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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.

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

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

**SUPPLEMENTAL DECLARATION OF
YURI ALEXANDER ROQUE CAMPOS,
240174337**

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 Yuri Alexander Roque Campos, 240174337

1. I, Yuri Alexander Roque Campos, am currently detained at the California City Detention Facility.
2. I arrived to California City Detention Facility in early September 2025, from the Mesa Verde Detention Facility, where I had been for about two and a half months.
3. I am currently 30 years old.
4. I am really worried about my heart condition. Since I arrived at California City, I have not been seen by a cardiologist. I went to the emergency room on September 5, 2025, the day that I transferred to California City, and the emergency room doctor said that I needed to follow-up with a specialist within 72 hours. I still have not seen a specialist, more than three months later. 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 November 6, 2025 (ECF No. 22-6). The facts in that declaration remain true, and I am repeating some of the relevant paragraphs here for context:
 - a. 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.
 - b. 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. [. . .]
 - c. 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. [. . .]

- d. On September 3, the cardiologist at Kern Medical told me that she had reviewed some of the results from [my] 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.
 - e. 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. [. . .]
 - f. To this day, I'm not sure when I will see the cardiologist again.
6. Since I signed that initial declaration, I have still not seen a cardiologist. I am still having very concerning symptoms. I frequently experience chest pain, usually on a daily basis. Sometimes, the chest pain is accompanied by a feeling that my heartrate is accelerating faster than normal, as if my heartrate is inconsistent. I also sometimes feel pulsing pain around my lungs too. When I feel stressed, the chest pain is more frequent. It feels like my symptoms are getting worse, and I am very worried that my heart condition is getting worse too.
7. Since getting to California City, I am no longer able to exercise or run because of my frequent chest pain. Now, all I can do is walk. I can't even walk quickly, because if I do, I start to feel chest pain and worry that my heart might stop. I can only walk for about 20 minutes on the yard before I have to stop and rest for about ten minutes.
8. I have tried to get the medical care that I need, and have submitted multiple sick call requests reporting my symptoms, including chest pain. I still have not been able to see a cardiologist, and I don't believe that California City plans to send me to one soon. No one from medical staff has told me that I have been scheduled to see a cardiologist.
9. Earlier this month, I went to the facility's medical clinic because of chest pain. I had an EKG and a nurse gave me ibuprofen. The nurse told me that there are irregularities with my heart, but that they could not do anything for me except give me pain medication. The nurse said that if I had chest pain again, I could come back to the medical clinic, but that they could not send me to a specialist.
10. I am very worried and even afraid about what will happen to me if I cannot get the medical care that I need. I have learned about other people who are detained here who have serious medical issues, and also need specialty care, but have not gotten the specialty care that they need either. This makes me even more worried

that I will not get the medical care that I need, even if I have a medical emergency.

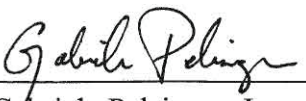
11. I am very scared about what will happen to me if I cannot get the medical care that I need while I am locked up at California City. I am afraid that I might die here because California City won't provide me with necessary medical care.
12. My three young children live in the United States, and I would like to be reunited with them. I want to take care of them and support them. I want to stay in the United States and fight my immigration case because of them, but sometimes I consider giving up and accepting self-deportation because I am so afraid of dying in this detention center.
13. 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 is completed and executed telephonically on December 16, 2025 from California City, California.

/s/ Yuri Alexander Roque Campos

ATTESTATION OF TRANSLATOR

I am a native Spanish speaker. On December 16, 2025, I reviewed the above declaration by telephone with Yuri Alexander Roque Campos in Spanish, which Mr. Roque Campos represented to me was his preferred and/or native language.



Gabriela Pelsinger, Investigator
PRISON LAW OFFICE

December 16, 2025

Date