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EXHIBIT A

"Isaac"

DECLARATION OF [REDACTED]

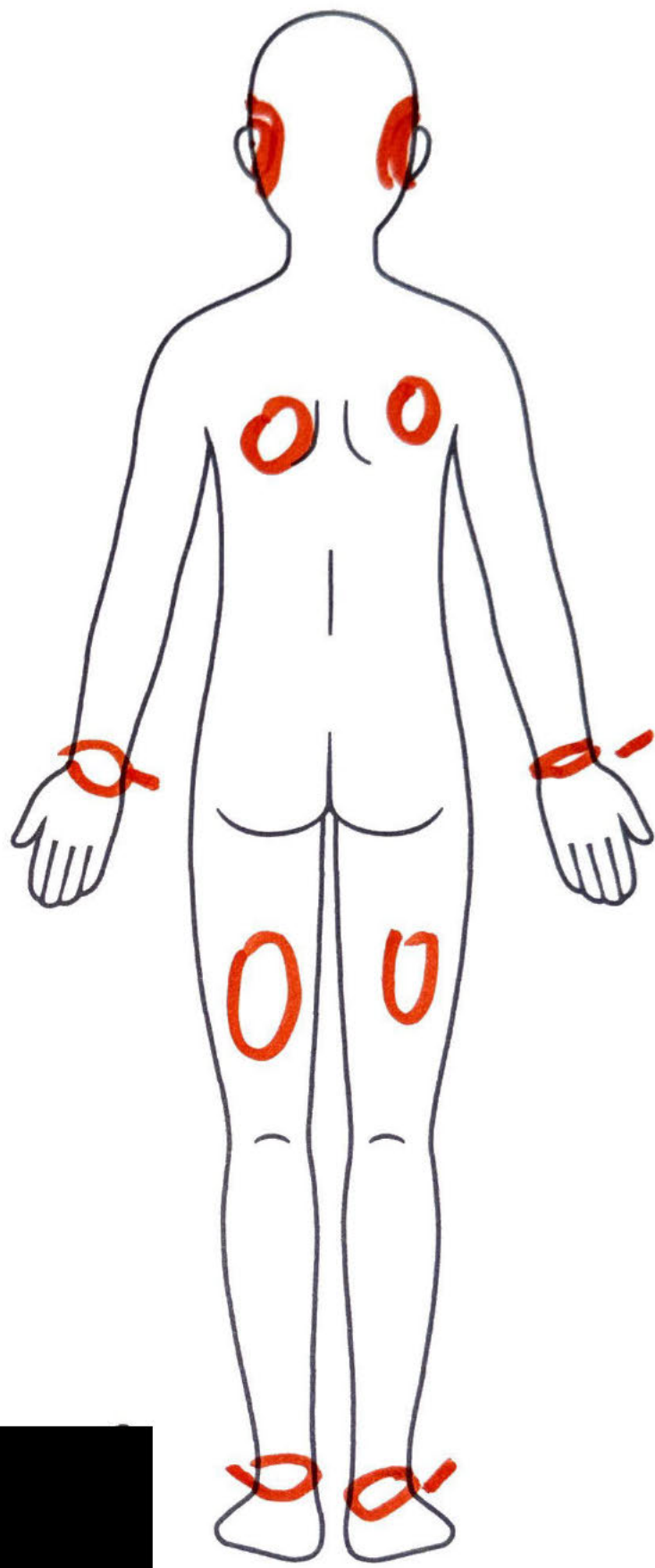
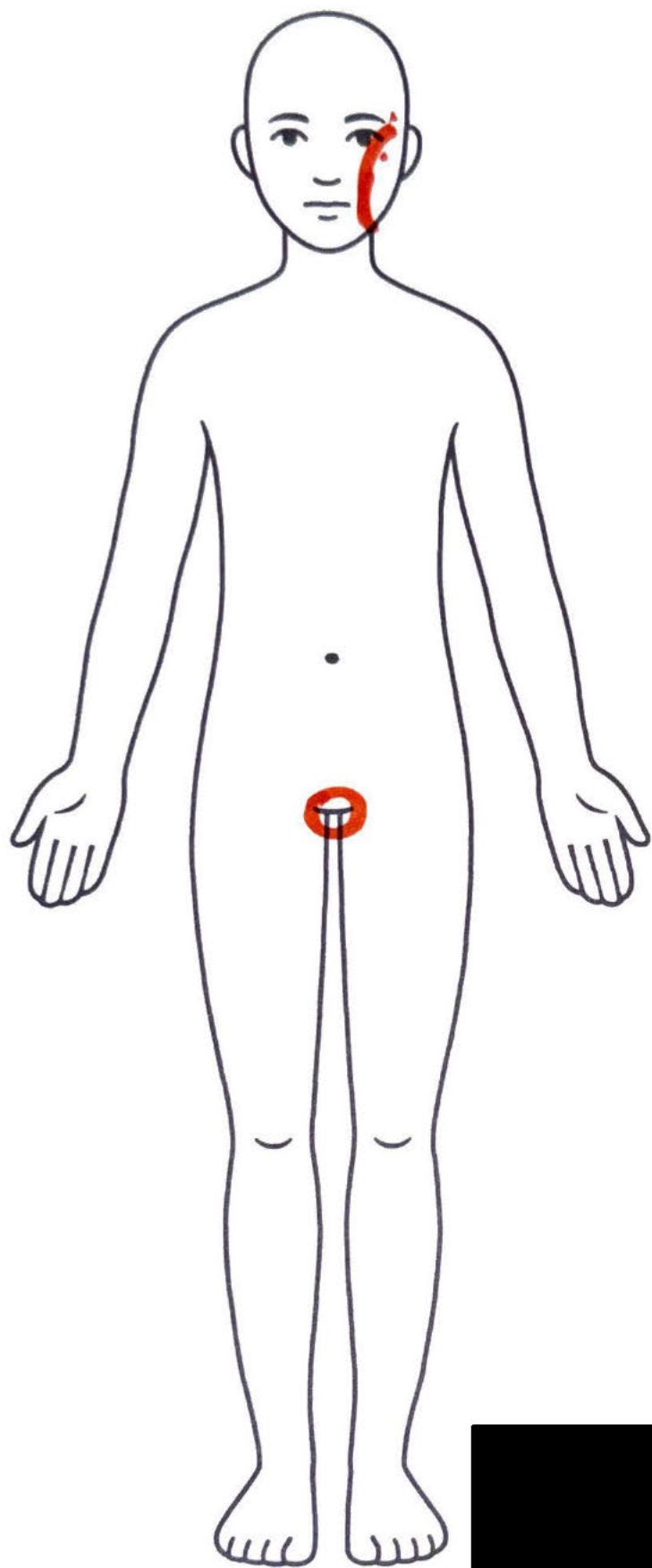
I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 43 years old and from Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 17, 2025.
4. Before I was detained by ICE, I lived in [REDACTED] Florida. I was a subcontractor and made deliveries for Costco and Lowes. I lived with the mother of my daughter and with my daughter. My daughter is five years old. When I lived with her, I enjoyed going to the park and the beach with her. We would watch TV together. I enjoyed doing everything with her.
5. At East Montana, I am held in the D-5 unit currently. I have been in the D-5 unit for approximately six days, since approximately Thursday, November 6, 2025. There are about 35 to 40 people in the D-5 unit. I used to be in the B-3 unit, but I was moved to D-5 unit because I am currently sick with the flu. I have been told that I will be moved back to B-3 when I recover.
6. The D-5 unit is supposed to be for people who are sick and need medications. However, there are people who have been in the D-5 unit for several days who haven't gotten their medications. There are also people in D-5 who are not sick. There are about eight people who seem healthy. I worry that those healthy people might get sick by staying around sick people in D-5. No one comes to clean the unit and it is in a similar dirty condition as B-3.
7. It has been approximately two weeks since I have seen the sky. While being in D-5 we have only been taken out to recreation once and it was for about an hour. Recreation takes place in an enclosed and covered area.
8. There were about 76 or 80 people in the B-3 housing units. The bathrooms were disgusting. The toilets were like the ones on airplanes that rely on air pressure. There was urine everywhere, including on the rims of the toilets and the floor. There was also fecal matter on the walls and the rims of the toilets. The dirty water from the bathroom would get into the dining area. The water was sometimes blackened from the things in the bathroom and that blackened water is carried to the dining area. The flooring for the

bathroom is made of wooden pallets and it emits an awful smell like there is fungus or mold growing. The puddle of dirty water was there every day. There is a barrier between the bathroom and dining area, but it does not block the water. We would often have to wipe the puddles with our clothes because we do not have towels or other supplies to mop up the dirty water.

9. When I was first transferred to East Montana, I arrived by bus with about 40 or 45 people. The bus was full. My legs and hands were cuffed with metal cuffed. We were put in a room with benches. I was there in the room with the benches for over 24 hours. There were no beds and I slept on the floor. It was very, very cold. There were about 20 to 30 people at a time inside that same room. I arrived on or around a Friday and I was held there until around Sunday, which is when I was finally taken to my tent. For the entirety of that time, I was given just one bag with a small sandwich and some fruit to eat.
10. Since I have been detained at Camp East Montana, I have struggled with high blood pressure. I have had high blood pressure since approximately 2021. In approximately 2023, I had a stroke. I was taking a medication called something like Lisinopril before I was detained. The facility should know I have high blood pressure because I told them about it soon after I arrived here. I did not receive medication for high blood pressure for approximately a month after I arrived here. I don't think I received any medication for high blood pressure until approximately September 20, 2025. During that time, my vision would blur and I would get a lot of headaches. I could tell my blood pressure was jumping way too high. Even after they started giving me the medication, Lisinopril, it has not been given to me on the correct schedule. It is supposed to be taken in the morning, but they often give it to me in the afternoon or evening. Right now at this very moment I also feel like I have very high blood pressure and I have not received blood pressure medication. I also have a headache.
11. About two weeks ago, a doctor prescribed me new medication that I believe is called something like diuretic, but they have still not given it to me.
12. I have been to the medical tent, including approximately last Wednesday. I go there because they take me to measure my blood pressure. Every time I go, I see them shredding a lot of paper. I don't know what the documents are, but I see them shredding documents.
13. Other people have also had problems with medical care. I saw one person whose blood was coagulating in his arm and it looked like his arm was going to pop. That person was telling the guards that he was not feeling okay. He told me the guards beat his swollen arm while he was in that condition. In fact, the guards told him that he had two choices, he could either go outside for recreation or go to the SHU. However, he didn't want to go to recreation because he was feeling unwell. In response, he told me that the guards grabbed him by the neck and choked him and the guards hit him in the eyes on his face.

14. This place seems designed to wear you out. There is no consistent schedule for going outside. I have gone multiple weeks at times without going outside. Sometimes, officers will tell us to go outside at 9 p.m or 11 p.m. when is cold outside. The lack of time outdoors hurts the functioning of our internal cycles and how we feel mentally.
15. The schedule for meals is also inconsistent. There are times when we don't get meals for the entire day. We will sometimes just get a random bag at 11 p.m. that is filled with minimal food, like a sandwich and two mandarins. We were also once given rotten juice to drink for a week. There are many people with special dietary needs and it does not seem like they are getting what they need. In the B-3 unit, there are approximately two diabetics, some people who are lactose intolerant, a vegetarian, approximately two who are on low sodium diets for blood pressure reasons, approximately two who require bland diets, and approximately two who are on kosher and halal diets.
16. There is a shortage of hygiene products here. We do not have enough shampoo or soap. There is very little toothpaste and people have to argue over who gets it. No one ever comes to clean the area. We ask for cleaning products to see if we can clean for ourselves, but we are not given the products we need to keep the space clean. These conditions have been so difficult. However, the guards do not respond to our written requests, or our requests when we ask in person. They only seem to respond if we protest.
17. I do not know of any library at this facility or any way to access legal resources. There is also no educational or religious programming that I know of or have had access to.
18. On a day approximately September 15-17, 2025, the guards used force against me because they tried to take me to Mexico and I told them I don't want to be taken there. The guards came into my housing unit and told me I was going to be deported. When I asked them where, they told me I will be taken to Mexico. I told them "no," at which point those guards left. However, they came back with about 30 other guards. Outside in the hallway, the guards started beating on me.
19. The guards hit my head. They slammed it against the wall approximately ten times. Also They squeezed and twisted my ankles. The guards also grabbed and crushed my testicles between their fingers, which was very painful and humiliating. I felt like I was being sexually assaulted. After the guards slammed my head against the wall, I had severe pain behind my ears. I couldn't even touch the left side of my head for about a month because of the pain. The guards seemed to be trying to not leave visible marks on me. Other detained people tried to help me when I was beaten, but one of them was so severely beaten that he ended up in a wheelchair himself.
20. Then they took me to a separate room. It seemed like a punishment room. ICE agents then went into that room and told me to cooperate. They told me I have to be well



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On [REDACTED] I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED] detention, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true,

[REDACTED] also gave me verbal consent to sign on his/her behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:
NAME:

[REDACTED]

Date:

[REDACTED]

2025

EXHIBIT B

"Benjamin"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 49 years old and from Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 16, 2025.
4. Before I was detained by ICE, I lived in Orlando, Florida. I have been living in the U.S. for 32 years. I worked as a hibachi chef for approximately 14 or 15 years. Before that, I worked in construction as frame carpenter. I have one son who is approximately fifteen years old. He is a U.S. citizen.
5. Approximately one week after I arrived at this facility, over the course of a week, guards called me out approximately four times to intimidate me into signing something like a voluntary deportation document. They threatened me by saying I have a bad record and the only solution is to go to Mexico. They said they would handcuff us, put bags over our heads and send us to Mexico. I refused to sign the papers. Approximately all four of the times I was pulled out, the officers told me that if I don't agree to go to Mexico, they will send me to Sudan in Africa, or to El Salvador, or to Guantanamo Bay. I told them I am not a Mexican citizen. I told them my whole family lives here. I am scared to go to Mexico because I am not from there. I also believe that there is kidnapping near the border area and that people could get robbed or killed there.
6. Approximately two weeks after I arrived at this facility, two border patrol officers who were women called me out and told me that a judge had submitted an order for me to be deported to Mexico. When I asked for the document of the order, they told me that they can't show me the document. Regardless, they put us on a bus to take us to the border. Six of us said we don't want to be sent to Mexico and twelve people seemed to say they would go to Mexico. They put the six of us who didn't want to go to Mexico at the back of the bus, but the driver said he still had to take us to Mexico to show the government that they had tried to take us there. My wrists and feet were cuffed and chained to the front of my body with a restraint on my waist.
7. When we got to the border crossing, there was one bus on the U.S. side and one bus on the Mexico side. I was on the bus on the U.S. side. The bus on the Mexican side is for those who go to Mexico to go farther in. The twelve people at the front of the bus got off.

I have not seen them again. Approximately seven masked men who looked like military men, but without badge numbers showed up. They got onto the bus that I was still on. When they couldn't succeed in intimidating me and the others who were still on the bus, they left. I was later brought back to the unit where they continued threatening me about taking me to another country. These threats feel like mental torture.

