

DECLARATION OF RES

DECLARATION OF [REDACTED]

I, [REDACTED], 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 [REDACTED], and I am [REDACTED] years old. I am from [REDACTED], and I am seeking asylum in the United States. I arrived to the United States in July 2020 I have seven children and wife who live in Maine. Two of my children are U.S. citizens. My youngest daughter is one year old.
3. I was detained by ICE on or about January 27, 2025, in Maine, when I went out to buy food for my children. When I returned home, ICE agents were waiting for me. I was detained in Maine for a week.
4. Then, on or about February 2, 2025, I was transferred to Torrance Detention Center in New Mexico. I was detained at Torrance for about a year.
5. Then, on or about January 13, 2026, I was transferred to Camp East Montana in El Paso, Texas, and I have been detained here ever since.
6. I have been housed in other immigration detention facilities in the United States but the conditions here at Camp East Montana are the worst I have experienced. I am shocked by the conditions; they do not reflect the United States I know. I repeatedly have asked ICE officials to transfer me to another detention facility due to inhumane conditions here, but I have received no response to my requests.
7. I also worked as a guard at the county jail in Maine starting in September 2024, for about 10 months. Then, I cleaned clinical rooms at the general hospital. When I worked as a guard in the county jail, I received training on how to properly and respectfully treat inmates. I received training for three months and had to pass an examination. The conditions at the county jail were much better than here at Camp East Montana. For example, I had to respect inmates, inmates had access to the commissary, food was better quality, inmates had access to outdoor recreation and educational programming and had better medical care. Inmates at the county jail had access to their own tablet. When they moved from one place to another, inmates did not have to be subjected to pat downs and searches (the only times that they had to be searched was when they had contact with people

on the outside like when they worked at the kitchen or had outdoor visitors). Here, we do not have any contact with other visitors in the same way. Here, anytime we go to the recreational area (which is totally enclosed), we are patted down on the way in and way out.

8. I have no criminal history at all. Here, I am being treated worse than a criminal and worse than the inmates where I worked at the county jail in Maine. I feel that I am being punished and tortured.

Housing Unit

9. I am now in unit B-2. I was previously in A-7 unit, which is in Alpha. Before that I was in other units, including C-4, E-7, and D-10.
10. Every unit I've been in has the same layout. They all have about 72 beds which are divided into two rows of 9-four-person bunk beds; one row on each side. There are about four big metal lunch tables in the middle of the unit, and there are about six toilets and showers across from the lunch eating area. There are also two televisions. There are no walls between the bunk beds, and we have no privacy while we sleep. There is not enough space for all of us to eat at the lunch tables together. The others have to eat at their bunk beds.
11. We're in a large tent divided into about sixteen units. The walls are wooden boards (which create the units within the large tent), and the floor is also wood boards. The ceiling/roof is made of a tarp-like material, which is kept up by these machines that blow air.
12. There are no windows in the unit. This means that I cannot see the sun or clouds during the day. There is also no clock in the unit, so the only way that I can tell time is by looking at the tablet whenever we get an opportunity to use them or when the guards tell us when to wake up, go to sleep, eat, clean, or go to the yard. All of the days feel the same. When I worked at the county jail, the individual cells had a small window; the unit had windows, and there were clocks around that allowed inmates to know the time of day. When I was at Torrance detention center, the individual units also had windows, and we could see the sun and look out during the day.
13. The tarp covering that serves as the roof of our unit is not fully sealed, allowing water and dust to enter the unit. That means that when it rains, rain gets into the unit and falls on people, particularly those who are on the top bunk. The same is

true when it's windy outside; dust and sand get into the housing unit and are particularly bad for people on the top bunk. In other units, I have slept on the top bunk where water fell on me when it rained, my face and body were covered by dust/sand throughout the night and day.

