

# DECLARATION OF PKP

**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]. I am [REDACTED] years old and from [REDACTED].
3. Before I was detained by ICE, I lived in Annapolis, Maryland. I worked as a house painter. I lived with and supported my family.
4. From January 2018 until November 2025, I was imprisoned in Easton Maryland (Talbot County Detention Center), FCI Lewisburg, and FCI Butner in North Carolina.
5. I am being treated much worse here at Camp East Montana than I was treated at any of the prisons where I served time. In those prisons, I had better conditions, rights, and privileges.
6. I first entered Camp East Montana on or around January 24, 2026. I was detained by ICE on or about November 19, 2025, when I was released from FCI Butner. I was detained in Atlanta, Georgia, at a GEO Group facility for about two months.
7. I have a severe stomach and digestive problems. On or around March 2022, I received an operation to remove my appendix. But when I woke up from the anesthesia, I was told by medical staff that my stomach was severely swollen with blood and that I passed out, and my heart failed, requiring the medic to use the shocks. The doctors told me that they found out that they had ruptured a main blood vessel in my stomach, which caused severe internal bleeding. The doctors quickly operated on me. Since then, I have had severe stomach and digestive issues. For example, I cannot eat much because when I do, I must use the bathroom right away. My stomach is reduced in size, and I cannot digest food well. When I was in federal prison, I received a special diet that consisted of vegetables, fruits, and limited protein that was well cooked and fresh (e.g., grilled chicken). I could not eat fried food. But here at the facility I have not received any special diet. The food that we receive at Camp East Montana arrives cold and sometimes is rotten, and I've found worms in my food many times since I've been here. I've also received food that is spoiled and expired. At the federal penitentiaries, I received much better-quality food that was warm. We also had access to commissary where I could buy food, snacks, and extra hygiene supplies.

8. When I arrived to Camp East Montana, I arrived at the Intake Processing Center. I was at the Intake Processing Center for about two nights, three days (from Saturday morning until Monday). I slept on the floor without any blanket, mattress, pillow, or covers and without being given access to a shower during that time. There was not enough room for all of us detainees to move around because the room was small. There were about 64 people in a room where it was standing room only and less than half could lay on the ground next to each other at one time. I saw that there was a sign posted stating that the capacity was for 30 people. The room was about 10x20 feet. We were all huddled next to each other on the floor or standing up. There was a toilet in the room, and we all had to use the restroom in front of others. I felt uncomfortable using the bathroom and people did not want to use it, but it was their only choice. When I had a bowel movement and use the toilet, I could reach up and grab the hand of another man all around me and other people were looking at me. The water we received was tap water that came out of the sink that sat on top of the toilet. The toilet does not have a seat cover and so the sink was dirty with spit and dust. When I was there, I noticed that there were people in the room with me who were sick as they were coughing, on the floor saying that they had a fever, and who otherwise appeared physically unwell. For example, a man was banging on the walls because he had severe pain in his teeth. Other people expressed that they needed their medication. But the guards did not care or listen. People were frustrated because we were all enclosed in a small space. For food, we received two pieces of white bread, a single slice of ham and cheese, an apple, and a small cookie; three times a day. That's it.
9. About two days after being in the intake room, I was given a quick medical evaluation which included measuring my blood pressure, weight, height, and temperature. They asked me if I was taking any medication and asked me if I had chronic illnesses or issues. I told the nurse that I have severe stomach issues because of my previous surgery and that I need a special diet, like the one that I was receiving at the federal prison. I did not see that the nurse wrote this down. The nurse told me that I would not be given a special diet here because the facility does not provide any.
10. After the intake I was taken to Delta-4. I was there for about one month. Then I was moved to Delta-1, where I was at for about a month. There, I was put in Delta-8, and I was there for about two weeks. I was moved several times to other units, but I did not know why.
11. Currently, I am in A-14, and I've been here for about a month. All of the units that I've been in have the same layout.
12. The housing unit where I am detained has approximately 72 beds organized into 9 four-person bunk beds. Each side of the unit has nine of the four-person bunks. There are no

windows anywhere inside the unit, so we cannot see sunlight, the sky, trees, or anything outside. There are also no clocks. Because of this, it is very hard to know what time it is or even distinguish one day from another. The only ways we can tell time is by checking the shared tablet or asking officers. Not being able to see daylight or the outside world has affected me mentally and emotionally. I often feel angry, desperate, anxious, and depressed because every day feels identical. We rely completely on the guards to tell us when to wake up, eat meals, go outside to the yard, and go to sleep. We are required to sleep at around 10:00 p.m. and wake up at approximately 5:00 a.m. for morning count.