8. Approximately a week ago, guards told me that Cuba will never accept me, but Mexico will accept me. They told me if I don't sign the document, they would send me to a prison in the heart of Arizona and that I'd have four months in prison and then they would send me to Mexico anyway.
9. I have been here for approximately three months and I have been sick approximately four times already. Approximately a week ago, I got the flu. I had a fever for approximately four days. I couldn't even get out of bed. I was not eating. I could not handle it anymore, so I started knocking on the door and they took me out. Then they moved me from D-1 to D-5. There were about eight people in D-5. Six people in D-5 had the flu and two had COVID. I know this because they gave us tests and told us what we have. They mixed the eight of us together even though we have different sicknesses. It took me two days before they gave me any medication, which was what I believe to be an antiviral.
10. The officers only take us outside approximately every 17 days for only approximately 20 minutes. The outdoor area in an enclosed space, it's like an enclosed box. It is sometimes very cold out there and we do not have long sleeves or warm clothing. We are not able to see the sun from there. It has been approximately a month since I've seen the sun, besides when I saw it just now when I was walking to this attorney visit.
11. There is a lot of dust in the housing areas we are in. From the dust, I wake up each day with a sore throat, phlegm, sinus pains, and I have suffered from bloody noses. This place is still under construction.
12. There is no law library here.
13. They don't seem to have enough food or medication or other basic resources for us here, but I hear they still want to bring more people to be detained here.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the th of November, 2025 in El Paso, Texas.

Signature: _____

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish.

On November 11, 2025, I personally spoke with [REDACTED] and

read the foregoing declaration to him, translated into Spanish faithfully and

accurately. [REDACTED] affirmed that s/he understood my translation and that the

information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:

NAME:

[REDACTED]

Date: 11/11/2025

EXHIBIT C

"Abel"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I, [REDACTED] make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] am 51 years old and from Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 17, 2025.
4. Before I was detained by ICE, I lived in Miami, where I lived for about 30 years. I came to this country in 1994. For work in Miami, I was a car tow truck driver. I had been doing that for approximately 20 years. Most of my family is here in the United States. My mother is here and I have two grandchildren.
5. At Fort Bliss, I am held in the D-1 unit right now. The conditions are bad and they are treating all of us like animals. They have us sleeping on very thin mattresses where we are practically sleeping on just the metal frame.
6. About two weeks after I arrived at Ft. Bliss, guards called me out to sign documents and add my fingerprints to them. They told me that I would have to go to Mexico. I refused to sign the papers and told them "no." I told them I am Cuban, not Mexican. In that moment, I was scared for my life because I would be a foreigner in Mexico. The guards took us to the front office and locked us in a room. I did not leave the room because I understood that the guards would put me on a bus and take me to Mexico.
7. When I refused to leave the room, a guard grabbed me and slammed me down and it hurt me so much that I had pain on my back for approximately two weeks. The guard beat me just because I was refusing to be cuffed and taken to Mexico. The guards also beat several other people. The guards threw me against the floor and approximately 4-5 guards came down on me until they cuffed me. This caused pain to the back of my head.
8. I am attaching a true and correct copy of an image of the body depicting the injuries I suffered on the day the guards tried to take me to Mexico this first time. I marked on the outline of the body with red marker to show where I was hurt by the guards. I completed this drawing on or around November 12, 2025.
9. Then, the guards took me on a bus with approximately thirteen people to a part of the border called St. Terasa, which is here in El Paso. My wrists and ankles were cuffed. They put a sort of iron belt around my waist and attached my cuffed wrists to it. I continued to feel a

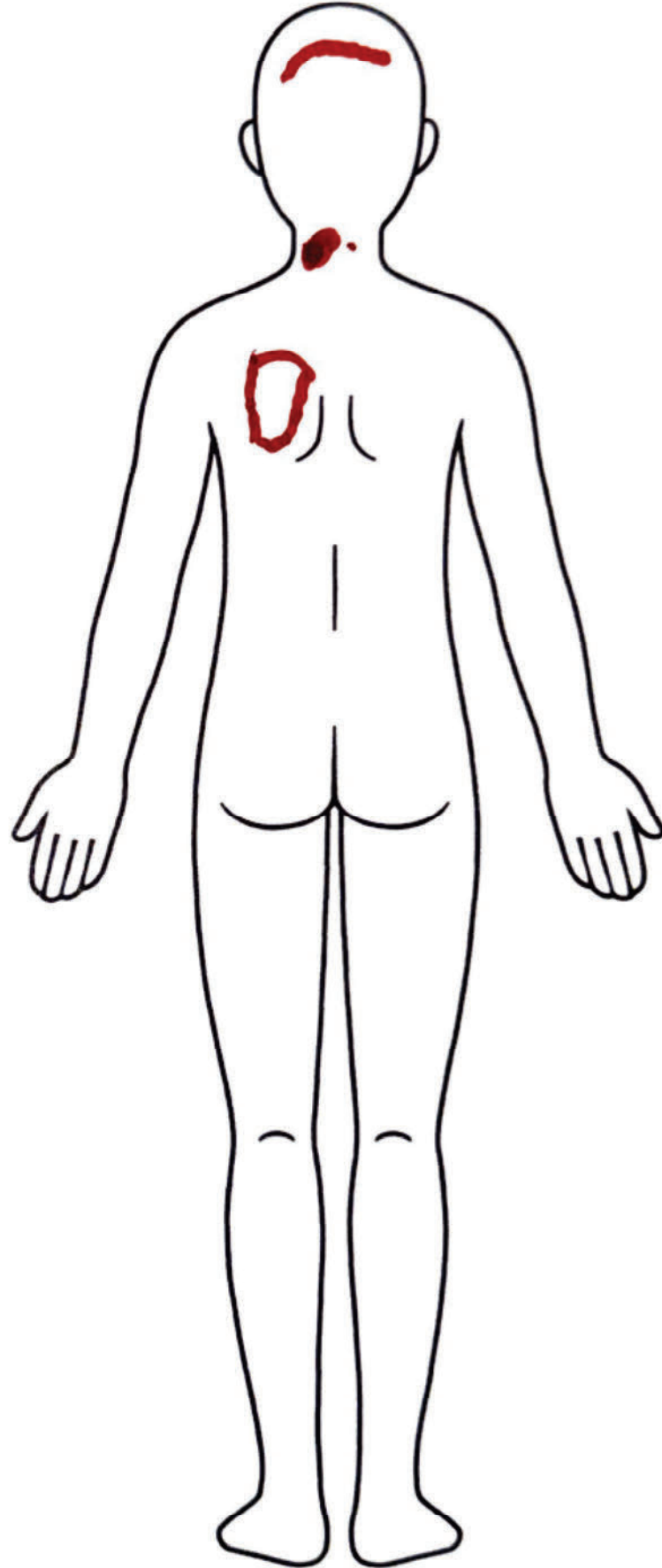
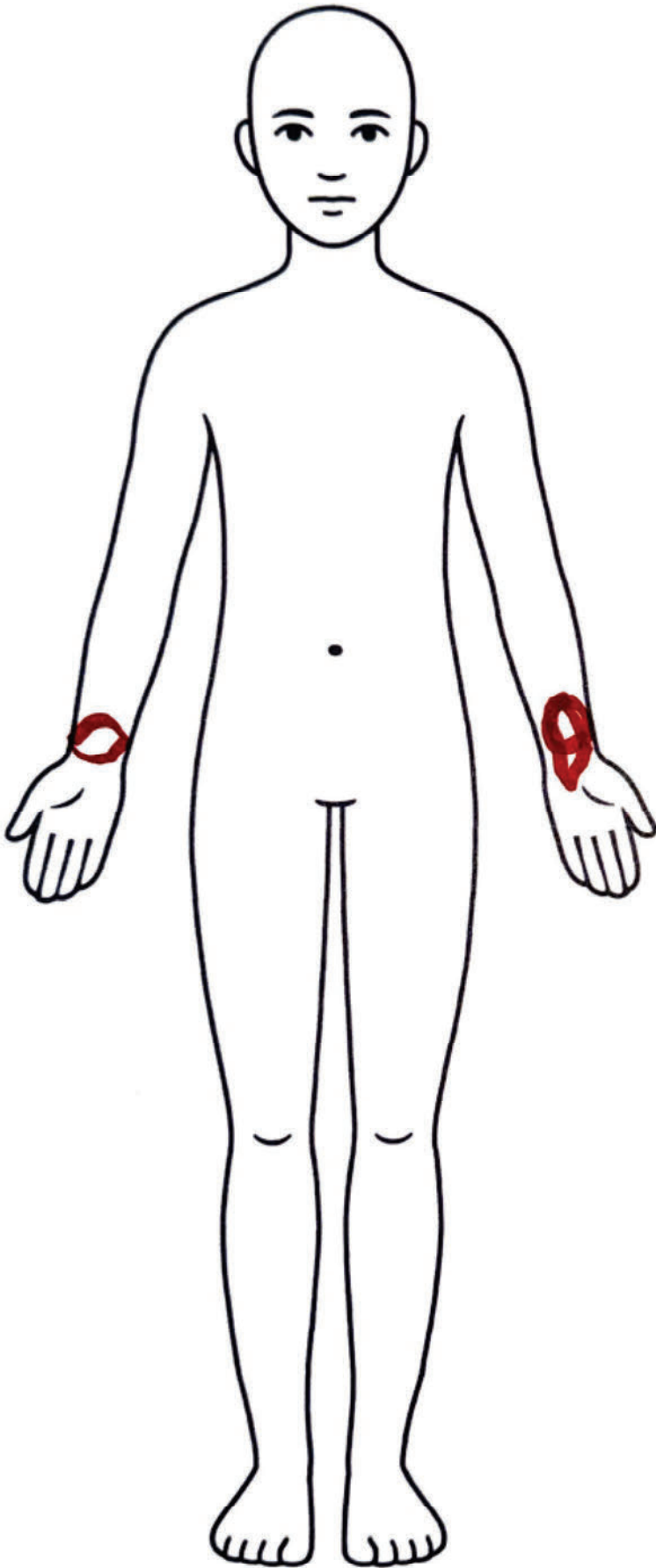
lot of pain because they had slammed me against the floor. The bus ride took approximately 40 minutes, but approximately an hour and a half or so on the way back because of traffic.

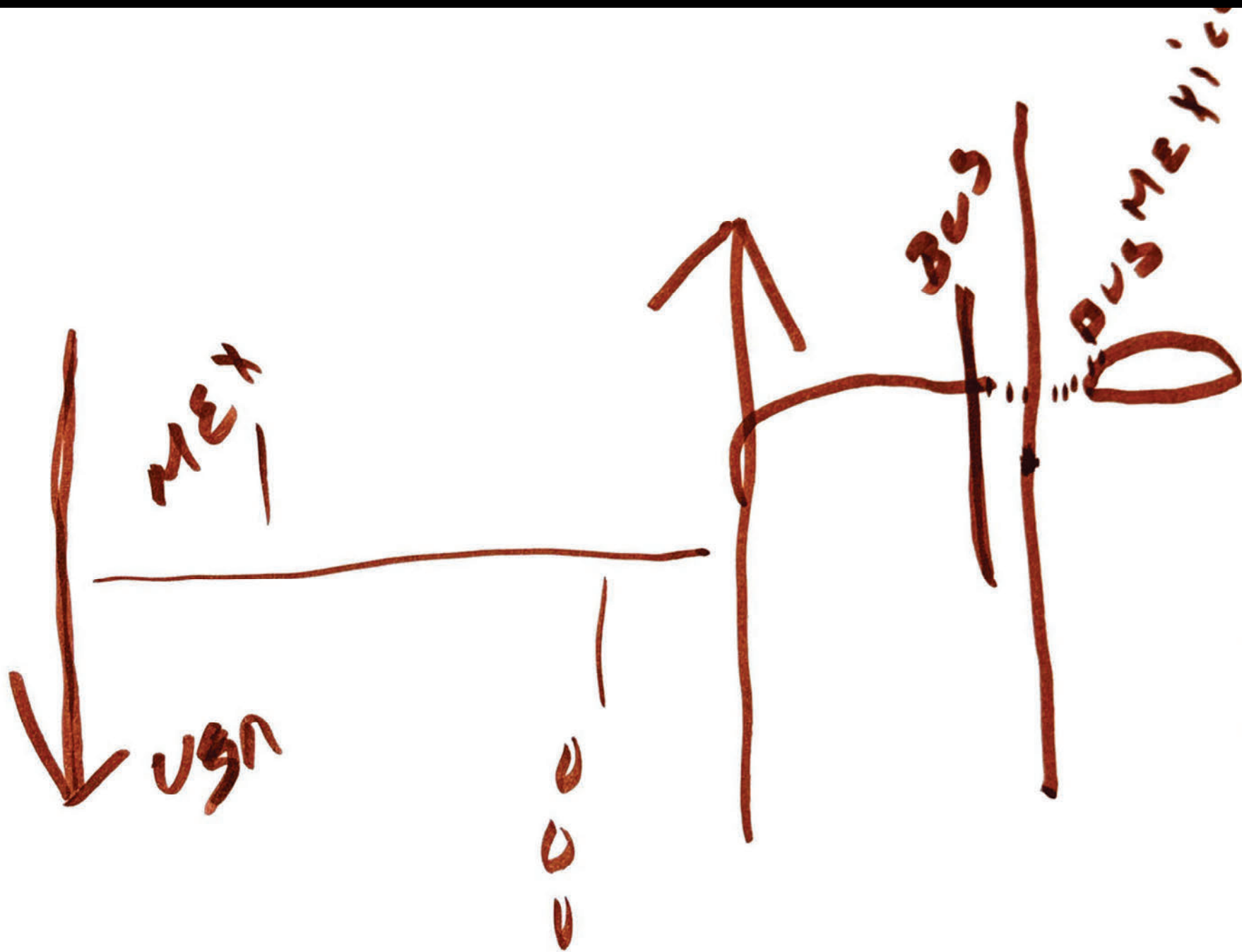
10. When we arrived at what I understand to be St. Tereasa, the guards took off our metal cuffs and put plastic cuffs on us. The area was on what appeared to be a large hill and it seemed high enough that my ears started to clog like when on an airplane. There were other people there who were wearing black masks on their faces with only a hole for their eyes. They told us to walk toward the Mexican bus. There was a bus to Mexico on one side and the bus back to the U.S. on the other. I started feeling very anxious at this point and I started yelling and screaming at the immigration guard in Mexico that this is a kidnapping and I don't want to be taken. The guard from Mexico then said that they don't want anyone who was going to be forced to go to Mexico. If I hadn't started kicking and screaming at that moment, I believe I might have been taken to Mexico. I was doing everything I possibly could to not be taken to Mexico.
11. I am attaching a true and correct copy of a drawing of my memory of the scene at St. Tereasa. It depicts the two busses: one going toward Mexico and the other going toward the U.S. I completed this drawing on or around November 12, 2025.
12. Out of the thirteen people who came with me on the bus, only four people returned with me. They left the plastic cuffs on my wrists, but they also put metal cuffs over them and tightened them even more than on the way to the border. My wrists hurt where the layered cuffs were.
13. I was so scared during that entire experience. Around the area where they brought us is where I believe trafficking of people happens.
14. Last week, the guards tried to take me to Mexico again. An ICE guard stood outside and called us. The guards came with materials for our fingerprints and signatures to consent to go to Mexico. I said "no" and that I was not going to sign. I told the guards that I was afraid for my life to be sent to Mexico and that I didn't want to be in a country of narcotraffickers. The guards told me they would deport me to a third-party country and would press charges against me. I told them I want to stay here. That time, I did not get on the bus. They continued to tell me that they would send me to jail and to a third country, like Africa, but I continued to tell them "no," and they put me back in my housing unit.
15. The experience of the guards trying to trick us to sign documents and trying to force us into Mexico made me very scared. Now, I feel like I don't know who to trust or what to do.
16. I am scared of retaliation for speaking about my experience here, but I believe the whole world should know what is happening here at Camp East Montana in El Paso and what has happened to me.

