

DECLARATION OF NAVDEEP

I, Navdeep, 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 Navdeep. My documents just list "Navdeep" on them. I believe my name is listed as "FNU Navdeep" in the ICE system. "FNU" means "First Name Unknown" or "First Name User." I am 29 years old and from India.
3. I am currently detained at ERO El Paso Camp East Montana in El Paso, Texas. I have been detained at this facility since on or around January 15, 2026.
4. Before I was detained by ICE, I lived in Minneapolis, Minnesota. There, I was a mail handler and delivered packages for companies like Amazon, DHL, and FedEx. I have a fiancée. Before I was detained, we were planning on getting married this upcoming summer. I was hoping to introduce her to my family and celebrate the beginning of our life together as a married couple. Unfortunately, I have not been able to speak with her since arriving here. I miss her very much.
5. I was plucked from my normal life and brought here to this ICE detention facility in El Paso where the rules are harsh and inconsistent and I am treated like a criminal even though I am in civil detention. I have no criminal record.

Intake

6. I was brought to this detention center from Minneapolis with approximately 60-70 other people. Officials cuffed our hands, waist, and ankles and put us on a plane. When we arrived, I was placed in a room with approximately 40 other people. We were wearing our "outside" clothes, which were the regular clothes we were wearing when we had been going about our daily lives before we were taken into custody by ICE.
7. We spent approximately 3 days on the floor of that small room wearing the same clothes we had arrived in. The floor was very messy and very dusty. After a couple days, when I touched the floor, I could draw a picture with my fingers in the dust that covered the floor. We were not given any blankets or other materials for comfort or warmth. I slept on the floor, just like most of the others in the room. The only water we had access to was from a fountain directly above the toilet seat in the room we were in. We did not receive toothpaste. We were given approximately three sandwiches per day.

Housing Units

8. After intake, they brought me to the Echo Unit. I have been in many housing units during my time here. Along with the Echo Unit, I have been in Bravo, Charlie, back to Echo, and multiple units within Alpha. All of the pods have a similar structure with approximately 72 beds. But each of the units have specific problems. In my experience, Bravo does not have a functioning drainage system, Echo has very thin mattresses, and Alpha has no hot water.
9. When we were taken out of intake and placed in the Echo Unit, we were still not given fresh clothes to wear. I was still wearing my own clothes that I had been wearing when ICE picked me up. I had already been wearing those clothes during my plane journey from Minnesota to Texas and during the approximately three days in the intake area. I had no choice but to continue wearing those clothes for approximately 19 additional days in the Echo Unit. I felt so dirty. Everyone in the Echo Unit smelled awful. The stench of everyone's bodies in dirty clothes was hard to bear. The situation was clearly not hygienic. Despite this, we tried our best to make it work. At night, I and others would try to wash our pants in the sink and would have to sleep without our pants while waiting for them to dry. The next day, I would put my still-damp pants on and would do the same thing with my t-shirt. I would wash it in the sink and keep it off while waiting for it to dry. I had to keep wearing the same underwear day after day after day after day. It was humiliating and disgusting, but there was no other choice. No one came to give us fresh laundry. Finally, after approximately 22 to 23 days of wearing the same clothes, we were given uniforms.
10. We get in trouble for requesting even the most basic things here, like access to water and to live in a hygienic place. There was one time when there were no cups in the housing unit. We need cups to drink out of the fountain in the unit. Our housing area was also dirty and had not been cleaned. We got frustrated and started asking for better treatment from the supervisor. She took me outside and asked me "who the hell do you think you are?" I felt like a criminal prisoner, just as I do during my daily life here. The treatment we are subjected to makes me feel like a criminal. I have to remind myself I am a civil detainee and that there is a difference between a civil detainee and a prisoner, but it does not feel that way here.
11. Two or three times, when I was in the Bravo Unit, the water was overflowing from the toilet. If I remember correctly, it was the third toilet. It would not flush because it seemed like something was stuck in it and it started overflowing. The toilets here use a vacuum system. When the vacuum system breaks, everything gets pushed out rather than in. I was on the right side of the unit, and the water came all the way up to the bed area where I was sleeping. The water was smelly and dirty.

