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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 JULIO SANTOS
 AVALOS 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.

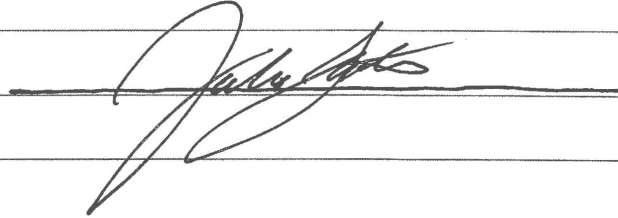
Declaration of Julio Santos Avalos, 029556703

1. I, Julio Santos Avalos, am currently detained at the California City Detention Facility.
2. I arrived to California City Detention Facility on September 5, 2025 from Mesa Verde Detention Facility.
3. I am 47 years old.
4. I have been in the United States since I was 7 years old.
5. I am currently housed in a cell with one other person in Unit G-300.
6. I was transferred from Mesa Verde to California City on a bus with about 44 other people. I was restrained in waist chains, handcuffs, and leg shackles. The restraints made the hour and a half drive very uncomfortable.
7. When I arrived to California City, I was in intake for two days. The cell I was in for those two days was very dirty and the toilet was clogged and overflowing. There was mold on the window next to the bed where I laid my head. I had a mattress and one blanket. It was so cold that I had to sleep in my clothes. I do not think that California City was ready to house so many people.
8. The cell I'm in now is very dirty. Every day, I wake up to a lot of dust everywhere. Whenever it rains, the ceiling leaks. There was also water pooling on the floor in my cell. I do not know where the water came from. Usually when it rains, the electricity goes out. The last time this happened was on or around October 13, 2025. The electricity was out for a couple of minutes.
9. While I was at Mesa Verde, I was taking two medications for depression and pain. When I was around a year and a half old, I had polio. As a result of the polio, my ankle has a permanent deformity, which causes pain and limits my mobility. I am also diagnosed with Guillen Barre. When I was leaving Mesa Verde, the staff told me that my medications would follow me to California City Detention Facility.
10. When I arrived to California City Detention Facility, I saw a member of medical staff in intake who asked me if I take medication. I told him about the medications I take. He said that I would be receiving the medications. During the two days I was in intake, I did not receive my medications. During that time, I submitted a number of written requests and also spoke with multiple officers about my medications. I did not receive any response to my requests.

11. I am still having difficulty receiving all of my medications. I only received a muscle relaxant—Tizanidine—for a few days. Without this medication, it is more difficult to walk and I have more pain in my ankle. It is especially painful to climb up and down from my upper bunk.
12. I have multiple times requested a lower bunk to accommodate my ankle, but I have not received any response. In or around late September, I saw Dr. Hooper about my medications. He asked me if I was on a lower bunk. I said that I was on an upper bunk, and it was difficult for me to navigate it. He said that he was going to note that I was on a lower bunk in case “we get audited.” I did not understand why he would note something in my chart that was not true.
13. I have hurt my ankle trying to get down from the upper bunk. I was using a chair to help me reach the first rung of the bunk’s ladder, but one day an officer came to my cell and said that I was not allowed to have it. I explained to the officer that I needed the chair in order to access the upper bunk. He said that people were “making excuses” to have things and he took the chair. When I next was climbing down off the bunk, because the step was so far to the ground, I landed wrong on my ankle and injured it. It was very painful. After I twisted my ankle, I spoke with the officer again about needing the chair, and then I also spoke with his supervisor. I eventually received authorization to have the chair in my cell.
14. I have never received a handbook to let me know what the rules are at California City. The rules seem to change every day, depending on which staff are working. For example, on one day the officer working in my unit will say that I can wear shorts, sweatpants, and slippers in the dayroom, but the following day when a different officer is working, I will not be allowed to wear those things and instead must wear my more formal clothes. Some officers will lock up our tablets and others allow us to have them. It is stressful when the rules change because I never know what I will be confronting.
15. The time that food is served varies. For example, sometimes, food is served at 12 pm, and other days it is served at 2 pm. Sometimes dinner is served at 5 pm, and on other days it is served at 7:30 pm. Sometimes we are served lunch at 2 pm and then served dinner at 5 pm. It is stressful not knowing when I will be able to eat.
16. During the week of October 6, 2025, another detainee hung himself in my unit. I saw staff take his body out on a gurney. It was so upsetting that I asked to speak with the doctor because I could feel my blood pressure was very high. When staff measured my blood pressure, they told me that it was around 161 over 100, which they said was close to the level one has when a person is having a stroke. Staff just told me to try to calm down and I returned to my unit.
17. At Mesa Verde, my children were able to visit me. Our visits were one to two hours long and we were able to give each other a hug. My family has not visited me at California

City because driving the six hours to get here only to be able to visit me for 30 minutes in a non-contact room where we cannot hug doesn't seem worth it.

1 I, Julio Santos Avalos, declare under penalty of
2 perjury that the foregoing is true and correct and that
3 this declaration was completed on October 15, 2025, in
4 California City, California.
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