Everything in this declaration is true and correct to the best of my knowledge and recollection.
This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED] rd of December, 2025 in El Paso, Texas.

Signature: [REDACTED] _____





U.S. DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

Alien Name: [REDACTED]

Alien Number (A #): [REDACTED]

Date: [REDACTED] 2025

NOTICE OF REMOVAL

This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) intends to remove you to Mexico.

CERTIFICATE OF SERVICE

I certify that, on today's date, the contents of this notice were read to [REDACTED] in the Spanish language, and I served the alien a copy of this notice in person.

Refused to sign
Signature of Alien

DO [Signature]
Title and Signature of ICE Official

[REDACTED] 25
Date of Service

1500
Time of Service

Name or Number of Interpreter (if applicable)

EXHIBIT D

"Eduardo"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am approximately 35 years old and my country of origin is Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 17, 2025. However, I was taken to the Otero County Processing Center for about two weeks after that date and then brought back here to Camp East Montana. However, the official bracelet that I wear still says my entry date at this facility was August 17, 2025. Things seem to have gotten increasingly worse here since that date and it keeps getting worse.
4. Before I was detained by ICE, I lived in Miami, Florida. I had lived there for approximately 10 years. I worked as an electrician. I have two companies. I lived with my wife. I have three children, all of whom were born in the United States and are U.S. citizens. I have a baby girl who is just about five months old. I also have two sons. One is about three years old and the other is about thirteen years old.
5. At Camp East Montana, I am held in Unit D-3. There are about 72-76 beds in the tent I am held in. Most of those beds are now filled, but it didn't start out that way.
6. The unit I am in is not clean and we are not usually given cleaning products to clean with. Everything feels dirty. We live in tents and the vents spit out dust and you can see it spill down onto the ground. The toilets are filled with urine and fecal matter. The walls and the floor around the toilets have fecal matter on them. Water from that area and from the shower area collects and that same dirty water leaks over to the area where we have meals. The flooring under the shower is made out of what seems to be a wooden pallet structure rather than something water-proof. There also don't seem to be any measures to prevent a fire from spreading here. For example, I don't see a fire extinguisher or any place for water to be sprayed if there is smoke.
7. Since I have been detained at Fort Bliss, I have faced many problems with medical care. I suffer from anxiety and blood pressure issues. The facility should know that I have this condition because I shared this information with officials when I arrived at this facility and I believe it is documented. I require a medication that sounds like Hydroxicin or Hydrozine for anxiety. I also require a medication that sounds like Enalapril for my blood pressure issues. I receive these medications inconsistently. I'll receive it one day and then not for four days and so on. The one I'm supposed to take in the morning, they

sometimes give it to me at 3pm. Hydorxicin is something I'm supposed to get earlier in the day but they give it to me between midnight and 3am. When I don't get medications on time, I feel bad. My blood pressure rises. I can't sleep because of the anxiety.

8. I don't receive timely medical attention here. For example, I have been having diarrhea since about October 24, 2025. I was supposed to receive medication for it, but I was told I couldn't receive it. I'm also concerned because sometimes they will give us different medications than what we are prescribed. We are supposed to fill out a document to request treatment, but our requests are largely ignored. When they do give us medical attention, it will often be five or six days later, and even then it seems to be just be one time or temporarily and then never again.
9. I did see medical staff at what appeared to be a general hospital after I was beaten by officials at this facility on about October 14, 2025. The hospital was about ten minutes away. I was transported to the hospital in an ambulance. I believe I received x rays and body scans. Though my hands feet were cuffed the entire time and a belt held me down, I felt I was treated properly there at the off-site hospital. Both sides of my ribs and my spinal column still hurt from that beating.
10. Since I have been detained at Fort Bliss, I have rarely had outside recreation. Now they only take us out at night in tents that have no opening on the ceiling. I have only seen the sky when I have come out to talk to you about this declaration. I last saw the sky on October 24, 2025. I saw it again today when I came here to complete this declaration.
11. It is difficult to stay clean and maintain hygiene while detained here at Camp East Montana. We do not receive enough hygiene products. Our clothes become dirty without a routine for washing them. We have no way to clip our nails. We must chew on our nails to shorten them.
12. The food here is so bad I hardly want to talk about it. It seems to just be getting worse and worse with time. Just seeing it might make a person vomit. I would not even feed the food we are given to the dog at my house. The food is frozen. When it defrosts, it becomes very liquidy. The food makes me feel sick almost every day. My stomach hurts. I often have diarrhea and sometimes vomit. Others in my unit also seem to be suffering with diarrhea and vomiting from the food.
13. I don't believe there is a law library at this facility. I do not know of any programs, such as religious or educational programs, that people can participate in here.
14. On or about October 14, 2025, I was beaten by guards here at Ft, Bliss. I was asking for the two medications I need, but the guards were not giving it to me. When I tried to get their attention, about six or seven guards started beating on me. They beat me on my ribs and my abdomen and the back of my head. There is still a large mark on my abdomen from it. I was cuffed and the guards started stomping on me until I lost consciousness. I

believe I was taken to the hospital then. After bringing me back, they took me to SHU, which is a punishment cell. I was left in SHU from about Tuesday, October 14, 2025 to about Sunday, October 19, 2025. I was in there for days without the medicine I had been asking for. When I was released on Sunday, I kept asking for my medication. The guards said "no," and when I kept asking them for it, about ten to twelve guards beat me again while I was cuffed. They threw me to the ground and my clothes were torn off me. I was left bruised and bloody. I was in such bad shape that I was taken to the hospital in an ambulance. I was at the hospital for several hours. I believe they scanned my body while I was there. I still have bruises on my arms, legs, and back, and abdomen. It still hurts.

15. After I was beaten for the first time, I was held in solitary confinement from approximately Tuesday, October 14 to Sunday, October 19, 2025. There was a bunk bed in there, but no other furniture. It was about half the size of the attorney visitation room, which fits just three chairs around a small table. They never seemed to shut the lights off in SHU. If I had to use the bathroom, I had to ask the guards. I was not able to shower the whole time I was in there because I was never let out to shower. I had no communication with anyone the entire time I was in there, since I did not have access to a tablet or any other way to communicate. Supposedly there is supposed to be a panel to evaluate the circumstances of our confinement in SHU, but I had no access to it. I had no opportunity to challenge my confinement in SHU. There is also always the risk of retaliation here for trying to ask for our rights to be respected.
16. I am attaching a true and correct image to this declaration depicting the injuries I received from this first beating by the guards
17. On or around November 3, 2025, I again was requesting my medications, which I was not receiving as I should have. There was a medication cart that was coming around, but they did not come to me. I felt awful and felt that I needed the medications. When I asked for the medications, a group of guards came and started beating me. Two of them held me. They pinned me down on the floor. They cuffed me and started hitting me in the ribs. I felt humiliated that I would get beat like that just for requesting my medication. Lately, I've been scared to ask for anything because I'll just get beaten. I feel ostracized, like I am an animal. After they beat me, they again put me in SHU for about four or five days, around the 7th of November.
18. I am attaching another two true and correct images to this declaration depicting the injuries I received from this second beating by the guards.
19. I'm not the only one who has experienced violence and harsh treatment by the guards here. I have witnessed other violence and harsh treatment by the guards toward others. When other detained people ask for things like medicine or food, they have gotten pepper sprayed. When people complain about the conditions here, they get sent to SHU.

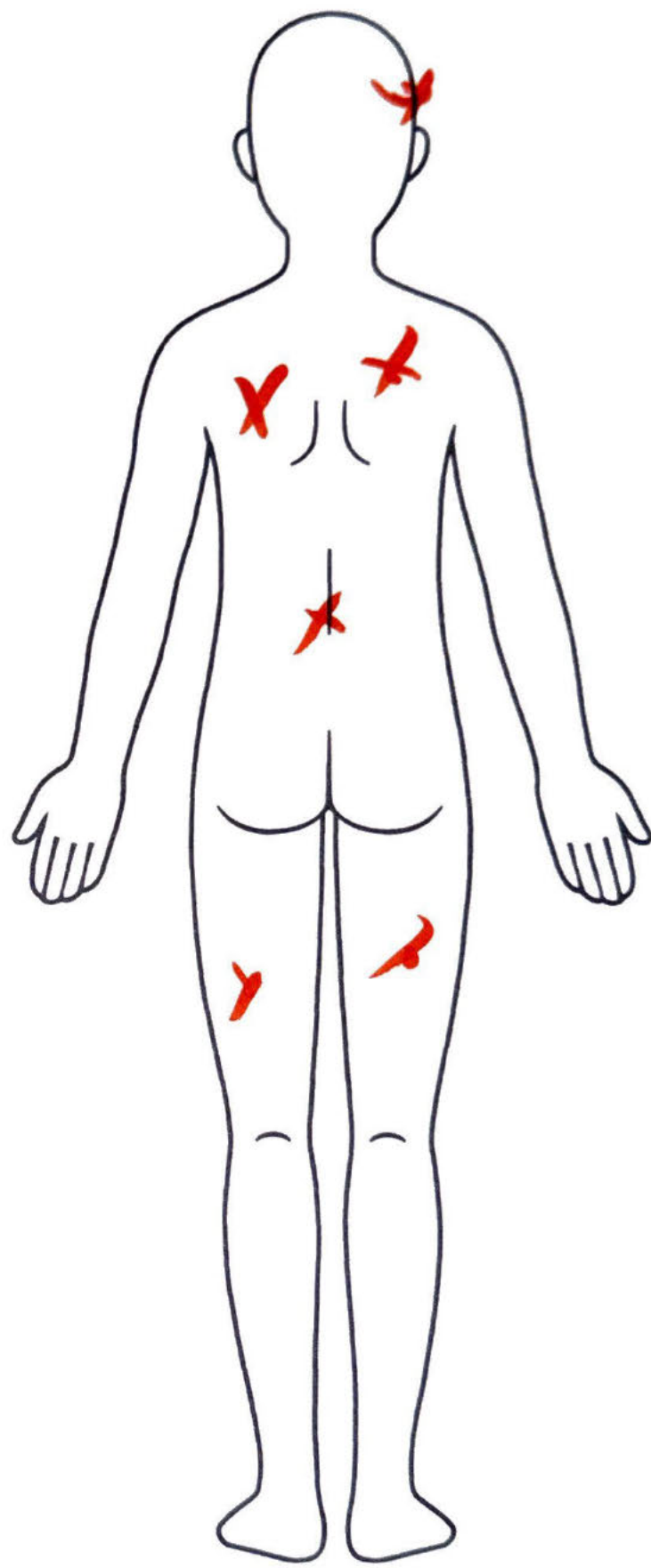
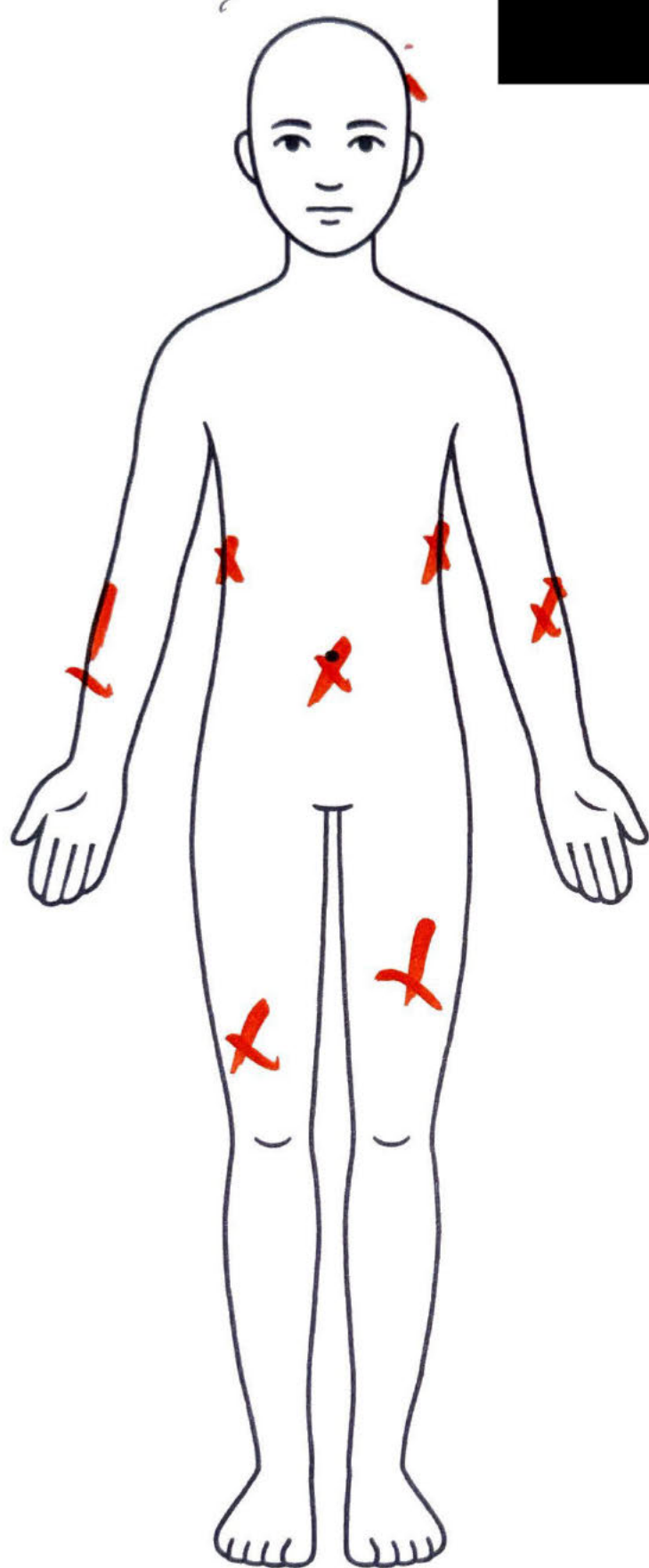
20. On at least two occasions, sometime in around September 2025 and around October 23, 2025, people working at this facility tried to remove me to Mexico. The guards told me me "We're going to show you your family," but I never saw my family or had a chance to call them. Instead, they tried to remove me from the United States to Mexico. I am Cuban, and do not want to be sent to Mexico. I am scared to go to Mexico. I have never been there. I would fear for my life there.
21. On both occasions, which were around midday on both days, they put me and several other detainees in a truck to a place called St. Teresa. It takes about two hours from the detention center to get to St. Teresa. The first time, in September, there were about 24 to 25 people in the truck with me. On around October 23, 2025, there were about twelve other people with me in the truck: 10 Cubans and 2 Nicaraguans. The guards cuffed our wrists and ankles while we were in the truck. The people who put us on the truck and transported us worked at the detention center, but there were also masked people there when we got near the border wall. I don't think these masked people were from the detention center. They wore black masks with just one large eye hole. There was also one ICE representative. That person did not have his face masked.
22. When the guards took us out of the truck, they replaced the metal cuffs with plastic ones and then told us to jump over into Mexico. They told me they were going to charge me with federal crimes and I would never get out of this detention center if I did not jump. The masked people sometimes beat on people to get them to jump the wall even if they don't want to. I have seen other people get beaten up and forced to jump. But I did not jump. I do not want to be deported to Mexico. A lot of people, however, did end up jumping.
23. Yesterday, an attorney had a legal visit scheduled with me. I know this because she told me she scheduled a legal visit with me. No one told me I had a legal visit scheduled or that an attorney was here to visit with me. I was not asked to go out to a legal visit. I would ^{not} want to turn down a legal visit.
24. Whenever I am allowed to leave this place, I will be leaving it with a great deal of trauma from my experience here.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

