

DECLARATION OF NYG

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 being detained, I lived in Odesa, Texas, for about 11 years with my wife and two children. I owned a small business and home.
4. Previously, I was detained at Krome Detention Center in Miami from approximately April 2023, until approximately November 2023.
5. Most recently, I was detained by ICE officials in Odesa, Texas, on or about May 28, 2025, when I went to update my address.
6. I was held at a facility in Odesa, and then I was quickly deported to Mexico erroneously. When I was in Juarez Mexico, I told ICE officials that I was afraid of being in Mexico because of the cartels and because I was kidnapped while in Mexico. I told ICE officials that I was wrongfully deported. I was then given permission to re-enter through a lawful port of entry in Juarez.
7. On or about November 25, 2025, I re-entered and I was held at a county jail in El Paso until on or about December 6, 2025. The judge denied my re-entry and, on or about December 6, 2025, I was transferred to Ft. Bliss Camp East Montana.

Intake and Housing Conditions

8. I was in the intake processing center for one night and then transferred into the general population on or about December 7, 2025. When I was at the intake processing center, I was forced to sleep on the floor (with no mattress) with many other people, huddling next to each other for warmth because it was so cold. I estimate that there were about 100 people in a large room with me. There was definitely not enough space for all of us, we were crammed in there. There was also one toilet for us without any coverings, meaning that we had to use the toilet in front of everyone. This was degrading. When I was there, people were coughing and visibly sick.
9. The following day, I was also provided with a quick medical evaluation by a nurse that consisted of measuring my height, weight, and blood pressure. During that screening, I told them that I needed medicine for my prostate. The nurse prescribed me medication, but I did not receive it until about two weeks later.

Medical Issues and Mental Health

10. While I waited to receive my medication, around mid-December 2025, I was taken to the emergency room because I kept bleeding from my right testicle and it was swollen. I had a lot of pain in my prostate. I was taken to the emergency room outside of Camp East Montana, and they gave me a shot for my pain. I told the medical staff at the emergency room in Spanish that I wanted to see a urologist. A guard from Camp East Montana was present in the room when this happened, and he was interpreting for me to the emergency room doctor during my medical appointment (I spoke Spanish and the ER doctor spoke English). When I asked the guard to translate on my behalf to tell the medical staff that I wanted to see a urologist, the guard interrupted me and told me “No” and that Camp East Montana would not provide me with a urologist. The doctor told me that I had a chronic condition. I believe that the guard translated this to the doctor, but I am not sure what he told the doctor in English. The hospital emergency staff also prescribed me what was interpreted to me as antibacterial vaccine for my kidneys. While the bleeding stopped, I was still swollen and in pain.
11. My prostate is chronically an issue for me here at Camp East Montana. I have chronic pain in my anus and testicles every single day. I have trouble sleeping, walking, standing, and moving around the facility because of this.
12. On or about March 15, 2026, I was standing in the yard. I had severe pain between my anus and testicles, and I could not walk. I laid on the ground because I could not take it anymore. The other detainees called the guards and the guards brought out a wheelchair for me. They took me to the medic; they gave me another shot for the pain. I told them that I needed morphine, but I am not sure what they gave me. They did not prescribe me anything, and I still was in a lot of pain. When I was detained at Krome, I would receive morphine shots to help with the pain in my prostate.
13. When I lived in Odesa, Texas, I had a urologist who was treating me for my prostate, and I felt much better than I do at Camp East Montana. The urologist would evaluate me every three months to check if I had cancer in my prostate, and he would prescribe me medications to help me urinate and to manage the pain symptoms for my prostate. When I arrived at Camp East Montana during the intake evaluation, I told the nurse about my regular cancer prostate screenings, medications, and issues with my prostate. But I have not received any cancer screenings here. I have some levels of pain every day. My testicles are swollen and infected. I cannot urinate normally. I cannot sleep well. I can only get a little sleep because I am given sleeping pills. What I really need is for my prostate to be treated by a urologist, so it doesn't hurt so much.

