

DECLARATION OF PHETSAMONE SENEVILAY

I, Phetsamone Senevilay, 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 Phetsamone Senevilay, and I am 56 years old. I am from Laos.
3. I've lived in the United States for 46 years. I lived in California and then went to Minnesota to raise my family. Minnesota is a lovely place. All my family are U.S. citizens except for me.
4. I have been detained at Camp East Montana since on or about January 22, 2026.
5. I've never been to prison, but I was in jail for about a month 20 years ago. Jail was so much better than Camp East Montana. There, you get access to things, a good meal, officers who know and follow the rules. Here, the officers can't handle everyone, there's constant fighting over the TV and food, and people stealing food. Here in Camp East Montana, we're pat down every time we leave or return to the housing unit. It wasn't like that in jail.
6. Since I've been at Camp East Montana, the population has fluctuated a lot. There are fewer people detained here now, and things are a little better. When there were thousands of people detained here, it was really bad. That was three or four months ago. Then, it was like Animal House. Everything was chaotic. This morning an officer told me that hundreds of additional detainees arrived last night. That worries me, because things will get even worse with a larger population in my experience.
7. Everything here is really chaotic even now. Staff don't seem to have a system and seem to be just winging it. The officers don't tell you the truth about anything. They just say, "We'll see what we can do," but nothing happens. After they leave, they forget about you. I stopped wasting my breath. The officers won't help.
8. You have to try to make a routine to avoid going crazy. I just walk around the pod, just walk in a circle. That's all I can do to pass the time here. There's nothing else to do.

9. Most of the detainees here are Spanish speakers. The guards only make announcements in Spanish. We try to tell them some of us speak English, and we have to constantly ask to have them make announcements in English.

Medical

10. I have had gout for years, and it flares up off and on depending on what I eat and drink. Turkey is the number one problem food for me; it makes my joints swell up and causes me pain. Before I was detained, I had medication I would take when I needed to help manage my condition, and I knew what foods to avoid.
11. At Camp East Montana, you have to eat whatever they give you, or you will starve. Earlier this month, we were given turkey to eat multiple days in a row. The next night, I woke up with a very swollen ankle and throbbing pain. The pain was constant. I filled out a sick call request at around 5:30 am and wrote that I have gout, was in pain, and need medicine ASAP.
12. Although I was in extreme pain, I wasn't seen by a nurse until about a day and a half later. During the time between when I submitted the sick call request and when I was finally seen by a nurse, I kept telling staff in the housing unit that I was in a lot of pain. They tried to make me go to the recreation yard, but I told them I couldn't go unless they brought a wheelchair.
13. When I finally saw the nurse, I told her the pain was at like a 7/10.
14. I tried to explain to the nurse what type of gout medication I took before being detained, but she didn't seem to know what it was. She gave me a few pills and told me she'd order more pills for me.
15. The next day, I didn't receive any more medication. I was in extreme pain for about ten hours. I couldn't put any pressure on my ankle – it felt like there were 1,000 needles poking my foot.
16. I put in another sick call request. I was taken to see another nurse at around 3:30 am. I don't know why they can't do medical appointments during the daytime, but that nurse was better. She looked at my records and said that she didn't know why the first nurse hadn't ordered the medication for me. She gave me medication and since then I've been offered the medication daily.

Sand and Weather

17. I'm housed in A-13 now. Since I've been at Camp East Montana, I've been housed in A, B, C, D, and E. I don't know why they have moved me around so much. The conditions in each unit have been the same; the same layout, the same structures, the same sand coming in.
18. The sand comes in when it's windy outside, but the wind is constant, so it comes in a lot. About two months ago, there was a sand storm every week, and the housing unit filled with sand. There was sand in the food and in your hair. I'd wake up with a dry mouth. I never had a dry mouth like that until I got here to Camp East Montana. When we swept the unit, there would be piles of sand.
19. When it's windy outside, you can hear the tent sides and roof flapping, and it's really noisy. You can't sleep when that happens. Sometimes it goes on for six hours straight.
20. When it rains hard outside, sometimes water leaks into the housing unit.
21. We just get a sweatshirt and a thin blanket here. We're not given a jacket. It can be really cold here, especially at night. A lot of people in my unit complain about that, especially at night and early in the morning. I've seen people ask other detainees who are leaving if they can have their blankets, so they can try to stay warm. But the officers search our bed areas and take away any "extra" blankets and call them "contraband," and say we're only allowed to have one blanket.

Measles

22. I was supposed to be deported on or around March 22, but was told that I was being placed in quarantine for measles instead.
23. Staff didn't tell us much about the outbreak. They just told us someone had measles. But we didn't know what measles was. Staff didn't explain what measles was to us, didn't tell us how to protect ourselves, what to look out for. They just took us out of the housing unit and told us we needed to get shots. People were really upset. They just didn't tell us enough about what was going on, and we didn't understand why things were so restricted. People were kicking doors in frustration.

24. There were two quarantines, one for people in orange uniforms, and one for people in red uniforms. I have a red uniform. We were quarantined next to the pod with measles. The pods are just created through four walls in a larger tent, with no ceiling. So the air that is in one pod can get into the other.

25. Right when our 21-day quarantine was supposed to end, on maybe Day 20, staff told us one of the guys in orange had a case, so we had to spend another 21 days in quarantine. We were really upset when we heard that. My unit did a sit-in; we refused to do count unless we could get a haircut and nail clippers, because they denied us the ability to go to the barbershop to cut our hairs, shave, and clip our nails during the quarantine. The officers let us use nail clippers and razors in the housing unit after that, but once we were off quarantine they stopped allowing that.

26. A week after the second quarantine ended, someone came in with Covid, and we were quarantine for another six or so days.

Conclusion

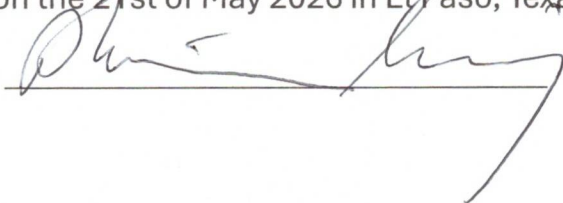
27. I've been here for months, and the conditions are just so bad. It's the way they treat us – I don't feel like a human being anymore. There's just no rhyme or reason on how they do things here. The conditions here made me want to leave the country. I've asked to be deported. I can't stand it here anymore.

28. I hope this declaration can help other people at Camp East Montana. It's too late for me.

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

Executed on the 21st of May 2026 in El Paso, Texas.

Signature: _____

A handwritten signature in black ink, appearing to be 'Omar Lopez', written over a horizontal line. The signature is cursive and somewhat stylized.