

DECLARATION OF SOMSAK BOUNVONGXAY

I, Somsak Bounvongxay, 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 Somsak Bounvongxay. I am 48 years old and from Laos.
3. I came to this country with my parents as a child, and I have been here since 1989. We had legal status. Before I was detained by ICE, I lived in Moorhead, Minnesota, with my wife in a home we owned. I worked as a tattoo artist, and I have owned my own shop in Fargo, North Dakota, since 2014. I give to charities, and my wife works in social services.
4. I was detained at the Camp East Montana (CEM) ICE Detention Center, located at Fort Bliss in El Paso, Texas, from on or about February 11, 2026, until early March 2026. I was there for about two and a half weeks. I was then moved to the El Paso Service Processing Center (EPSPC). I have noticed significant differences in the conditions at EPSPC compared to CEM.
5. At CEM, I was held in the Delta unit. In my unit, there were about 70 bunk beds, which were arranged in rows against two opposite walls. All but about 6 or 7 of the beds were filled. In the middle of the room were several round tables. The bathroom was connected to the room, and there was no separate recreation or dayroom area: we ate, slept, and spent almost all of our time in that one room. The room was cold and often dusty, and ants and flies got into our living area.
6. **Intake Process.** When I was transferred to Fort Bliss, I was held in an intake room with roughly 30 other people from around 4 p.m. on February 11th to early morning, around 3-4 a.m. on February 12th. The room seemed to be about 16 feet x 20 feet, although it's hard to estimate, and it had metal benches, but no other furniture. There was only space for about half of us to sit on the benches.
7. I am Type 2 Diabetic, and I take multiple medications to manage my diabetes. I usually take my insulin before bed each night, but I did not receive insulin on the evening I was held in the intake room. In the early morning on February 12th we were put in lines in the intake room to wait for medical screening. This was around 3 a.m., so I was feeling the negative effects of not receiving my insulin in the evening. While I was waiting, I asked one of the security guards if I could go talk to one of the officers doing screening because I had diabetes and needed insulin urgently. I was told that I had to wait my turn. I asked again and they told me no again. Ultimately, I explained that I needed medication to the

other detainees in front of me in line, and they let me move forward to see the medical staff earlier.

8. When I got in to the screening area I told the medical staff that I had diabetes and that I had brought my medications from home. I told them that the medications were in my personal property. I then showed the staff the medications I had that my primary care physician had prescribed to me. The staff told me that my need for insulin was an emergency, and that the officers shouldn't have stopped me from skipping the line.
9. **Medical Care.** Staff at CEM were aware of my diabetes because I reported it during intake and showed staff my medications. However, I did not get my medications regularly at CEM, and I did not get enough food. When this happens, it makes my body feel wrong. I feel off balance, my body feels light, and my vision gets blurry. At CEM, my blood sugar was consistently spiking and falling. These symptoms weren't an issue for me when I was managing my own medications outside of detention, and they have improved since I have been at the El Paso Service Processing Center.
10. Before I was detained, I managed my own medications. I would inject my insulin myself before going to bed every day. I also took two other medications, Jardiance and Victoza, to manage my diabetes. I told the officers at intake and in medical about all three of my medications, and I showed them all three of those medications. I was told that the facility didn't have Jardiance or Victoza, so they would be ordered, but I never received either of those medications and they wouldn't let me take the medications I had brought from home. I was only given insulin once per day by the medical staff, and my daily doses were often late or missed all together.
11. In contrast, at EPSPC, I consistently receive insulin 3 times a day. I receive two different types of insulin in the morning, and then I get one before lunch and one before dinner.
12. When I was at CEM, I asked one of the guards in my unit to call down to medical most days around the time my insulin was due, because they did not usually call for me on time. When the guards called, medical would usually say that someone would come to get me, but some days no one ever came, or they came late. When medical was late or didn't seem to be coming, I would try to talk to the guards about it, but they just said that they had already called and that was all they could do.
13. My insulin came an hour or two late several times during my two weeks at CEM. When that happened, I would start to feel weak and shaky and get extremely hungry. On about four occasions I did not get my insulin at all, and I had to completely skip a dose. When I did not get my insulin, I would try to eat something to feel better, but it was hard because there was no commissary or anywhere to get food from outside of meals. Because there was no other source of food, I tried to save little cookies or snacks from my meal for

when I didn't get insulin. Some of the other detainees also gave me the parts of their meals they had saved when I felt bad because I couldn't get my medications.

