

### DECLARATION OF LUNG VAN DO

I, Lung Van Do, 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 Lung Van Do. I am 51 years old. I was born in Vietnam but have lived in the United States since I was 3 months old when I was brought on a US Naval Ship as a refugee.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at Camp East Montana since on or around November 13, 2025. I was taken by ICE officials at my place of work in the Chicago area on or around November 12, 2025. I spent the night at the Broadview Detention Center in Illinois. After about 12 hours of traveling, I arrived at Camp East Montana around 7 pm on or around November 13, 2025.
4. When I arrived at Camp East Montana, it took about 15 hours before I got through the intake process. A group of us all waited at the intake station overnight. We could only sleep on a metal bench or on the floor. There were two tables at the front of the room where the staff were doing a health check and a mental health check. I could hear and see everything that happened at that table because it was all in the same room and there was no barrier. The health check was really quick. They asked if there was anything wrong with me and if I took any medications, and they took my temperature and blood pressure. I take medication to help me sleep at night so they made me talk to the mental health person to get that medication. I also have a device implanted in me for my overactive bladder, and I told them that I had the device.
5. I didn't get a handbook when I arrived at the facility but there was one in the pod. The first few months I was detained, it was really chaotic and nobody understood any of the rules. Staff is only consistent at being inconsistent. They don't seem to follow rules in the handbook. I read the handbook very closely. I kept asking them for things in the handbook, like commissary, but they said that they didn't have it. I don't understand why we have a handbook if it's not relevant to the facility itself.
6. Since being at Camp East Montana, I was housed in Delta unit until on or around April, when I was moved to Alpha unit. I drew a picture of the layout of the facility to

the best of my recollection and drawing abilities. It is not to scale. A true and correct copy of my drawing is attached hereto as **Exhibit A**.

7. When I was housed in Delta, to get to medical they would escort me through Charlie, Bravo, and Alpha, and intake to get there. The recreation yard for Alpha has a partial covering, so you can see the sun in part of the area. The recreation yard for Delta was divided into four separate yards, and there was a covering over the yards.
8. I was also housed in the SMU for 48 hours, and that was in a separate area with its own recreation yards.
9. I also drew a picture of a pod inside of Alpha unit, to the best of my abilities. It is not to scale. A true and correct copy of my drawing is attached hereto as **Exhibit B**.
10. I also drew a picture of the layout of the pods within Alpha unit. There are fourteen pods total. It also is not to scale. A true and correct copy of my drawing is attached hereto as **Exhibit C**. There is a hallway down the middle of the tent, and on either side are the pods, which have four walls but no ceiling other than the top of the tent high above. The walls are about 10-12 feet high but there's no ceiling that connects to the walls. You can toss things from one pod into another. I've been hit by things people throw from another pod before. When you're in your pod, you can hear what's being said in the hallway outside your pod or in the next pod. I can hear the officers gossiping in the hallway.
11. The food here is really bad and the portions are very small. Everyone here has lost weight. I have always stayed a consistent weight but even I have lost at least 5 pounds since being here. It's the bare minimum just to keep us surviving. At one point, when I was in a different pod, we found insects in the food. On or around last Sunday, I saw a large insect that to me looked like a spider crawling in the pod. Someone said it was a "Roman ant."
12. When I first got to Camp East Montana, it was really crowded and there were fights every day. Staff put too many people in the pods. There was a big population decrease, and fewer fights, but now the population is increasing again and the fights are becoming more frequent. I've been in the Alpha 13 pod for about a month now. When I first got to Alpha 13 there were only about 32 of us in the pod but now it's about 48 people because new people arrived today.
13. I spend most of my time here in bed because there isn't anything else to do. There are two TVs in the pod but everyone is always fighting over them. Sometimes we can

get books from the library but there are only about 30 softcover books that we're allowed to check out. There are also some hardcover books about Donald Trump but we're not allowed to check those out of the library. We're supposed to get access to the library every day but it's very inconsistent on when we are actually allowed to go. I would like to go to the law library so I can work on an appeal, but they haven't let us go yet today.