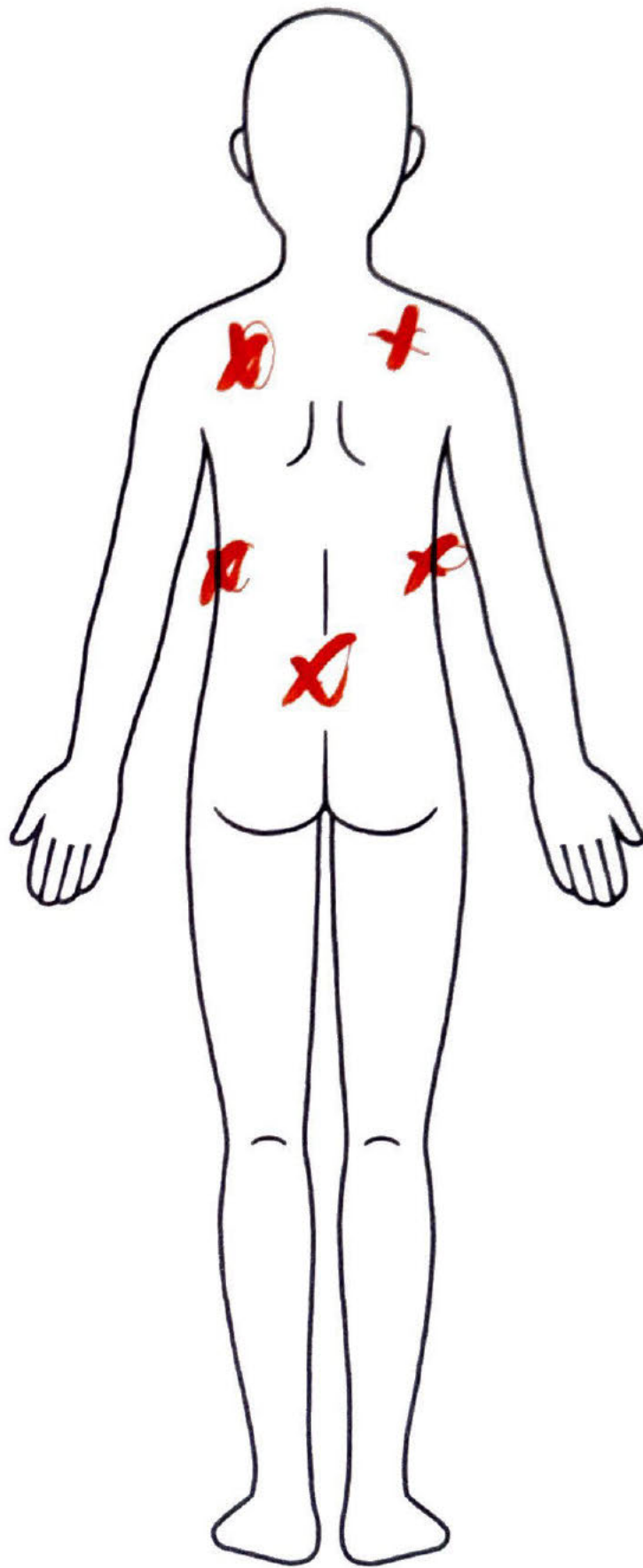
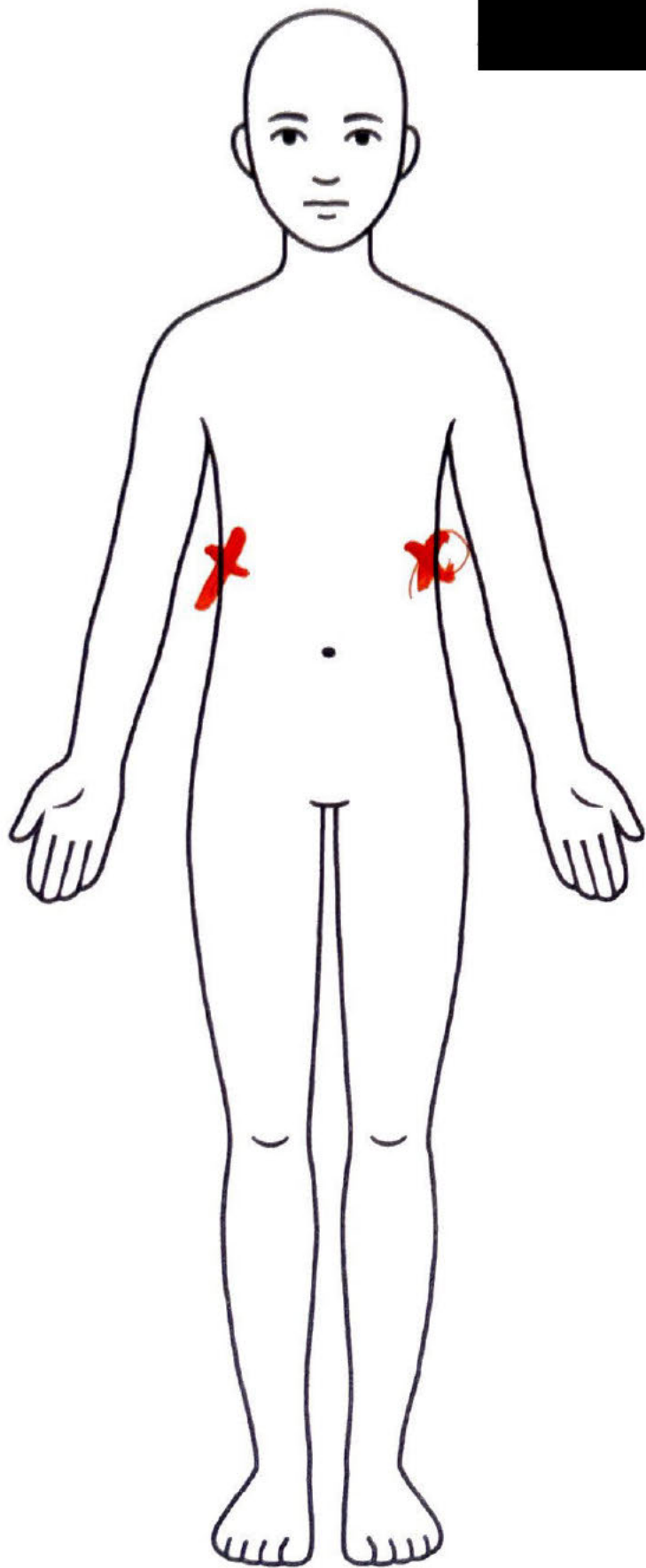
Executed on the [REDACTED]th of November, 2025 in El Paso, Texas.

Signature: [REDACTED]

Me golpearon este día 10 / [redacted] / 2025



Mo golpłaka este dla 11/11/2022



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On November [REDACTED] 2025,

I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately.

[REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED]

Date: 11- [REDACTED] -2025

NAME: [REDACTED]

EXHIBIT E

"Samuel"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 19 years old and from Venezuela. [REDACTED] is a pseudonym I am using for this declaration.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 20, 2025.
4. Before I was detained by ICE, I lived in Chicago, Illinois with my mom and my two younger siblings. I was studying and working there. Sadly, my mom died approximately four months ago from cancer. My father had abandoned me.
5. At Fort Bliss, I am held in the Bravo 2 unit. There are about 71 or 72 beds here. I was in unit Charlie 9 before. In my unit, Bravo 2 there are bunk beds throughout the room with five tables in the middle area where we eat. I spend approximately 24 hours a day in the dormitory each day.
6. Since I have been detained at Fort Bliss, I have rarely had outside recreation.
7. Since I have been detained at Fort Bliss, I have faced many problems with medical and dental care. I did not have an intake exam when I arrived here. I have had issues with my molars, such as my gums bleeding, and there is no dentist here. I have made about ten complaints about molar pain, migraines, stomach issues, depression, and anxiety. The doctor I saw on or about October 12, 2025, which was after I made those complaints, gave me a Tylenol and sent me away. I received nothing else. That appointment was not private.
8. It is difficult to stay clean and maintain hygiene while detained at Camp East Montana. We do not have soap to wash our hands or bodies.
9. The food is horrible and causes me to have diarrhea, gas, and acid reflux. For that reason, I usually just eat one meal a day.
10. Other people have problems with the food here. I know five to eight people who have had diarrhea, gas, and stomach aches because of the food.
11. There is no law library here that I know about.

12. We have electronic tablets here, however there is one tablet for every four people that we can use for limited times during the day. It's not clear how to access things like legal information on it, if there is a way to access it on the electronic tablets at all.
13. On or around October 17, 2025, I turned off a light on the way to the yard. That is what triggered an altercation with an officer who spoke Spanish. The officer started insulting me, and I sat down on the floor. After that, he called the second officer who came and they had an exchange in English that I did not understand. Then both of them tried to cuff me. I didn't know why they were trying to cuff me. Then the rest of the officers started piling onto me and using their bodies to block the security camera. Blocking the camera with their bodies is a tactic I have seen them do before with other detained people. Then, the officers body-slammed me and started to beat me. My front right tooth broke from the force of being slammed to the ground. Then, even more officers came. One of the officers grabbed my testicles and firmly crushed them. An officer forced his fingers deep into my ears. Since then, I have had a lot of trouble hearing out of my left ear. I can't hear as well now. After cuffing me, the officers pulled my fingers back very painfully, almost to the point that it felt like my fingers might break. The officers continued beating me. An officer then started punching into the side and front of my mouth at which point I bit down on it. I was in so much pain and I still have marks from the incident on my body.
14. I am attaching a true and correct copy of a drawing on which I marked using red marker to show the places where I believe the guards hurt me on or around October 17, 2025 as described in part in the previous paragraph. I made the markings on November 13, 2025. The drawing shows my injuries and areas of pain from the incident, which include: scratch marks from guards scratching me near my collarbone, bruising on the left side of my neck from the beating, pain in my fingers from guards pulling them back, pain near my legs and ribs from the guards kneeling and punching me. Pain around my testicles from the guards crushing them.
15. After a while, the officers stopped beating me. Then an officer held me up against the wall. I was dizzy and fighting to remain conscious. An officer started laughing at me quite a bit and making fun of the fact that I had chipped my tooth when I had been slammed to the ground. The guard told me I was like a little girl. Then, I believe three guards took me to the medical tent. My consciousness faded in the medical tent. When I regained consciousness, I was in an ambulance on the way to the hospital.
16. At the hospital, the medical staff gave me an IV drip and checked for broken bones. They told me that the guards had told them that the reason I was in the hospital is because I had gotten in a fight with other detained people. The medical staff gave me some sort of muscle relaxant. At that point, I had bruising on my back, chest, legs, and other injuries. My face was swollen and I had pain in my jaw. I couldn't really chew for a

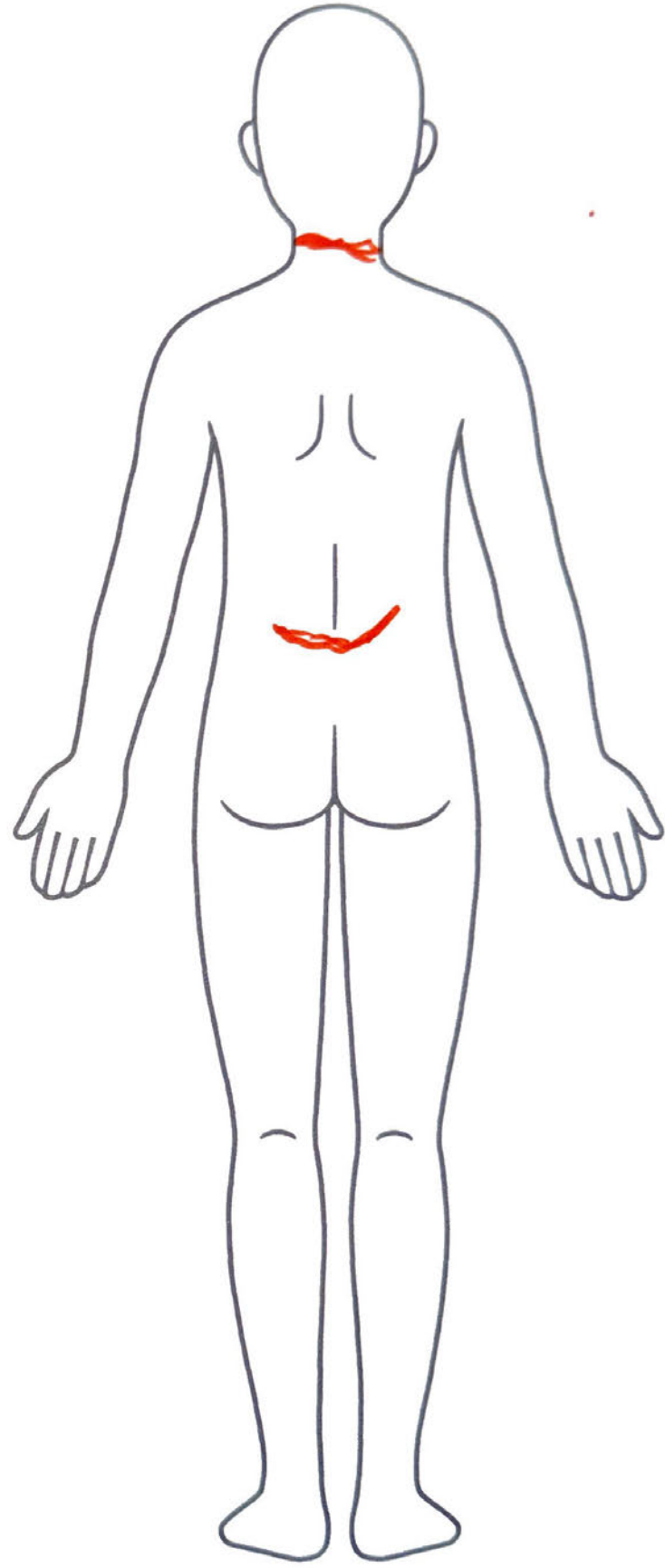
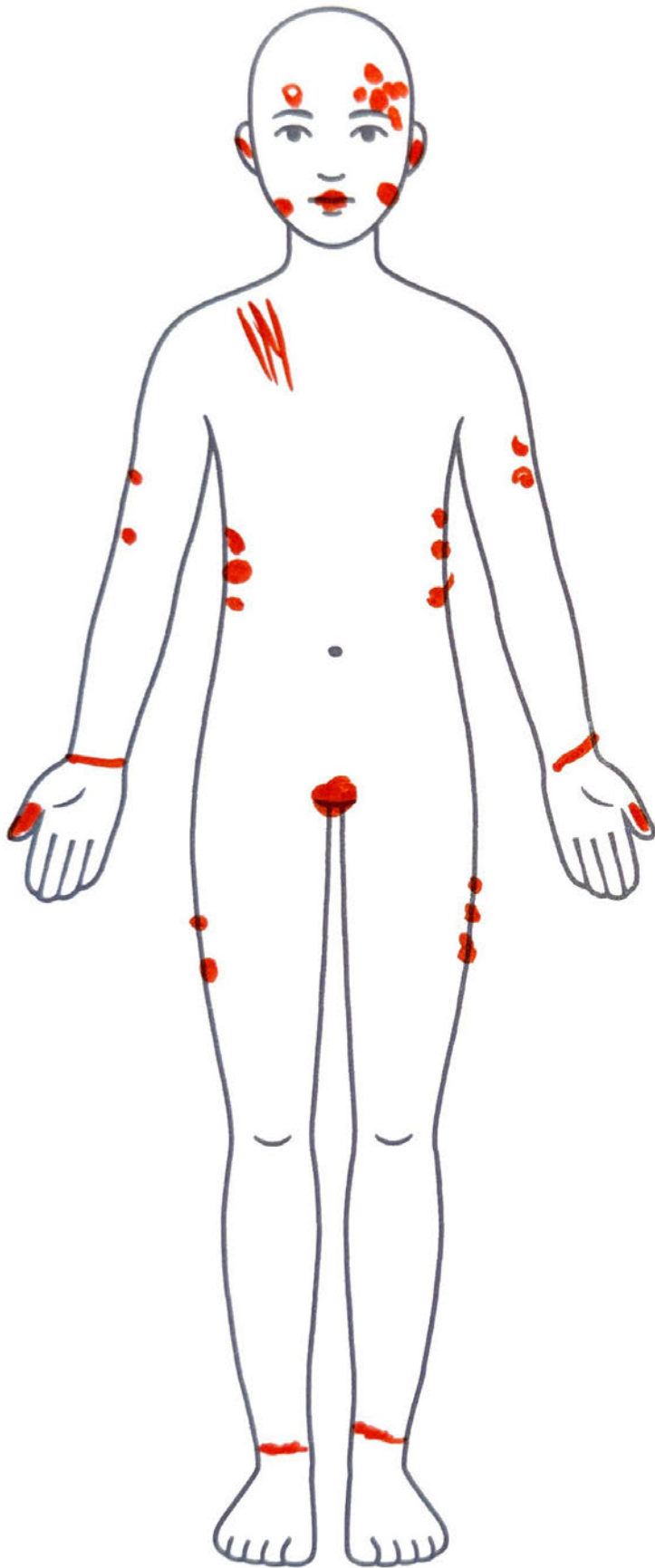
while. I also suffered ear damage and reddening around my ear. I was at the hospital from about 6:30 pm to 2 am.

