yard weekly. Sometimes the yard hour is very early in the morning and people are still asleep. On October 19, 2025, we were informed by the officers that the Warden has stated that if we go to yard, we must remain in full clothing no matter the temperature (in CDCR, we could take our shirts off).
9. Now in the detention center, if we are not on the yard, we are locked in our units. There is not much to do besides a couple of games, some TV (of which there are very limited channels), and some books available. We spend 164 hours a week in our unit.

10. I currently have a job as a porter cleaning my building. I get paid \$1 a day, but they owe us a lot of backpay. We are not offered education courses or programming.
11. When I was a prisoner here, we had access to contact visits with our families. Now, all visits are behind glass.
12. Staff at the immigration detention facility treat us much worse than prison staff used to treat us. The officers and the medical staff speak to us disrespectfully. It seems like they intentionally try to provoke us.
13. Medical staff have threatened to withhold medications from people for not following their rules. In early September 2025, one female nurse yelled at me and others, saying something to the effect of, "If you don't line up, you won't get any medication!" Another nurse told an officer that she did not want to give some people medications because they did not line up.
14. Whenever we leave our building, we are patted down and searched. Some male officers leave us feeling violated and subject us to inappropriate touching, including touching our privates. I have spoken to others who experienced similar behavior from officers and have reported it. Some people do not go out to yard because they do not want to be patted down.
15. On September 12, 2025, a few people were exercising in the common area (dayroom) because we had no access to the yard. It was very hot in the building so they had taken off their shirts. They were ordered to put their shirts back on but refused so multiple officers responded armed with pepper spray and threatened us. One person who refused to put on his shirt was taken to the "hole" (solitary confinement), and the rest of us were placed on lock-down in our cells. The lock-down lasted about 24 hours. It feels like the officers like to show their authority over us.
16. The conditions are so bad, and I see a lot of people having a hard time mentally. We have nothing to do here to pass the time. We have no programming available. We just sit here all day. I have heard people talk about how this place is breaking them down. I have seen people get agitated, and I have seen some people give up and try to kill themselves.
17. On October 9, 2025, I saw officers respond to a person's attempted suicide. I was in the dayroom and heard them call a "code blue" (medical emergency) and I walked over to see what happened. I saw the person hanging from a rope in his cell; his body was shaking. Others screamed that he was dead. The person who hung himself did not

speak any English. A few days before this incident, I saw him hand a note to an officer that was written in Chinese. I do not know what the note said but I did see the officer brush him off and not take the note. I do not know if he was trying to ask for help.

18. After they took the man down, the officers told everyone to go back into their cells to lock up, but I did not want to lock up because I was worried about him. Other people in the unit did not want to lock up either. We wanted to know if he was still alive. We eventually went back into our cells, and we were locked in for about thirty minutes to an hour. After we were let out of our cells, officers came back into the unit and told the people in the unit that we had been interfering with medical and mental health care. I saw the officers issue discipline to at least two people because they did not immediately go back to their cells when officers told us to after the person's attempted suicide.
19. That experience was very traumatizing for me. I could not sleep that night because I had flashbacks to his body shaking. He and I are friendly, and we greet each other every day. I wanted to cry when I saw his body shaking like that. Staff's response—yelling at us and threatening to punish us—only made me feel worse.
20. Since that person's attempted suicide, I have not received any information from staff about how I can request mental health care or what mental health support resources are available.
21. I also have chronic medical conditions that are not being properly treated at California City. I have chronic migraines, chronic kidney disease, arthritis and frequent ear infections.
22. While I was at Mesa Verde, I faced difficulty getting medical care but it was nothing compared to California City. I was prescribed medication that I am not receiving at California City.
23. When I was at Mesa Verde, I had medical specialty appointments scheduled with a neurologist, an ear-nose-and-throat doctor, an orthopedist, a hand/finger specialist, and an ophthalmologist. All of these appointments were cancelled when I was transferred to California City.
24. In early or mid-September 2025, I asked a doctor who was visiting our building at California City when I was scheduled to meet with the offsite specialists. She told me that all of those appointments were cancelled. She told me that California City does not have any contracts with offsite specialists. I asked her whether I am going to have

to live here in this kind of pain and suffering, and she said yes. At the end of the conversation, she confirmed again that all of my offsite specialty appointments had been cancelled.

