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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 YURI ALEXANDER  
 ROQUE CAMPOS 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 Yuri Alexander Roque Campos, 240174337**

1. I, Yuri Alexander Roque Campos, am currently detained at the California City Detention Facility.
2. My A-Number is 240174337. I am 30 years old.
3. I have been detained since June 12, 2025. I was first detained at the Mesa Verde Detention Facility in Bakersfield. I then arrived at the California City Detention Facility on September 5, 2025.
4. I am living with one other person in a cell in Unit G-200.

**My Family**

5. I am engaged and have three young children with my fiancé. My fiancé is a U.S. citizen. My oldest daughter is three years old and my son is one. My third child, a baby girl, was born on October 4, 2025. She was born while I was in custody at California City and I have not yet met her. I was there for the births of my two other children, which were very beautiful and important moments in my life. It was very difficult not to have been able to be there for the birth of my youngest daughter, and to still not have met her. I would really like to be home with my children and their mother and to be able to support my fiancé, the mother of my children, during this time.
6. I was the main provider for my family before I was detained. My oldest daughter has autism. I worry a lot about how my family is doing without me.
7. I have not seen my family since my arrival at California City. California City is too far away from my family for them to be able to visit me.
8. It is very difficult not to be able to see my family. We used to share every day together, and now I have not seen them for several months. No matter how strong someone is, it is very psychologically painful to be separated from my family for so long, and under these conditions.

**Medical Treatment at the Mesa Verde Detention Facility**

9. I have had a heart condition since I was young. When I was around 12 years old, my mother told me that I had a heart condition and had to be careful. My heart is enlarged; I have a faulty valve and a small hole in my heart that needs surgery. Sometimes I also get pain in my veins in my forearms and legs.

10. Before I was detained, I was seeing a specialist at a cardiology clinic in Merced. They referred me to see another cardiology specialist at Stanford University. I had been scheduled for an appointment at Stanford in July, but then I was detained.
11. At the Mesa Verde Detention Facility, I was taking Aspirin once a day to prevent blood clots and to help regulate my circulation, a second medication to prevent water retention, a daily vitamin, and potassium every three days, to prevent dehydration from the water retention medication I was taking. A couple of days before I was transferred to California City, my cardiologist also prescribed me Tylenol for chest pain.
12. When I was in Mesa Verde, I saw a cardiologist about every week or every other week at an outside hospital in Bakersfield run by Kern Medical. Mesa Verde also had an onsite cardiologist who could check up on me and nurses who checked my vitals once daily.
13. My conditions require surgery. At the end of July, a doctor at Kern Medical gave me a heart monitor and told me I would use it for four weeks to monitor my heart rate. The doctor told me they would review the results with me to determine if I needed surgery. On September 3, the cardiologist at Kern Medical told me that she had reviewed some of the results from the heart monitor and that I needed a valve transplant surgery urgently, and that she would try to schedule the surgery on or around October 3.
14. The cardiologist also told me that she would write me a letter to support my medical release. Two days later, on September 5, I was woken up early and taken to California City. I told one of the officers involved in the transport that I was worried about being moved because of my medical conditions.

#### **Medical Treatment at the California City Detention Facility**

15. On September 5, 2025, I was taken from Mesa Verde to California City in a van with two other people who had medical conditions. I was restrained with waist chains, cuffed at the wrists, and had shackles on my legs.
16. When I arrived at California City, it had been about 24 hours since I had received my heart medications. I asked medical staff for the medications but they did not give them to me.
17. On the same day, I had extreme chest pain, felt dizzy, and could not move my body. I was taken to a hospital in Antelope Valley, I think it was called Antelope Valley Hospital. I lost consciousness in the ambulance and woke up in the hospital. I was at the hospital for about eight hours before being taken back to California City. At the hospital, the doctor told me that I might have pulmonary hypertension, and that I needed medical observation for the next 72 hours. The doctor told me that they did not have access to my medical records from Kern Medical at Bakersfield.

