

DECLARATION OF CUONG BACCAM

I, Cuong Baccam, 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. If called to testify, I could and would do so competently and truthfully to these matters.
2. My name is Cuong Baccam, and I am 54 years old.
3. I am stateless and was born in a refugee camp in Laos. I am part of the Tai Dam ethnic minority. When I was a child, my parents and I came to the United States as refugees. My family still lives in the United States.
4. I have never been to prison but, when I was younger, I was arrested and spent time in county jail. My last conviction was thirty years ago, in or around 1996. Since then, I've worked hard to improve myself and build a life here.
5. ICE has tried to deport me several times over the last thirty years. In or around 1996, I was told I couldn't be deported because Laos wasn't taking anyone back, so I was put under supervision. In or around 2008, I was detained again but then let go.
6. Most recently, on or around February 7, 2026, ICE agents came and got me outside my work in Minnesota. The agents never showed me an ID, badge, warrant, or anything. They didn't explain who they were or that they were there to take me into immigration detention. Instead, they just yelled, "You know who we are!" The agents kept swearing at me, saying things like, "Get the fuck out of your car," "We know who the fuck you are," "We are going to break your fucking window if you don't open the fucking door."
7. When I got out of the car, two of the ICE agents pushed me against another car and tried to handcuff me. They kept yelling, "Stop resisting!" But I wasn't resisting. I wasn't doing anything except letting them restrain me. During all this, another agent punched the back of my head repeatedly. I have a broken front tooth because of that.
8. Although I was arrested by ICE in Minnesota, I was sent to Camp East Montana in El Paso, Texas.

9. When I and others got to Camp East Montana, we were exhausted. We had been shackled since we were taken into custody in Minnesota. We were put into an intake room that had benches but no beds, mattresses, blankets, or pillows. There was one toilet in the room for the approximately 36 of us in there. We were so tired that we tried to lay down on the floor to sleep. The guards wouldn't let us do that during the day, but they weren't able to process us all when we arrived. Staff kept saying, "We're so busy."
10. I and about 35 others spent our first night at Camp East Montana trying to sleep on the floor of the intake room together. We didn't get blankets or pillows or anything. It was hard to sleep. Throughout that night, staff kept taking me and others out of the room, to another room for processing, like to get our ID checked or to give them any money we had on us, and then they'd put us back in the intake room. I think I was taken out three or four times that night. When we were outside the intake room, staff wouldn't let us sleep or lay down or try to rest. They would say, "Sit up," "Can't lay down," "Can't sit on the floor, sit on the bench." They wouldn't even let us lean against the wall. We kept telling them we were tired and had been up for 24 hours already, but they wouldn't listen and told us, "Sit up and stay up."
11. Throughout the whole night, we were given short medical screenings. I got mine in the early hours of the morning, I would estimate it was around 4 am. They took us to a big open space in the same tent as the intake room we slept in. When medical staff asked me questions for the medical screening, other people could see and hear. We were sitting right next to each other. When we went up to the nurse, we sat at a table. But everyone else was sitting on a bench behind us waiting for their turn and could hear what was being said. There wasn't anything to give people privacy.
12. During the screening, I told the nurse that my front tooth had been broken when ICE arrested me and was painful. The nurse told me that it wasn't of concern unless it really hurts, in which case they'd give me Tylenol. I asked for some Tylenol for my tooth, but never got any.
13. Since I've been in ICE detention, I haven't seen a dentist. Other detainees told me that the wait time is long and it's hard to be seen and that the dentist will only extract teeth. The guards here at El Paso Service Processing Center have also told me that the dentist is "extraction only" and that every detention facility is like that.