14. It is very dusty and sandy in the pods, especially when there are dust storms. After a dust storm, there's a layer of dust on top of everything in the dorm and it's hard to breathe. In or around March there was a bad dust storm and there were a lot of guys in the pod who were sneezing a lot and couldn't breathe at all. Somebody told me that they had something called desert fever or "Valley fever." I had never heard of that before and don't know what it is.
15. There is also mold in the pods. Before I was detained by ICE, I did water damage and mold remediation so I know what mold looks and smells like. I've told the guards about the mold in the pod right now but they haven't done anything about it. It's been there at least since the middle of April when I got to this pod. I think the mold makes it harder to breathe at night especially. I often have itchy eyes and a dry throat.
16. We get one hour of recreation almost every day. Sometimes the guards say it's mandatory and sometimes they say it's optional. There's a schedule up in the dorms but it doesn't seem to mean anything. From November until April, I didn't see any sunlight because our recreation was all covered. Since I moved to Alpha 13 in April, I go to a different area for recreation and that area has a section that is uncovered so I get to see the sun. I went out everyday in April because I had missed seeing the sun so much. Now it's starting to get too hot to be comfortable outside and it's very dusty so you breathe in a lot of dust at recreation. The water we get outside at recreation is warm and has a bad smell. I don't like drinking it. We get one soccer ball and one football at recreation. I sometimes get hit in the face with the soccer ball when people are playing because there isn't any separation between the people playing soccer and the people not playing soccer. I saw someone get hit and their glasses broke.
17. When recreation is optional and if we choose not to go outside, they scan our wristband to record the denial. I do IT work outside of detention and I recognize the warehouse management system that they're using to track all of us, like how you

would track packages in a warehouse. I used to operate one of those systems when I was working. It feels like human trafficking on a large scale and by the government.

18. Even though it's getting very hot outside, it's too cold in the pod. All of the guards wear jackets, but we detainees don't get jackets – we just get one sweatshirt. When we turn in our sweatshirt for laundry, we don't get a replacement and are without a sweatshirt until laundry returns, usually later that night. When the population here was larger, it would take longer to get our laundry and we wouldn't get it until the next day, so we'd have to sleep without a sweatshirt. Even with a sweatshirt and the thin blanket, it feels like the temperature is turned down overnight and I shiver in bed every night. I'm always cold inside.
19. I feel uncomfortable in the pod because I can see that there are cameras looking into the showers and bathrooms. The guards say that the camera is for security purposes only but I see Captain Jones, a woman, watching the cameras all the time. Sometimes female officers are watching too. That makes me uncomfortable.
20. A few weeks ago, the guards came and told me I had to sign a form about PREA. The form looked like a questionnaire and they asked me all of the questions in the law library but other detained people were there and could hear the conversation. Then they told me to sign the form. The questions were about whether I had experienced sexual harassment or abuse. I wouldn't feel comfortable answering those questions publicly, so I just signed the forms. The next week, they came around and did the same thing again but that time it was in the hallway by the pod, also around other detained people who could see and hear everything. I think they're making every detained person do these questionnaires now. They haven't told me anything else about how to file a PREA grievance or who to talk to if I have a concern. Each time they brought two identical documents and made me sign them. They didn't give me a copy of the documents they made me sign. That was the first time I had been asked to sign those documents.
21. It's hard to get medical attention here and when they do come it's often very late at night. For example, I put in a sick call on or around May 17, 2026, because I had a sore throat, cough, and runny nose. They came to take me to the clinic at midnight that night. They took my vitals, gave me cough drops, and put me in a holding cell, which was really cold. It's really frustrating when they wake me up because they know that I have trouble sleeping and am on sleep medications but they still come late at night.