12. The bathrooms here are consistently dirty. There is often urine all over the seats and feces all over the bowls. We try our best to designate certain toilets for urination only and others for #2 (defecation) only to try to keep the seats cleaner and avoid clogs, but it does not always work. When new people arrive, our self-created system quickly breaks down.

Recreation

13. For the first month I was here, there was no recreation at all. I was not able to see the sun during this time. I started receiving recreation around March when I was moved into the Bravo Unit. There are signs posted on the walls of Camp East Montana that say we are supposed to get recreation every day, but this still does not happen. It feels like the guards just take us to recreation whenever they want to. I have seen two types of yards here. One of them is a smaller space that is covered with a ceiling so it is not possible to see the sky. The other one is half covered and half open. Most of the time, if they take us to recreation, they take us to the small yard that is covered. They put approximately 50 of us in there. The amount of space is too small for so many people. I get hit by balls often during recreation. I want to be able to feel the sun and be outdoors and experience recreation, but the way the guards are offering us recreation feels stressful rather than stress-relieving.
14. The way things operate in here is very inconsistent and unprofessional. For example, sometimes we have no yard time at all. Other times they tell us we have to go to yard or suffer consequences. One day, it was very windy and the sand was blowing everywhere. I experience sinus troubles while here and it is made worse by the dust, which is why I didn't want to go outside that day. I was worried my eyes would get watery, red, and painful. I expressed that I did not want to go to recreation that day, but they forced me to go anyway.
15. Guards use force for all sorts of things. The other day during recreation, two guys got into a conflict about dribbling. Other detained people tried to get them to calm down because they were worried that guards might use force against them. The guards came and took two of them to SMU. Then the guards came back and took approximately three other people to SMU who hadn't even been involved in the arguing. At this point, it feels like the guards can do anything to us.

Lack of Programming

16. There is no programming here. We usually just stay in our pod. Anytime we step out of the pod for anything, like recreation, medical, visits, or anything, they pat us down. They usually ask us to put our hands against the wall and they stand behind us and frisk us. The old company would usually only frisk us when they were taking us to court, but the new company frisks us for everything.

Coerced Deportation Attempt

17. Approximately 15 days after intake, when I was in the Echo Unit, a security guard woke me up at around 4-5 am and told me there's someone from ICE who wanted to speak with me. An ICE agent whose name I believe is Mr. Brown and is from Atlanta said he had my passport and driver's license. He told me he was giving me the option to sign a voluntary departure form and threatened that I would be here for a very long time if I didn't sign. He told me that under the Trump Administration, I would not be able to win my immigration case. He told me that if I signed the voluntary departure form, I could come back legally. He told me where I needed to sign on the form and told me that if I do not sign the form, it would cause negative impacts for me. He told me the judge will see it as the detainee being uncooperative, and it would reflect poorly on me. I felt threatened and intimidated, but I refused to sign the form, especially without the ability to talk to my attorney first. I am here in the United States because I am trying to seek safety. Even though the conditions at this detention center are horrendous, I cannot give up on trying to seek safety in the United States.

Use of Force By Guards

18. At Camp East Montana, we are not treated like we even have the potential to experience pain. On May 11, 2026, as we were coming back from yard (recreation) and we were in the Charlie hallway, a guard asked me to put my arms behind my back. I was in pain, so I tried to put my arms behind my back, but I was not able to all the way. I asked if I could explain and I tried to explain to the guard that I could not put my hands behind my back in that moment because of pain from existing injuries. However, the guard refused to listen and got agitated and said "put your hands behind your back!" and he pulled me out of line and put cuffs on me very tightly for refusing to follow his orders. He cuffed me very aggressively, causing me a lot of pain. He also twisted my shoulder, which caused additional pain. Still, I did not resist. I repeated that I could not put my hands behind my back because of my existing injuries. He threw me in intake and said I refused a direct order. Then, 5-6 people from the DCT (disturbance control team) came. I was not resisting or being violent. I was already in pain, which is why I had not been able to put my hands behind my back initially. DCT officers cuffed me again, bruising my left hand and arms in the process.

