

DECLARATION OF CARLOS CAMARILLO-GONZALEZ

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

1. My name is Carlos Camarillo-Gonzalez. I am 33 years old and from Venezuela.
2. I was recently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I first arrived at Camp East Montana on or about September 29, 2025 and was held there until on or about April 9, 2026. At that time, I was transferred to the El Paso Processing Center, where I am currently held. In total, I was detained at Camp East Montana for about eight months. Before I was detained by ICE, I lived in Dallas, Texas.
3. I was brought to Fort Bliss by airplane and then by bus. When we arrived at Camp East Montana, the guards left us cuffed on the bus for about five hours. They didn't allow us to go to the bathroom during that time. Then, guards put me in a small room with about 45 other people. The room was cold, which caused pain on the side of my body because I have what I believe are kidney stones. Me and the other detainees were left in that cold room for approximately three days. The guards only gave us bread and water during that time.
4. At Camp East Montana, I was first held in the C-3 unit. At different times during my time there, I was held in the Charlie, Echo, and Delta units. I was moved between housing units multiple times.
5. In the units, I believe there are 72 beds. The units are very dirty. When I first arrived at Camp East Montana, the bathrooms were often broken. The showers and the bathrooms would all overflow with water. The overflowing from the bathrooms happened up until late November, approximately. Detainees had to bang on the doors to beg the guards to do something to address it. I felt frustrated that we had to resort to things like banging on doors just to get basic issues like this addressed. We also had to beg for cleaning supplies so we could clean the unit ourselves. The guards would not proactively bring us things to clean with.
6. Receiving mail was also a persistent issue at Camp East Montana. Sometime in March 2026, my family sent me some documents by mail that I needed to submit as evidence for my immigration case. When I spoke to them they told me that the tracking information showed that the package had been delivered at Camp East Montana. I asked the guards over 10 times for approximately one month for my mail but they repeatedly told me they had not received it. I was very anxious because my court date was coming up. Two days before my court appointment, the guards finally brought my mail. They did not tell me where it was or why I did not receive it sooner.
7. There was a lot of dust that came into the tent and made us feel sick. The dust made me feel very congested, as if I had a cold, and I would sometimes get nosebleeds. It is unbelievable and inhumane that we are forced to live in these conditions. In the units, I could see a layer of dust on top of all surfaces including the beds and the tables where we

ate every day. People that slept in the top bunk beds would wake up covered in dirt and dust. This happened at every unit I was housed in.

8. Camp East Montana does not seem designed for humans to be housed here. Water would drip into the ceiling of the housing tents where I was held. This caused puddles inside the housing tent and the areas outside. There was construction noise outside the tents all day and all night. These noises made it hard to sleep. We could hear the beep, beep, beeping noise all the time. It did not stop. We also heard jackhammers banging and other construction noises constantly.
9. Throughout my time at Camp East Montana, we were not regularly given hygiene products like soap or taken outside to the yard. This feels like a violation of my rights as a human. We had to beg to receive recreation time. It seemed like the only way we could request the things we are entitled to, such as recreation time, was by banging on the doors. There didn't seem to be another mechanism to talk to anyone from ICE about the issues we were experiencing and about getting our basic needs and rights met there.
10. There was no commissary at Camp East Montana for us to purchase additional items that we are lacking.
11. The food we were given devastated me because it was so bad. The food smelled bad and was watery. It would often make me sick, with vomiting or diarrhea about 3 or 4 times a month.
12. In early November 2025, 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 witnessed when I would ask for help or information and no one would give me a single response. Aft
13. Another reason why I stopped eating was because I needed medication for the pain caused by my kidney stones. Not eating was the only peaceful option I felt like I had left to try to get my basic needs met. I started feeling like the only way they were going to take me to the hospital is if I was in a life or death situation.
14. I became very skinny while on my hunger strike.
15. Throughout my time at Camp East Montana, approximately every week, between one to three people went on hunger strike because they wanted status updates on their cases and wanted to know what was happening to them and how long they would be trapped there without any information.
16. When it came to medical treatment, there was always a delay of many days between when we ask for medical attention and when we receive it. It could take 3-4 days before we received any type of response after we put our name on a list indicating we needed medical attention, even if we needed medical help urgently.
17. During my intake at Camp East Montana, I told medical staff that I had kidney stones. I learned that I had kidney stones about six months prior to arriving at Camp East Montana during a doctor's appointment in Dallas. I was supposed to have a follow-up medical

appointment with that doctor to treat them, but I could not attend that appointment because I was detained and transferred to Camp East Montana.