18. Before I left the hospital, the doctor gave me three copies of documents (two in English and one in Spanish) explaining what happened at the hospital. When I arrived back at California City, the guards took them from me and said I could not keep them. They said they would give the documents to the doctor, but I do not know if they did that. I don't have the documents myself.
19. The next day, on September 6, I went back to the same hospital and I stayed there for about six hours. The doctor told me I had a "pre-heart attack," and an anomaly with my enlarged heart, and that I needed to continue to take my heart medications. The hospital staff did not give me any documents from this hospitalization, but they gave them to the California City officers who were escorting me. I did not ask the officers if I could look at the documents because I did not want to bother them.
20. After these hospital visits, my wife received a bill for \$680. I'm not sure if the bill was for the September 5th or September 6th visit.
21. When I returned to California City, I was placed in an observation cell. A custody officer came by every 20 minutes. A nurse came by to ask how I was and to sometimes take my blood pressure and temperature.
22. Even though nurses came by, they did not give me any medication. When I asked the nurse about this, she said that the facility did not have the medication and that sometimes there were delays in receiving medications.
23. On or around September 10, I began to receive some of my medication again. I had been without any of my medication for about five days by that point, and had been in pain. On or around September 10, I was given aspirin and Tylenol, but not the other medications. I still have not received the medication for water retention, the vitamin, and the potassium, that I had been prescribed at Mesa Verde.
24. The same day, while I was still in the observation cell, a doctor and two nurses at California City took the heart monitor I had been given at Mesa Verde. One of the nurses spoke Spanish and told me that I had an appointment in early October to discuss the results from the monitor.
25. I have not had any follow-up appointments related to the monitor results. I had been anticipating having an appointment in early October, one month ago, and it has been very stressful to have missed it. I am really worried about my health, and without the medical care that I need, I am afraid that I could die. It is very hard and it feels like the people in charge of my medical care don't care if I survive.

26. I put in written requests after the appointment did not happen, but I have not received a response. To turn the requests in, I had to give them to officers, for officers to turn in to medical. I don't know if there are delays getting the requests to medical staff.
27. The cardiologist in Bakersfield also told me that I was also supposed to have a vein study, but I have not had that at California City.
28. After eight days in the observation cell, on or around September 14, I moved to an upper bunk in H-300. I was scared to be on an upper bunk because, if I had another heart incident, I could fall and hurt myself. I did not say anything to guards because I did not want any problems. I later moved to G-200, where I am now in a cell with one other person. I am still on an upper bunk.
29. On or around September 24, I again felt significant chest pain and told an officer. The officer called a nurse who checked my blood pressure and did an EKG. She told me it was just stress and that they would not call the doctor or take me to a hospital unless it was an emergency.
30. I have also had trouble getting my medications again. I stopped getting Aspirin and Acetaminophen completely on or around September 24. I submitted multiple health care requests about this and, finally, on or about October 14, I spoke with a nurse. She said I did not have an order for any medications. When I told her that my chest hurt, she called the doctor via radio and told me, "I'm sorry, you don't have any medication orders."
31. On or around October 19, I started to get omeprazole, a medication for stomach ulcers even though I do not have ulcers. I know this because my old cellmate used to take medicine for ulcers and what I received was the same as what he used to receive. I also asked the medical provider if the medication was for my stomach. He confirmed it was for my stomach and said that it would help my digestive system. But I do not have any stomach issues. My medical condition is related to my heart.
32. I then started getting Aspirin again around October 22. I had been without it for four weeks by that time. I still have not received acetaminophen.
33. To this day, I'm not sure when I will see the cardiologist again. Medical staff simply tell me to put in more medical requests. When I spoke with Nurse Lopez in mid-October, I told her that I was not getting my medication and that I have not been able to see a cardiologist. She said, "I'm sorry, I can't do anything. It's the doctor's orders." This is very different than Mesa Verde where I saw a cardiologist weekly or every other week.
34. In addition to my heart-related medical condition, I have been experiencing pain in my right testicle. I submitted health requests about this. Approximately two weeks later, on or around October 21, I saw a doctor who confirmed that my testicle was inflamed. They also

took blood, a urine sample, and had me blow into a bag. Then the doctor prescribed me medication, but I am still in pain and the inflammation has not gone down. It does not seem like the medication had any effect. I am worried it could be a hernia or cancer. I submitted another medical request about these issues on November 3. I have not been seen by medical staff yet.