19. Throughout this process, I tried to explain that I could not put my hands behind my back due to pain. The reason for the pain is that sometimes my left shoulder, collarbone, ribs, and back hurt as the result of a car accident and other prior injuries and surgeries many years ago. I was hospitalized for an extended period of time as a result. Now, my left shoulder sometimes gets locked in place and other affected parts of my body are in pain sometimes. Neither the officer nor the DCT team were willing to take into account my

explanation for why putting my hands and arms behind my back was painful. Instead, they used painful force on me. They also tried to intimidate and threaten me, saying they would make my life and situation in this camp very bad.

20. I have heard that there have been deaths at this facility. It makes me feel scared. More people could die in here. It feels like no one would care. Officials might not even tell the truth about how you died and cover up the truth about it.

Solitary Confinement

21. After I forcibly cuffed by guards on May 11, 2026, I was then told that I had interfered with security at the facility and was going to be put into SMU (solitary confinement) for five days. We detained people often call SMU the "can."
22. It was hard to keep track of time in the SMU. SMU is a small room where there is just a toilet and a bed. There is nothing to do. I had to just stare at the wall. As part of my punishment, I did not have a tablet. I already felt sad and depressed before being put in SMU, and I felt even worse when in there. A true and correct copy of a drawing I made of SMU dated May 21, 2026 is attached as **Exhibit A**.
23. Before I was put into SMU, they did a mental health evaluation of me. A woman asked me some questions and I answered that I did not want to hurt myself or anyone else. I explained I didn't feel like talking after what I had just gone through. The woman said something like "you came here with nothing," as if she was trying to say my situation was better now. But actually, I had a life before. I was an undergraduate student for a while at the University of Alabama. I have a family who I love. I had a job. I had things to look forward to. It didn't seem like good mental health advice to tell me I came from nothing before. Mental health has been a huge challenge here and I don't feel like I was given resources before or after my time in SMU to help me deal with the sadness I have been feeling here.
24. During my time in SMU, I felt depressed. At first, there was nothing in the room, not even a bedsheet on the mattress. I just sat on the floor for many hours when I arrived in the small room. For several days, I did not eat any meals because I didn't feel hungry. I was sad being completely alone. Being in there made me miss my family a lot. Being in that room felt creepy, especially at night. It's hard to explain, but it was scary to feel like I was completely alone in a cell in a tent in the desert.
25. Sometime after I was put in SMU, I was told that I had a violation 199, which is conduct that disrupts or interferes with security and orderly running of the facility. I was told I'd have a hearing the next day. I was given a piece of paper stating that I had the right to a panel hearing about the charge. That piece of paper included a heading titled "Detainee Rights at The Institution Disciplinary Panel Hearing (IDP)." A true and correct copy of this document that I received and is dated May 11, 2026 is attached hereto as **Exhibit B**.

26. At some point I believe violation 199 was changed to 299, which is conduct that interferes with security running of the facility.
27. I spent time then preparing a written statement for the hearing I expected to have. I wrote out a one-page statement about what happened and the unreasonableness of my punishment in SMU. A true and correct copy of the statement I wrote while in SMU in preparation for the hearing I thought I would receive is dated 05/11/26 and is attached hereto as **Exhibit C**.
28. However, I never received a hearing or any of the other promises written on the papers I was given about the panel hearing. I never had a chance to present my side. I felt silly for expecting that there would be any sort of due process when that has not been my experience here. I really had thought putting together a statement could make a difference and they might re-consider, recognizing that I was not a security threat, but it feels like nothing matters in here. Rules and expectations are written on the walls and handed to us but not followed by staff.
29. The report from the disciplinary panel stated that I had committed violation 299 and the consequence was 5 days in SMU with one day served and 4 days without the tablet for anything except legal access.
30. After my placement into solitary, the color of my uniform was changed to orange, which I believe is a higher security level. The paper titled "Detainee Rights at the Institution Disciplinary Panel Hearing (IDP)" (Exhibit C) states that one of the rights detainees have is "[t]he right to appeal the decision of the IDP by means of the Detainee Grievance Procedure to the Officer in Charge, within 15 days of the notice of the panel's decision and disposition." I tried to follow this outlined process to use the grievance procedure to challenge my designation as a higher security level. Almost right away, on May 16, 2026, which is well within the 15-day period after I was released from SMU and my designation was changed, I submitted a grievance challenging the decision to change my security classification. A true and correct copy of the grievance I submitted on May 16, 2026 is attached hereto as **Exhibit D**. On May 17, 2026, I received a denial of my grievance with the response "Go onto tablet and write a classification request." The reason I used a grievance form to submit my request was because I was trying to follow the process that had been outlined in the Detainee Rights form. It felt like going in circles. I then followed the process for a re-classification request on the tablet, but it was declined within the same day.
31. The staff at Camp East Montana have control of the evidence, they are the factfinders, and they are the ones delivering the judgment. And yet, they weren't even able to give me a hearing as their own papers promised me. It seems like they can just throw us into SMU if they feel like it. It's like they are just wasting paper when they aren't even going to