17. After bringing me back from the hospital, the officers put me directly in SHU, also known as "the hole," or solitary confinement. It is also called a "center for discipline". I was kept there in isolation for about eight days without contact with anyone, even my lawyers, who I learned later were requesting calls with me. SHU is a small room with a bed and a toilet. It was intolerably cold. I had a hard time sleeping because of how cold it was. The blanket itched me rather than providing me with comfort. It needled and stung me when I put it around myself. The fabric would let out a lot of dust and some sort of residue because of the material it was constructed with. The toilet in SHU was already dirty when I got there. The water pressure would fluctuate. Sometimes the toilet bowl contents wouldn't go down and other times they would. There were times when the feces remained in the bowl and would not flush and I had to wait for the guards to come repair it.
18. I didn't see the sky for the entire time I was in SHU. For the two weeks prior to going in there I hadn't seen the sky at all and then I also didn't see the sky for the whole time I was in there. I felt really sad about that. I felt like going outside could help my stress and anxiety. The guards would let me shower, but it would be at strange hours like 1AM or 2AM.
19. I experienced migraines and a feeling of deafness in my left ear while I was in SHU and suffered from serious depression and anxiety. I am still feeling these things now. For example, I can only hear a little bit out of my left ear now.
20. I'm currently in SHU again. I've been in here since on or around November 6, 2025. The guards tell me I can appeal being in SHU, but they do not tell me how I can appeal it. I was supposed to be there for five days, but on or around the fifth day a guard came to tell me that I was going to be left in the SHU for eleven more days. They told me this was to learn my lesson.
21. I feel overwhelmed and desperate here. I've never been locked up like this and my feelings of sadness got worse with my mom passing away. I'm just trying to carry myself through this situation.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the _____^{NOVEMBER}th of _____, 2025 in El Paso, Texas.

Signature: _____



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish.

On November [REDACTED] 2025, I personally spoke with [REDACTED] and

read the foregoing declaration to him, translated into Spanish faithfully and

accurately. [REDACTED] affirmed that s/he understood my translation and that the

information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed
NAME

[REDACTED]

Date: 11 [REDACTED] 2025

EXHIBIT F

"Noah"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

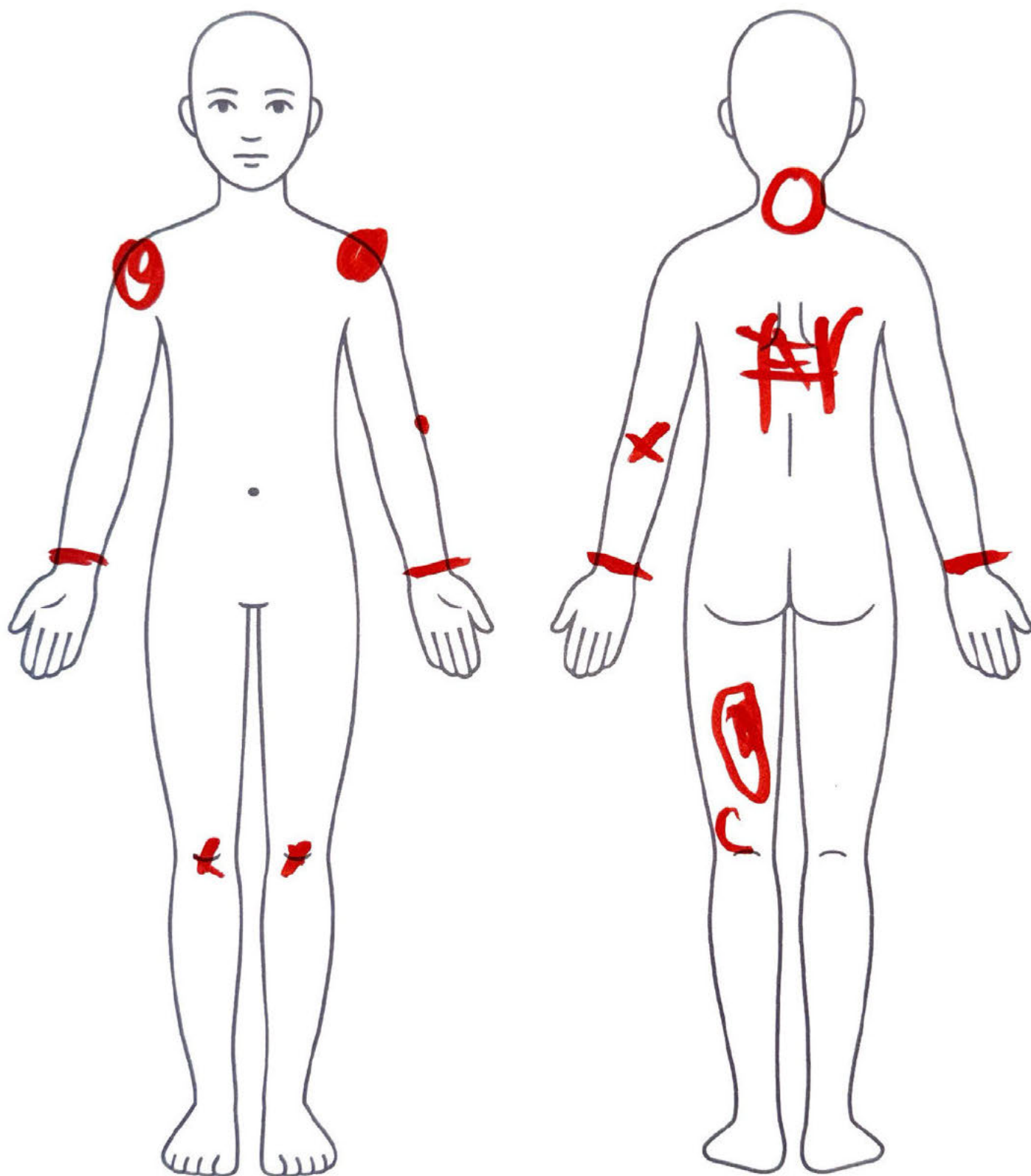
1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 32 years old and from Venezuela.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about October 5, 2025 and then I was processed on October 7, 2025, which is the date it says on my bracelet. I arrived here on or about a Tuesday morning. We were put in a cold room for 2 days with about 40 of us in it. We had to sleep on the floor with a sheet that looks like an aluminum paper. They only gave us small sandwich bags with very little food. I came here with my documents, including my ICE papers, but they will not give them to me or tell me where they are. It feels important to me to have my ICE papers because those are the only documents I have that identify me. I have tried to talk to supervisors and captains about my papers, but I still have not received them. I have asked them multiple times and whenever I ask, they just tell me my things are elsewhere.
4. I am now in the Charlie-8 unit. The conditions are always dirty there. It is dusty. Some people have had COVID and then they will quarantine us. I have very bad allergies here. I am always sniffing, my eyes run, and there are secretions from my ears. My chest hurts and I can't breathe through my nose.
5. Ever since I got here, I have been asking for medicine for my allergies. I continue to be suffering from allergies. I am supposed to receive allergy medication every day. However, today is Thursday and I have not received allergy medication since Sunday. My throat has been hurting and I have had chest pain.
6. The treatment here is cruel and they the guards treat us poorly. They don't value our rights here. I tried to talk to the guards, but they don't pay attention.
7. Approximately two weeks ago, as a result of the conditions here, in particular not having the opportunity to meet with ICE representatives, we decided to hunger strike to try to get our rights met. It was important for me to meet with ICE representatives for two reasons. First, I want to know about my possessions and second because I have already seen a judge and I have an order of deportation, so I do not understand why I am still here. The hunger strike lasted about 5 days to the point that some people became weak.

8. During my hunger strike, there was a time when I was asking for medication to treat my allergies. Some of the other people I am detained with were screaming out for help. There were three or four guards there at first. One of the guards called others and approximately 30 or 40 guards came. Those guards started cuffing us and threw us against the floor. My arms and legs hurt when I was thrown to the ground while cuffed with my hands behind my back. Even though I was not resisting, I got very hurt by the guards. Guards put their knees behind my neck and pressed down on my neck.
9. Attached is a true and correct copy of a drawing where I added red marks with a marker to show the places on my body where I was hurt by the guards approximately two weeks ago. I drew this on November 13, 2025.
10. During that same incident, I saw a guard beat and punch someone I am detained with in the face. That person was bleeding profusely from his face. Guards took that person away and after that I never saw him again.
11. Right after that, they started grabbing us one by one and started taking us away. There were about ten of us who they took away and put in separate rooms. These rooms were called "the hole" or solitary confinement. We were each alone in the hole. While in the hole, I was just lying down, staring at the ceiling, wondering when I would get out. I was still on hunger strike then. I did not know when I was going to be let out and I did not know of any process to review my placement in the hole. I was in there for one day.
12. The first few days after the incident where I was pushed to the ground, my arms, my legs, and the back of my neck hurt. I still have at least one mark on my left elbow area from the injuries I received from being pushed onto the ground.
13. I don't cry easily, but I cried after the incident because I felt so powerless in that situation. We are not dogs here, but we are treated like dogs. When we ask for things, even basic things like medicine, the guards treat us so harshly.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the 13th of November, 2025 in El Paso, Texas.

Signature: _____



Hace 35 Días los guardias nos agredieron

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On November [REDACTED] 2025, I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:

NAME:

Date: 11/ [REDACTED] /2025

EXHIBIT G

"German"

DECLARATION OF [REDACTED]

1. [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] am 33 years old and from Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 5, 2025.
4. Before I was detained by ICE, I was in Kentucky staying with my father for approximately a month, even though I was based in Miami, Florida. For work, I drove vans for an internet cabling business.
5. At Fort Bliss, I am held in Unit D-1. It is a tent with approximately 72 beds. Most of the beds are occupied. The tent I am in is dirty. We try to request cleaning products to clean it ourselves, but we are denied cleaning products. The showers leak all the way into the area where we eat. There is supposed to be a small barrier between the showers and other parts of the tent, but water leaks from under it into the area where we eat. The floor pallets in the shower emit a horrendous smell because water seeps through them and that same water goes into the eating area. Since we are not given anything to mop up the dirty water, we have to use our own underwear and socks to wipe up the water. We also sometimes use towels from formerly detained people who were moved or deported to mop up the water.
6. People here don't seem to be getting the medical care they need. For example, there was a man in my unit who seemed to be in his sixties. He had high blood pressure and often complained that he was not feeling well. He kept asking for medical attention, which he did not receive. His condition got so bad that he fainted, fell face down on the floor, and it looked like he broke his nose. He was bleeding profusely because of the fall and broken nose. When we tried to get the guards' attention, they did not come. When the guards finally came to give out our meal, they ignored the man who was still on the ground in a puddle of his own blood. They left the man's meal on his bed.
7. In terms of mental health, there seem to be a lot of people here struggling with anxiety and depression. I heard someone from Unit Alpha 8 was suffering from anxiety and depression and deeply missing his mother. He did not want to be deported to Mexico and killed. He would bang on the door loudly and repeatedly. I do not know if his cries were


answered. I lost contact with him because our vest colors are different and a new policy here seems to require separating us by vest colors.


