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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 DENNIS RIVERA-
 TRIGUEROS 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 Dennis Rivera-Trigueros, 044803246

1. I, Dennis Rivera-Trigueros, am currently detained at the California City Detention Facility.
2. I am 35 years old.
3. I arrived at the California City Detention Facility on or around September 6, 2025 from the Golden State Annex (GSA) detention center in McFarland, California.
4. I am currently housed in a cell with one other person in Unit G-200.
5. I served 14 years in the California Department of Corrections and Rehabilitation (CDCR). I was first incarcerated at age 17 and was sent to juvenile detention. I was at two juvenile detention centers. On my 18th birthday, I was sent to CDCR custody. I paroled from this very same facility—the California City Correctional Facility (CAC)—in March 2022, when the facility was being run as a state prison. I served approximately three and a half years at CAC before my release. Upon my release, I was picked up by ICE and sent to GSA and then California City Detention Facility.
6. I am currently seeking asylum in the United States.
7. There were approximately 40 people on the bus from Golden State Annex to California City with me. The bus was full.
8. When we got off the bus at California City, staff searched me and the other passengers. The officers lined us up against the wall and performed pat down searches on us. At this point, it felt clear that we would be treated differently than we had been at GSA.
9. I spent approximately 40 months at this facility when it was a state prison. I have now spent approximately one month in this facility as an immigration detention center. It has been my experience that the detention facility is currently being run like a SHU unit in CDCR.
10. When I was at CAC, I remember there being two counts, at 10 am and 4 pm. The counts took approximately one hour. At the California City Detention Facility, there are 5 counts during the day. The counts take about an hour, at 7 am, 11 am, 3 pm, 7 pm, and 10 pm, but sometimes take longer. Around a couple of times a week, counts take around one hour and forty-five minutes. During count, we are locked down in our cells and are not allowed to have or use the tablets. At Golden State Annex, there were only three counts during the day.

11. When I was at CAC, there were multiple programs for incarcerated people to participate in, such as mural painting, college classes, and self-help groups. For example, I participated in Inside Out Writers, a program to use writing for self-reflection and insight. Participating in these groups helped me connect to other people who were also trying to make positive changes in their life. At the California City Detention Facility, none of these programs are available.
12. When I was at CAC, I also took college classes to work towards getting my Associate of Arts (AA) degree in Psychology and Liberal Arts. At the California City Detention Facility, there are no college courses available.
13. When I was at CAC, we had outdoor recreation on the yard twice a day, for more than an hour each time. At the California City Detention Facility, we can only go outdoors once a day, for one hour.
14. When I was at CAC, I was allowed to have contact visits with my family and we could hug each other. At the California City Detention Facility, I have heard from other detained people that visits are non-contact and through glass.
15. When I was at CAC, CDCR issued me a sweatshirt and sweatpants for free. At the California City Detention Facility, I was not issued a sweatshirt or sweatpants. These items are only available to purchase through commissary at the California City Detention Facility. At Golden State Annex, I had been issued sweatpants and a sweatshirt for free, and was able to bring them with me. I have to wear them every day because it is very cold in my housing unit.
16. When I was at CAC, I was allowed to purchase razors and keep them in my cell at all times. At the California City Detention Facility, I am not allowed to have a razor. About once a week, staff have allowed me to borrow a razor to use during count. My cellmate and I are only given about thirty minutes to use the razor before we have to give it back.
17. When I was at CAC, I was allowed to have a regular sized toothbrush. At the California City Detention Facility, I am only allowed to have a small toothbrush that is about three inches long. When I was in CDCR custody, the only time I had to use a small toothbrush was when I was sent to administrative segregation. Having to use a small toothbrush all the time at the California City Detention Facility makes me feel like I am being punished.
18. When I was at CAC, I could move around the facility without an escort, including to go to visitation, all of the medical clinics, group therapy, and my college classes. I lived on Facility C and I could go to my classes on Facility B without an escort. I was only patted down by staff during a random search that happened when I was going out to yard. I only

remember one pat down search during the approximately three years I spent at CAC. At the California City Detention Facility, staff escort me anytime I leave my housing unit. Staff do pat down searches of me every time I go out to yard and also when I come back from yard. When I went to the medical clinic, staff did a pat down search when I left the housing unit and when I came back. Staff have done pat down searches every time I have left the housing unit and every time I have come back to the unit.

19. At Golden State Annex, I was allowed to buy and wear tennis shoes. I have flat feet, and without the right arch support, it is painful for me to walk and stand. Medical staff at Golden State Annex wrote an order in 2022 explaining that I needed to be allowed to wear tennis shoes because of my medical condition. They gave me a paper copy of that order.
20. When I arrived to California City on or around September 6, 2025, I was wearing my tennis shoes. During the intake process, an officer asked me to give up the shoes. I told the officer that at Golden State Annex, I had been issued a chrono to wear these shoes for my medical condition. The officer told me he would put a note in the system about this.
21. After I had been at California City, for a few days, the Unit Manager told me that I had to give up my shoes because I was not allowed to have them. He said I had to wear the orange plastic sandals that were provided to other people at California City. I told the Unit Manager that I had been issued a medical chrono to wear my tennis shoes, but the Unit Manager said that I did not have a chrono. I explained to the Unit Manager that it would be painful for me to walk in the orange plastic sandals, but the Unit Manager said I had to give up the shoes anyway.
22. The Unit Manager called a code, using his radio to call for back up. A captain and around five other officers entered the housing unit. The captain told me that I would be taken to administrative segregation. I was restrained and put in handcuffs and taken to the medical clinic, where a nurse took my blood pressure. My blood pressure was very high. The captain and the other officers took me to Building E2, cell 113, which was being used for administrative segregation. I later learned that the Unit Manager issued me a disciplinary write-up for refusing to give up my shoes.
23. I spent about 2 and a half weeks in administrative segregation. During my time in the unit, the only way I was allowed to go outside was by going to the small outdoor cages next to the building. The cage was about 9 feet by 19 feet. When I went to the outdoor cage, it was very dirty. There were bird droppings and feathers all over the floor, and there was even a dead bird hanging upside down on the top of the cage. There was nothing to do in the cage except walk back and forth. I could not even do this because the floor was so dirty with bird droppings and feathers. I did not want to go back to the

outdoor cage after this experience, because I was worried about getting sick from the filth and did not want to get any of it into my cell.

24. I was also allowed to leave my cell to go to the dayroom for one hour every day, by myself. The officers did not allow me and the other people in administrative segregation to talk to each other, even during dayroom.
25. During my time in the administrative segregation unit, staff would sometimes wake me up in the middle of the night, by either banging on my door or entering my cell and turning on the light in my cell.
26. One day, I went to take a shower. When I returned to my cell, my shoes were gone. I believe that staff entered my cell while I was in the shower and took my shoes. I saw an officer carrying my shoes, and that officer told me that he had been instructed to take my shoes from my cell. My shoes were taken, even though I had not seen a doctor at California City yet. I had not had a medical evaluation of my need for tennis shoes since arriving to California City.
27. During the week of September 29, 2025, I finally saw the doctor. The doctor ordered x-rays of my feet and told me that I was flat footed. The doctor told me that I should see a podiatrist when I get out of immigration detention. The doctor said that I could buy different shoes from commissary. I cannot afford to buy shoes from commissary.

1 I, Dennis Rivera-Trigueros, declare under penalty
2 of perjury that the foregoing is true and correct and
3 that this declaration was completed and signed on
4 October 8, 2025 in California City, California,
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8 Dennis Rivera-Trigueros, A-044803246
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