

DECLARATION OF REINALDO MORENO RODRIGUEZ

I, Reinaldo Moreno Rodriguez, 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 Reinaldo Moreno Rodriguez. I am 52 years old and from Cuba.
3. I came to this country in 1994. Before I was detained by ICE, I lived in Miami for about 30 years. There, I worked as a tow truck driver for approximately 20 years. Most of my family is here in the United States. My wife, sons, mother, sister, nephews, and cousins are all here.
4. I was detained by ICE on June 25, 2025. I was recently detained at the Camp East Montana ICE Detention Center ("Camp East Montana"), located at Fort Bliss in El Paso, Texas. I was first detained at this facility since on or about August 17, 2025, until late January 2026. I was then moved to a detention facility in Florence, Arizona, where I was held for approximately 16 days. On or about February 8, 2026, I was transferred back to Camp East Montana. I was detained there until April 22, 2026, when I was transferred to Alligator Alcatraz where I am currently held. In total, I was detained at Camp East Montana for approximately 8 months.
5. Throughout my time at Camp East Montana, I was held in different pods or units, including the Alpha, Charlie, and Delta units. Before I was transferred out of Camp East Montana, I was in unit Alpha-14. The conditions in all of the housing units I was in were bad and the guards/officers treated all of us like animals. The mattresses they give us to sleep were so thin that we were practically sleeping on just the metal frame of the bunk bed.
6. About two weeks after I first arrived at Camp East Montana, guards called me out to sign and fingerprint some documents. The guards then told me I had 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 then took about 3 or 4 people from my pod to the front office and locked us in a room for two hours. There were other detainees there.
7. The guards then started calling people out of the room one by one and cuffing their hands and feet. A guard told us we were being taken to Mexico. A guard called my name but I did not go up to the door. I understood that the guards would put me on a bus and take me to Mexico. I was scared for my life.

8. The guards saw me standing in the room and ordered me to come forward and get on the van. I pled with the guards again and told them that I was Cuban, that I was scared for my life to go to Mexico, I did not want to go to Mexico. A guard then grabbed me and slammed me down to the floor. The guard threw me against the floor and approximately 4 or 5 guards came down on me. The guards stepped on me so that I would not move, and one of the guards put his knee behind my neck and pressed down forcefully. I was struggling to breathe and was scared I would pass out. I yelled out at them to stop and told them I would go with them. The guards cuffed my hands and feet and pulled me up to stand. This caused pain to the back of my head and my back. I was in pain for over two weeks. The guard beat me because I was refusing to be cuffed and taken to Mexico. Other people later told me that the guards had also beaten several other people for refusing to go to Mexico. People were really scared.
9. 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.
10. Then, the guards took me on a bus with approximately thirteen people to a part of the border called Santa Teresa, which is near 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.
11. When we arrived at what I understand to be Santa Teresa, the guards took off our metal cuffs and put plastic cuffs on us. There is a sign as you approach the border that says "Santa Teresa." 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 at the immigration guard in Mexico at the other side of the border 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 yelling 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.

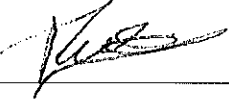
12. I am attaching a true and correct copy of a drawing I made from my memory of the scene at Santa Teresa. It depicts the two buses: one going toward Mexico and the other going toward the U.S. I completed this drawing on or around November 12, 2025.
13. Out of the thirteen people who came with me on 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.
14. I was so scared during that entire experience. I didn't know what would happen to me if I went to Mexico. I don't have any friends or family there, and I've heard that around the area where they brought us is where trafficking of people happens.
15. Sometime between October and November, facility staff tried to take me to Mexico again. An ICE guard stood outside the door to the pod and called people out by name. The officer had materials, including ink and some papers, to take our fingerprints and signatures to consent to go to Mexico. I said "no" and told them 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 narco-traffickers. I told them that all my family is here in the United States. The guards told me they would deport me to a different country and would press charges against me. I told them I wanted to stay in the United States. That time, I did not get on the bus. They continued to tell me that they would send me to jail and to another country in Africa, but I continued to tell them "no," and they put me back in my housing unit.
16. The experience of the guards trying to trick us into signing 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. Throughout my time at Camp East Montana, I witnessed guards trying to deport other Cubans into Mexico. In early April, approximately 7 or 8 detainees who I believe to be Cuban came back into my pod after being called out by guards. The detainees said ICE had put them in a van and tried to deport them into Mexico, but they refused.
17. Medical care at Camp East Montana is terrible. On or about March 22, 2026, in the afternoon, I felt very nauseous and felt a sharp pain on the left side of my abdomen, near my pelvis. On a scale of 1 to 10, my pain was about 6. I take medication for an ulcer on the left side of my abdomen. At that time, I believed the pain was due to the ulcer. That night, I submitted a sick call request to see the facility's doctor. I told the guards in the pod that I was feeling sick. I was not taken to the doctor that night. I continued to feel this pain for two or three nights in a row. I remember submitting multiple sick call requests to see the doctor.