14. For about the first two weeks I was at Camp East Montana, staff only gave me a pair of socks and underwear. Other than that, I had to wear and sleep in my street clothes (the clothes I had on when I was arrested), because they didn't give me a uniform. I had to keep washing my clothes in the shower to try to stay clean.
15. When they finally gave me a uniform, they gave me an orange uniform. I was told that meant I was medium-high security. Staff never explained why that was.
16. I was at Camp East Montana about three weeks before I was moved to the El Paso Service Processing Center on or around February 25. While I was at Camp East Montana, they moved me around a lot. I was housed in Alpha, Bravo, Charlie, Delta, and Echo. The conditions were the same in each unit.
17. The conditions at Camp East Montana were bad. People got sick constantly. You could hear people coughing all the time. We'd tell the guards we needed to see medical staff, but the guards would just tell us to put in a sick call request. But doing that didn't get us seen, and it could take weeks just to get an aspirin.
18. At Camp East Montana, we never had enough soap, and I constantly had to wash my hands without soap, even when everyone around me was getting sick. I'd ask the guards, and they would say they ran out of soap and I should wait for the next shift and ask. But I would get the same answer then. We didn't get a bar of soap and didn't have access to a soap dispenser. All we got was a tiny packet of shampoo. It was so small, like the condiment packages from a gas station. That's all we had to shower with or wash our hands with or wash our clothes. It wasn't enough.
19. There was dust everywhere at Camp East Montana in the housing unit. I mean everywhere. You couldn't escape it. It was on the bed, on the tables, on the floor. When you wake up and blow your nose, it's nothing but dust. I was on the top bunk, and I could see the dust suspended and moving in the air, backlit by the lights. When people moved around the unit, the dust would kick back up into the air.
20. A lot of the guards wore face masks, but when we asked for some too to protect ourselves, we were told masks were for staff only.
21. The guards would move us about once every two or so days, purportedly to clean our section of the housing unit, and we'd have to wait in an even more dirty section of the housing unit with even more dust/sand for hours. When we were put back in

our section, it didn't seem like it was much cleaner. It looked the same, and the sand and dust were still there.

22. Staff would also force us to go outside to the recreation yard. The recreation yard was so dirty. It was very windy there, and dust storms would come in. We'd feel sick from the dust. Everyone complained and asked why we had to go outside. People didn't want to go because it was so windy and dusty and made us sick.

23. I hated going to recreation. It was nothing but dust storms and wind. There was astroturf everywhere, so you're not on real grass. It looks like a dog cage; you're separated like an animal. There was barbed wire everywhere. There's a canopy over the yard, so I could only get partial sun, and only then if I stayed on one side of the yard.

24. Each time we went to recreation, guards would pat us down and use a metal detector wand. Every time we went out of or came back into our housing unit, we were searched in that way. During the pat searches, a staff person puts his or her hands on your shoulders, waist, legs, and other body parts. It felt invasive and like I was a criminal.

25. Camp East Montana really affected my health. I've never felt like this in my life: fatigue, body aches, weight loss, and coughing constantly. I've never been sick so much. I asked to see a nurse about three times for sick call because I was having trouble with the dust and sand, but the nurse just said I wasn't on the list.

26. The food at Camp East Montana was terrible. They didn't give us enough food to eat and there was no way to get extra food – no commissary or anything. I was always hungry. Sometimes detainees would take two trays instead of one because they were hungry, but that meant someone didn't get a tray and couldn't eat. There were lots of fights over food because it was so limited. The guards didn't do anything about it. I saw guards give some people who didn't have a tray a baloney sandwich, but that was it.

27. At Camp East Montana, most guards didn't seem to care about us at all and acted like we had no rights. It seemed like we were being punished. The guards kept saying we were illegal, and some guards would tell us, "You guys can always self deport and get away faster." When we tried to raise concerns, guards would tell us, "If you don't like it, you shouldn't be here." I tried to explain to them that my family

came to the United States as political refugees, and they had fought alongside the United States.

28. The guards told us we couldn't have nail clippers or razors. I was never able to go to the barber shop because the waitlist was long and guards would cancel the barber shop at their discretion. They cancelled it once because they said it was too windy for us to walk from one tent to another. But then about an hour later they made us go outside to recreation in the dust storm.
29. When we asked what we were supposed to do without nail clippers, the guards said, "You can just bite your nails." When I asked what I was supposed to do about my toenails, the guards said, "If you can bite them, bite them."
30. My fingernails and toenails got long when I was there. It was uncomfortable and demeaning. I don't understand why it was like that. When I was in county jail, we were given razors and nail clippers. No one there told me to bite my toenails. That's disgusting.
31. I need reading glasses in order to read. That's really important to me because there's nothing to do to pass the time, and officials keep trying to get me to sign documents. I need to know what those documents say, so I don't accidentally agree to something I don't want to agree to.
32. ICE took my reading glasses away from me when I got arrested. At Camp East Montana, I asked the guards several times for my reading glasses. They would just say, "I'll look it up for you," "I got you," or "I'll get it for you," but they never did. That's their favorite thing to say, but they never do anything. I finally got my glasses back at El Paso Service Processing Center.
33. I didn't know what was going on half of the time I was at Camp East Montana. I don't speak Spanish, but a lot of the announcements were only in Spanish. Almost every other detainee in my unit spoke Spanish. There were only a few of us who didn't. When I and others would ask guards to speak in English, guards would say things like, "This is El Paso, you better learn how to speak Spanish." In the few instances where they did speak English, it was hard to understand them because they had a heavy accent. When we asked them to repeat themselves, they got upset with us. I didn't want any trouble, so I would walk away. Only a few guards would take the time to make sure we understood, and they weren't around very often.

