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 22 *Alexander Roque Campos, Sokhean Keo, Gustavo Guevara Alarcon, Alejandro Mendiola Escutia*
 23 *and all others similarly situated*

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 FERNANDO GOMEZ RUIZ; FERNANDO
 27 VIERA REYES; JOSE RUIZ CANIZALES;
 28 YURI ALEXANDER ROQUE CAMPOS;
 SOKHEAN KEO; GUSTAVO GUEVARA
 ALARCON; and ALEJANDRO MENDIOLA
 ESCUTIA, on behalf of themselves and all
 others similarly situated,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
 ENFORCEMENT; TODD M. LYONS,

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

**SUPPLEMENTAL DECLARATION OF
 FERNANDO VIERA REYES, 074334561**

Judge: Hon. Maxine M. Chesney

Date Filed: November 12, 2025

1 Acting Director, U.S. Immigration and
2 Customs Enforcement; SERGIO
3 ALBARRAN, Acting Director of San
4 Francisco Field Office, Enforcement and
5 Removal Operations, U.S. Immigration and
6 Customs Enforcement; U.S. DEPARTMENT
7 OF HOMELAND SECURITY; KRISTI
8 NOEM, Secretary, U.S. Department of
9 Homeland Security,

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Defendants.

Supplemental Declaration of Fernando Viera Reyes, 074334561

1. I, Fernando Viera Reyes, am currently detained at the California City Detention Facility.
2. I arrived to California City Detention Facility about late-August 2025, from Golden State Annex, where I had been for about 17 months.
3. I am currently 50 years old.
4. I am really scared that I have prostate cancer, and since I arrived at California City, I have not been seen by a urologist or had a biopsy to give me a diagnosis. I am worried that if I do not receive proper medical care immediately, I am going to die at California City.
5. I am a Named Plaintiff in the above-captioned case and submitted a declaration in support of our Motion for Preliminary Injunction, which I signed on October 28, 2025 (ECF No. 22-24).¹ The facts in that declaration remain true, and I am repeating some of the relevant paragraphs here for context:
 - a. Prior to coming to California City, I was at Golden State Annex for about 17 months. Soon after my arrival at Golden State Annex, I completed blood work that showed elevated PSA levels. I was given a course of antibiotics and given Flomax to help with my urine output. I received a repeat blood draw to see if those medications brought down my PSA levels. The lab work showed that my PSA levels were still high. A few months later, my PSA levels were even higher. The doctor at Golden State Annex explained to me that high PSA levels could mean cancer.
 - b. I was seen by a urologist and underwent some testing to determine whether I have prostate cancer. I had an ultrasound, cystoscopy, and two MRIs completed.
 - c. I had an MRI completed in November 2024 which indicated that there was a high likelihood that I had cancer and that clinical correction was needed.
 - d. I saw a urologist in January 2025 and she wanted me to do a prostate biopsy. It did not happen. I saw her again on March 17, 2025. She wanted to do a biopsy two days later. She said it needed to happen right away. She requested that I be NPO and start Cipro the next day. I was not seen then

¹ The initial declaration as filed accidentally omitted the day in October 2025 on which it was signed.

and I do not know why. I asked and was told by medical staff at Golden State Annex that the biopsy was ordered and I would have it done. I left Golden State before it could be done.

- e. Since late 2024, I have had symptoms of burning with urination and an inability to empty my bladder. It has only gotten worse, even with the Flomax. It is painful to use the restroom and I go frequently. A few weeks before my arrival to California City, I began to experience bleeding with urination.
 - f. When I left Golden State Annex, I was still waiting for my prostate biopsy and I was prescribed Flomax. I let the intake nurse at California City know about my biopsy and that I needed Flomax. I let her know about my symptoms and that I experienced bleeding with urination and in my stool. She told me that I would see the doctor soon and that I could explain to them. I put in multiple sick-call slips that I was bleeding with urination and in my stool because it was taking too long to see the doctor.
- 6. Since I signed my initial declaration, my health has deteriorated further. Overall, my symptoms are still getting worse, and I feel a constant, pulsing pain. The intensity of my pain varies, but I spend most of my time now sitting or lying down because I feel so weak. The nurses give me Tylenol and Ibuprofen for pain, but they give me the medication in unpredictable ways. Some nurses give me around twenty pills of Tylenol and ibuprofen for my pain, and I take them until I run out. Other nurses just give me a handful of pills. Some nurses do not give me pain medication at all and instruct me to buy it from canteen. It is difficult to manage my pain when the medication is so unpredictable.
 - 7. I feel like I am getting weaker every day, and I sleep a lot to deal with the pain and fatigue. When I first got to California City, I was able to work out and do things like push-ups, but I can no longer exercise. I feel too weak to exercise, and I feel pain in my back. Even walking can leave me sweaty and feeling exhausted and winded. Lately, I feel like I am having a hard time catching my breath. I only go to the yard to get some sunlight now.
 - 8. I keep losing weight, and I have had no appetite lately. I force myself to eat at least half of my tray so I can get some calories in my body. When I arrived at California City in late August 2025, I weighed around 225 pounds. I weighed myself on December 11, 2025, and I was 209 pounds. I am really worried about all of the weight that I am losing.