follow their own rules. It's like they are making fools of us. Despite all of this, I've continued to try my best to follow the processes offered to me.

Inadequate Food

32. The food portions here are very small. They keep us hungry. We don't have commissary or the ability to receive additional food. Often, the food does not seem edible and I have to throw it away. Even when it is edible, it is not enough. Within the first month that I was here, I learned I could not ask for extra food when I was hungry. I was told by a guard "you're a detainee, you don't get extra food." I wake up and go to sleep feeling hungry.
33. There was a man who arrived at Camp East Montana with me on around January 15, 2026, who was a Sikh and he would only eat vegetarian food. He would beg the guards for vegetarian food, but there was no special diet that they gave him. He ate almost nothing for approximately 20 days. Guards finally started giving him vegetarian meals, but it was the same food for each meal. He often had to throw it out because the vegetarian meals were often mislabeled and contained foods he could not eat. I noticed he seemed to lose a lot of weight. I worry for people who cannot eat the usual food for religious or medical reasons. The food here is already so bad for those of us like myself who can eat anything. It is very hard to survive for those who require a particular diet.

Dust

34. I didn't have sinus problems before arriving at Camp East Montana, but now I do. We live in tents at Camp East Montana. Here in El Paso, it gets very dusty. The dust collects in our tent. Whenever there is even a little movement, the tent moves and there is dust that falls on us. The air isn't clear and we can see particles in the air. The dust affects my health. From the top of my nose all the way through my throat feels uncomfortable, like I am breathing hot air. Sometimes my throat gets blocked. It hurts to breathe. My eyes get very red and itchy. I have been taking allergy medication at night, which seems to help for approximately 10 hours, but then my symptoms start up again, including sneezing, a runny nose, red and watery eyes, and my throat feeling swollen. Even after I drink water, my throat still feels dry. It sometimes hurt to swallow.

Dental Care Concerns

35. I didn't have dental problems before arriving at Camp East Montana, but I do now. They only give us a tiny bit of toothpaste here and it does not seem very good. Still, I try to brush my teeth two times a day. After arriving here, I now have bad teeth. My lower teeth that are the farthest back on the right and the left seem bad, but they do not offer dental services here. Due to the pain in my teeth, I submitted sick call forms. The forms are about a fourth of a piece of paper. We are supposed to write our name, alien number, date, and the reason for the sick call on the form. We give the forms to the guard in the

unit and the guard gives it to someone on duty in the hallway. The guard can see what you wrote. I filled out a sick call form and after approximately two days, they gave me painkillers. I was kept on painkillers for approximately 2-3 days before an order was put in for antibiotics. I saw a doctor approximately around the end of February or beginning of March regarding the tooth pain. My mouth was swollen at that time. The doctor was a woman and she said I have cavities and that I will need a root canal. She said they don't do root canals here, but I could ask a dentist if and when a dentist showed up. No dentist has shown up. I feel intense sensitivity in my mouth. Cold water causes me pain, so when the water comes out cold, I let it sit until it returns to room temperature before I am able to drink it.

Medical Care Concerns

36. The medical services here are very poor. When I was in the Echo Unit, there was one man who was bleeding severely from his nose. I asked him to lie down and put his head back to try to help him. He put toilet paper around his nose, but bled through it. He put two t-shirts around his nose, but bled through those too. I think he started bleeding at around 11 pm and the guards didn't come to get him until approximately 2 am. I haven't seen that man after that, but I hope he is okay.
37. Sometime in March, there was a measles outbreak here. I was in the Charlie Unit at the time. We were told there were approximately 70 people who had measles and that they were quarantined. There was no recreation during this time and we just had to stay in our housing unit. People in the hallways were walking around with PPE kits, but I was never given a mask and no one else in my housing unit was given a mask. People would come to disinfect the unit once a week during that time. No other precautions were taken. Approximately 7 days later, when the measles outbreak was still going on, there was also a Covid outbreak. Between measles and Covid, I was very scared. The situation in here is already so bad, especially when it comes to the lack of medical services, so hearing about these outbreaks is very scary because we know we'd be on our own if we got sick.
38. It takes a long time to get medical attention here. If you have or develop a serious condition, you're out of luck.