35. At California City, medical staff have only treated me during emergency situations and have not provided any routine monitoring for my heart condition even though I was hospitalized twice after arriving here. There have been several different periods when I went days or weeks without any medication. Without regular access to my medication, routine monitoring, and evaluation for surgery, I worry that my medical condition could get worse, and become life-threatening.

### **Conditions**

36. Other conditions at California City have been awful.
37. When I was placed in an observation cell after my hospital trips, I did not receive a detainee handbook. Staff told me that I was not allowed to have access to anything in observation. I still don't have the handbook and I don't know what the rules are.
38. The observation cell I was placed in had a bed, shower, and toilet. The cell was very dirty and dusty. Although I had just been hospitalized, I was not given any help to clean the cell and used a wet towel to clean it myself. I was in the observation cell for eight days. During that time, I could not leave or use the telephone or tablet. After five days of having nothing to occupy my mind, a guard gave me a book in Spanish.
39. I wanted to call my fiancé and my attorney while I was under observation, but staff told me that I could not use the telephone. I was completely isolated. I tried to sleep as much as possible and, if I was awake, I tried not to get too upset and walked as much as I could. I could not go outside and I was not told how long I would be there. It was like being tortured.
40. In the observation cell, staff would give me a small cup that I used to drink water from the sink. The water tasted like it had a lot of chlorine in it.
41. On one occasion in observation, the officer opened the door and slid a tray of food across the floor. It woke me up and I asked what was going on. He said, "Food!" in English and closed the door. Every other officer had handed me the tray. It struck me as racist because there is no reason to treat another human being with such disrespect.
42. After I was removed from the observation cell, I was moved to H-300 and G-200. Here, they do not give us enough food and I often feel hungry. I have not been able to buy food

from the commissary because things cost more at California City than they did at Mesa Verde and I don't have enough money.

43. Now in G-200, my roommate and I clean our cell ourselves. The common area is cleaned by other detainees who earn about a dollar a day. If they do not take the trash out twice a day, there are a lot of ants. This happened in September. The ants got into my neighbors' cells.

#### **Access to Legal and Medical Documents, Legal Mail, and the Library**

44. When I arrived at California City, I was not allowed to keep my medical documents, legal documents, or dry food supplies even though it was all approved property at Mesa Verde. My medical records included my outside medical exam history and medical documents for my daughter. These documents are important to show the judge for my case. I sent requests to get the documents, but I haven't received a response.
45. On Monday, October 27, I tried to send legal mail. On October 30, my legal mail was returned to me with the envelope open. I was told that they opened it because they needed to know who sent the mail. I had not listed my name because I was concerned about them finding out about my involvement with this lawsuit. This happened to myself and two other people in my housing area.
46. The electronic law library is available on the tablet. However, I have not used it because I think it is only in English. I only read Spanish and I have not been able to tell if it has any information in Spanish.
47. Without access to my documents and to the law library I am unable to prepare for my case. This makes me feel lost and vulnerable, because I don't know how to fight my case, to try to stay in this country with my family.
48. I sometimes use the tablet to make phone calls. I had to buy headphones from commissary to be able to use the tablet to make phone calls. Without headphones, the calls on the tablet come out on speakerphone, which is very loud and can be overheard by other people.
49. This declaration was read for me in my native language.

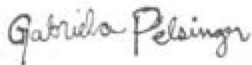
I, Yuri Alexander Roque Campos, declare under penalty of perjury that the foregoing is true and correct and that this declaration was completed and signed on November 06, 2025 in California City, California.

  
\_\_\_\_\_

Yuri Alexander Roque Campos, A# 240174337

ATTESTATION OF TRANSLATOR

I am a native Spanish speaker. On November 6, 2025, I reviewed the above declaration with Yuri Alexander Roque Campos in Spanish, which Yuri Alexander Roque Campos represented to me was his preferred and/or native language, and witnessed his signature.

  
\_\_\_\_\_

Gabriela Pelsinger, Investigator  
PRISON LAW OFFICE

November 24, 2025

Date