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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 YUNIEL LLUFRIO
 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 Yuniel Llufrío, 074055045

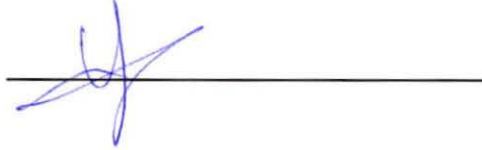
1. I, Yuniel Llufrío, am currently detained at the California City Detention Facility.
2. I arrived at the California City Detention Facility at the end of August 2025, from the Mesa Verde Detention Facility in Bakersfield, where I had been for around two and a half months.
3. I am currently 39 years old.
4. I have lived in the United States of America for approximately 30 years. I came to this country when I was 9 years old. Before I was detained, I lived in Vallejo, California, with my thirteen-year-old son. My son was born in this country.
5. I was detained by ICE on June 12, 2025. I had taken that day off of work because it was my son's graduation from middle school. On the day that I was detained, my son and I were on our way to his graduation. Many government agents surrounded me. Some of them had their guns drawn. It was a very traumatic experience for me and for my son. My son had to call a friend to come pick him up because ICE was taking me away. I don't know why the government detained me this way, with so much force, because I have regularly gone to all of my check-in appointments with ICE. I was supposed to have my next check-in appointment on June 25.
6. Before I was sent to California City, I was at Mesa Verde. While I was at Mesa Verde, my son was able to visit me. We were allowed to have contact visits, and hug each other. Since I have been at the California City Detention Facility, I have not had any visits. We are not allowed to have contact visits here, and I do not want my family to have to drive for six hours just so that my son can see me through a glass wall, without being able to hug each other.
7. I am currently housed in Unit H-300, in a double cell with one other detainee. Before I was in H-300, I was housed in Unit H-100. Staff have told me that the units on Facility H are classified as low security. I think around 90% to 95% of the people who are in Facility H do not have criminal histories.
8. Since I have been at the California City Detention Facility, the conditions have been horrible.
9. During intake, staff threw away a lot of my property. They threw away my shampoo, deodorant, coffee, about \$100 worth of supplies. Staff also did not let me keep my rosary or my legal documents. I have repeatedly asked staff for access to the legal

documents in my property since my arrival, but I still have not been allowed to have them.

10. I live in a two-person cell, with a toilet in view of the bunk beds. When I need to use the bathroom in my cell, my cellmate is only a few feet away, and there is no curtain covering me. When we shower, there is no privacy either.
11. We spend a lot of time locked up in our cells. Almost every day we are locked up in our cells for many hours, sometimes for most of the day. We are locked in our cells from 10 pm at night until 5 am the next morning. There are counts at around 6:45 am, 11 am, 3 pm, and 7 pm, and we are locked inside our cells during the counts. There are also two counts during the night. Some officers wake us up during the night counts. There is also a light in our cells that is on all of the time, which also makes it hard to sleep. Each of the daytime count can take up to an hour to clear, but sometimes it can take longer, even up to two hours. On November 19, the 7:00 p.m. count did not clear until after 9:20 p.m. These kinds of count delays happen daily with the afternoon and evening counts having the most delays. We are not allowed to use the tablets during counts. There is not much that we can do during the counts.
12. Recently, staff have also started doing inspections of all of the cells in our unit every day. At around 8:30 in the morning, we have to stand outside of our cells until the inspections are over, which takes around 45 minutes. We are required to wear our uniforms during the inspections.
13. We do not get to go outside very much. We are only allowed outside once a day, and for only one hour. There are some days where we are not allowed outside at all. Recently, there were 3 or 4 days in a row where we were not allowed outside at all. The yard has a lot of rocks, and plants with thorns. There is no grass, so it's hard to play soccer without falling and hurting ourselves. The plastic shoes that we are issued do not protect our feet from the thorns and the rocks on the yard.
14. When we go outside to yard, staff perform pat-down searches on us, touching our bodies. When we come back from yard, staff do the pat-down searches again. Every time that I have had to leave the housing unit, like when I go to the medical clinic, staff have done a pat-down search when I leave the unit and when I come back.
15. I also have to be escorted by custody staff when I leave the housing unit. When I have gone to medical, at least one custody staff member has had to escort me.
16. Being treated like this makes me feel like I'm a prisoner and like I am being punished.

17. Listening to music helps me relax and take care of myself. It's very hard to listen to music here. If I want to listen to music, I have to get a tablet, and pay 5 cents a minute to listen to songs. I also have to pay to stay connected to my family. When my family sends me photos, like of my parents and of my son, I have to pay every time that I want to look at the photos.
18. As far as I know, there are no educational opportunities, like college classes or vocational programs, available to me here. There are also no programs, like self-help groups or rehabilitative groups. When I was at Mesa Verde, I could participate in Alcoholics Anonymous, which was a supportive and helpful environment. I have talked to the staff at California City to ask if there any groups like that here, but they told me they are not available here.
19. Sometimes, when it rains, there is a lot of leaking inside the housing unit. Once, when it rained, there was a lot of water that leaked right in front of my cell. I slipped on my way to breakfast and had to grab onto the railing to keep from falling.
20. It is very cold in my cell and in my housing unit. The staff here have not issued me any sweaters, sweatshirts, or beanies. The clothes that staff have issued to me do not keep me warm. I had to buy a beanie from the commissary to help stay warm. I have not bought a sweatshirt or sweatpants from the commissary yet because they are very expensive.
21. Sometime in October 2025, when I was in H-100, I saw staff use pepper spray on other people inside the unit, who were fighting.
22. Because I was detained by ICE, I have been separated from my son and my family, and even lost my home and my business. It has been very stressful to be here, and I am very worried about being deported and separated from my family and from the life that I have built here. The conditions at this facility have felt like a prison and have made it even harder for me to take care of myself and fight my case. It is also hard to know that my family has had to spend so much money while I have been here, so that I can buy basic necessities, like food, hygiene supplies, and being able to communicate with each other.

I, Yuniel Llufrío, 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 26th day of November 2025.

A handwritten signature in blue ink is written over a solid horizontal black line. The signature is stylized, starting with a large 'Y' and ending with a long, sweeping horizontal stroke.