18. Approximately one or two weeks after I arrived at Camp East Montana, I had to use the electronic tablet in my unit to contact my friend outside of detention and ask them to try to call 911 because I was experiencing extreme pain on the side of my body, where my kidneys are, fever, dizziness. If I had to put the pain on a scale from 1-10, it was a 10. I nearly lost consciousness. The pain was sharp and the area felt swollen and inflamed. I told the guards about this but they told me I had to wait to see the doctor. My friend called 911 and I believe that as a response, an emergency medical team arrived to Camp East Montana. I was not seen by that team, however, and did not receive treatment that night. The next day, one of the captains at Camp East Montana came to my pod, called me out, and took me to the medical tent. Again, I was given Ibuprofen. The pain went away for a few days but came back. Even now, after everything, I still feel pain from the kidney stones.
19. During my time at Camp East Montana, I submitted multiple sick call requests to get medical attention for my kidney stones. My pain was often as high as an 8 on a scale of 1 to 10, and sometimes it would be as extreme as a 10 out of 10. There were times I would even pee blood or felt a strong urge to urinate but could not pee at all. During the medical visits, I was prescribed ibuprofen or tylenol but nothing to treat the kidney stones. I felt like I had to keep living the pain over and over.
20. When I first arrived at Camp East Montana, I also asked the nurse to test me for HIV and other STDs. Before I was detained, I would get tested every six months because I knew I had been exposed to HIV. The nurse drew blood and she told me she sent it to a lab to get tested. I repeatedly asked the medical staff for the results of that test, but they were not provided to me. Up until the day I left Camp East Montana, the medical staff told me they did not have the results to those tests.
21. As time went on at Camp East Montana I started feeling very tired and often had symptoms similar to a cold. I visited the infirmary a few times to address this and they told me it was because of the dust in the units. I was not prescribed any medication. During one of those medical visits, I asked the nurse to do an HIV test again. Once again, the nurse drew my blood and told me they would send it to a lab for testing.
22. On or around March 15, 2026, I submitted a sick call request to see a doctor because I was feeling pain due to the kidney stones. I was feeling pain and burning in my kidney area and I wanted treatment, not just ibuprofen. When I was taken to see the doctor, I told him that I had requested an HIV test for a second time and that I had not received the results from the first or second test back. Approximately 15 days had passed since the nurse drew my blood for the second time. The doctor told me he did not have the results and that test results take a long time. The doctor prescribed more ibuprofen for my kidney stones and sent me back to my pod.
23. On or around that same day, at approximately 6 or 7 pm, the same doctor and a nurse came to my pod looking for me. They called my name and took me out to the hallway. In the

hallway, the doctor told me, in Spanish, that he looked at my medical history and asked if I knew I was HIV positive. He looked shocked and worried. I was in shock too. I wanted to die in that moment. I had asked medical staff for my test results for months. I do not know how long they had them and how long they knew I had HIV, but this was the first time I was learning about it after approximately 5 months of asking for my test results and without receiving any treatment. The doctor told me he would prescribe medication. I don't remember him telling me the name or giving me any other information. Then he left and I went back to my pod. The whole interaction lasted less than approximately 5 minutes. The entire time we were out in the hallway. People were walking by, coming in and out of the pod. I broke down crying. I was in shock. I didn't want to speak to anyone. I laid down and spent the whole night crying.

24. Six or seven days passed before I started receiving treatment for HIV. I was not taken to see the doctor after I was told about my diagnosis. No one explained the treatment or the diagnosis, the doctor only told me to take the pills. The medical staff at Camp East Montana did not perform any further tests to evaluate my condition or to determine my viral load, CD-4 or T-cell count.
25. My physical and mental health seemed to clearly deteriorate during my time at Camp East Montana, first because of the kidney stones and then because of the HIV diagnosis. I felt depressed and very anxious. My family and friends still do not know about my diagnosis.
26. Sometime after approximately March 30, 2026, I submitted a sick call request because I was feeling sick. I felt tired and very congested. I also wanted to get more information about my HIV diagnosis and any secondary effects of the medication I was prescribed. When I was taken to the infirmary, I asked for my medical records. The medical staff there told me I could not have it and that my lawyers had to request it. I told them I did not have a lawyer. They said I would have to request it "from outside."
27. On or around April 6, 2026, before I was transferred out of Camp East Montana, I told a captain that I wanted my medical records. He told me that I could not have them and that they would send them to the El Paso Processing Center. However, once I arrived at the El Paso Processing Center, I asked the medical staff for my records and they told me Camp East Montana did not send them. Up to this date, I have not received my medical records from Camp East Montana.
28. Before I was transferred out of Camp East Montana, I learned that the facility was changing contractors. Back then, I was not sure what that would mean for us and was hopeful conditions would improve. However, conditions remained the same and, in some ways, worsened. For example, guards started enforcing new rules but when we asked for the rules to be applied in our favor, like getting recreation time consistently, we were denied. The guards themselves do not follow the rules.
29. When the guards ignored our basic needs, I tried telling them that I know we are immigrants, but that does not make us less human. When we voiced our concerns, the guards would often threaten me and other detainees with solitary confinement. I felt so overwhelmed and

traumatized by my entire experience at Camp East Montana. Being there felt like torture. The whole experience drained me emotionally and physically. Before I was transferred out of Camp East Montana, I felt I could not survive another day there. They treated us like animals.

30. 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.

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 26 th of 05, 2026 in El Paso, Texas.

Signature: Carlos Carranillo

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, **Perla F Alvelais**, certify that I am fluent in both English and Spanish. On **May 21, 2025**, I personally spoke with Carlos Camarillo-Gonzalez and read the foregoing declaration to him, translated into Spanish faithfully and accurately. Carlos Camarillo-Gonzalez 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: **Perla F Alvelais**

Date: May 26, 2025