14. I also have serious mental health issues including chronic anxiety, Posttraumatic Stress Disorder (“PTSD”), depression, and suicide ideation and past suicide attempts.
15. I have PTSD. I sometimes feel like someone is pulling my feet when I sleep and I wake up in a panic. I sometimes hear a voice telling me to kill myself and another voice telling me that they are going to take me away. I feel tormented.
16. I have tried to kill myself three times in my life, including twice in 2023. Here at Camp East Montana, I am given pills Duloxetine (for anxiety), Prazosin (to treat PTSD symptoms of nightmares and insomnia), and sleep medication. Despite receiving this medication, I still feel tormented and I still have nightmares and negative thoughts.
17. Since I’ve been here at Camp East Montana, I have only seen a nurse or psychiatrist’s assistant a few times, who have prescribed me medication. The nurse usually takes me outside the housing unit in the hallway to ask me personal questions about my trauma in front of other people who could hear in the hallways, like guards and other detainees who walked by. I didn’t feel comfortable with that at all. It’s really hard to talk about the mental problems I am having, and I don’t want other people to know. That information should be private. I didn’t say everything I wanted to say because it was not a safe or confidential place to talk. I don’t know why the nurse thought it would be OK to have a conversation like that there. It made me not trust them.
18. On or about April 15, 2026, when the nurse stopped by my bunk to deliver my medication, I asked if they could switch my psychiatric medication because it was not working because I still feel anxious, depressed, and I cannot sleep. I also asked if I could see the psychologist. But the nurse said that I had to wait until the psychologist could come to the facility to visit me because the psychologist is not at the facility. The nurse did not confirm whether she was going to file a sick call request on my behalf. When I was in Krome in Miami I saw psychologists every two weeks, or once a week. And when I was at El Paso Service Processing Center, I was seeing the psychologist every week or ten days. When I saw the psychologists more regularly, I felt better.
19. I have a history of depression and anxiety since before I arrived at Camp East Montana, but being here has worsened my symptoms.
20. I saw when guards took away Geraldo, who was my bunkmate and he is the guy who was killed by the guards here. It’s really hard for me to talk about or think about it even now because I knew him and I sometimes think that this could happen to me – the guards could hurt me. Immediately after Geraldo was killed, I ask to speak with ICE officials about my immigration case, but ICE said that they did not want to speak with me or hear

from me. Shortly thereafter I was transferred to Florence detention center in Arizona. I don't know why I was transferred out of Camp East Montana. No staff has interviewed me about what happened to Geraldo. It feels like they're trying to cover it up.

21. On or around February 20, 2026, I was transferred to Florence detention Center in Arizona where I was detained for about a month and 7 days. There, I witnessed the guards physically abuse another detainee. I intervened in trying to protect the detainee. Because of this, I was sent to solitary confinement for 30 days. During this time, or about my fourth day in solitary, I tried to kill myself by cutting myself with a spoon. After this suicide attempt, the guards removed my clothing, did not take me to the medic, and just left me there in solitary. I was left there alone in the cold, naked, even without a blanket. I was seen by a psychologist and doctor, but I was not allowed to shower for five days after my attempted suicide. I was only given water and a sandwich. This was a torture to me and this did not help me feel better at all, it made me feel worse.
22. About seven days after being placed in solitary, I was transferred back to Camp East Montana. That was on or about March 27, 2026.
23. When I returned to Camp East Montana, I still felt incredibly depressed and anxious. The other detainees know this, and they try to cheer me up. I've told the guards about this, but they have told me that they do not care. I've told the guards about my suicide attempt, but I believe that they do not care based on their demeanor when I shared this. The psychologists has only offered to take me to the observation cell where they would strip me of my clothing, and I would be there alone for days in solitary confinement. I told the psychologist that I did not want this because I had already experienced this when I was at Torrance Detention Center and it didn't make me feel better, in fact it made me feel worse as I felt humiliated and degraded. I do not feel that staff at Camp East Montana have offered any other meaningful help. So, when I arrived again at Camp East Montana, I request to be released to the general population, and they let me go back into the general population. All I wanted was to talk to a therapist about my experiences, as that has helped me in the past, outside of Camp East Montana. I don't want to be banished to a solitary cell alone. I do not deserve this kind of negative hurtful mistreatment happening to me.
24. On or about April 20, 2026, I started to feel swollen on the right side of my face, cheeks, and head, and my teeth were highly sensitive and inflamed. I also had difficulty breathing. My sinuses were inflamed and I had a growth in my inner nostril. I filed two call requests on April 21, 2026, and April 22, 2026. On or about April 23, 2026, I was taken outside the unit to the hallway, around midday. There was no privacy during the appointment because there were other guards and detainees around the hallway, who could see me and hear what the nurse and I were saying. The nurse examined the outside

of my nostril, but only superficially as the nurse did not even look inside my nostrils and just prescribed me two Tylenol pills. That's it.