14. There are three types of people at Camp East Montana: people who wear a red uniform, people who wear an orange uniform, and people who wear a blue uniform. I've been told the red and orange uniforms mean people have some sort of criminal history (I'm not sure what the difference between those uniforms is), and the blue uniforms mean people haven't committed a crime. In my unit, I and everyone else wear blue uniforms. I do not have a criminal history.
15. Since on or about April 18, 2026, there are three counts during the day which is when the guards count each individual detainee. The first count occurs at 5 AM – 6 AM, and we are woken up so that the guards can scan our bracelets. The second count starts at around 12:45 PM, which occurs right when our lunch is served (requiring us to eat very quickly or at eat our bunk beds) or occurs right after lunch is served (requiring us to eat quickly in a few minutes). The second count lasts until about 2:30 PM or 3:00 PM. During that time, we cannot leave our bunks, go to family or counsel for visits, use the tablets, watch TV, walk around the unit, or go to the bathroom without permission. The third count starts at around 7:00 PM and lasts until around 8:00 or 8:30 PM. During these counts, I am confined to my bunk. When I worked in the county jail, our daily counts were quicker as I already had the names of the people. The control center called me to confirm, and I confirmed this quickly. When I was at Torrance Detention Center, count was done quickly as well and never during eating times.
16. I currently have a private immigration lawyer to help me with my case. If I want to speak to him I have to call my son and ask him to relay any messages to the attorney or give me updates about my immigration case. I have never had direct contact with my attorney. All communications are done through my son. If I need to contact my son about anything related to my attorney, I have to pay for that call and our conversation is not confidential. If my attorney wants to call me, I understand he has to make an appointment and ask permission from ICE but I cannot call him in a free and confidential line. At Torrance, there were attorneys that came to visit every week and provided free legal services. They answered our questions and had someone that spoke Portuguese. There's nothing like that here.

Cleaning and Hygiene

17. The housing unit is not cleaned adequately. About 72 of us have to share the same few toilets, and they get filthy often. It's indescribable. There are five or six toilets that are shared between 72 men. The toilets are often dirty with urine and feces, which are everywhere, including dirty and used toilet paper. It reeks everywhere in the unit of urine. Staff only clean the toilets once a week. That is not nearly enough. On the other days, guards expect us to clean the unit, toilets, showers, and common areas. The guards bring us a mop, broom, toilet scrubber and tell us that we can clean the unit if we want or just keep it dirty. We are not given any disinfectants, and we must clean with just the tap water. We are often mopping the floors with just water which is dirty because of the sand and dirt that enters the unit. The facility does not provide us with any food or pay if we "volunteer" to clean the unit. In comparison to the county jail, the facility was cleaned every day. At Torrance, I cleaned every day and received the proper supplies to clean; there was a corner that stored all of the cleaning supplies (e.g., gloves, disinfectant, mop/broom, scrubbers), and I received \$5 to clean the unit.
18. When it's windy outside, sand and dust get into the unit. It can take days before it's cleaned up. For example, on or around Sunday, April 26, a lot of dust and sand got into the unit, but it wasn't until the following Tuesday that staff came to clean it up.
19. We are not given a bar of soap, and there are no soap and dispensers in the housing unit. We are only given small packets of shampoo and moisturizer that we are supposed to use for everything – for when we take a shower and clean our hands. That's not enough. They're tiny packages, like a single-use ketchup package you get at fast food restaurants. We have to tear them open with our teeth. If you poured it onto your hands, you would use up the entire packet with one hand wash. In Torrance, they had disinfectant dispensers across the entire facility. There is nothing like that here.
20. Because we don't get enough shampoo, I often can only wash my hands with water. Sometimes I'll grab a little piece of toothpaste and rub it against my hands under water to try to stay clean. But I also want to be able to brush my teeth, so I don't want to use up all my toothpaste that way.
21. When I ask the guards for more shampoo, they won't give me any and instead tell me something like, "No, I've given it to you already. I'm not going to give you any more."