8. Since I have been detained at Fort Bliss, I have rarely had outside recreation. I have not seen the sun for approximately one month. Officials have only been taking us out at night. Usually over fifteen days pass before we are taken outside at all. We have a calendar that says that we are supposed to be taken outside routinely, but the guards do not pay attention to it. We have to beg to be able to go outside.
9. It is difficult to stay clean and maintain hygiene while detained at Ft. Bliss. Right now, no one seems to have any hygiene products like toothpaste, soap, or shampoo. Even when shampoo is handed out, we are given only 15-20 one-time use packets for all of the approximately 72 people in the unit. This leads to people fighting for access to basic necessities. In addition, we are told to put the clothing in the laundry area, but people rarely come to do our laundry, so we have to re-wear the clothes we put in the laundry area. Often, when the guards pick up the laundry, they don't bring it back, so people do not have clean clothes to wear.
10. There is not enough food for everyone and the meal times are irregular. The food is very bad. It is some sort of unpleasant stew that does not seem to be in edible condition. We sometimes throw the food away because of this. When we try to complain about how bad the food is, there is usually no response.
11. There is one electronic tablet per four to five people here, which we all use for phone calls. It seems to only work in the morning. I have a child in Cuba and it costs a dollar per minute to be able to talk with him and try to maintain a connection with him. The tablets haven't had connection for approximately this whole week, so they are unusable. Even when the tablets have worked previously, signal on the tablet seems to stop working after noon.
12. I do not know of any law library here or any other way for us to access books or other legal materials.
13. I was placed in solitary confinement for approximately one day approximately a month ago when I was still in unit Alpha-8. I was placed there for protesting the inhumane conditions at this facility, such as the inedible food. Two other people and I were cuffed with metal cuffs placed over the plastic ones. We were slammed against the wall, and put into SHU. The side of my head was injured from being slammed against the wall. I had to bang on the cell asking for my painful cuffs to be taken off, which they finally were after two to three hours in SHU. My wrists and ankles got hurt from the cuffs.
14. There was no bed or furniture in solitary confinement. There was only the hard floor and a toilet. You have to advocate for yourself to even get an aluminum blanket. It felt freezing in there and I was very cold, sleeping on the floor. The air was pumping directly

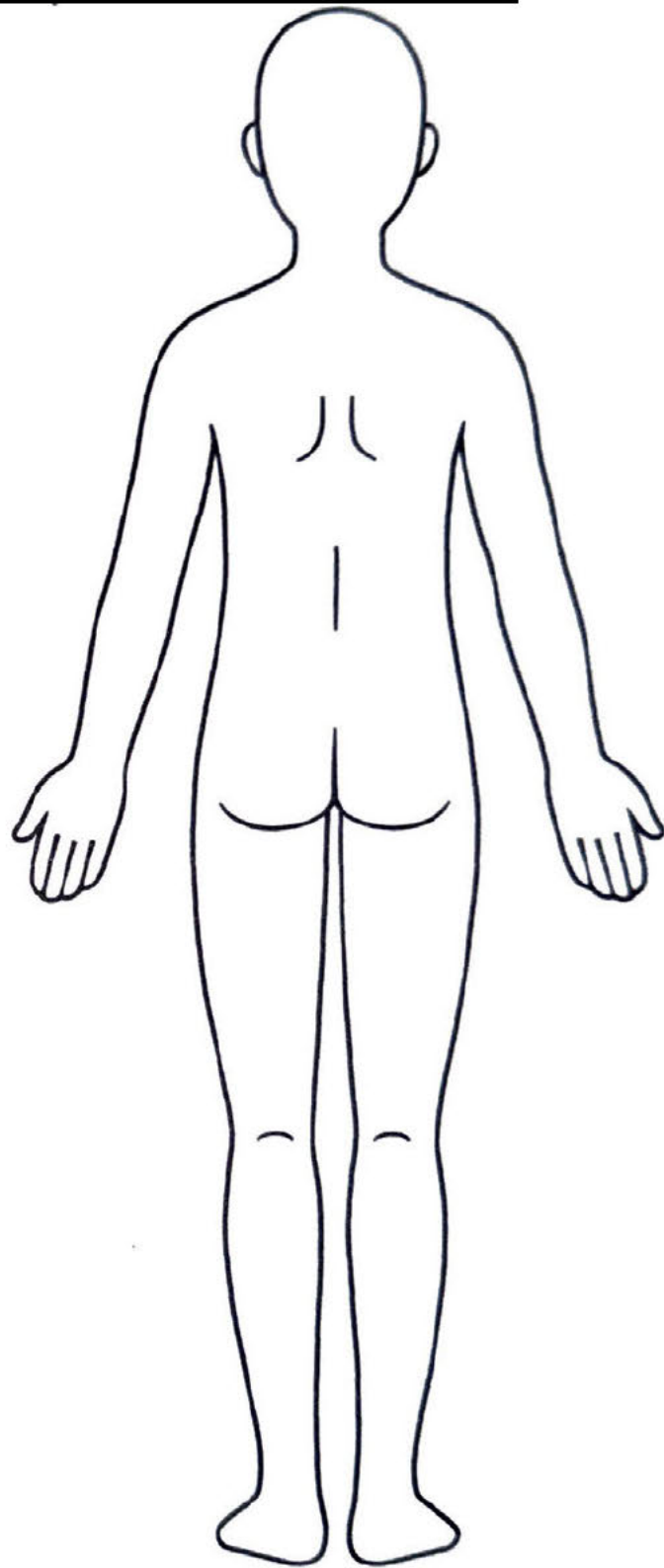
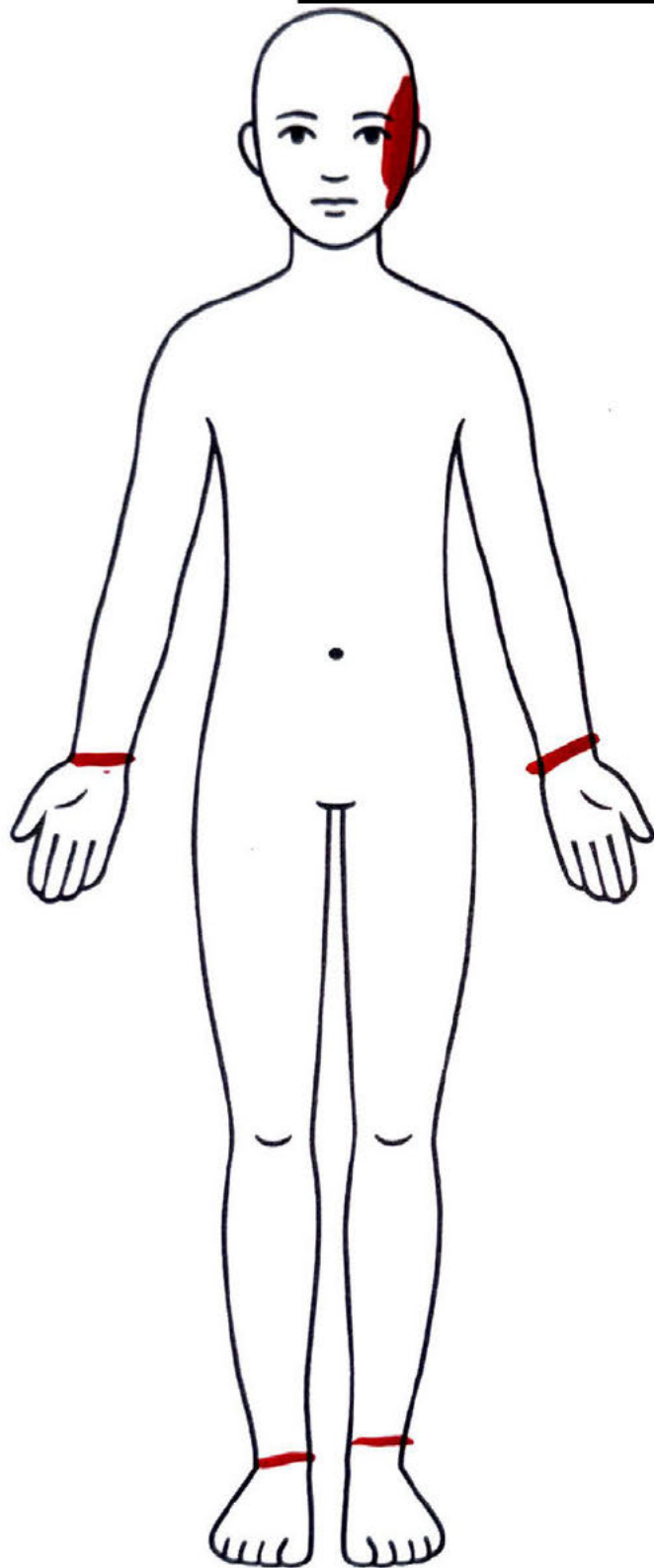
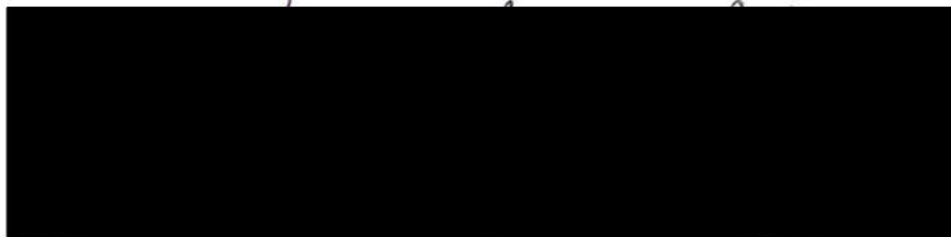
and aggressively in the area. It was a very small area with just enough space for one person. In SHU, I was given three small sandwiches three times a day without a schedule.

15. Officials here have tried to take me to Mexico twice. The first time was about a month ago when I was in unit Alpha-8 and the second time was about a week later when I was still in unit Alpha-8. They called for me in my unit and gave me my belongings. They asked me to sign papers that I think were voluntary deportation papers. I told them I don't want to sign those. They asked me if I want to go to Mexico. I told them I do not want to. They told me they were going to put me on a bus to Mexico and if I didn't get off the bus at the border that all I would do is stay here. They said once I got on the bus to the border, a second bus would take me to Mexico. I refused to go anywhere, so they did not put me on the bus. The second time, officials put me in a small room without giving me my belongings and asked me to sign papers that I think were voluntary deportation papers. The people who signed the papers were segregated to one side and those who did not sign were segregated to another. I wasn't taken to the border because I did not sign the forms.
16. I have never been in a situation like the one at Camp East Montana and I never expected to be in one. The conditions are so horrible here that everyone thought this place would be shut down, but it hasn't happened yet. I am worried and stressed all the time here. I am hopeful that I will not be here forever.
17. Attached is a true and correct copy of a picture I drew on of the injuries I sustained when I was placed in SHU. I added the red markings to the image of the body to indicate where I was hurt.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the th of November, 2025 in El Paso, Texas.

Signature: 



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On 11- [REDACTED] -2025,

I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately.

[REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:

[REDACTED]

Date:

11- [REDACTED] -2025

NAME:

[REDACTED]

EXHIBIT H

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 32 years old, and my country of origin is Colombia. My date of birth is [REDACTED]. I am married, my wife lives in the Dallas, Texas, we have a two-year-old daughter who was born in the United States. While living in Dallas, I worked as a butcher.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 15, 2025.
4. At Camp East Montana, I am held in Unit Charlie. There are about 72 beds in the tent I am held in. Most of those beds are now filled.
5. The unit is not clean and we are usually not given cleaning supplies. Dust comes in through holes in the vents, many people develop allergies or cough. In my two months in Unit Charlie, the unit has been cleaned twice and the cleaning only consisted of sweeping the area. I, along with other people in my unit, have to ask for brooms and mops so we can clean. In my previous unit, Unit Alpha, there were flies and other insects. It was disgusting and the personnel did not clean the tent. It was always dusty.
6. **Food.** We receive very little food and it is generally bad, I do not think it is fit for human consumption. We get three meals per day, but the portions are kid-sized and not enough for adults. Many people throw away their food because it is undercooked, frozen or dry. The food has no salt, even for people without dietary restrictions. When I first arrived, we received snacks between meals, such as cookies, crackers, or juice. The snack program was recently cut. We no longer receive anything between meals which forces us to go hungry between the very small meals we receive.
7. **Medical Care.** I injured my knee and requested medical attention. I was taken to the doctor. They took x-rays and gave me pain medication. I used to receive daily pain medication for my injury, but I have not received it for about five days. My knee still aches and I worry the injury will get worse.
8. My entire unit was placed in isolation for fifteen days because two people had COVID-19. Those two people were removed from the unit. The rest of us were not allowed

recreation or visits. We were not tested for COVID. Some people had symptoms. I had a sore throat but did not receive treatment. The guards did not wear masks or take precautions, they also did not provide others with masks to prevent the spread of COVID.

9. **Recreation.** I rarely have recreation time. There is a schedule, but the guards do not ever follow it. We are supposed to have recreation five times per week for one hour. In reality, we go outside two or three times per week. The time varies depending on the guards. Recreation in Unit Charlie takes place in a small covered area. We cannot see the sun. When I was in Unit Alpha, there was a small outdoor area shared with Unit Bravo. I received recreation twice per week there.
10. **Hygiene and Cleanliness.** It is difficult to stay clean while detained here. We do not receive enough hygiene products. We receive small bottles of shampoo and toothpaste daily. For the past fifteen days we have not received any toothpaste. We used to receive disposable toothbrushes but were recently told to keep the toothbrushes because they stopped handing them out.
11. **Laundry** is unreliable and clothes are often lost. There are two laundry days; one is for uniforms and one is for bedding. Bedding laundry is mandatory. The staff often mixes items or returns them to the wrong people which makes people think twice before sending their items off to be washed.
12. The toilets do not have disinfectant and they always smell like urine and feces. They are always dirty. There is dust everywhere. There are five showers, but two are out of service because they leak into the entire unit.
13. **Library and Activities.** I do not believe there is a law library here. I do not know of any religious, educational, or other programs that people can participate in.
14. **Legal Access.** There is no clear way to contact an attorney and I cannot use video calls to contact my family. I use the tablet to call my family, but the wait is extremely long because we have to share very few tablets among 72 people. Sometimes I wait up to two hours to make a call. Calls cost about one dollar for fifteen minutes.
15. The tablets have information about the facility. You can pay to watch movies or listen to music. I believe movies cost about two or three dollars. There is a television in the unit. We can change the channel. The guards control the lights. The lights turn on at six in the morning and turn off around ten at night. There is a list of pro bono providers and consulates.
16. **Treatment by Guards.** The guards are not usually violent, but their supervisors are. I have witnessed beatings on multiple occasions. Three days ago, there was a fight in the

unit. A guard stepped in and de-escalated the situation. In most cases if a fight breaks out, guards do nothing and wait for supervisors to arrive. When supervisors arrive, they beat anyone they can get their hands on, even if they are not involved.

17. For example, in Unit Alpha there was a Colombian man in his thirties who had an injured ankle. He was sitting on a shared table. He had trouble standing when the guards tried to move the table. They beat him, stepped on his ankle, and made the injury worse. They placed him in isolation and later took him to a hospital.
18. About one month ago, fifteen people refused to eat because the turkey was undercooked. The guards pressured everyone to eat and the people refused. The captain threatened to call the anti-disturbance forces to beat them.

Everything in this declaration is true and correct to the best of my knowledge and recollection.
This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the th of Nov, 2025 in El Paso, Texas.

