

# DECLARATION OF HOK

**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 Minneapolis from around 2023 until 2026.
4. I was detained by ICE in a parking lot when I was with my children. Masked individuals got out of an unmarked vehicle, grabbed me, and said that I was under arrest. They never told me that they were from ICE or immigration officers. I asked them if they had an arrest warrant and they said no. Then, they grabbed me and I started to run away because I was afraid and I did not know who they were. They were all black with no uniforms. I tried to run away from them and then they grabbed me again. One of them grabbed me in front of my neck and forced me into the snow and placed a boot on top of my knee and pressed it into the snow. The snow cut my knees. Then, the official began to punch me in the face, which gave me bruises. The other official told him to stop.
5. On or about January 12, 2026, I was transferred to Ft. Bliss Camp East Montana.

**Intake and Medical Care**

6. I was held in the intake area for about three weeks. I was in a housing unit with about 72 other people in the processing area. They did not give us a clean change of clothes; I had to wear the same clothes that I was arrested in. I had to wash our own clothes in the sink with the single use packets shampoo/body wash that I got. They only gave us small packets of toothbrush, toothpaste, and shampoo (which were single use). But there were days when we did not receive these hygiene supplies. We used shampoo to wash our body, wash our hands, and clean ourselves.
7. When we got our meals, some of us ate at the tables but there weren't enough tables. The rest of us ate in our beds and on the floor. For food, we received a sandwich that was two pieces of white bread, a thin slice of baloney, and cheese slice, with fruit or a cookie for a few days. Then, for the rest of the time we received prepackaged meals that usually consisted of rice, beans, and some kind of meat. The food was horrible.
8. I lost weight during these three weeks. When I entered, I weighed 205 pounds. I was weighed on the first day that I arrived at that Ft. Bliss Camp East Montana, and that's what staff told me I weighed. About a month and a half later, I went to see the nurse and I was weighed again and who told me that I weighed 187 pounds. On or about April 20, 2026, I went to the medic where my body weight was measured again, and I was told that I weighed 177 pounds. On May 27, 2026, I weighed myself and I weighed 173 pounds.

9. On or about January 12, 2026, I was given a quick medical evaluation because I requested it since I had trouble walking. In the first week, I completed about two sick calls a day so that they would examine my knee. I had a puncture on the skin of my right knee which prevented me from walking. I had lots of blood coming out of my knee. The nurse quickly applied some kind of cream on my knee, but did not clean my wounds, and gave me ibuprofen. Because the nurse did not clean my wounds, I still had dirt on my knee, and it became infected over the next three weeks which caused me severe pain and I could not walk. The nurse said that they were going to give me cream and supplies so that I could continue to clean the wounds on my knee, but they never did.
10. The nurse also asked if I had any allergies and they gave me a TB skin test. They said I needed a TB skin test to get the medical care I needed. The nurse never checked my TB results three days later. A month later they called me to do another TB skin test because the medical team had lost track of me already had done the TB skin test the first time. I asked for an X-ray test, but the medical staff said “no” and that if I refused the second TB skin test, they would ask the guards to isolate me in a cell on my own for a month. So, I did not have a choice but to do another TB skin test. The test came out positive, but that’s because I got my TB vaccines in my home country. That second nurse said that the medical team should have just conducted an X-ray and explained that they should’ve never have done the second TB test and that that nurse shouldn’t have intimidated me to do this second test.
11. When I arrived to Camp East Montana, I was given a wheelchair because I could not walk. I used the wheelchair for the three weeks when I was in the intake unit. I had difficulty showering, using the bathroom, and moving around the unit. When I had to use the bathroom/shower or to go get food, other detainees had to help me. Neither the shower nor the toilets had grab bars to support myself. I had to press my arms against the walls of the shower and the toilet to try to stay upright and stable; I had to press my arms against the walls of the porta-potty to sustain myself. For these three weeks, I could only stay in my bunk bed because I could not move around.
12. During the three weeks, we were not permitted to go out to the yard. We did not have access to tablets. We were given a phone call that we could use for 2 minutes once a week to call our family. We were not given any legal resources numbers/sheets, and we were not given any opportunity to call an attorney.
13. During my intake, I never received an orientation or a handbook. To this day (May 27, 2026), I still have not received any handbook or rulebook.

### **Housing Conditions**

14. I was then transferred to B-1, which is a high security unit, for about a month. Then I was transferred to B-4, and then B-11. I am currently housed in A-14, which is the high security unit.