22. There was a change in the contractor who runs Camp East Montana last month. Since the new contractor took over, we did not have access to that area and so could not shave, cut our hair, or cut our nails. Sometime last week, on or about May 13, 2026, the barbershop reopened. I had not been able to cut my hair or my nails for two months. We're not allowed to have nail clippers or razors in the unit. At Torrance, we each got our own nail clipper and we would get razors from the officers each week.
23. Before, when we could go to a barbershop, it wasn't that great either. You could only go weekly, and you had to rush to put your name on a list to go. Only if you were in the first twenty names on the list could you go. Otherwise, you'd have to wait until the next week and try again.
24. There is a small library where the barbershop used to be, but since the new contractor took over last month, we no longer have access to it. That doesn't make much of a difference to me; the books were mostly in Spanish, and I don't read (or speak) Spanish. At Torrance, they had a library with a lot more books in many languages, including Portuguese. I also like playing Sudoku and the librarian there would print Sudoku pages for me to pass time. They don't have anything like that here at Camp East Montana.
25. Since on or about May 8, 2026, I was moved to unit Bravo-5. There are about 6 toilets in the unit and there are 6 showers. On or about May 10, 2026, four of the toilets were clogged and sewage was seeping out of the toilets. People had no choice but to continue using the toilets, even though sewage was seeping out onto the floors next to the bathroom. The sewage water seeped into the corridor where the individual toilet and shower stalls are and where we must walk to go into the shower or toilet. The dirty sewage water just sat on the corridor floor. We had to walk through the dirty water with human feces. The guards saw the need for the toilet/shower area to be cleaned. On or about May 12, 2026, a maintenance crew came to unclog the toilets and drains and then the guards only brought us brooms, hand gloves, and water buckets for us to clean, but detainees did not want to clean because it was dirty with sewage, toilet paper, and human waste. The facility did not send a cleaning crew to clean and sanitize the area. So, the toilet and shower area remained dirty with human feces on the floor until on or about May 12, 2026, when the detainees had enough and detainees cleaned the toilet area, but we were not given disinfectant to sanitize the area. The detainees who decided to clean were also not given any hand soap, face masks, or any other supplies to properly protect themselves while they cleaned or clean themselves after they cleaned. The detainees used their

own personal towels to clean and wipe the floors. That was degrading to us all. During the time when the toilets were clogged and the area was dirty, the smell was horrible. I also felt nauseous and felt like vomiting. Even when I had to go pee, I had to hold my breath. When I could not hold my breath, and I had to breathe in the air, my stomach hurt. During this time, I made all possible efforts to not use the bathroom. I also could not have my normal bowel movements during this time. I also could not sit at the lunch tables or watch TV because the smell was horrible and prevented me and others from using those common areas. I could smell the sewage and human waste during our meals and at night while I slept, preventing me from sleeping well. The facility only sent a maintenance cleaning crew on or about May 13, 2026, only after the detainees had already cleaned the area.

Recreation

26. It's very hard and highly stressful for me here. It is very difficult for me to keep a calm spirit. I have my Bible and some brochures with prayers that I brought with me from Torrence. That's all that we have. There is very little to do to pass the time.
27. There's a tablet that they give four people to share at a time, and it has music and movies on it, but you have to pay for all that. I don't have any money, so I can't listen to music or watch movies on the tablet. I was the sole breadwinner for my family before I was detained by ICE, and now my family is in debt. I call my wife maybe once or twice a week on the tablet. I don't have enough money to call her every day. When I call my family and friends, I try to keep calls short so that I can make the funds in the tablet last a bit longer. I don't usually talk to them for longer than 10 minutes at a time.
28. There is a television in the unit, but the whole unit is meant to share it and it's usually on a Spanish-language channel because most of the people in my unit speak Spanish.
29. There is a small outdoor space that they sometimes take us to. It has a cover on top, so even when you're out there, you can't see the sun and sky. When you go to the outdoor space, and when you come back to the housing unit after, the guards pat us down and use a metal detector on us like we're criminals. They do that every time we leave the unit for any reason, including to go to the barbershop or to the doctor or even just to go out into the hallway. It's a total body search, where they put their hands on your collar, under your sleeves, socks, legs, everything. It's really stressful. I used to work in a jail, and that's the

same type of search we'd do when a new inmate came in. But we wouldn't do that to everyone every time they moved around.

30. The schedule for going outside is pretty inconsistent. Sometimes I have gone three days in a row without being allowed to go outside. And we are not outside for very long. Usually after 45 minutes they tell us to go back in.
31. I'm not sure why the outdoor time is so limited and inconsistent. I believe it is because that small space is supposed to be shared among all people detained here at Camp East Montana and so there's not enough time for all of us. I've been detained for fifteen months, the last four here at Camp East Montana. At other facilities, we got a lot more outdoor time and had other things to keep us occupied, to help things feel more normal. At Torrance, they had exercise equipment like weights and a stationary bicycle, they also had a large open yard with small basketball court and an area where we could play soccer. The guards would take us out every day so I would try to exercise every day. We were able to be in that space for up to two hours each day. This helped a lot with my stress and high blood pressure. I was also able to keep myself busy with work at Torrance. As I mentioned before, I worked cleaning my unit for a while and would get paid \$5 per day. I later worked in the kitchen and would get \$7 dollars per day. I would use the money I earned working to call my family and get some things from the commissary. I had a routine, it helped me feel better. I felt productive.

