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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 VERONICA
 GARCIA ROMERO 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 Veronica Garcia Romero, 071917913

1. I have lived in the U.S. for approximately 37 years. I was convicted of a misdemeanor related to the use of a false name in 1993 and served 45 days in jail as a result. I have a U.S. Citizen husband and three U.S. Citizen children. My husband and I met on December 25, 1989, and lived together ever since but we officially got married in Oceanside, California on April 2, 1994. Our children are 34, 31, and 24 years old, and five U.S. Citizen grandchildren. In recent years, I have been actively helping my children care for my grandchildren and have spent much of my time living with them to provide this support.
2. I had an appointment scheduled with USCIS on October 6, 2025. I submitted a green card application through my U.S. citizen husband, and this appointment was for the first interview of that process. I was arrested by ICE at that appointment.
3. I was brought to the California City Detention Facility by ICE on October 7, 2025, and I have been here since, for more than a month. It is very difficult being here.
4. When I arrived here, I had a medical screening. I told the medical staff which medications I was taking. I have lupus and hypothyroidism, and I take several medications for those conditions. Because I was not receiving my medication, my bones started to hurt. A nurse comes by my unit to pass out medication most days, and I told her that I was experiencing symptoms because I was not taking my medication. She told me she would request that I see a doctor. I never saw this doctor.
5. It is very cold in my cell and in my housing unit. We do not have adequate clothes, so we have started wearing socks on our arms to try to stay warm. Staff have not given me any sweaters, sweatshirts, beanies, or other warm clothes. There were three days in November where we did not have any hot water in our unit. We could not take showers during those three days without hot water.
6. I have a lawyer, but it is very difficult to see him. I have seen him three times, but I had to talk with him through a glass wall. It is difficult to talk with him by phone. My lawyer has also told me he came to see me two other times, but he was unable to see me due to staffing shortages. I understand that it takes lawyers a very long time to schedule an appointment for a confidential phone or video visit, and many other people in my unit are having similar difficulty talking with their lawyers. I would like to talk with my lawyer soon to find out what my options are, but I have only been able to have three meetings with him so far as a result of these difficulties. My lawyer is placed in the detained person portion where there are no power outlets and there is bad phone service so he cannot connect his laptop or access necessary programs.
7. I am currently housed in Unit F-300, in a double cell with one other detainee. Before I was in F-300, I was housed in an intake room for 1 ½ days and we had to sleep on the

floor. It's my understanding that units F-100, F-200, and F-300 are being used to house women.

8. Since I have been at the California City Detention Facility, the conditions have been stressful, and awful because they have multiple counts a day, when there is no movement and we have to stay in our cells, sometimes up to 3 hours.
9. We do not get shampoo often, no combs or brushes, a tiny toothbrush, and as a result, we have to purchase supplies in the commissary store for twice to three times the price of a market.
10. We spend many hours each day locked up in our cells, sometimes up to 8 hours a day. We are locked in our cells from 10 pm at night until 5 am the next morning. There are counts at 7 am, 11 am, 3 pm, and 7 pm, and we are locked inside our cells during the counts. Each of the counts can take up to an hour. Sometimes the counts take more than one hour, and in the last month, we spent almost 3 hours waiting for a count to be finalized. We are not allowed to use the tablets during counts because we cannot bring them into our cells. During counts, all we can do is wait and or read the bible.
11. We are not allowed to go outside much, about once a week with women only. We are only allowed 1 hour during this weekly outside yard time.
12. 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. Pat-downs occur anytime we leave and return to the housing units. I feel as if I am a convicted felon and a dangerous person each time I get patted down.
13. I also have to be escorted by custody staff when I leave the housing unit. When I have gone to any place outside my housing unit, including medical, chapel, or during visiting, at least one custody staff member has had to escort me. I continued to feel like a criminal and felt like the guard thought I would escape.
14. As far as I know, there are no educational opportunities or other classes available here. There are no programs, like self-help groups or rehabilitative groups. There is only the chapel service.
15. About 3 weeks ago, some manager came to our housing unit yelling to tell us not to cover the air conditioning vents, and not to use socks in our hands, and if we kept damaging the facility property, he would write us up so the court would have a disciplinary report. He also stated we would have to pay for the socks. We felt he treated us like animals. We are all just cold and trying to stay warm.

16. I feel like we are being treated like animals here. I am making a declaration because I want to make sure that the people here are treated as human beings.

17. This declaration was read for me in my native language.

I, Veronica Garcia Romero, 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 23rd day of November 2025.

Veronica Garcia Romero

ATTESTATION OF TRANSLATOR

I am a fluent Spanish speaker. On November 23, 2025, I reviewed the above declaration with Veronica Garcia Romero in Spanish, which Veronica Garcia Romero represented to me was her preferred and/or native language, and witnessed her signature.

Mario Valenzuela
Mario Valenzuela, Attorney
THE ADVOCATES' LAW FIRM

11/23/25
Date