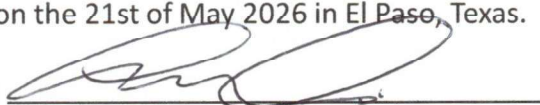
22. Sometimes it takes a long time for them to come after you put in a sick call. One of the guys in my pod had a bad case of gout a few weeks ago. His foot was swollen to double the size and he couldn't walk on it without help. He was basically bedridden for multiple days. He kept asking staff for help but they didn't give him medication. I was helping to get him water and to help him walk to the bathrooms. I asked a sergeant to come take a photo of his foot for medical so that they could see how bad it was. When medical finally came to see him, I think it was the next day, they only gave him medicine for one day and he was in pain the next day.
23. There was another man here who I think maybe didn't have a tongue or couldn't swallow. He walked around with a rag in his mouth that he took out when he ate and drool came out of his mouth. Once, I gave him some food and he took out the rag and had to lie down to slowly eat the food in a specific posture. It looked like he was really struggling to swallow the food. I think they had to take him to the hospital and I haven't seen him since.
24. In or around March, there was a measles outbreak. I wasn't in the pod that got quarantined but they came around to my pod to give us all a tuberculosis skin test. That was the first time I had the tuberculosis test since being detained. My test came back negative because the bubble under my skin never turned red or swollen. There was another man in my pod whose bubble turned red and swollen but they told him it was negative and didn't do anything else for him. We were all a little worried about being close to him after that.
25. The guards have mostly been okay to me but I've seen them hurt other people. Sometimes they'll bring about 20 guards at a time to take down one person. I saw that happen to a Cuban who didn't want to go to be deported to Mexico. Staff left and came back an hour or two later with 20 or so guards to forcibly remove him from the pod. I saw them have to drag one guy out. To see that level of force made me scared to ask for help.
26. I think the night guards get really bored and will mess with us. A few months ago, one of the night guards woke me up at 3:00 am to sweep the hallways. He said I had to get up to do this. It was frustrating because I have trouble sleeping and I didn't understand why we needed to sweep the hallways in the middle of the night. I've heard about other people randomly being asked to do this other times too.
27. I am submitting this declaration to help improve this facility and how staff treat detainees. But I don't know how they can fix everything here. We're treated worse than inmates. I've never been to prison but I was in jail over 20 years ago, and we

were treated better than I am here. I've spent more time being an ICE detainee now than I have in jail.

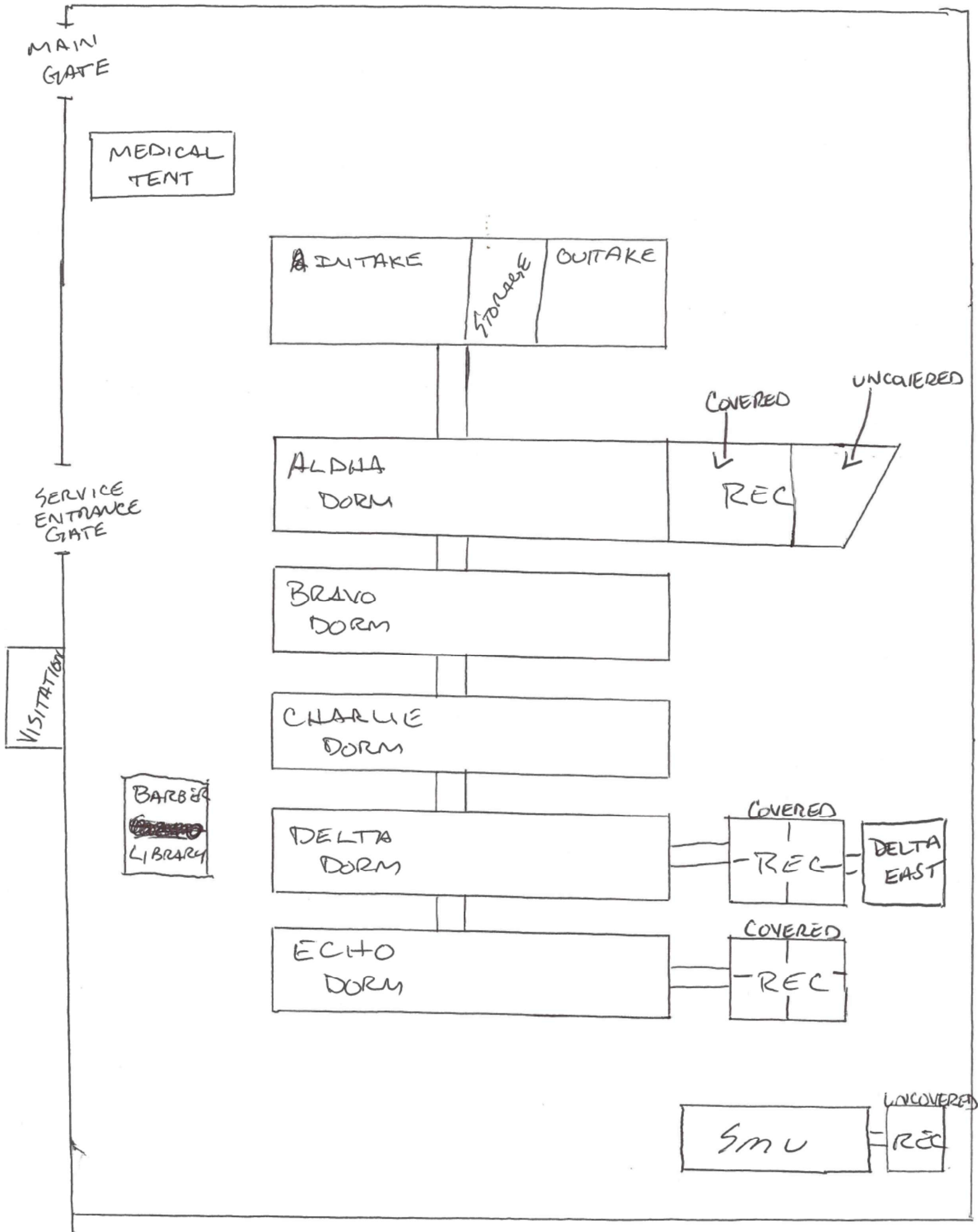
28. Everything in this declaration is true and correct to the best of my knowledge and recollection.

