

KEKER, VAN NEST & PETERS LLP
 STEVEN P. RAGLAND - # 221076
 sragland@keker.com
 CODY S. HARRIS - # 255302
 charris@keker.com
 CARLOS C. MARTINEZ - # 354616
 cmartinez@keker.com
 633 Battery Street
 San Francisco, CA 94111-1809
 Telephone: 415 391 5400
 Facsimile: 415 397 7188

CALIFORNIA COLLABORATIVE FOR
 IMMIGRANT JUSTICE
 PRIYA ARVIND PATEL - # 295602
 priya@ccijustice.org
 MARIEL VILLARREAL - # 317048
 mariel@ccijustice.org
 1999 Harrison Street #1800
 Oakland, California 94612
 Tel: (650) 762-8990

PRISON LAW OFFICE
 MARGOT MENDELSON - # 268583
 mmendelson@prisonlaw.com
 TESS BORDEN - MJP # 805022, *pro hac vice*
 tess@prisonlaw.com
 PATRICK BOOTH - # 328783
 patrick@prisonlaw.com
 ALISON HARDY - # 135966
 ahardy@prisonlaw.com
 RANA ANABTAWI - # 267073
 rana@prisonlaw.com
 1917 Fifth Street
 Berkeley, California 94710-1916
 Tel.: (510) 280-2621

AMERICAN CIVIL LIBERTIES UNION
 FOUNDATION
 KYLE VIRGIEN - # 278747
 kvirgien@aclu.org
 FELIPE HERNANDEZ - # 338468
 npp_fhernandez@aclu.org
 MARISOL DOMINGUEZ-RUIZ - # 345416
 mdominguez-ruiz@aclu.org
 425 California Street, 7th Floor
 San Francisco, CA 94104
 Tel.: (415) 343-0770

CARMEN IGUINA GONZALEZ - # 277369
 ciguinagonzalez@aclu.org
 915 15th Street, NW, 7th Floor
 Washington, DC 20005
 Tel.: (202) 393-4930

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 FERNANDO
 GOMEZ RUIZ 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 Fernando Gomez Ruiz, 246060156

1. I, Fernando Gomez Ruiz, am currently detained at the California City Detention Facility.
2. I am 61 years old. I was born in June 9, 1964. I have lived in Los Angeles for 22 years. I have U.S. citizen children. The only person who is able to work to support my family right now is my youngest daughter, who is 20 years old and is also studying full-time. I also have a sister and a U.S. Citizen niece. I never have had any problems with the law, and I have never been arrested until ICE detained me recently.
3. I was detained by ICE in about early or mid-October 2025. On the day I was picked up by ICE, I did not want to cook at home, and I decided to eat at a food truck I enjoy that parks outside of Home Depot. I was eating by the food truck, along with several other people, when around 15-20 government agents pulled up, grabbed us, and asked for our papers. They arrested about 10 people and threw us in their cars.
4. I was first sent to an immigration facility in Adelanto for about a week, and then I was brought to California City around mid-to late-October 2025.
5. I am getting very poor medical treatment here at California City. I worry because I am very sick and need medical attention. I am not doing well here, and I need to get out as soon as possible. When I am home, I can take care of myself and take myself to the doctor. Here, they control everything and do not even give me access to the supplies I need to take care of myself, like antiseptic to wash an open ulcer I have on my foot.
6. I have Type 2 diabetes, and I am not receiving treatment to manage it. Before I was in immigration detention, I used to take insulin every day 15 to 30 minutes before eating breakfast. That is how the doctor told me to take it, because my body needs the insulin around when I eat. Sometimes I would take insulin twice a day depending on how high my blood sugar levels were.
7. At California City, I do not receive insulin in an appropriate way. Some days I do not receive any insulin at all. In the short amount of time I have been at California City, I have not been given my insulin on two occasions that I can remember. Even when I receive insulin, I never receive it more than once a day, nor do I receive it at the right time. Instead, I get my insulin at whatever time the nurses decide to come to my unit to give it to me. On some days, I receive my insulin at night, after I have already eaten for the day. Based on what my doctor before I arrived in detention explained to me, this is the wrong time of day to receive insulin.
8. I think these problems with receiving insulin at the right times for me are making my diabetes worse. When I was living at home, my blood sugar level was generally between 90 and 100. I do not get daily blood sugar readings at California City. I have to go to the medical clinic to have a blood sugar reading, which does not happen every day. I think my blood sugar should be checked every day to make sure that I am not getting worse. When my blood sugar levels have been checked at California City, they have been much

higher than they were when I was at home. They have reached levels that I know are unsafe for my health based on conversations I had with my doctors outside of California City in the past. I have had several blood sugar readings at California City where my blood sugar was over 200. Those readings scare me because I worry they have seriously affected my health. I have told my family about my care here, and they are very worried as well.