18. On the second or third night, I was feeling sicker. My pain increased to about 9 out of 10. I was nauseous and could not eat at all that night. Approximately at 11 pm, I began vomiting and noticed there was blood in my vomit. I had never vomited blood in my life. I was scared and thought maybe one of my organs burst. I told the guard in the pod right away that I had vomited blood. He told me I had to wait to see the doctor. I then threw up about 4 or 5 more times. It was extremely painful. I could not sleep at all that night.
19. I had heard of people dying from lack of medical care at Camp East Montana and heard someone was killed for asking for their medication. I was very worried that I would not get any medical attention until it was too late. I grabbed a disposable cup from the water fountain and next time I felt nauseous, I vomited into the cup. Again, I could see blood in my vomit. In the morning, during the guard shift, I showed one of the incoming supervising officers the cup with blood in it. I asked him if they were waiting for me to die before they took me to the hospital. The supervising officer seemed alarmed and ordered another guard to take me to the infirmary.
20. I was at the infirmary for approximately 40 minutes. The medical provider took my vitals and checked my blood pressure, then she told me I was going to the hospital. Guards then cuffed my hands and feet, put me in a van, and drove me to Del Sol hospital. The drive was approximately 20 minutes long.
21. At the hospital, I was brought in through the emergency room. I threw up again while I was getting checked by the doctor. The staff at the hospital took me to get tests and performed a laparoscopy to check my organs. They put an intravenous drip and gave me what I believe was morphine for the pain and something for the nausea. I was hospitalized for two days. I was discharged on the morning of the third day.
22. A guard handcuffed me and drove me back to Camp East Montana in a van. When we arrived, I was taken directly to the infirmary. I told the doctor there that I was still feeling sick and very tired. The doctor said it would take them approximately three days to start giving me the medication the hospital prescribed. The doctor also told me I had two hernias and an ulcer. I did not know about the hernias until then. The doctor checked my blood pressure and vitals but did not give me any care instructions or changed my diet. The entire interaction lasted approximately 5 minutes. I was then taken back to my pod.
23. Back in my pod, I was still feeling sick. For about two days, I continued to feel a lot of pain in my stomach and had trouble walking. Approximately 3 days after I returned from the hospital, a nurse came into the pod and gave me the medication the doctor from the hospital prescribed. I started feeling better after taking the medication.

24. No medical staff in Camp East Montana has told me what happened, why I vomited blood, and if I was diagnosed with anything in particular. I believe this incident was caused by the food at Camp East Montana. The food was very spicy and hard to eat. After eating the food, I would burp frequently, pass a lot of gas, and experience discomfort and pain in my stomach. There were times I would eat only milk and cookies instead so as to not get sick.
25. Throughout my time at Camp East Montana, I also noticed a lot of dust coming into the units. Every morning, I would wake up feeling congested and with cold-like symptoms. Our clothes were often covered in dust and when I showered, I could feel the dust or dirt in my skin. The top of the bunk beds would often be covered in a layer of dust. We were not given any face covers, so we breathed all the dirt in. I believe a cleaning crew is supposed to come in once a week, but the dust gets into the unit every day.
26. Sometime in April, the contractors at Camp East Montana changed. The guards were wearing a new uniform but it was still the same guards that we saw every day. I recognized some of the guards that I interacted with before wearing the new uniform. The food was still very bad and made me feel sick, and recreation time remained inconsistent. Even though the contractors changed, the conditions at Camp East Montana remained as bad as before.
27. We were treated like animals at Camp East Montana. I felt desperate, depressed, and sometimes I wanted to give up. I would sometimes cry underneath my covers. I think of my family and all the time we have spent apart. I have been in ICE detention for almost a year. I am scared of retaliation for speaking about my experience, but I believe the whole world should know what is happening at Camp East Montana 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 28 of 5, 2026 in Ochopee, Florida.

Signature: 

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, **Perla F Alvelais**, certify that I am fluent in both English and Spanish. On May 22, 2026, I personally spoke with **Reinaldo Moreno** and read the foregoing declaration to him, translated into Spanish faithfully and accurately. **Reinaldo Moreno** affirmed 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: Perla F Alvelais

Date: May 26, 2026