14. When I was transferred to EPSPC, a lady from the medical staff at EPSPC called me in for intake, and she said that my file was blank. She told me that staff at CEM sent over the actual medication they were giving me, but no information about my condition or medical history. She told me that EPSPC did not know what to give me because they had no medical history. Because CEM did not send over my medical history, EPSPC had to start from scratch by testing my blood to check on my medical condition, and they had to start over my medications from the lowest dosage, because they didn't have any of my medical history or prescriptions. On April 21st, after being at EPSPC for more than a month, I was told that everything is finally adjusted so I am getting the proper doses of my medications.
15. **Food.** Because I am diabetic, I have special dietary needs, and what I eat and when impacts my blood sugar and insulin levels. When I do not get enough to eat, or my food is not tailored to my medical needs, I can feel jittery, weak, and hungry. Sometimes my eye sight goes fuzzy, and I can't read things, and I can get light headed if I move too fast. This happened 2-3 times per week when I was at CEM, because I was not given enough food. I was given a snack with my insulin, but it was only the size of a tangerine, and it was not generally enough to fix the overall lack of food.
16. At EPSPC, I have an option for a special meal for diabetics, which I have received sometimes. However, I do not tend to have problems with weakness, jitters, hunger, and blurry vision at EPSPC regardless of the meal I get, because I am given enough food and medicine, and I have access to snacks as needed through the day via vending machines and the commissary. There was no diabetic meal option at CEM, and no way to access snacks throughout the day.
17. **Hygiene/Dust.** CEM was filthy to the extent that it was basically unlivable. The biggest problem was the dust, which felt and looked like a red sand, kind of like gravel. There was visible dust in the housing unit at CEM any time there was heavy wind. CEM is made of tents. The dust comes in from gaps in the tarp they use to cover the whole tent. I could see light coming in at all the places where the tarp connects, including the roof, corners, and sides. When the wind blows, you can smell and feel the dust. About three to four times while I was at CEM there was so much in the living areas that when you swiped your hand on the table your hand would turn red.
18. I visited the medical unit almost daily to get my insulin at CEM, and the dust was also a problem there. It might have been even worse in the medical unit than the living area. When dust got into the medical area, it did not seem to be cleaned. When dust would blow in on one day, I would still see it there each day I came back that week. While I was in the medical unit waiting to receive my medication, I would sometimes mess with the

dust on the ground with my shoes, and there was enough dust that I could create piles of it with my shoes, like making snow angels. The floor of the medical unit was dirty and sandy the whole time I was at CEM.

19. I wore a mask to sleep whenever it was windy because the dust made it hard to breathe. I believe this happened at least four times while I was at CEM. I was able to get masks from the guards at our unit or from the medical unit, because I went there most days. But the guards in our unit sometimes ran out of masks, and when they did, other people in my unit would just have to wait for them to get more.
20. The cleanliness at CEM was bad, so I washed my clothes in the shower to try to stay clean.
21. Any time I left the unit to get insulin or for yard I walked down a hall where I would pass several other units. One of these units was a COVID unit, which was labeled on the door. People were sent there for quarantine if they were sick. But all of the units in our tent were like cubicles- the walls did not go up to the ceiling. This included the COVID unit, which shared a wall with some of the regular housing units and the hallway. The walls were only about 10-11 feet high, while the roof was about double that height at its peak. So air could pass through from the COVID unit to the regular housing unit and the halls.
22. The guards at CEM seemed untrained. On my second or third day at CEM, I was called out to see an ICE agent for a quick interview. I left my unit and I spoke to the agent in an outtake room for about 5 minutes, and then I was told to wait and a guard would take me back to my unit. I was left alone in three different rooms for hours at a time and completely ignored by the guards. One of the ladies who moved me between the rooms told me they were short staffed, but I could see several guards milling around and chatting while I waited. They didn't seem to be doing anything. While I was still stuck in one of those rooms, I saw a boss come and yell at the guards that he always sees them standing around doing nothing in that area when they are needed in other areas. On that day I left my unit round 3 p.m. and I didn't get back until about 9 p.m.
23. I've been told I'll be deported soon. I am submitting this declaration anyway because I want to help others – no one should have to go through what I did.

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

Executed on the 22nd of April, 2026 in El Paso, Texas.

Signature: _____