Counsel Communication

39. I don't have a way to make calls to my attorney because there is no secure or confidential way for me to make outgoing calls. I would also have to pay to make a call to my attorney. As a result, we have to wait for attorneys to schedule their own visits. It feels bad to know that I can't just call my attorney when I have a question or need important documentation.
40. Even when an attorney requests a virtual visit, the room the visit takes place in is surrounded by glass, so it does not feel very private. The guards that are walking around

outside the virtual visitation booth can see me and my mouth moving and they might also be able to hear me, though I'm not sure.

41. With in-person visits, it seems like there is an attempt to make them seem private, but not confidential. There are walls in the in-person visitation rooms, but it feels like they are made out of cardboard or some other thin material. There are four walls but no ceiling. Above us in the in-person visitation room is just the tent that is shared by all the other attorney visitation rooms and everything else in the tent. I have experienced in-person visitation a couple times, including on May 27, 2026, when I visited with a lawyer from the ACLU of Texas. I could hear people speaking with their lawyers in the rooms around us.

Training and Procedures

42. It doesn't feel like the guards here are properly trained or have experience working at detention centers. There is a sense that everything happening is very unprofessional and rushed. It feels like a temporary circus camp that thousands of us have had to live in.
43. Another challenge is the language barrier. I speak English, Hindi, Punjabi and am familiar with Sanskrit. Even though I didn't understand a word of Spanish when I arrived here, I'm having to pick some up because the guards here speak almost entirely in Spanish. When the guards come in and do a Public Address (PA), that address is in Spanish. When I can't understand what they are saying, I ask them to please translate into English because I don't want to miss the announcements. Sometimes the guards agree to translate into English, but much of the time they refuse to translate from Spanish into English and they turn around and leave. This causes me to miss important announcements. For example, if the guards have information about the barbershop or the library, it is generally told to us in Spanish, so I sometimes miss these announcements until it is too late. I have requested multiple times that PAs happen in English as well as Spanish, but so far the PAs have remained in Spanish.
44. Another inconsistency involves the way we are treated when we go to court. I went to my first court appearance on or around February 11, 2026, for a bond hearing. Guards came into my room on or around February 10, 2026, and woke me up at approximately 10 pm to tell me I had court. They instructed me to come with them immediately. They put me in cuffs in the intake area. My stomach, feet, and wrists were bound while in the intake area. At approximately 3 am, guards threw us in a bus and took us to the El Paso Processing Center. Then, we waited for court, which was around 8 am. We did not return back to Camp East Montana until approximately 5 or 6 pm that day. This makes going to court a very exhausting process that completely wears me out on very important court days. On May 26, 2026, I had court again. Guards took me out of the unit at approximately 2am for that and I didn't have court until the morning.

Contractors

45. I understand the contractors at this facility changed sometime in April. Things are pretty much the same when comparing the old company to the new company. The main difference is that the law library closed down for a while around mid-April. We talked to the pod officer about this and then the supervisor. The supervisor told us this is a deportation facility, so with the new company there would be no library or barbershop or anything else like that, since we're just going to be deported. However, then the barbershop seemed to re-open. There is still no scheduled law library visit. It is all very inconsistent and uncertain. During the time that the barbershop was closed, my nails had continued growing and were approximately an inch long or even longer. It feels dirty and uncomfortable to have my nails grow so long without a way to trim them.
46. The other big change between the old company and the new company is that the guards who work for the new company don't wear nametags, so it's very difficult to identify them. They also frisk us whenever we leave the pod.
47. I feel like the guards will do whatever they want to me in here and if I ever question them, there will be consequences for me that I do not even want to think about. Being here makes me feel like my rights do not matter. I want to be a voice for everyone else who is losing hope in this place.