13. Beginning on or about April 18, 2026, when the new contractor took over, the facility started conducting three separate counts each day, during which officers count the detainees in the housing unit. The first count begins around 5:00 a.m. and can last until about 6:00 a.m. During that time, all the lights are turned on, and we are required to wake up so that officers can scan our wristbands. The second count starts at approximately 12:30 p.m. and sometimes lasts until 2:30 or 3:00 p.m. Often, this count overlaps with lunch service, forcing us either to rush through our meals in only a few minutes or eat while sitting on our bunks. The third count usually starts around 7:00 p.m. and continues until approximately 8:30 or 9:00 p.m. During all counts, we are not allowed to use the tablets, watch television, or move freely around the unit. Even using the restroom requires permission from the guards during count and sometimes guards do not even want to let us go. Sometimes I respectfully ask for permission to go to the restroom in Spanish and the guard says, "I don't speak Spanish." Then when I ask in English, the guard does not respond. Before the current contractor took over, there were also three daily counts, but they were much shorter and less restrictive. The morning count was a head count, and we were not woken up. At that time, we were still allowed to keep and use our tablets during the count, including calling our families.
14. The lighting inside the dorm is very harsh and remains on throughout the entire day from 5:00 AM until about 10:00 p.m. Even after the main lights are turned off at 10:00 PM, one bright light above the front entrance stays on all night. In every housing unit where I have stayed, that light has bothered me when I try to sleep because the light shines directly toward where I sleep. Because of this, I have difficulty resting at night and rarely sleep well. At times I have tried covering part of my bunk with a blanket to block some of the light, but the guards tell me that this is against the rules. Since being detained at this facility, I constantly feel tired and sleep deprived, despite spending most of my time sitting or resting during the day.
15. The middle of the unit contains a common area with approximately five metal lunch tables and two televisions mounted on both sides of the room. Behind the tables are about nine toilets and nine showers, in A-14. The bunks are about three feet apart from each

other, and there are no walls separating the bunk beds, which means there is almost no privacy, even while lying down. The toilets and showers are enclosed only with tarp-like partitions instead of solid walls. The tarps have two clear plastic openings cut into them, so guards and detainees can see inside while someone is using the toilet or showering. While we eat meals, we can see other people using the restroom or bathing, and we can also smell sewage coming from that area. The lack of privacy feels humiliating and degrading.

16. There is almost nothing productive to do during the day. Most of my time is spent sitting at the tables reading the Bible. I organize the Christian prayer group with other detainees, but we do not have any church services. Other than that, there are no educational opportunities, rehabilitation programs, counseling, or organized activities available. The days feel repetitive and empty because there is nowhere to go and nothing meaningful to occupy our time. That's really different from when I was in prison, where I had access to, for example, educational services (I earned my GED), church services Wednesdays, Fridays, and Sundays and I led services, we could go watch movies, we had a much bigger library, educational videos, and vocational education. We could also work for pay and learn trades. In comparison at Camp East Montana, there is nothing productive, healthy, or educational that we can do, which makes me feel desperate. I have talked to people who feel desperate enough and have commented that they want to take their own life because they feel trapped here.
17. Each four-person bunk area shares one tablet among all four detainees. The tablet can be used to make telephone calls, which cost about seven cents per minute plus taxes and fees. From on or about April 18, 2026 until or about May 14, 2026, we were not allowed to make video calls, and no explanation has been provided for the change. Before that, I used video calls every day to speak with my family. Although that cost more money, being able to see them helped me emotionally and lifted my spirits. When the video calls were not allowed, I felt sad and emotionally distressed because I could not see my family. I also felt angry because we are denied basic human necessities and treated worse than criminals. I am being treated worse than when I was in federal prison; the conditions at Camp East Montana are much worse.
18. The cost of using the tablet becomes expensive very quickly, especially because we have no way to earn money while detained. The tablet includes simple games, but they require additional payment of several cents per minute, so I avoid using them. We can also send text messages through the tablet, but we are charged for the time spent sending and receiving messages, including photographs from family members. Movies are available as well, but they also cost money. Sometimes I watch a movie just to help pass the time, although I try not to because of the expense. Music streaming is also available for a fee,

so I generally avoid listening to music on the tablet. Since the tablet must be shared among multiple detainees, access is limited, and we can only use it when another person is not already using it. When I was in federal prison, each person could purchase their own personal tablet for about \$130 but we could use the services on the tablet for unlimited time. We also received 500 free minutes a month of free calls. We also had contact visits with our family where we could hug our families.