9. I was sent to the emergency hospital on November 27, 2025. Around 2 PM on November 27, 2025, I told multiple custody officers that I was urinating blood. I also turned in a sick-call slip that said I have had blood in my urine for the past two days. Even though I told officers about the blood in my urine, medical staff did not come talk to me. Around 10 PM that night, I felt weak and had still not been evaluated by any medical staff, so I went “man down” to try to get emergency medical attention. I was brought to the medical clinic at that point, and I was evaluated by a nurse. After about 20 minutes, I was brought in an ambulance to a hospital in Tehachapi. I had imaging and bloodwork done at the hospital, but there was no urologist at the hospital. While I was at the hospital, I heard a nurse on the phone with ICE trying to figure out which hospital they could send me to with a urologist. They eventually brought me to a hospital in Palmdale, but that hospital did not have a urologist either. At the hospital in Palmdale, medical staff put in a catheter, gave me pain medication and an IV for hydration, and prescribed me antibiotics because of a urinary tract infection. I have still not seen a urologist.
10. While at the hospital, I was told that the imaging showed I have a lesion on my spine. The doctor said it could be cancer. I am even more worried now.
11. I returned to California City in the evening of the following day, November 28, 2025. When I returned, I was placed in a medical observation room, but I did not have access to a shower while I was in that room. I cried and begged to not be placed in observation room without access to a shower because I was concerned that, if I could not shower, I would get another infection because of the catheter placement. Even though I begged to be moved, I was placed in medical observation housing for 24 hours, and I did not have access to a shower during that time.
12. On the following day, November 29, 2025, I was sent to administrative segregation instead of remaining in medical observation housing because there is supposed to be shower access in administrative segregation. But the day that I was placed in administrative segregation was a Saturday, and officers told me that I could not shower on Saturdays or Sundays in administrative segregation. When I asked why I could not be sent back to my regular housing unit, a security officer told me that my catheter was a “security issue.” While in administrative segregation, I was not given a towel until Monday, December 1, so I could not take a bird bath in my sink or clean my catheter site. From Friday, November 28 until Monday, December 1, I could not shower or properly clean my catheter site. I was finally moved out of administrative segregation later that week.

13. I think I am bleeding into my catheter bag. The color of the liquid inside the catheter is often orange, which I think is a mix of blood and urine.
14. Medical staff at California City have only replaced my catheter bag once since I returned from the hospital, and they only replaced it because I accidentally stepped on it and it was leaking. I try to clean it on my own with water, and for around two weeks, I used a string as a makeshift tie to keep the bag attached to my leg so it did not move around. After returning from the hospital, no one explained to me how to take care of my catheter or how to keep it clean. I only use water because I was not given supplies or soap to keep it clean.
15. While I was in administrative segregation, Dr. Hooper told me that they would order me a new catheter that I could secure it to my leg with a device, but I did not receive that catheter at California City. I tried my hardest to keep my catheter bag securely in place so it did not get dirty, break, leak, or drag on the ground.
16. When I got back to my unit after being in administrative segregation, I was given a new bunkie that I did not know, and I felt uncomfortable cleaning my catheter with him in the room. I was bleeding into the catheter, and I did not want to clean it in front of him. I wanted to move back with the old bunkie who I knew, so I was asking for days to move into a different cell. On December 12, 2025, an officer finally agreed to let me move. As I was moving my stuff to the new cell, I noticed a lot of bright red blood in my catheter bag. I showed the officer who called medical. A nurse came by about 30 minutes later and saw the blood too. She told me she would be back. A few hours later, I was taken to medical and sent to the emergency room again.
17. I did not see a urologist at the emergency room. Instead, the emergency room staff replaced my catheter with one that is easier to use and has a strap to keep it secured to my leg—I think this is the type of catheter that the doctor at California City told me they would order for me. They also gave me an extra bag to use in case I needed it. I did not have a back-up bag for my old catheter. The emergency room staff also told me I have another urinary tract infection and prescribed me antibiotics. I was instructed to take three pills a day, every eight hours, for 14 days. The ER gave me the first pill in the hospital.
18. I returned to California City on Saturday, December 13, 2025, at about 1 or 1:30 AM. I was placed in a medical observation room and was seen by an RN and the doctor later that morning. The doctor told me I can go back to the unit, and I asked if I could get the antibiotics ordered as “keep-on-person” (“KOP”) so that I can make sure I take them on time. The doctor said, “We’ll see.”

19. When I was released to the housing unit, our entire unit was moved to a new building. The new building does not have sick-call slips so I could not ask about my medication. As of 1:15 PM on Monday, December 15, 2025, I have not received any antibiotics at California City. I did not get any while in the medical observation unit. I have asked the pill nurse who brings medication to the unit if I have any antibiotics to take and the nurse did not have any for me.
20. It is really difficult to access even basic medical care at California City. I try to submit handwritten sick call slips, but I do not always get a response. Sometimes I see a nurse, and sometimes I do not. Since early November 2025, I have given officers at least ten handwritten sick call slips to submit for me. I write on the sick call slips that I am having a pulsing pain internally and I am bleeding, but there does not seem to be any rush to get me to the specialist. No one, not even the California City doctor, has talked to me about a treatment plan or when I can expect to go out to get a biopsy done.

I, Fernando Viera Reyes, declare under penalty of perjury that the foregoing is true and correct and that this declaration is telephonically completed and executed on December 15, 2025 at California City, California.

/s/ Fernando Viera Reyes