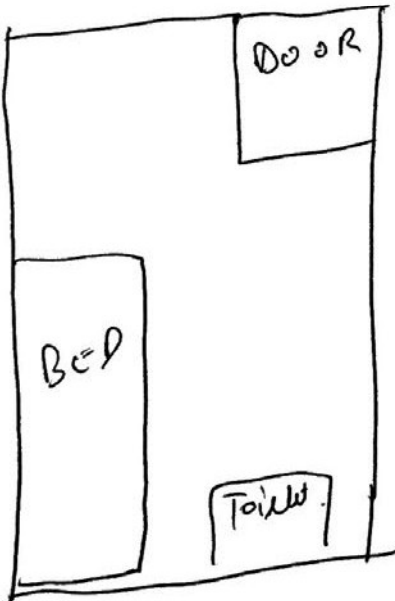
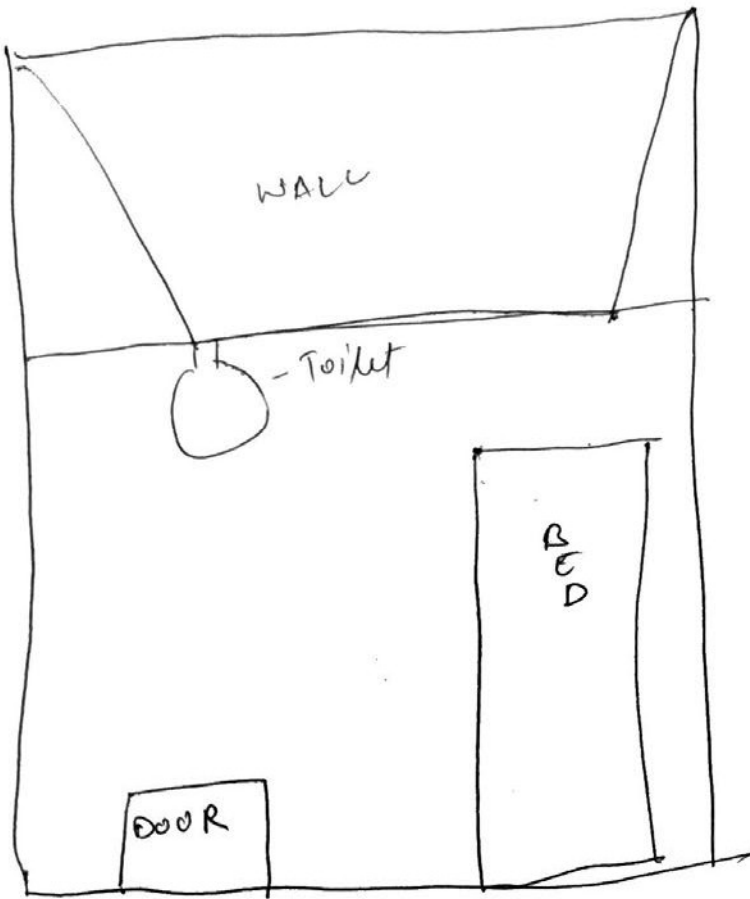
Everything in this declaration is true and correct to the best of my knowledge and recollection.

Executed on the 21 th of MAY, 2026 in El Paso, Texas.

Signature: Nowclap

EXHIBIT A

SMU



NADEEP FNU
05/21/2026 .

EXHIBIT B

Incident of Prohibited Acts And Notice of Charges

CI M- 26- _____

Detainee Name: NAVDEEP, FNU

A-Number: [REDACTED]

Nationality: INDIA

Date & Time of Incident: 5/11/26 @ 1050

Incident Location: Charlie Hallway and Intake

Work Assignment: N/A

Classification Level: Low

Quarters: B5

Prohibited Act(s):

Code: 199 - Conduct that disrupts or interferes with the security and orderly running of the facility

Code: _____

Code: _____

Description of Incident:

On 5/11/26, starting at approximately 1050 hours, Detainee Efnu Navdeep [REDACTED] refused to comply with directives given by officers. While walking back from the Echo Rec, the detainee refused to place his hands behind his back. Officers R. Tarin and L. Caballero gave him multiple directives to place his hands behind his back during the escort. The detainee continued to argue with the officers and was placed in handcuffs by Officer R. Tarin. The detainee pulled away while being put in restraints. The detainee was escorted to intake and placed in a holding cell. The detainee stopped walking to prevent himself from being put in the holding cell but was moved into the cell by DCT C. Galindo and DCT E. Flores. After removing the handcuffs, the detainee struck the wall and was placed in restraints by DCT C. Galindo and DCT E. Flores. The detainee did not comply with commands to stand up and place his hands behind his back. He had to be lifted from a seated position to be placed in restraints. The detainee refused being scanned for detainee movement tracking purposes and had to be lifted from a seated position again to be scanned. The detainee refused to stand up again to have the handcuffs removed and had to be lifted again to access the handcuffs for removal.