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

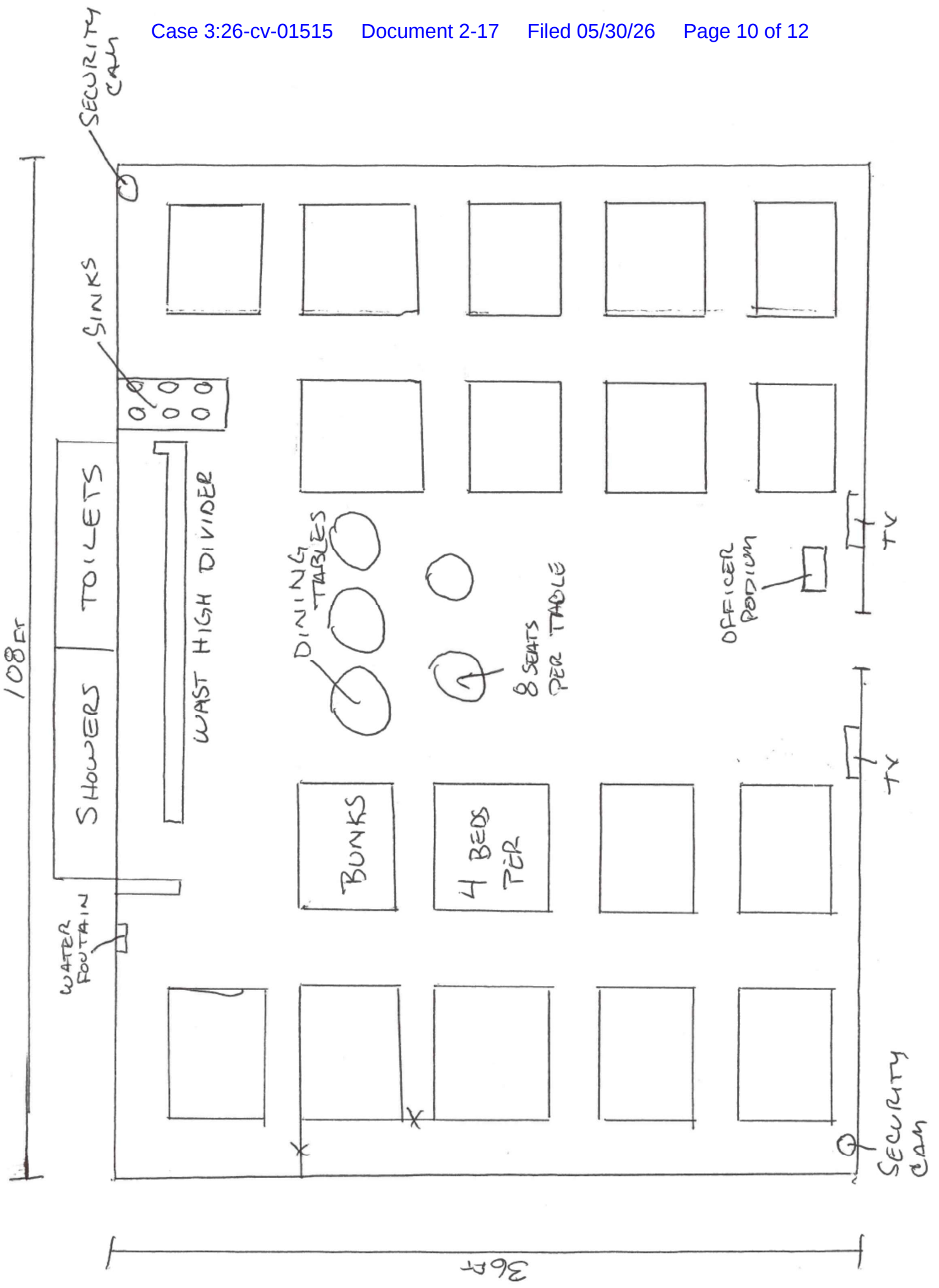
Signature: \_\_\_\_\_

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