34. One time I asked a guard if I could see a nurse, but the guard told me that I had to have signed up for it in the morning. I didn't know that. Maybe they made that announcement in Spanish. I missed things like the barber because I didn't know it was happening – again, maybe because the announcement was made in Spanish.
35. I got an orientation handbook at Camp East Montana, but they took it away from me when I transferred to the El Paso Service Processing Center. The handbook didn't seem to be related to Camp East Montana, though. Like, it said there's commissary, but we didn't have commissary. The guards seemed to make up rules. You could ask four guards the same thing, and you'd get four different answers. One time a guard told us that there was a rule about volume. We asked where that was, and the guard looked at a rule book and then admitted that it didn't have anything about volume. We asked another guard why the handbook said there was commissary, but he didn't have an answer for that.
36. At Camp East Montana, four people would share one tablet. You could make phone calls, play games, and watch videos on the tablet, but it would cost you money.
37. You need a pin number to access the tablet. I didn't get my pin number for about the first two weeks I was at Camp East Montana. I would tell the guards that I needed a pin number, but all they would do was write my request down and pass it to someone else. During that time, I couldn't call my family or an attorney. When I finally got to use it, I was able to call my family and tell them where I was and that I was OK. They had been really worried about me. But it was hard to use the tablet to make phone calls as much as I wanted because I had to share the tablet with other people. There weren't any phones on the walls to use, like there are at El Paso Service Processing Center and county jail.
38. There was nothing to do at Camp East Montana. I was stuck inside of a windowless room. All you see is the roof of the tent blowing around when it's windy. When there's a big dust storm, you can see and feel the dust come in. There were two TVs, but it was hard to get access to them. Everyone wanted to watch TV, because there was nothing else to do. Because almost everyone spoke Spanish, it was rare that a TV would be on an English channel. I would just try to sleep to pass the time, but the TV volume would always be at full blast during the day so that was hard to do. It was so loud in the unit at all times.

39. I went to see a nurse when I was at Camp East Montana about three times, once for a TB test, and twice for a chest x-Ray. There's a separate medical tent. The tent is small and just an open space. When you're sitting to wait your turn, you can hear everything the nurse and a patient are saying. So when I met with the nurse, other people, including other detainees, could see and hear me.
40. Staff seemed very disorganized. They gave me a TB test (a shot beneath my skin) and told me they'd come back and check on any reaction after three days. But they didn't check on it then. I asked a guard why, and he told me staff had come that morning to check people's reactions, but staff thought I had left the facility. I'm not sure why that would be; I was in the housing unit the whole time and they always scan our wristbands during count. Staff told me I wasn't cleared because they did not see the TB test. They later made me get a chest x-Ray but the next day they called me in again and said they wanted to give me a chest x-Ray. I told them I had already gotten one the day before, so I refused to take it again. About an hour later, staff told me they found the first chest x-Ray.
41. When I got to El Paso Service Processing Center, the nurses told me and others that we had to get another chest x-Ray. I said that I didn't want to do it again, because I'd already had one done at Camp East Montana. I asked why they couldn't just look at the medical records from Camp East Montana. The nurse told me that Camp East Montana wouldn't send the medical records over, so we had to do it again. All of us had to get another chest x-Ray.
42. Although I am no longer at Camp East Montana, I am submitting this declaration because I don't want anyone to go through this. It's not right how we were treated. ICE has already tried to deport me three times in the last thirty years and in the process I've lost everything: my wife, house, business, and cars. I feel despair. They can come again in one, five, ten years and try to deport me again. I don't know where they'll put me the next time, and I don't know if they'll move me again now and put me back at Camp East Montana. I don't understand why they would detain me before they got travel documents to deport me. That just seems wasteful and like they are trying to pressure me to give up my rights. Since I've been in detention, ICE officers have tried four times to get me to sign a paper saying if another country (not Laos) takes me, they can send me to that country.

43. I am worried about retaliation because I am stuck inside here and I am in the total control of ICE and the guards. I am still submitting this declaration because people need to know what is happening to us. It is not right.

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

Executed on the 6th of May, 2026, in El Paso, Texas.

Signature:

A handwritten signature in blue ink, appearing to be 'Lenny B.', written over a horizontal line.