

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@ccijjustice.org
MARIEL VILLARREAL - # 317048
mariel@ccijjustice.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 ONEIL GUTHRIE
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

DECLARATION ONEIL GUTHRIE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION

Case No. 3:25-cv-09757-MMC

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 Oneil Guthrie, 216429656

1. I, Oneil Guthrie, am currently detained at the California City Detention Facility.
2. I arrived at the California City Detention Facility about a month ago from Golden State Annex.
3. I am 49 years old.
4. I practice the Rastafarian religion. My religious practice includes burning specific colors of candles, using incense, group prayer, and bible reading. I am aware of at least three other people at California City Detention Facility who practice Rastafarianism.
5. While I was at Golden State Annex, I was able to practice my religion. There was one other practicing Rastafarian at that facility. We were allowed to burn our candles and incense and pray together.
6. I have been unable to practice my religion since I was brought to California City Detention Facility. I do not have access to colored candles, incense, or group prayer. I am aware of at least 3 other Rastafarians at California City Detention Facility.
7. I spoke to the chaplain about what I need to practice my religion properly. I requested candles, incense and a time to pray with other people who practice my religion.
8. I know that there is a room at California City Detention Facility that is used for religious services. I know that someone on staff created a calendar giving different days and times for different religions to use that room. There were no days or times given to Rastafarians.
9. I told chaplain that I would like to have a time for Rastafarians to use the room. It has been several weeks since I requested my religious materials and a time to use the religious space. I still have not received any of the items I requested nor a time to use the religious space.
10. Being unable to properly practice my religion has made this time very hard. I feel that it has made my anxiety and depression much worse.
11. Before I came to California City Detention Facility, I was diagnosed with eczema, severe seasonal allergies, and low blood pressure. The eczema causes dry patches on my skin that are very itchy and sometimes painful. The low blood pressure makes me dizzy, light headed and extremely tired. I sometimes also have blurred vision when I am experiencing

low blood pressure. My severe allergies make breathing difficult, cause watery eyes and make me sneeze repeatedly.

12. While I was at Golden State Annex, I was prescribed a medical lotion for my eczema, a nasal spray for my allergies, and pills for my low blood pressure. These medications helped control my symptoms so that I could go on with my life and do things safely. I use these medications every day.
13. When I was brought up to California City Detention Facility, I brought my medicated lotion and nasal spray with my property. When the bus arrived at California City, the staff searched our property and I was made to throw away my nasal spray and my medicated lotion.
14. As we entered the building from the bus, a nurse asked each person if they took any medication, and I told the nurse about my medication. Later that same day, after they took my photo, I spoke with another nurse who was supposed to take my medical information. That nurse was unable to work the computer to record my medical information. That interview with the nurse was cut short before I could tell the nurse about my medication.
15. Once I was assigned a building and a cell, I started to be concerned because all of the intake was over and I wasn't sure if anyone had written down the medications I need. Over the next day, I did not receive my medication.
16. I told the nurses when they came into my building that I did not have my medication. I also told the guards in my building.
17. Without my medication, my eczema began to make my skin very itchy, very dry, red and painful. I also experienced dizziness and difficulty breathing.
18. It took over a week for me to get medications for these illnesses.
19. I also take medication for insomnia, anxiety, and severe nightmares. I was able to take all of these medications while I was at Golden State Annex.
20. I told the nurses and guards at California City that I needed these mental health medications, but I did not receive them.
21. While I wasn't receiving these medications, I felt more anxious than I did with the medication, I could not sleep, and I experienced very bad nightmares.

22. I also tried to use the “sick call” system to get my medications. I filled out papers with the medical and mental health problems I was having and the fact that I needed medications I was taking at Golden State Annex.
23. I also used the tablet that we were given to submit a request for medical help and my medication.
24. I did not get any responses to my sick calls.
25. There are other people in my building who are sick and who are not getting their medications. I am very concerned about their well-being because I know it has been very hard for me to get my medication and get my medical care.
26. About two days ago, I was sprayed by pepper spray along with several other men in my building. In protest of our lack of medical care and lack of access to personal property like hygiene items and writing materials, we refused to return to our cells during “count” lock down. We had tried to tell every staff we could about these problems but we got no help.
27. Once we started our protest by refusing to enter our cells, the guards called for back-up and some of them put on masks. They continued to tell us to return to our cells and we did not. No one was being violent. When the back-up guards came outside of our building door, one of them let off the pepper spray just outside the door. The cloud of pepper spray came into our building causing staff and detainees to cough and rub their eyes—some of the spray got on me as well.
28. Since that day, I continue to experience red, sore, itchy eyes, a burning painful chest and difficulty breathing, and headache and dizziness. I am worried that the pepper spray has triggered my allergies and low blood pressure symptoms. My eczema has also gotten worse with redness and itchiness.
29. I put in a “sick call” to request medical care and I have not gotten any response.
30. We have to have a “pat down” search every time we enter or leave the building. This includes if we decide to go outside for recreation. These pat down searches are very invasive and include patting over our entire bodies and groping our genitals. I have stopped going to the outside areas for recreation because I have found the searches uncomfortable and humiliating. I did not experience these types of searches at Golden State Annex.

31. We are locked down very often in this facility. Every time there is a count we are locked down meaning we must return to our cells and have the doors locked. These counts happen at 7am, 11am, 3pm, and 7pm as well as a few times at night. These counts last anywhere from 40 minutes to over 2 hours. We are also locked down from 10pm to 5am.
32. During the lock down for count and at night, we are not allowed to have our tablets.
33. I have not experienced this many lock downs at any other detention facilities.
34. I want to share my story because I am concerned for my health. I also don't want other people to be treated this way in any detention center.

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2 I, ONEIL GUTHRIE, DECLARE UNDER THE PENALTY OF PERJURY THAT THE
3 FOREGOING IS TRUE AND CORRECT AND THAT THIS DECLARATION WAS
4 COMPLETED AND SIGNED ON OCTOBER 5, 2025 IN CALIFORNIA CITY, CALIFORNIA
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