# EXHIBIT A

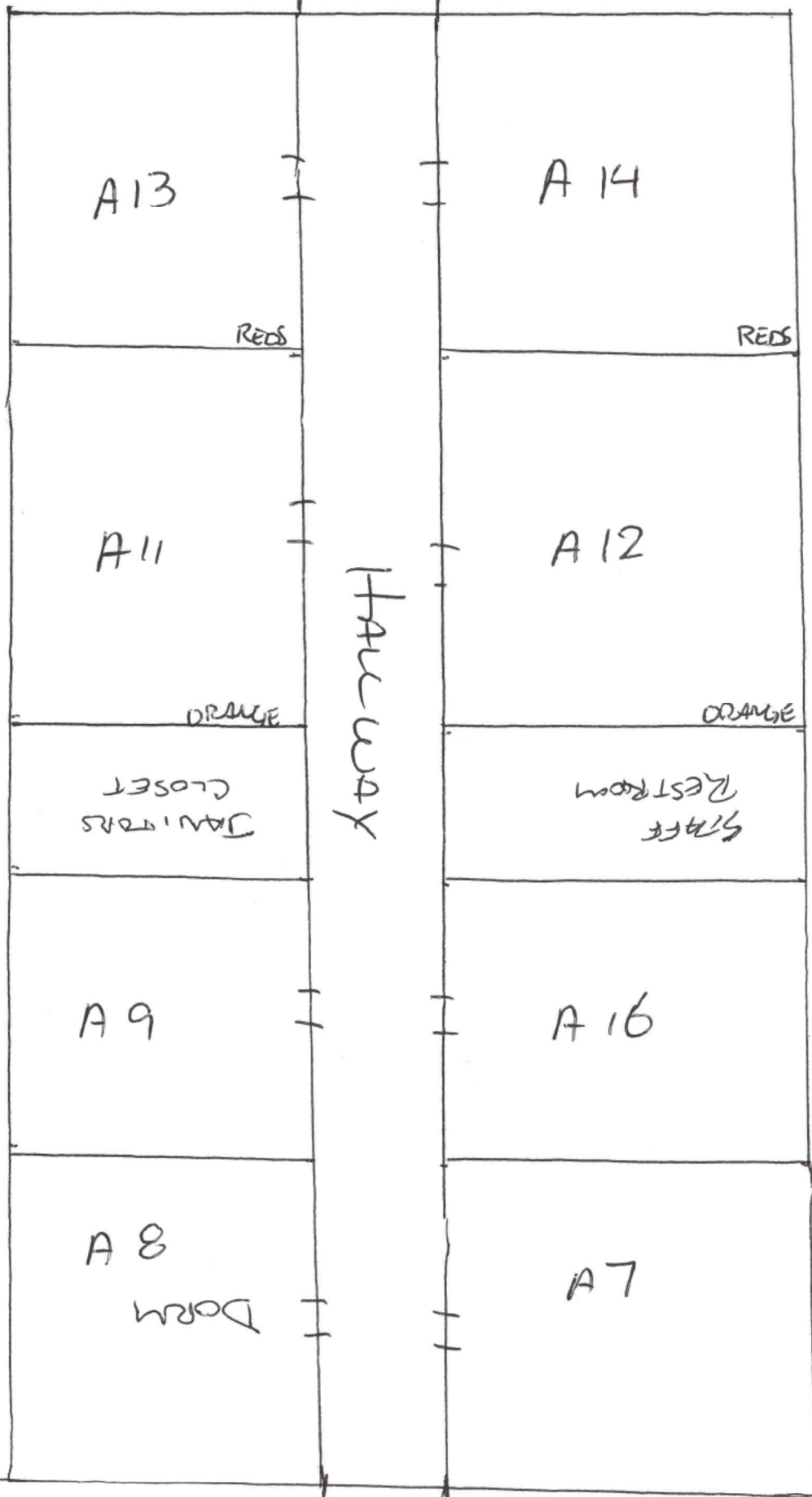


# EXHIBIT B



# EXHIBIT C

HALF OF  
~~POD~~ ALPHA  
DORM



WALKWAY BETWEEN PODS  
OFFICERS DESK