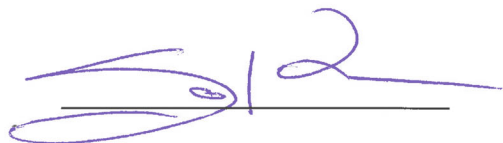
25. In Mesa Verde, I began to see a neurologist every 2-3 months for my chronic migraines. My last appointment was about six months ago. I had an appointment pending when I left Mesa Verde but that appointment was canceled when I arrived to California City.
26. I had an appointment scheduled with an ear-nose-and-throat specialist because I have chronic ear infections as a result of a hole that I have in my ear. I was pending an appointment with the ENT before I left Mesa Verde but that too was cancelled. I believe I currently have an ear infection that began about three weeks ago. My ear is draining and clogged. I have not reported to medical at this time that I am having symptoms because I need to see the ENT and I have already been told that appointment is not going to happen. I submitted a grievance on this issue already and have not heard back.
27. I had an appointment scheduled with an orthopedist for my knees and my elbows. When I was at Mesa Verde, I had a lot of pain in my right knee and my right elbow. I was not able to run or bend my knees. I had an MRI, and I was referred to a bone doctor. I was told that appointment was cancelled.
28. I had an elbow and knee brace that helped me, but that too was taken away when I first arrived because I was told that they are medical devices that need to be approved by a doctor. It took over a month to receive my elbow brace, but I did not receive my supportive knee brace back. I only received a cloth knee brace that I had in my property. Without my knee braces, I cannot be as active as I would like to be, and I cannot exercise in the way that I want. My knee continues to hurt and I have difficulty going up and down the stairs.
29. I had an appointment scheduled with a hand specialist. Around five months ago, when I was at Mesa Verde, I broke my ring finger on my left hand. I was sent to the outside hospital in Kern County and given a finger brace. At that time, medical staff ordered a consultation appointment with a hand specialist to determine whether I needed surgery. When I was at Mesa Verde, medical staff told me that the appointment with the hand specialist was scheduled. But that appointment was cancelled when I was transferred to California City. I cannot bend that finger at all without significant pain. I have a hard time using my left hand to complete my activities of daily living, including washing and putting on my clothes. Staff have not

offered me any help or disability accommodation so that I can more easily perform these activities on my own.

30. I was regularly seen by an ophthalmologist while I was at Mesa Verde. I might have glaucoma and I have floaters in my line of vision. I was pending a return visit to the specialist before I came to California City. That appointment has been cancelled.
31. According to a psychiatrist I spoke to in September at California City, this detention center has no offsite contracts and barely has a contract with a pharmaceutical company.
32. I also am frequently issued my medication for anxiety several hours after the time I am supposed to receive it. I take Prozac once per day, and I am supposed to take it between 8 and 10 PM because it slows my thoughts and helps me sleep. I need to take the medication with food so it's critical that I get it on time. About half of the time, the medication is issued to me between 1 and 2 AM and I have to refuse because I cannot take it on an empty stomach. If I take it on an empty stomach, it causes me stomach upset and diarrhea.
33. I also have a hearing disability, and my disability is not being accommodated. I use hearing aids in both ears, but I have not received hearing aid batteries since I arrived at California City. Now, I cannot use my hearing aids because my batteries have died. I have asked officers for new hearing aid batteries, and I see that they write something down and say that they will ask a nurse or a doctor, but then nothing happens. I also asked a nurse for replacement batteries but did not receive new batteries.
34. I told the Chief Security (an officer) that I need hearing aid batteries. The Chief said that the batteries might be in my property, but when I received my property, the batteries were not in there.
35. I have now not been able to use my hearing aids since I arrived because I have not been provided with replacement batteries. I stopped asking because I became tired of asking and having nothing happen.
36. Without my hearing aids, I sometimes have a hard time hearing if someone does not speak loudly.
37. When I arrived during intake, the nurse reviewed my medical records that arrived with me from Mesa Verde but did not ask me about anything related to disability accommodations. It was me who asked for batteries for my hearing aid.

38. When I have asked for batteries, I have been told to use the sick-call process. I do not know of any ADA coordinator in the detention center or an ADA grievance process.
39. We are responsible for maintaining the cleanliness of our own cells. The porters clean the dayroom with supplies they are given but we are not allowed to use those supplies in our cells. Some of us clean with our shampoo, or our personal soap.
40. We get three cold meals a day. The food is supposed to be warm but it sits out for so long before it is given to us that it is served cold. The portions are very small: “baby portions.”
41. If you do not have support from family to purchase food at the commissary, you will always be hungry and will lose weight. The food in the commissary is very expensive and costs far more than it ever did in CDCR or even Mesa Verde.
42. The water smells and tastes bad. We have complained about it to the officers, and we are told it’s “not [their] problem” but a facility problem.
43. I am struggling being here. I really need medical treatment. I also need something to do daily. This place is very stressful. I know of people who have agreed to be deported so they can leave California City. There is also the person who tried to kill himself because it was all too much.

I, Sokhean Keo, 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 this 28 day of October 2025.

A handwritten signature in blue ink, consisting of stylized cursive letters, is written over a solid horizontal line.