19. The housing unit has only two video kiosks, which are located underneath the televisions in the common area. There is no privacy when using them because everyone nearby can hear conversations and see the screen during calls. From approximately April 18, 2026 until May 14, 2026, we were not allowed to use video kiosks at all.
20. There is a small bookshelf outside the unit, where the barbershop is at, with a very small library shelf, but I have not seen any books in Spanish when I have gone. The books are all in English. Since I've been here, I've been to the library about three times because there are no books for me to read there. I don't read English, so I cannot access the books.
21. On approximately April 18, 2026, barber services closed and we were told by the staff that they would hire an outside vendor to come in to cut our hair. For about a month, I did not get a haircut, shave, or clip my nails until on or about May 13, 2026, when I was told the barber shop was available again and another detainee cut my hair there.
22. We receive several invasive pat downs each day when we go and return from the yard, when we go or return from a virtual or in-person counsel visit, or when we go see the nurse. The pat downs are invasive as guards look inside our underwear and pat down our bodies. I have seen that guards have sometimes conducted pat downs in ways that are inappropriate and invasive of our privacy.
23. Since I have been here, I have never received the opportunity to make a private, free, and confidential phone call to an attorney. The only way that I have spoken to an attorney is if the attorney makes a 1-hour in-person or virtual appointment. But to do this, a detainee already has to know of or have a lawyer. Even if I could call an attorney on my tablet, that call would be monitored and recorded and I would be charged for it.
24. I have never called my attorney on the tablet. But if I did call her, that call would be recorded and monitored and I would have to pay. I don't want the government knowing what I am talking with my attorney about.

25. The only way that I can speak with my attorney is when she schedules a VTC to see me. When my attorney does not call me, or if there is something I need to talk to my attorney about, I have to ask my family on a recorded line to ask my lawyer to call me.
26. On or about May 8, 2026, I was in the unit talking to a friend who uses a wheelchair who I help push and help him access the facility, like getting his food. He was sitting on his bed and I sat on my friend's wheelchair to talk to him because there was no other place to sit and talk to my friend. My friend gave me permission to sit on his wheelchair. This was also at 10 PM at night and we are not allowed to use the lunch tables. We have to be in our bunks to talk to others. The only other option was to sit on the dirty floor. A guard approached me and told me that it was against the rules for me to sit in the wheelchair. I told the guard to show me the rule prohibiting me from sitting on a wheelchair. The guard did not show me the rules. Instead, the guard told me that he was the authority figure and that if I did not obey him, I would be taken to the solitary confinement. After this I moved and sat on the floor. I felt humiliated because the guard yelled at me and I felt like I could do anything. The next day, when I was on my bed at 8 AM, that same guard accompanied by four other guards approached me and told me to get up, and they searched my bunk bed and belongings and removed my socks and shirt that I had permission to have on me. I told the guard to please respect me, and that I had not done anything wrong. On Sunday, the same guard again searched through my bunk and belongings before yard time. He did not find anything. I felt that the guard was just looking for a reason to take me to the "hole" for punishment just asking him to show me the rule prohibiting me from sitting on my friend's wheelchair when I was talking to him. The guard is still in my unit and I feel unsafe with him around.
27. On or about May 13, 2026, at around 11 PM, I was sitting down talking to other detainees when I saw an elderly man sitting at the lunch table wearing an arm sling and he looked very sick. He was leaning over, falling asleep, and he was asking the guards for help but the guards were not helping him. The man was asking for help for about an hour, but the guards did not help him. Suddenly, the man collapsed on the floor and started to tremble aggressively. To me it appeared that he was having an epileptic attack based on my experience of seeing a family member experience the same thing. We called for the guards to come quickly and help. The guards came and yelled at us to return to our bunk bed. As I started to return back to my bunk bed, a guard impeded my walkway preventing me from returning to my bunk. I told the guard that he should help the man and that I was just trying to return to my bed. The guard then yelled at me and said, "Get back to your fucking bed." I responded in English "Don't talk to me like that," even though I am not fluent in English. The guard then hit my upper right chest and moved me to the side. I was nowhere near the man who had collapsed, and I was not impeding the walkway. I responded to the guard that he should never do that, and I returned to my bed. The guard

just laughed at me. When I was back at my bunk bed, the guard came to me and said, "Don't fight with me because I like you." I asked the guard "Don't ever hit me like that ever again, please." But the guard responded, "Or what?" I interpreted the guard's response as a threat even though I was just asking him to treat me with respect and that he did not hit me. At night, while I tried to sleep (but I could not sleep well because I was upset and a bit scared), the guard kept walking next to my bunk. In the morning, during the 5 AM count, the guard grabbed my bracelet and threw it into my face while I was laying down. I feel very bothered and disempowered because of this incident. I believe that I did nothing wrong because I was walking back to my bunk as I was ordered to do, but the guard hit me for no reason. Even when I was in federal prison, I never experienced this level of abuse.