15. Every housing unit I have stayed in at this facility is set up basically the same way. My unit has 72 beds made up of four-person bunk beds lined along both sides of the room. There are no windows or clocks anywhere inside the unit, so we cannot tell whether it is day or night or see any sunlight. The walls are plain white, and the bright overhead lights are on from about 5:00 a.m. until 10:00 p.m. every day. The days blur together and it is hard to keep track of time. We rely on officers or the shared tablet to know the schedule and the time. Being cut off from daylight and the outside world has affected me emotionally and psychologically. I frequently feel anxious, frustrated, and trapped. Officers control nearly every part of our day, including when we wake up, eat, go outside, and sleep.
16. When it rains in the unit, people get wet because the roof leaks. For example, on or about May 27, 2026, it rained from about midday until about 5 PM. People on the top bunks across the unit and sitting on the lunch tables got wet because of leaks in the roof. This has happened in other units that I've been in.
17. Starting in mid-April, officers have conducted three counts every day. Morning count starts around 5:00 a.m., when the lights come on and officers scan our wristbands. Midday count starts at around 12:30 p.m., and lasts for hours and can overlap with lunch, which forces us to eat quickly or take food back to their bunks. Evening count usually happens between 7:00 p.m. and 8:00 p.m. During count, we are not allowed to move around freely, use tablets, or watch television. Even going to the restroom requires permission from an officer.
18. The lights inside the dorm stay on during the day and they are very bright. Even after the main lights are shut off around 10:00 p.m., a bright light near the entrance remains all night. Because I sleep near the main entrance to the unit, the light bothers me when I sleep. I have tried covering part of the light with a blanket or shirt, but officers told me I could not do that because security cameras need to record us all night. Since being detained here, I often feel exhausted because I do not sleep well. On average, I think I sleep about 4-5 hours a night.
19. In the middle of the unit there are about five metal tables, but when the dorm is full, there is not enough seating for everyone. There are two televisions on one side of the unit. Next to the tables, there is an area with about 9 toilet stalls and about 9 shower stalls. The bunk beds are right next to each other without any privacy. The shower and restroom areas are separated only by tarp-like coverings with openings that allow people outside to see inside our feet and our neck and head. We can also see and smell the restroom area while eating meals nearby.
20. The units I have been in have always been dirty. The facility sends a cleaning crew about once a week, but sometimes they do not go. So, on the other days we are essentially forced to clean. The guards bring us a broom, mop, toilet brush, but they do not bring any disinfectant (as far as I can tell). I personally clean. We often have to use whatever remaining shampoo/body wash we have from our single-use packets to clean.

21. There are no productive or supportive programming or vocational activities in the unit. Most days feel empty and repetitive. There is very little to do here. I feel trapped here and anxious.
22. Each four-person bunk shares one tablet that detainees to use for phone calls, video calls, and SMS messages. Calls and video calls are charged by the minute and also include extra fees. But for about a month we did not have access to video calls. The tablet system is very expensive. Everything on the tablet costs money, including games, messages, music, movies, and receiving photographs. All SMS messages and photographs have to be approved by the facility. For example, my wife has sent me pictures of my kid, but I have not received those. Because several of us must share the same tablet, access is also limited.
23. To make video calls, we have to use two video kiosks which are below the televisions in the common area. There is no privacy because other detainees can hear conversations, and the television is on during calls.
24. While there is a small bookshelf, but I have only seen about three books that are in Spanish. I read those three short books with about 100 pages each with a large font. I read them all quickly.
25. Barbershop services are inconsistent. For about a month that I was here, there were no barbershop services. For that time, I was unable to get a haircut, shave, or trim my nails until other detainees volunteered to cut hair. These barbers are not paid, not even with extra food. We can only get one kind of haircut that is approved by the facility.
26. Every day we get invasive pat-down searches several times. Almost every movement requires a search. We are searched when we leave for or return from the yard, medical appointments, attorney visits, or family/personal visits. Officers check inside waistbands and touch our bodies in intrusive ways. Sometimes when we are sleeping, guards perform bunk checks in the middle of the night. They come and throw our belongs and bed sheets on the ground, and then we have to arrange it after.
27. Since arriving at this facility, I have not been offered access to any free or private phone calls with an attorney. The only way to speak with a lawyer is if the attorney schedules a virtual or in-person visit ahead of time. Calls made through the tablet system are monitored and require payment.

### **Recreation and Lack of Programming**

28. The “yard” has artificial grass, covered in dust and sand, and there’s nothing to do there. There is not enough space for us all to be out there and exercise. Sometimes we play soccer using a heavy thick plastic ball. Currently, in A-14, only half of the ceiling is covered which allows us to see the sun when the sun is out. But, in all of the other units, the roof is completely covered, and we cannot see or feel the sun or sky. In those units,

we can only feel the sun through a side chain linked fence. We line up next to the fence to try to feel it.

29. There are no regular or weekly religious programs that I am aware of. We pray together every day, but this isn't a service that's provided from the facility.

### **Guard Mistreatment**

30. On or about May 13, 2026, at around 11 p.m., I was at my bunk bed, and I saw an elderly man sitting at the lunch table wearing an arm sling and he looked very sick. The man was calling for help for about an hour, but the guards never brought any medical help. Suddenly, the man fell onto the ground, hit his head, and started to convulse aggressively. We stood up to try to help the man. We called for the guards to come quickly and help. But the guards were just standing around him and did not even pick him up or help him. We all started to ask the guards to help the man or at least pick him up off the ground. The guards came and yelled at us to return to our bunk bed. When I returned to my bed, I saw that as another detainee, PKP, was walking back to his bunk bed a guard impeded his walkway and was acting aggressively towards PKP. I overheard that PKP said that he was just trying to return to his bunk and pointed to his bunk, which is near to my bunk. That's when I saw that the guard hit PKP on his upper right chest with a closed fist. After that, I just heard that PKP said something to the guard in a calm manner and then returned to his bunk bed. When I saw that the guard hit PKP, I felt angry because I felt that the guards disrespected PKP and us by hitting him. There was no need at all to hit PKP in that way because PKP was walking back to his bunk and he was not being aggressive or doing anything.
31. In total, I feel that I am being punished here and that I am trapped and treated unfairly. I regularly feel anxious, frustrated, and sad about being here. The conditions here are horrible.

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 [REDACTED] 2026 in El Paso, Texas.

Signature: [REDACTED] \_\_\_\_\_

**ATTESTATION AND CERTIFICATE OF TRANSLATION**

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