Medical Care

32. I have high blood pressure and take medication for that daily. At Camp East Montana, they give me a monthly supply of medication (pills) to keep and take each day.
33. Renewing my prescription is really problematic. On or around March 31, for example, guards took me out around 2 am to go to a different part of the camp to get a refill of my prescription, with about four other detainees. We were there until 6 am waiting for our medication. I don't understand why they would do that and not just bring us when it's ready and give it to us in the daytime, or have a nurse deliver it to us when they are in the housing units administering other people's medication.
34. On or about May 4, 2026 my medication for high blood pressure was running out. I was waiting for the nurse to bring a refill but they wouldn't so I submitted a sick call to get it refilled. The next day, a guard came to take me to the clinic. The

nurse checked my blood pressure and it was extremely high, up to 200. The nurse gave me a medicine. My blood pressure then went down to 180. The nurse then gave me another medication. I was there for approximately 4 hours. I did not get my medication then. They only gave it to me the next day.

35. While I've been at Camp East Montana, staff came and gave me a chest x-Ray. I asked them why they were doing that, and they told me, "Well, this is mandatory. We have to do it to everyone's that here." They didn't tell me what was going on. I didn't know that people had measles and tuberculosis here at Camp East Montana. No one explained anything to me, including what those diseases are and how to protect myself. Staff never gave me a mask or anything to protect myself with.
36. The sand and dust here are really bad. When there's wind outside, the entire unit gets covered in dust and a sandy substance. We've asked guards for masks to cover our mouths and noses, but they won't give us any. Most of the time I have to sleep in those conditions. My throat gets really affected and starts aching and itching, and I start to sneeze. I've gone to medical staff about it here and explained what's happening, but they just say, "No, you don't have anything, here are two lozenges" and tell me to drink water. They just give me two lozenges, but that doesn't fix the problem.

Staff and Change in Contractor

37. It's not worth asking the guards questions here, because when you ask, no one gives you an answer. For example, I have been here five months and have only two t-shirts. One was completely torn around the collar. I filled out at least five requests, one each week, to get a new t-shirt. Two weeks ago I submitted a sixth request but left out my nationality. The next day, I finally received a new t-shirt.
38. We were told there was a change in the contractor who runs the camp last month. From what I can tell, they have only changed uniforms, because the people are mostly the same, the conditions are the same, and the treatment is the same. Why bother changing contractors if everything just stays the same?
39. Actually, I think the conditions are getting worse. The food is worse. We don't get bread here. The only time we get bread is when we first go through the intake process, when they gave us a sandwich. Now, it's only when they run out of food that they give a sandwich to the people who didn't get a meal. There's no coffee, no tea, no fruit juice – nothing but water. There's no commissary or store either.

40. When I went through intake here, there was a video running all the time with fake images. The video showed windows being opened, beautiful food being served, people who were well fed, everything being clean, and people who were well dressed. I thought to myself, OK, the conditions are going to be OK. I was with another detainee and I remember I even told him to look at the video, that it looked like things would be good here. But when you come into the camp, the reality is totally different. I asked staff why they were running a video showing something untrue. But they never answered me.
41. I feel like I'm a criminal here because of how I am treated. The stress is really high, very intense. It seems like they put all this pressure and stress and pat downs and everything to make us so desperate so that we will agree to self deport. ICE officials and guards put pressure on me, telling me that my case is lost and bringing me papers to sign so I can self deport quickly. They told me they would give me \$2,600. But I don't want to do it. I have an asylum request pending. That's the only explanation I can think of for the kind of conditions they have put us in – the United States is the biggest, richest country in the world. There's no other reason to treat people like this. The staff won't do anything for us. It's only God that helps us here.
42. Before I was detained by ICE, I myself worked in a jail here in the United States. We were taught to respect inmates, to listen to their needs and fulfill them, respecting the rules of the prison. The inmates had access to razors to shave, nail clippers to cut their nails, coffee, tea, milk, and fruit juice. Here, it's the opposite.
43. I have witnessed and experienced many injustices here. I want authorities and people outside to know what is happening at Camp East Montana. Being at Camp East Montana is like living in a whole different world, and most people do not know what goes on here. I want them to know.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Portuguese, a language in which I am fluent.

Executed on the [REDACTED] th of [REDACTED], [REDACTED] in El Paso, Texas.

Signature: _____

[REDACTED]

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Portuguese. On [REDACTED], I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Portuguese faithfully and accurately. [REDACTED] 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: [REDACTED]

Date: _____ [REDACTED]