28. Before I entered Camp East Montana, I had a preexisting injury to my left knee and my left shoulder. I was injured around 2014 in [REDACTED] when I was a child, by my some of my persecutors who, in this case, were the police. Then in 2020, I injured both again. When I was outside or in Federal prison, I did not have issues with my knee or shoulder, meaning that they were not inflamed/swollen because I was able to do exercise, stay active, walk around, and I was seen regularly by medical staff. For example, when I was in federal prison, I received physical therapy in my knee and pain medication. I was informed by medical staff at the federal prison that I was going to receive knee surgery if physical therapy did not work out.
29. When I was detained at Camp East Montana, I told the nurse about these pre-existing injuries. I asked them if they could evaluate my knee because it was hurting me a lot and it was swollen. The nurse said that she was going to write it down during intake. Starting around February 2026, my knee started to get swollen when I was laying down. When I got up and place pressure on my knee when I walked around, my knee would get swollen. During this time, I made a sick call request regarding my swollen knee. I was seen by a doctor and I was given Tylenol. In all, I made three sick calls. I have received three different medications, none of which have helped. The first time I received Tylenol, which did not help. The second time I received what I believe were steroids which did not help. The third time I received medication I was told was meant to alleviate tense muscles, but that has not helped. I feel that I need an orthopedic knee brace to help me walk. I have asked the nurse for a brace but they have told me that this is prohibited because I can make it into a weapon. But in federal prison, I had a knee brace with me which helped me walk around. When I arrived here at Camp East Montana, I had my knee brace that I was issued in federal prison. A guard saw it and threw it away in the trash during the intake.

30. I also have cavities which hurt each time I eat. I need fillings. I have not made a sick call for this because I was told by a nurse during intake after I told her about my cavities/tooth pain that they would only extract teeth and they wouldn't provide any other dental care.
31. When I was in federal prison, I was receiving medication and a special diet to manage my high cholesterol. When I arrived here, neither the nurse or the medical team checked my cholesterol levels or provided me with medication or provided me a special diet. Sometimes I feel tightness in my chest and nauseous because I do not have cholesterol medication. After I eat the food here, I feel tightness in my chest and dizzy. I think that is because the food we receive here is full of preservatives, salty, and unhealthy.
32. I have chronic anxiety. When I was in federal prison, I received medication for my anxiety. I would also see the psychologist who prescribed me medication for my anxiety. Since being here, I have felt the symptoms of chronic anxiety because there are no windows, I feel trapped here, and feel that I cannot get any fresh air. When I arrived, I told the nurse that I was previously taking anxiety medication when I was at the federal prison. The nurse said that they could not provide me with the same medication but that they could give me another kind of medication. When the nurse explained the other medication that they offer, I knew that this medication would not work for me because I had previously used it and it just made me sleep all day and night and it did not help my anxiety. So, that is why I have not asked for medication for my anxiety.
33. I also feel depressed because I am trapped here and I cannot even see my family on video calls.
34. During my time in federal prison, I did not feel depression, anxiety, and sadness anywhere near to the same extent as I feel here at Camp East Montana. I feel that I am being treated worse than a criminal, worse than being in maximum security federal prison. I feel that I am being tortured and punished here for something that I have not done.
35. The whole time I've been here at Camp East Montana, almost four months now, conditions have been bad. Although we were told a new contractor took over on April 18, 2026, I haven't noticed any improvement to conditions. Most of the guards are still the same, and we're still treated the same. In some ways, like with counts that I described and access to video calls, conditions have worsened.

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

Sig



**ATTESTATION AND CERTIFICATE OF TRANSLATION**

I, [REDACTED], certify that I am fluent in both English and Spanish. On [REDACTED] personally spoke with PKP and read the foregoing declaration to her/him, translated into Spanish faithfully and accurately. PKP affirmed that s/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.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]