25. On April 23, 2026, I met with the Psychologist assistant by chance. When I had my medical appointment for my sinus infection, the assistant was there and I asked if I could ask her a question. There was no privacy during the appointment because there were other guards and detainees around the hallway, who could see and hear us. I told her that I wanted to speak to the Psychologist to fix my medication because I had not seen the psychologist since I arrived in March 2026. The assistant told me that she was going to make a request so that the psychologist could see me. The assistant clarified that the psychologist only comes once a month. The assistant did not give me an estimated time when I could hear back. To this date, I still feel the same mental health symptoms and my medication does not help me at all.
26. On or about April 27, 2026, a psychiatrist came to see me. The guards took me out to the hallway to see the psychiatrist. There were about five or six guards around me during the appointment, and they could overhear everything I was telling the psychiatrist. There were also other detainees in the hallway who I believe could overhear what I was saying. I told the psychiatrist that I needed to be seen in a private setting for confidential reasons. The psychiatrist did not acknowledge my request. Instead, the psychologist asked me personal questions about my mental health. While I did not feel safe or comfortable speaking to the psychologist in the hallway, I felt that I had to because this was my only time that I had seen a psychologist after repeatedly asking to speak to someone. The psychiatrist asked me how I was feeling and I shared that I had lots of depression and anxiety and that I wanted a change in my medication and to also help me sleep better and that I wanted to speak to a therapist. The psychiatrist informed me that they were going to see if they can provide me with therapy or change my medication. Since then, I have asked the nurse for updates, and I have not received any updates.
27. On or about May 5, 2026, I saw the psychologist for the first time since I've been here. I saw the psychologist for about an hour. Since then I've seen every Tuesday. I am receiving talk therapy in person. I feel a bit better after receiving this therapy.

Housing Conditions

28. I am currently in unit A-14. Previously, I was in units D-1, D-2, and D-4. All of these are high security units. All of the units have the same layout. There are 72 beds, arranged in 18 bunkbeds of 4 beds each. There are 9 four-person bunk beds on each side of the room. Each set of four-person bunk beds is about 3 feet apart from one another. There are no walls between the bunkbeds.

29. There are no windows and so we do not see the sunlight during the day. We cannot see the sun, clouds, or trees. We only see the sunlight if we are allowed to go out to the yard and we can only see it through a chain-link fence. In the middle of the unit there are lunch tables. There are two TVs, one on each side of the room hanging on the ceiling. There are 6 toilets and 6 showers that are on the other end of the unit. The toilets and showers are not private. The shower has two small windows, one that looks at your face and the other at your feet. The toilet stalls also have two openings that allow guards and other detainees to see our faces and feet.
30. We are given tablets to make phone calls but they cost about 7 cents per minute. We used to have access to video calls which cost about 21 cents per minute. But, since the new contractor started, on or about April 18, 2026, stopped offering video calls due to technical issues. We were not told what was going on with the video calls and we do not know if they are going to be offered again. But, on or around May 17, 2026, we received access to video calls again on the tablets. When the video calls are offered, it is hard to hear on them because other people are in the area and are yelling and watching TV. People have to talk loudly or yell to be heard sometimes because of all the noise from everyone in the unit. I do not watch TV because I am depressed all of the time and do not have energy to do anything.
31. When the new company took over, on or about April 18, 2026, there are now three counts per day and they last for much longer and are disruptive. Count means that the guards have to count every person in the unit. The first count starts at 5:00 AM and lasts until around 6:00 AM. For the first count, we are woken up, all of the bright lights are turned on, and the guards scan our bracelets. The second count starts at around 12:30 PM and ends at around 2:30 PM or 3:00 PM. Although on or around May 13, 2026, the second count was shorter, and we did not know why. The second usually occurs at the same time as our lunch meal, which means that we either have a few minutes to eat quickly or we have to eat at our bunk beds. The third count starts at around 6:30 PM and ends at around 7:15 PM. During each count, we are not allowed to walk the unit. We must stay in our assigned bunk beds, we cannot use the tablets, watch TV, use the restroom without permission, or do anything else. With the previous company there were also three counts, but the morning count was just a headcount and we were not woken up. The second and third counts each lasted no more than 45 minutes.
32. We are also subjected to multiple pat downs every day. That means that the guards inspect our entire bodies, including looking and touching into our underwear area for contraband. We get patted down by the guards anytime we enter or leave the unit. For example, we get patted down to go and turn from yard, when we go talk to counsel

(either in-person or virtually), when we go for an in-person visit, or anytime we leave the unit. These are very invasive to our privacy as the guards touch your entire body areas.

Hygiene and Cleanliness

33. The facility is dirty. Sand and dirt get everywhere in the unit. Because the toilets are close to the bunkbeds, we get the foul smell of urine, feces, and body odors. We get this smell when we eat, while we are sleeping, and all day. That's because we're almost always in the housing unit, and there aren't separate rooms.
34. Our unit is regularly dirty because the cleaning staff does not come to clean it enough. The cleaning staff maybe comes by once a week. So, instead, the detainees clean the bathrooms, common area, bunkbeds, and unit but we are not given any proper cleaning supplies to do it. There are a lot of common, shared surfaces, like tables and sink handles and chairs that a lot of us touch throughout the day, but that aren't cleaned regularly.