Staff Witness? Yes No

Evidence Attached? Yes No N/A

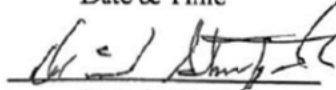
Supporting Memorandum? Yes No NA

SGT V. TRINH
Name of Reporting Officer

5/11/26 @ 1245
Date & Time


Signature

Reviewed for accuracy prior to investigation by: _____


Supervisor/SDDO

05-11-26 / 1343
Date & Time

Incident Recorded on EADM? Y N

Classification Level Changed? Y N

Level changed from _____ To _____

Copy to Detainee within 24 hrs and prior to UDC.

Cop. Received by: Navdeep
Detainee Signature

Date/Time: 2026/11/05 @ 1507

Detainee Rights - IDP

CEI 1-26-

Detainee Rights at The Institution Disciplinary Panel Hearing (IDP)

As a detainee charged with a Prohibited Act(s), you have been referred to the Institution Disciplinary Panel for disposition. While at the IDP hearing, you have the following rights;

1. The right to have a written copy of the charge(s) against you at least 24 hours prior to appearing before the IDP.
2. The right to have a full time member of staff who is reasonably available to assist you before the IDP.
3. The right to call witnesses and present documentary evidence in your behalf provided institutional safety would not be jeopardized.
4. The right to remain silent. Your silence may be used to draw an adverse inference against you. However, your silence alone may not be used to support a finding that you committed a prohibited act.
5. The right to be present throughout the IDP, except during committee deliberations and where institutional safety would be in jeopardy.
6. The right to be advised of the IDP decision in writing and the facts supporting the panel's decision, except where institutional safety would be jeopardized.
7. The right to appeal the decision of the IDP by means of the Detainee Grievance Procedure to the Officer in Charge, within 15 days of the notice of the panel's decision and disposition.

I hereby acknowledge that I have been advised of the rights afforded me at the Institution Disciplinary Panel hearing.

Signed: Nardup A - Number: _____ Date: 05/11/2026 @ 1507

Notice of Rights given to the detainee by: Flores, Ernesto 05/11/2026
Staff Member & Date

Refusal to Sign

I have personally advised _____ of the rights afforded detainees at the Institution Disciplinary Panel Hearing. The detainee refused to sign the acknowledgement.

Staff member and date: _____

Waiver of 24 Hours Notice

I have been advised that I have at least 24-hour notice prior to appearing before the IDP. At this time, I wish to waive this right and proceed with the IDP hearing.

Detainee Signature, Date and Time: _____

Form I-892 (Revised 09/09)

Original Form Received by: Refused to Sign Date/Time _____
Detainee Signature
05/11/2026 @ 1506

EXHIBIT C

05/11/26

While walking from the Fed Rec. Employee Asked me to put my hands Behind my Back I want to do it but, I was unable to do so because of the following Medical Reasons:

~~My~~ My Shoulder (Left) was locked in place from yesterday after Noon due to my previous surgery and accident and it was causing me severe pain to put my hands Behind my Back. I have a Major Accident with Shattered Collar bone and ~~Extracted~~ ribs, ~~and~~ severe Neck Trauma, ~~and~~ two Back Surgeries from 6-4, 6-8. Some time because of these injuries my left shoulder and back sometimes hurt but it's better with time. Not for couple of days it will be fading alot.

While I was trying to explain this to Employee when he said put your hands Behind your Back is said I can't he pulled me out of the line said "Are you refusing to follow orders?" is said "I can't" and he lashed out said "put your hand Behind your Back" and instantly cut off me without even giving me the chance to explain why not he bothered to Ask.