9. I am afraid because I am suffering serious side effects from my poorly treated diabetes. For example, I have an ulcer on one of my feet, and medical staff are not giving me supplies to properly clean it, nor the medications I need to prevent infection. I need to wash it regularly with antiseptic and apply antibiotic ointment and a clean bandage. I ask staff frequently for supplies to wash my foot, but they do not give them to me. They do not even give me soap. I do my best to clean it with water, and then put the same dirty bandage back on my foot, but I worry this is not enough and that it will become infected. I do not have any clean bandages or gauze with which to bandage my foot. I have been reusing the same bloody and dirty bandages for about a week. My foot with the ulcer is swollen and is much larger than my other foot. The ulcer itself is an open wound that is larger than a quarter. The wound is pink colored and oozes blood throughout the day. The wound hurts a lot when I walk. I worry that this wound is worsening significantly because I cannot keep it clean.
10. I have been asking for clean gauze to bandage my foot for three days. On or around November 1, 2025, I showed an officer the condition of my wound and the dirty bandage, and asked him for clean gauze and to see the doctor, but the officer told me he did not have access to the doctor but would talk to the clinic staff about my request. I have not received clean gauze or seen the doctor since then.
11. I arrived at California City with two ointments for the ulcer, but the ointments ran out approximately one week after my arrival. I had to break open the bottles of the ointments to be able to use every last drop of ointment. At California City, I was eventually prescribed two ointments for the ulcer, which I received approximately two weeks after my arrival. However, the ointments ran out on or around November 1, 2025, and I have not been provided any additional ointments since then.
12. I am also supposed to be seen every day by medical staff so they can clean the wound, but many days go by where they do not call me to the clinic to clean the wound. Between October 20 and October 28, 2025, medical staff only cleaned the wound twice. I do not believe that they have cleaned the wound again since October 28, 2025.
13. I know that my diabetes puts me at a higher risk of contracting an infection that could lead to an amputation. I am really worried that my ulcer will get infected and that I will lose my leg. I do not want to leave ICE detention without one of my legs.
14. Because of my diabetes, I should eat more vegetables than bread, because bread and carbohydrates are not good for me. I am issued a diabetic diet at California City. However, the food that I am provided is not appropriate because it very rarely includes

any vegetables, and often includes potatoes and bread. But I need vegetables, like broccoli, not bread. Around the end of October 2025, I submitted a grievance about the food that I am provided, to inform staff that I am diabetic and need diabetes-appropriate food, like vegetables. I am still receiving the same type of food. I have not received a written response to my grievance.

15. Shortly after arriving to California City, I was issued a pair of shoes that were made of a nylon-like material. However, they quickly became dirty and soiled with dust and dirt. The shoes are no longer clean or in good condition. There are also bloodstains on the shoes from my ulcer. I do not want to use these shoes because I am worried about the wound on my foot getting infected because the shoes are not clean. I tried to tell the doctor about my need for new shoes when I last saw the doctor, and I showed him the shoes, but I'm not sure he understood me. The doctor speaks in English, and there was an interpreter on the phone to translate. But the doctor told me that he did not understand me. I still have not been provided with replacement shoes. I am placing bandages between my foot and my shoes to try to protect my ulcer, but the bandages are dirty and I am worried that the ulcer will become infected.
16. When I step on my foot, I am in pain. I have to walk very carefully to not put too much pressure on the ulcer. I do not go outdoors to yard because I am worried about dirt getting into my wound and that it would get infected.
17. When I was detained by ICE, I was wearing a jacket, but staff at Adelanto confiscated it. When I arrived to California City, I asked if I could have my jacket, but staff told me that it was not in my property, and may have been left at Adelanto. Staff told me that I had to buy a sweatshirt here. I cannot buy a sweatshirt because I cannot afford it. I have not been provided warm clothing, like a sweatshirt or jacket, at California City. I am very cold in my cell and in the housing unit because the air conditioning is very cold. I have had bronchitis in the past and am worried that I could get it again, because my lungs are vulnerable.
18. I have never been incarcerated before. Here, I feel like I'm in prison. Before I was detained, I could regularly see my family, and they helped take care of me when I was unwell. I have many family members, and we are very close and take care of each other. Now, I spend all my days locked in a cell or inside the housing unit, far away from them. I don't get to see my family regularly. When my family has been able to visit me, I have not been allowed to hug them, but instead, we had to meet through a glass wall. Although I was grateful to have had the opportunity to see my family, it is very difficult to be separated from them. My wife also has health problems, and I am worried about her wellbeing. I am very frustrated about the poor medical treatment I have received, and my family is also very worried about me and my wellbeing. We are all afraid that I will get even more sick, and that my ulcer could get infected and that I could lose my leg.

I, Fernando Gomez Ruiz, 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 4 day of November 2025.

FGR

ATTESTATION OF TRANSLATOR

I am a native Spanish speaker. On November 4, 2025, I reviewed the above declaration with Fernando Gomez Ruiz in Spanish, which Fernando Gomez Ruiz represented to me was his preferred and/or native language, and witnessed his signature.

Gabriela Pelsinger

Gabriela Pelsinger, Investigator
PRISON LAW OFFICE

November 24, 2025

Date