Recreation and Lack of Programming

35. Yard time is inconsistent. Although the yard schedule is posted in the units, the guards do not follow it. Sometimes we go out early in the morning, other times late in the day. The yard is just another tarp with a roof covering, with artificial grass, and with lots of sand and dirt. We cannot see the sun because the yard is covered with a tarp. The only way we can get access to some sunlight is if you stand on one side of the yard with a chain linked fence that filters some sunlight (and assuming that it's not cloudy or too windy to stand there). Yard time is sometimes mandatory, meaning that we have to go out even if we are feeling sick or we do not want to go out.
36. When I do go out to recreation, I do not play soccer because I cannot and that's the only activity or exercise that we can participate in. When I go out, I just talk to the guys. I get a bit of fresh air. This helps me a little bit, but not a lot. I wish we could get out more, have space to walk around, sit, and look at the sky. But all we get is the four walls of the tent.
37. Aside from yard and the TV, there is nothing meaningful here to do. We are trapped in a windowless tarp all day

Guard Mistreatment

38. I have not been taken to solitary while at Camp East Montana, but guards regularly threaten us with solitary confinement. Like on April 7, 2026, someone in my unit refused to take his medication and the guard threatened to take him to solitary. Although he was

not taken to solitary, it's really scary to hear that from the guards. I know what solitary is like. I've been there before. It's awful. It makes you not trust the guards or want to ask them for help, because they will just threaten to lock you up. I don't think that's right.

39. On or about April 28, 2026, while we were out on the yard, I told the guard that I needed to go the restroom urgently. The guard told me that I had to wait until yard time was over. I could not hold it in anymore. The guard told me that if I defecated my pants while in the yard then I would have be sent to solitary confinement. So, I had to wait and I had a severe stomach ache after.
40. Almost everyday guards and detainees argue verbally. People are tense, anxious, stressed, and depressed here. It's really stressful. There's no one I feel like I can turn to for help on staff, because they just threaten or yell at us.
41. Even with the change in contractor, the guards have stayed the same. I have noticed that the guards are much stricter in terms of not giving us enough hygiene products and being more verbally strict and abusive.

Access to Counsel and Rules

42. The rules also seem arbitrary and change regularly. Guards sometimes apply the rules and sometimes they do not. But we cannot say anything because if we do, then we are threatened by the guards of being thrown into the "hole," which the punishment cell.
43. Even though the rules say that we're supposed to be able to call a lawyer from the facility, I have never been offered the opportunity to make a private, free, and confidential call to my attorney. Instead, the only way I can access a lawyer is if the lawyer knows about me, has my information (through family on the outside), and if the lawyer sets up a virtual or in-person appointment. Even if I tried to call a lawyer from my tablet, I would be charged for that call and the line would be monitored and recorded by the facility. There are several times when I wish I could call my lawyer or a lawyer to talk about my case, talk about my horrible conditions here, or just to get some help. I cannot and I feel trapped here.

Food

44. The food is terrible. For example, we usually get some kind of ground meat, a bit of rice, and a small amount of veggies. It's not enough. I am always hungry. I just eat it anyway because I need to. But the food portions are inconsistent and once they took away our dinner. For example, on or around April 2, 2026, or during Easter and for about 10 days,

we complained to the guards that we kept getting the same food which consisted of carrots in water, potatoes, and small protein balls. We got the same meal for breakfast, lunch, and dinner. In response, we protested by not eating and complained to the guard. The guards told us that they do not care. On one occasion, the guards took the food away and did not give us any dinner. We went to bed without dinner. That's wrong. We shouldn't be punished for raising our concerns.

45. Since I have arrived, we periodically get food that is rotten, like spoiled potatoes. On or about April 23, 2026, I received rotten potatoes in my unit for lunch and I showed it to the guard. The guard said that he could not do anything because they are just following orders. I threw away the spoiled potatoes. Others complained as well. On or about April 23, 2026, I saw that another detainee had a bug in this food. He complained to the guard and the food plate was replaced.
46. I experience chronic stress, anxiety, depression, persistent rumination, and nightmares. I have been detained by ICE for approximately a year, and my mental and physical health has worsened during this time. I feel like I am tortured and punished here. I do not deserve to be treated worse than a criminal.

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

Signature: _____



ATTESTATION AND CERTIFICATE OF TRANSLATION

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