When he was cut off he was clearly very aggressive with cuffs and ~~deliberately~~ / intentionally tightened the cuffs to point where it would hurt and rotated them to cause me pain. Also he twisted my shoulder which was already causing me so much pain. Even then I did not resist. While they were talking me to the intake they said I stopped to protest that

But I walk slower than most average person and I also eat very slow ^(just slow) ~~(slow)~~

After they ~~removed the~~ ^{removed the} cuffs in the intake they were very aggressive and all the use of force was ~~unjustified~~ ^{UNJUSTIFIED} in doing I was in a lot of pain because of my shoulder and that locked and I kicked a wall a bit a bit because I was angry and in lot of pain then they (Employee) ~~put~~ ^{came} in and then

me up against the wall and cuffed me again while using unreasonable use of force, I was in Noway violent or resisting. After that they (Employee) 4-5 they started to intimidate me threaten me that they will do bad things to me and they will make the situation very ~~just~~ ^{just} for a worse for me ~~later~~.

199 - Conduct that disrupts or interferes with the Security and orderly running of the facility. I have ~~not~~ ^{not} share Not did anything violent or anything to resist the order ~~or~~ that would jeopardize the Security of the facility. I did not

interfere with any security procedures that are carried out in place not ~~to~~ ^{to} orderly running the facility and there is evidence of ~~select~~ ^{select} otherwise. My name did jeopardize seems I have been allowed months and in depressed and frustrated but ~~to~~ ^{to} in Now stand a few a few

~~and~~ ^{and} requested to put back by my quarters ~~because the punishment does not allow for this type of punishment~~ and also I have did my punishment 5 days in 5 months with future punishment is unreasonable.

EXHIBIT D



Emergency Grievance/ Emergencia: [] YES/SI [X] NO Medical Grievance/ Queja médica: [] YES/SI [X] NO Grievance Number: _____

DENIED

**CAMP EAST MONTANA
DETAINEE GRIEVANCE FORM / FORMULARIO DE QUEJA DEL DETENIDO**

INSTRUCTIONS / INSTRUCCIONES: Submit to staff or place in grievance box. No retaliation for filing.
Entregar al personal o en el buzón de quejas. No habrá represalias.

Name/Nombre: NAUDEEP PNU [Redacted] Date/Fecha: 05/16/2026

Housing Unit/Unidad: A-11 Nationality/País: INDIA

TYPE OF GRIEVANCE / TIPO DE QUEJA (Mark one / Marque una):

- Staff Conduct / Conducta del personal
- Medical Care / Atención médica
- Conditions / Condiciones
- Property / Propiedad
- Food Service / Alimentos
- Religious / Religioso
- Legal Access / Acceso legal
- Other / Otro: Challenging the decision change in Security - Appeal - Classification.

GRIEVANCE DETAILS / DETALLES DE LA QUEJA:

On 05/16/26 my Security Classification was changed to orange and I challenge that decision as it is completely bogus. There is not enough evidence and material that would constitute this decision. I have not done anything that would interfere with "SECURITY RUNNING THIS FACILITY". There is no evidence on the contrary.

INFORMAL RESOLUTION ATTEMPT / INTENTO INFORMAL: Yes / SI No

If yes, explain / Si sí, explique: There is No Informal Resolution for this because it has no bearing at all, I have no criminal record and any act that would be construed as a threat to security of the facility.

REQUESTED RESOLUTION / SOLUCIÓN SOLICITADA:

This decision is completely unfair and the act was not near enough for this kind of punishment. I have bestness people doing work things and gets a little to nothing in punishment compared to this. This is decision is totally discriminatory.

DETAINEE SIGNATURE / FIRMA: Naudeep Date/Fecha: 05/16/2026

STAFF USE ONLY / USO OFICIAL

Received By / Recibido por: _____ Date/Fecha: _____ Time/Hora: _____

DISPOSITION / RESOLUCIÓN: Approved / Aprobada Denied / Denegada Referred / Referida

RESPONSE / RESPUESTA: Go onto tablet and write a Classification Request

Staff Name & Title / Nombre y título: _____

Signature / Firma: [Signature] Date/Fecha: 5.17.26

APPEAL / APELACIÓN: You may appeal within 5 days / Puede apelar dentro de 5 días Yes / SI NO