Signature:

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/ [REDACTED] 25, I personally spoke with [REDACTED] read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:

NAME:

[REDACTED]

Date: 11/ [REDACTED] 2025

EXHIBIT I

"Gershon"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 24 years old and from Mali.
3. I was previously detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I was detained there from on or about September 6, 2025 until on or about November 15, 2025.
4. Before I was detained, I lived in New York with my U.S. citizen fiancée. I was taking exams to obtain my General Educational Development (GED) certificate. In March 2025, I received my work permit and began working as an Uber driver.
5. On June 27, 2025, I was arrested while leaving the immigration court in New York after attending my Master Calendar hearing. I asked the officers why they were arresting me and they responded that I came to the U.S. illegally, and the new administration wants immigrants out of this country.
6. After I was arrested, I was detained at Manhattan Federal Plaza for two days. Then, I was detained at the Delaney Hall Detention Facility in New Jersey for about two months and a detention center in Louisiana for one night.
7. On or about September 6, 2025, officers put chains on my legs and hands and put me on a plane to Fort Bliss.
8. At Fort Bliss, I was deprived of adequate medical care, sufficient food, and basic hygiene items.
9. I suffer from Post-Traumatic Stress Disorder, Depression, and Anxiety because I was enslaved in my home country for being a member of a lower ethnic class.
10. For treatment, I take Lexapro as an antidepressant, Hydroxyzine to help me sleep, Propranolol for anxiety, and Prazosin for nightmares.
11. More than ten times, Fort Bliss did not give me my medication at all. If they did bring me my medication, they often brought it late. When I asked the nurse why this happened, she responded that the officers hadn't told her I needed my medicine.
12. When the facility didn't bring me my medication or brought it late, my Depression and nightmares got worse. When I was deprived of my medicine, I either could not fall asleep or I slept all day.
13. I requested medical appointments with a psychologist to inform them of these issues. I requested to speak with a psychologist five times. Only after my sixth request, a psychologist met with me. I told the psychologist that the facility wasn't giving me my medicine and if they did, was giving

it to me late. The psychologist said there was nothing she could do.

14. The food they gave us was about the size of your fist. The food often ran out because the guards wouldn't control the food. For example, they would allow people to get seconds before everyone had received a single serving.
15. When the food ran out, I would have to wait four or five hours for the next meal. This meant that I would only eat two meals a day. There were four times when I only ate two meals a day.
16. I was jumped by four detainees because of disputes over the food. The guards did not bring special diet foods that day for the detainees with dietary restrictions. One of the detainees said that no one could eat until the special diet food was brought. I stayed in line and the detainee told me to shut up. I told him the same and in response, he and three other detainees jumped me. They punched me on the mouth and back, and they kicked my legs. My lips became swollen and started to bleed.
17. The whole time the detainees jumped me, the guards watched and did nothing.
18. There is no soap in Fort Bliss. Sometimes, the guards did not provide us toothbrushes or shampoo. The longest I had to go without a toothbrush was four days. The longest I had to go without shampoo was five days.
19. We were supposed to be taken outside five times a week for one hour a day but the guards never followed this schedule.
20. Once I went without seeing the sun for two weeks. Sometimes, we wouldn't be taken outside for ten days.
21. The tablets at Fort Bliss were the only way we could call our families, but there were technological issues with the tablets every day. Sometimes, I would try calling my family for one or two hours but I would only be able to speak with them for fifteen minutes because of connection issues. When I did reach them, they often could not hear me.
22. We told the guards about this issue one to two times a week. The guards said that they would fix it but they never did.
23. I sometimes felt suicidal at Fort Bliss because of the bad conditions: because I had to fight to get enough food, because the tablet wasn't working and I couldn't speak with my family. I started feeling down and down and down. I had thoughts of ending my life but I never acted on it.
24. My detention has felt traumatizing to me. I thought I was doing the best thing by going to immigration court. Instead, they arrested me and sent me here.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in English, a language in which I am fluent.

Executed on the [REDACTED] nd of December 2025 in El Paso, Texas.

Signature: _____

[REDACTED]

EXHIBIT J

"Maria"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct. I make this declaration based on my own personal knowledge.

1. My name is [REDACTED] is a pseudonym I am using for this declaration. I am 28 years old and from Honduras.
2. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 30, 2025.
3. Before I was detained, I was living in Houston with my partner. I worked in a salon there. I liked working there; my boss there treated me like I was her own daughter.
4. At Fort Bliss, I was held in the C-5 unit. In my unit, there were approximately 66 people. The bathrooms were nasty. There was no toilet brush to clean with. There were stains and residue from excrement and urine all over the inside of the toilet bowl. We only received supplies for the bathroom once about every 15 days or once a month. The sinks where we wash our hands were also dirty. The water flooded out from the shower area. It flooded until it reached the entrance of the tent. The flooding got to the area where we were supposed to eat. There was a little wall near the bathroom area, but the water still passed under that wall.
5. I'm having a tough time here. As a trans woman, I am not respected. The detained individuals and guards treat me like a joke. I am housed with men even though I identify as a woman. The guards tell me my only other option would be protective custody. They tell me I should think twice before opting for protective custody because I wouldn't be allowed to shower, I'd get a smaller portion of food, and there would be no bed so I'd have to sleep on the floor. Just thinking about those conditions made me feel depressed. I don't like having to live with men, but the description of protective custody here scared me.
6. When I was transferred to Fort Bliss, I arrived on a plane from Florida. There seemed to be approximately 100 people on the plane. At first, they were going to put me with the women, but then they ended up putting me with the men. I was in the processing area with the women for approximately 25 minutes before being moved to the area with men. At that time, I told the people at intake that I take a medication called something like Mirtazapine for depression. It took them about a week and a half for them to give me the medication. When I don't receive my medication, I want to cry on a daily basis. I also lose my appetite and have pain in my back.
7. When I first got to the unit, the guards did not give me clothing. For the first fifteen days, I had to wear the clothes I came in from Miami. It was disgusting to have to keep wearing

those clothes for so long. After that, they only gave me one shirt, two pairs of pants, and one tank top.

8. As much as I tell the guards here that I am trans and my name is A.P., they keep calling me by my legal name.
9. The food is awful at Ft. Bliss. It is freezer food that looks very ugly and comes out spoiled. I have gotten sick from the food with diarrhea and stomach aches.
10. If you report that you want to go to the doctor, the guards tell you to sign a list of people, but they won't attend to you on that list for approximately 1-2 weeks after you put your name on it. The guards seem to have to see you lying on the floor before giving you the attention they need. I have seen people lying on the floor before receiving treatment.
11. I do not know how to request confidential visits with my attorney. I've seen my attorneys on screens, but I do not know if the area I am in when I meet with them is confidential.
12. There is no law library here. There are also no educational programs or anything like that for me to participate in.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11 [REDACTED] / 25, I personally spoke with [REDACTED] and read the foregoing declaration to her, translated into Spanish faithfully and accurately. [REDACTED] affirmed that she understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED]'s detention and the virtual nature of this visit, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, [REDACTED] also gave me verbal consent to sign on her behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED] [REDACTED] Date: 11 [REDACTED] 2025

NAME: [REDACTED]

EXHIBIT K

"Frank"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 52 years old, however, my bracelet says I am 50. I am from Mexico.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 27, 2025.
4. Before I was detained by ICE, I lived in Florida for 24 years with my wife. I worked in construction during my time in Florida.
5. At Fort Bliss, I am held in Unit C-11.
6. I am held in a unit with approximately 72 people. People sleep in bunk beds. We share a bathroom, and the bathroom is inside the unit. The unit is very dirty. The bathrooms are never cleaned by staff, and we are not given regular access to cleaning supplies. I have had to request brooms or supplies and clean the bathrooms with other detainees. We do not have soap so we clean our unit using water.
7. **Medical and Dental Care.** Since I have been detained at Fort Bliss, I have experienced serious problems with medical care. I was pre-diabetic before arriving, but I am now a diabetic. The facility is aware of my condition and of my prescriptions because I informed them at processing and have made repeated requests to see a doctor and get medication during my time here. I have been able to see a nurse at Ft. Bliss who prescribed me two medications: one for my blood sugar (500mg) and another for my blood pressure (20mg). However, there are serious delays in the distribution of my medication. For instance, upon arriving there was a one month delay in the provision of my medication. As a result, I had to rely on my leftover medication from my detention at

Krome. I am currently going 15 days without either of my prescribed pills and have not received insulin at all. As a result of this lack of medication, I have experienced high blood pressure and a lack of sleep.

8. I have requested medical care multiple times by submitting written medical request forms and handing them to guards, who are supposed to forward them. However, these requests are either not escalated or are ignored by supervisors.
9. **Food.** I would not feed the food they give us here to my dogs. It is so disgusting that people cannot eat it because they become ill. Some people even throw it away. I am a diabetic and I am supposed to receive meals that account for my medical condition. There have been days where I do not eat until 10pm because my meal is delayed.
10. **Hygiene.** It is nearly impossible to keep clean at Fort Bliss. I do not have soap and we are only given very small bottles of shampoo that we have to use to wash our body, hair and sometimes our clothing. Laundry is always delayed, sometimes it gets delayed for 1 or two weeks. They take our uniforms and do not return them. When delays happen, we submit written requests but receive no information about who the messages go to. We make our requests in blue ink and they are returned to us with red pen markings. However, the issue is never resolved.
11. **Tablets.** The tablets I use to call my family do not work. Calls often drop, especially when the internet service is bad. I have also tried to use the tables to submit medical requests, particularly as my health condition has worsened. During my time here, I have submitted ten medical requests to ICE using the tablet. These requests also go unanswered. This is especially harmful because people become desperate and depressed when they cannot communicate with their loved ones. We also have a TV in our unit, but they are currently not working. People become desperate because there is nothing to do with our time.

Everything in this declaration is true and correct to the best of my knowledge and recollection.

This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED] of November, 2025 in El Paso, Texas.

Signature:

[Redacted Signature]

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On 11/15/15, I personally spoke with [REDACTED] [REDACTED] read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED]

Date: 11/15/15

NAME: [REDACTED]

EXHIBIT L

"David"

DECLARATION OF [REDACTED]

A# [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 35 years old and from [REDACTED], Mexico.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 19, 2025.
4. Before I was detained by ICE, I lived in Immokalee, Florida with my U.S. resident wife and two U.S. citizen children. I worked in construction during my time in Florida.
5. At Fort Bliss, I am held in the C-4. In my unit, there are about 72 people. It is dirty and hardly gets cleaned. The bathrooms are especially dirty. The shower drains do not work and constantly cause flooding. The flood water is dirty, filled with urine and fecal matter. The guards are aware of this, and we have repeatedly requested that they fix the flooding problem. No one has attempted to fix the issue. As a result, I have had to ask for cleaning supplies to try keep our unit clean. However, they only let me borrow a broom and a mop. They don't provide soap or cleaning supplies. This makes it difficult to keep our unit clean.
6. **Intake Process.** When I was transferred to Fort Bliss, I arrived by plane. I was placed in a small room, it was overcrowded. There were about 100 people in a room with a capacity for about 20 people. We were kept there overnight and had to sleep on the floor. During this time, we were not given food and only had access to one water fountain. However, I quickly realized that the water was making people sick and stopped consuming it.
7. **Medical care.** Since I have been detained at Fort Bliss, I have faced many problems with medical care. I suffer from gastritis. The facility should know that I have this condition because I informed them during my intake, have submitted medical care requests, and have told the guard about this. While detained here, I have had health complications. I require medication for my gastritis. However, I barely received this medication two weeks ago despite requesting it every day since my arrival. As a result, I am very concerned about my health and have become stressed.
8. **Dental care.** I suffer from teeth and gum sensitivity, at previous detention centers, I was taken to see the dentist and given special toothpaste for my sensitivity. At Ft. Bliss, I have

not been taken to see the dentist despite submitting requests. As a result, I have experienced increased sensitivity and tooth pain.

9. Other people have also had problems with medical care. For example, a man in my unit had a foot infection. The infection developed into an open wound and he has experienced bleeding and extreme swelling. The man has submitted requests for medical care but has not received attention or medication for his infection. His condition is worsening.
10. **Recreation.** Since I have been detained at Fort Bliss, I have rarely had outside recreation. We are supposed to be taken outside at least five times per week, but I have only had recreation 2 times per week at most. Our recreation area is very small.
11. **Hygiene and Cleanliness.** It is difficult to stay clean and maintain hygiene while detained at Ft. Bliss. We receive very little shampoo which we use to wash our hair, bodies and even our underwear. We do not get soap at all. I have also experienced issues with laundry, items get lost and it is difficult to get them back. As a result, I try to hand wash my own clothing in the bathroom sink using the little shampoo that we have available.
12. **Food and Water.** There are many issues with the food here. The food we receive is not fit for human consumption. The food is bland, undercooked, and the portions are very small. In my case, the food has worsened my gastritis symptoms.
13. **Communication Issues.** I have access to tablets in my unit, but they hardly work. The internet connection is often down. I have experienced issues contacting my family, for example, the calls sometimes do not go through, and they often drop. I also have not been able to contact the Mexican Consulate, despite having attempted multiple times.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED]th of November, 2025 in El Paso, Texas.

Signature: [REDACTED] [REDACTED] [REDACTED] _____

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/1/25, I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED]'s detention, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, [REDACTED] also gave me verbal consent to sign on his/her behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:
NAME:

[REDACTED]

Date:

11/1/2025

EXHIBIT M

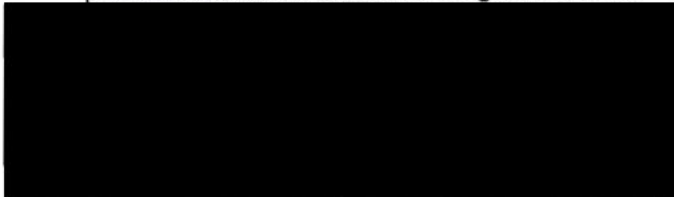
DECLARATION

I hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I am 44 years old and my country of origin is Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since September 6, 2025. I was first taken into custody on August 6, 2025.
4. Before I was detained by ICE, I lived in Tampa, Florida. I had lived there for 5 years, had a valid work permit and a pending asylum application. I worked multiple jobs in housekeeping, construction and clothing manufacturing.
5. At Camp East Montana, I am held in Unit 5. There are about 72 beds in the tent I am held in. Most of those beds are filled. The conditions in my unit are terrible.
6. The unit I am in is very dirty. No one in the facility cleans it. Dust comes in through holes in the ceiling vents, and everything is dusty and dirty. We are not given cleaning supplies. We constantly have to ask for brooms, mops, and other basic items. We clean the unit ourselves. Sometimes the guards offer us leftovers or chips in exchange for our cleaning.
7. The toilets are especially dirty. We are not given enough toilet paper. We receive one roll per day for 72 people. When it runs out, we are told to wait until the next day for more. People become desperate. Guards sometimes ration toilet paper by handing out single sheets.
8. **Dental Care.** Since being detained at Fort Bliss, I have had many dental and medical problems. I developed a gum infection while in detention. I believe it is due to the poor quality of the food and the lack of dental care supplies like toothbrushes and toothpaste. The facility knows about my condition because I asked to see a dentist as soon as my gums started hurting. The guards took me to a nurse and told me there is no dentist here. The nurse prescribed antibiotics that I am supposed to take every eight hours. The guards do not follow these instructions. My medication is often delayed. If I am lucky, I receive it every other day. Sometimes it comes at noon and other times late at night. I have experienced complications as a result of these delays. When I do not receive the antibiotics on time, my gums swell and become very painful. I also get headaches.
9. **Medical Care.** I did not have any medical conditions before being detained. While here, I contracted COVID-19 on November 11, 2025 and was placed in an isolation unit. I was moved from this unit on November 18, 2025. A nurse gave me pink and white tablets. I

was placed in isolation with other people who had COVID. There were no real barriers or precautions to stop the virus from spreading to others. The guards did not clean the isolation area.

10. **Mental Health Care.** I have had problems accessing mental health care while detained at Fort Bliss. I have anxiety. A psychologist diagnosed me and I have seen them twice. I have been prescribed sleeping pills, which I receive at night, although they are sometimes delayed. The pills help me sleep, but they are not real treatment for my anxiety.
11. **Recreation.** I have not had any outside recreation since arriving at Fort Bliss. I have not seen the sun in more than three months. The only recreation time I have had was on Sunday, November 16, 2025. I was taken to an indoor common area that the guards called a library. There were no books. There were computers, but they had no internet access. I cannot look for information about my case and there is no law library. I do not know of any religious or educational programs available to people here.
12. **Sanitation and Hygiene.** It is difficult to stay clean at Camp East Montana. We do not receive enough hygiene products. Our clothes get dirty and there is no reliable laundry routine. The guards have a laundry schedule, but they do not follow it. We receive a very small 32-milliliter bottle of shampoo almost every day. There is no soap, so we must use the shampoo for our hair and our bodies. This is especially hard for women with long hair. If we need pads, we must request them from the guards. We must request almost everything from them.
13. **Food.** The food is terrible. The staff does not consider people's dietary needs. I get stomach irritation when they serve spicy foods because I am not used to eating them. The portions are small and not enough for adults.



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/[REDACTED]125 I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed
NAME

Date:

11/[REDACTED]125

EXHIBIT N

"Xavier"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 32 years old and from Venezuela.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility for about two months. Before I was detained by ICE, I lived in Dallas, Texas.
4. When I was in Dallas, I worked washing cars, gardening yards, and selling food. With this money I made, I supported my two children in Dallas and took care of them.
5. I arrived at Fort Bliss by airplane and then bus. They left us cuffed on the bus for about five hours upon arrival. They didn't allow us to go to the bathroom during that time. Then, they put me in a small room with about 32 other people. The room was cold, which caused pain on the side of my body because I have what I believe are kidney stones. We were left in that cold room for approximately three days and they only gave us bread and water during that time.
6. At Fort Bliss, I am held in the C-3 unit. In my unit, there are 72 beds. The unit is very dirty. The bathrooms are often broken. We have to beg for cleaning supplies so we can clean the unit ourselves. The guards won't proactively bring us things to clean with. There is a lot of dust that comes into the tent and makes us feel sick. The showers and the bathrooms all overflow with water.
7. The overflowing from the bathrooms happened as recently as yesterday. We had to bang on the doors to beg the guards to do something to address it. I feel frustrated that we have to resort to things like banging on doors just to get basic issues like this addressed.
8. This place does not seem designed for humans to be here. Inside the housing tent where I am held, there are drops of water that come from the ceiling. This causes puddles in our housing tent and the areas outside. All day and all night there are construction noises here. These noises make it hard to sleep. We can hear the beep, beep, beeping noise all the time. It does not stop. We also hear jackhammers banging and other construction noises constantly.
9. We are not regularly given hygiene products like soap or taken outside to the yard. This feels like a violation of my rights as a human.

10. There is no commissary here for us to purchase additional items that we are lacking.
11. There is no library here even though the facility manual says that we have the right to use a library to conduct research for our legal cases for 15 hours each week.
12. The food we are provided with devastates me because it is so bad.
13. Shortly after I arrived at Fort Bliss, I let medical staff know that I have kidney stones. I had these for about six months prior to getting here. I was supposed to have a medical appointment for them, but I missed that appointment because I was transferred here.
14. When it comes to medical treatment, there is a delay between when we ask for medical attention and when we receive it. It can take 3-4 days before we receive any type of response after we put our name on a list indicating we need medical attention, even if we need medical help urgently.
15. Around three weeks ago, I went on a hunger strike. I stopped eating mainly because I was not getting a court date nor any information about my case. I felt overwhelmed and tormented without a court date. I also felt sad about the lack of humanity I felt when I would ask for help or information and no one would give me a single response.
16. Another reason why I stopped eating is because I needed pain medication for the pain caused by my kidney stones. The only peaceful option I felt like I had left to try to get my basic needs met was to stop eating. I started feeling like the only way they were going to take me to the hospital is if I found myself in a life or death situation.
17. I became very skinny while on my hunger strike.
18. Approximately every week, between one to three people usually go on hunger strike because they want status updates on their cases and to know what is happening to them and how long they will be trapped here without any information.
19. About one and half months ago, I had to use the electronic tablet in my unit to contact my boyfriend outside of detention and ask them to try to call 911 because I was experiencing such extreme pain on the side of my body in my kidney area. If I had to put the pain on a scale from 1-10, it was a 10. It was sharp and felt swollen and enflamed. I believe that as a response, an emergency team arrived and the captain here came to pick me up and take me outside so I could receive some medical attention.
20. Even now, after everything, I have pain from the kidney stones. I signed the list to get medical attention two days ago and again yesterday. I have not heard anything back. I feel like I have to keep living the pain over and over.
21. We have to beg to receive recreation time here. It seems like the only way we can request the things we are entitled to, such as recreation time, is by banging on the doors. There

doesn't seem to be another mechanism to talk to anyone from ICE about the issues we are experiencing and about getting our basic needs and rights met here.

22. The guards here do not treat me with respect. They abuse their authority and state that we have to do what they tell us to do. They do this through threatening that they will not allow us to fulfill our rights or privileges. For example, they do not take us to the barbershop.
23. When the guards ignore our basic needs, I try to tell them that I know we are immigrants, but that does not make us less human. I feel so overwhelmed and traumatized by the whole situation of being here. Being here feels like torture. I feel like this experience is finishing me emotionally and physically. I don't feel like I can survive for another month at this place. They treat us like animals.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/11/25, I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that he understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED]'s detention and the virtual nature of this visit, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, [REDACTED] also gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED]

Date: 11/11/2025

NAME: [REDACTED]

EXHIBIT O

"Vincente"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 25 years old and from Mexico.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about 09/08/2015.
4. Before I was detained by ICE, I lived in Alabama for 2 years I worked in construction during my time in Alabama.
5. At Fort Bliss, I am held in Unit C-11
6. At Fort Bliss, I am held in a unit with approximately 72 people. The unit consists of rows of bunk beds closely positioned next to each other. The bathroom is inside the unit and is shared by everyone in the dorm. The unit is not kept clean. The bathrooms are never cleaned by staff, and we are not given regular access to cleaning supplies. Detainees must request brooms or supplies and clean the bathrooms ourselves. Since we do not have soap, we clean our unit using water.
7. **Intake Process.** When I arrived at Fort Bliss, I was processed and placed into the dorm. I did not receive meaningful information about how to request medical care, legal access, or mental health services. I was not given a working PIN for the phones for about one month. During this time, I was unable to contact my family or an attorney. I repeatedly asked for assistance, and only after I spoke directly with a supervisor did I receive a functioning PIN.
8. **Medical and Dental Care.** Since I have been detained at Fort Bliss, I have experienced serious problems with medical care. I have repeatedly suffered from extreme headaches for several days in a row, and I have repeatedly submitted requests for medical help. The guards tell me that the medical area is full, and I am never taken. I used to receive medication for sleep and ointment for back pain every night, but a nurse recently informed me that the facility no longer provides these items because the center claims it has no budget.
9. I have requested medical care multiple times by submitting written medical request forms and handing them to guards, who are supposed to forward them. However, these requests are either not escalated or are ignored by supervisors. When medical attention is given to anyone, it is often delayed until the person's condition worsens. The guards have told me that they will not call the doctor unless someone collapses.
10. **Other Detainees' Medical Issues.** I have witnessed numerous medical emergencies go unaddressed. A man with heart problems told guards he felt very sick. The guard reported it to supervisors, but no help arrived until the next day. Another young man has fainted

multiple times. He asks for medical assistance before fainting, but he is only treated after he collapses. He requires a special diet but often does not receive it, causing him to go days without appropriate meals.

11. Two men with diabetes are not receiving proper diabetic meals or medication. I personally informed a guard that they had not received their diet trays that day. They had gone nearly the entire day without sufficient food and only received sandwiches around midnight.
12. **Mental Health Care.** At Ft. Bliss, I have mental health needs and previously saw a psychologist twice a week with the help of a guard who arranged my visits. That guard is no longer here. Since then, I have requested mental health visits again for several weeks but have not been taken back. It has been approximately 15-20 days since my last session. My mental health has worsened due to lack of care.
13. **Recreation.** Since arriving at Fort Bliss, I have had very limited access to outdoor recreation. I once went more than two weeks without being able to go outside or see the sun. The only way detainees receive recreation is by collectively shouting to get the officers' attention. The recreation yard is a small area with limited space and minimal equipment, we have a soccer ball. Lack of fresh air and sunlight is affecting me, I become stressed and anxious, as do many others.
14. **Hygiene and Cleanliness.** Maintaining hygiene is extremely difficult. There has been no soap available for over a month. Cleaning supplies are rarely provided. The dorm was cleaned for the first time in more than a month only two weeks ago. Laundry is supposed to be done two to three times a week, but it often happens only once every 15 days, and clothing frequently goes missing. The blankets I was given are insufficient for the cold weather, and I have seen many people develop rashes from the rough blankets provided.
15. **Food and Water.** Meals have been reduced over time. I used to receive a plate, juice, and a tortilla with every meal, as well as cookies. These items have been discontinued. The current meals leave me and many other people hungry between mealtimes. People who require special diets, including those with diabetes, are often not given them for days at a time. I often save my apples and share them with them to help them manage any complications as a result of the inadequate diet they are given.
16. **Library/Activities.** There are no religious services, educational programming, or meaningful activities. There is no law library available to us and I have not been able to access information about my case.
17. **Legal Access.** It is extremely difficult to access legal help. There is no posted information on how to contact attorneys. Phone calls require payment, and many detainees, including myself when I first arrived, go weeks without a working PIN. Tablets frequently malfunction or drop calls. Messages sent to ICE through the tablets have gone unanswered for more than a month. Many detainees have been here for over a month without being assigned a court date.
18. Confidential communication with attorneys is not guaranteed. Calls drop frequently, and there is no clear system for requesting private attorney calls or visits. Moreover, the phone numbers that I was given to contact the Mexican Consulate do not work. Every time I try to dial out the call drops or does not go through. This is especially urgent for me because I have been trying to reach them to facilitate my voluntary departure, which I signed on August 2, 2025.

19. **Treatment by Guards.** Guards have been yelled at for submitting requests on our behalf. Some guards have told me privately that conditions at Fort Bliss are worse than at other detention centers where they have worked and that "things are not supposed to be like this." I have witnessed guards being reprimanded by their supervisors for attempting to assist detainees with basic needs.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED]th of November, 2025 in El Paso, Texas.

Signature: [REDACTED]

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On 11/12/25, I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:
NAME: [REDACTED]

Date: 11/12/25

EXHIBIT P

"Hernan"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 27 years old and from Guatemala.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 25, 2025.
4. Before I was detained, I lived in New York and worked in the service industry. I had a good life in New York and had the opportunity to meet many incredible people. I was able to help my family in Guatemala. Everyone comes here for a dream and I was pursuing that dream.
5. In August 2025, I was arrested. Then, I was brought to Manhattan Federal Plaza for two days and was transferred between several different facilities. After, I was handcuffed on my hands and feet and put on a bus for four hours to go to the New Jersey airport. During the four-hour bus ride, we did not have water and the bus was not air conditioned. We stayed in the plane for about eight hours before it took off. For 18 hours—from when we left the facility to when we arrived in El Paso—we were handcuffed.
6. I arrived to Camp East Montana on August 25, 2025. Each unit is one pod with bathrooms and a dormitory. There are fourteen pods per tent and there are five tents total at Camp East Montana. The guards have told me that they are building more tents.
7. The biggest problems here are the bathrooms leaking contaminated water into the dormitory, the lack of medical care, and the food.
8. Contaminated water has overflowed from the bathrooms to the dormitory. The overflowing water contained excrements and urine and we had to eat and live in that room with the contaminated water. Detained individuals in the "A" Tent told me that this happened in their tent and the rest of the tents too.
9. We don't have soap. We're only give one single-use shampoo packet to clean ourselves each day. Supposedly, this single-use packet is supposed to be enough to wash our whole body but it is insufficient.
10. There is no medical care for me or anyone here. About a month and a half ago, I twisted my ankle in the yard and I couldn't walk. I've been requesting medical care every day since then, but I still haven't received medical attention. I request medical care by putting my name on a sick list every day. My ankle is no longer bruised or swollen but it still hurts to walk. There is now a bulge on my ankle that was never there before. Sometimes when I walk, there's a popping sound, and I believe that's my tendon.
11. Many people here, including myself, have suffered from the flu and cough. They put their names on the sick list but they never receive medical attention. I have put my name on the sick list

because of the flu and cough twenty times but have never received medical care for this.

12. Many people here, including myself, have suffered diarrhea, vomiting, and stomach pains because of the food and don't receive medical attention. They put their names on the sick list but they never receive medical attention. I have put my name on the sick list every day because of stomach pains from the food but have never received medical care for this.
13. The food is a big problem here. The food isn't enough to fill you and it tastes horrible. We have to eat it regardless because we're hungry. We're always hungry here.
14. The food tastes terrible and makes us sick. The food is frozen. When they put it in the microwave, the food doesn't have any flavor regardless of whether it's beef, chicken, or vegetables. I have vomited five times after eating the food. Most of us here have vomited and had diarrhea from the food. I've lost weight because of the food. I know this because my clothes used to fit me and now they are loose.
15. Being in Camp East Montana makes me feel depressed, anxious, and stressed. I am afraid because I don't know what my future looks like here. I feel this all day every day not knowing how long I will be here. I don't know if I will be able to stay in the U.S. but the best situation would be staying in the U.S. I cry here a lot. I know I'm not the only one who cries in this facility because I've seen other detained individuals cry too.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the  rd of , 2025 in El Paso, Texas.

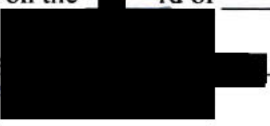
Signature 

EXHIBIT Q

"Samuel"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 19 years old and from Venezuela. [REDACTED] is a pseudonym I am using for this declaration.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas.
4. On or around October 17, 2025, officers beat me. For example, one officer grabbed and crushed my testicles and an officer forced his fingers deep into my ears.
5. As a result of the officers' use of force, I had to be taken in an ambulance to the hospital on the day of the incident.
6. Now, even though it has been about a month and a half since the incident, I am continuing to experience hearing loss in my left ear. In addition, when I go to the bathroom, I continue to feel pain in my testicles.
7. Approximately two weeks ago, I received a medical bill charging me \$1,140 related to the emergency visit to the hospital on the night of the incident when the guards beat me. I believe this cost is for the ambulance and the emergency services.
8. I don't have the money to pay for this bill. I fell unconscious because the guards beat me and now I am being charged for the medical treatment I required from the injuries caused by that beating.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On December [REDACTED] 2025 I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED] detention and the virtual nature of the visit, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, [REDACTED] also gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED]

Date: [REDACTED]

12/1/25

NAME: [REDACTED]