

DECLARATION OF ZOR

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge, and if called to testify, I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] and I am currently detained at Camp East Montana. I am [REDACTED] years old.
3. I have been detained here at Camp East Montana since approximately September 21, 2025. Before that, I was detained at the Boone County Jail in ICE custody and the Butler County Sheriff's Office in Hamilton, Ohio, also in immigration custody.
4. I have lived in the United States for approximately 14 years. I am originally from [REDACTED] but I had to flee my home country after several members of my family were killed there.
5. I have three children: a 17-year-old boy, a 13-year-old girl, and one U.S.-born son who is 6 years old. My wife and two older children all have U-visas. I miss living with my wife and children in Kentucky. I used to work two jobs to support my family.
6. I have three DUI convictions. I served a few days in jail for the first two, but the third one was turned into a felony, and I served approximately 6 months in county jail. After I finished serving my sentence, I was turned over to ICE.
7. It took me several months to find an immigration attorney, but once I did, I began fighting my case to stay in the United States. I am afraid to return to [REDACTED] given that my family has been targeted for violence and several of my family members have already been killed. Based on this, I was granted withholding of removal by the immigration judge in my case, and the government chose not to appeal that grant of relief. I also have an application for a U-visa pending.
8. My experience in the many months I have been detained at Camp East Montana has been horrible. It is worse than county jail and worse than the other immigration detention center I was detained at before coming to Camp East Montana. They run this place like a prison and treat us like prisoners.
9. When I arrived at Camp East Montana, I was placed in an intake room for about a day and a half. We were told we had to wait to be processed and assigned a housing unit. The intake room was small, maybe about the size of a bedroom, and very cold. There were about 20 to 30 people with me in this intake room, so it was really crowded. We had to

sleep on the cement floor, and that was if we could sleep at all because it was really cold and we got no blankets or anything else to keep us warm.

10. During this time in intake, we were only fed small, cold sandwiches and a cookie. These meals were very small and did not taste very good. I was very hungry. We had to drink water from the sink in the bathroom that is located in that intake room.
11. Eventually they moved us from this small intake room into a larger processing area where I went through a medical intake. They asked me if I had any allergies, if I had had any operations, or if I had any illnesses. This medical intake happens in a room with staff, guards, and other detainees around you. There was no privacy; there were people right next to me who could overhear everything I was saying. I shared with the medical staff doing the intake that I have depression symptoms, but I did not feel comfortable sharing a lot of details because people around me could hear what I was saying and there is a lot of stigma associated with mental illness and depression, especially for men.
12. I never received a screening for tuberculosis during this medical intake process.
13. After the medical intake, we are given a bag with clothing, shoes, and a detainee handbook. That detainee handbook was in English and Spanish. However, it was for another facility, not Camp East Montana. Many of the procedures and information in that handbook had no relevance to Camp East Montana. There was no orientation or other information about facility rules or procedures.
14. Camp East Montana is not like the other ICE detention center I was at before. It is a tent facility. Each housing unit has about 72 beds. I am currently in housing unit A-13, and during my time at Camp East Montana I have also been in housing units D-2, B-2, and D-8. All the housing units I have been in are pretty much the same. There are bunk beds on either side of the tent, four tables in the middle, and the bathrooms are towards the back of the tent against the back tent wall. The tents are windowless and there is no natural light coming in to the housing units from anywhere.
15. The bunk beds are set up really close to each other. I estimate there is about 2-3 feet of space between the bunk beds. When I first arrived at Camp East Montana in September of 2025, my housing units were very full, with about 60 to 70 people in them. When the housing unit is full it feels really crowded. The number of people in each housing unit went down for a while to about 50 to 60 people, but now it is starting to go back up again. I think there are some empty housing units in the facility, but instead of spreading us around they just cram us into a few housing units instead.

16. The tables in the middle of the housing unit are where we eat our meals. However, we are not allowed to be at these tables after 10pm. I have seen people being taken to “the hole” for wanting to sit at these tables after 10pm.
17. The housing unit is where we spend the majority of our time. There are two TVs for entertainment. The facility used to provide some limited games – cards, checkers and chess – but they stopped doing that after the new contractor took over in around March of 2026. Now there are no games provided at all, although if someone came in with a deck of cards from another facility, sometimes they are allowed to keep that deck of cards for some entertainment.
18. Six very bright lights are on from approximately 6am to 11pm in my housing unit. They make my eyes tear up and it hurts my eyes.
19. I have a Spanish-language Bible with me that I read from time-to-time. There are no other books for me to read in the housing unit. The library at the facility has 8 computers and maybe 8 to 10 books in English. I finally recently found 1 book in Spanish that I borrowed after putting my name on the list.
20. There are 18 tablets in the housing unit. These tablets are shared with everyone in the housing unit. We use these tablets for making calls to our families, but only for those of us with money in our accounts. We also use the tablets to submit any requests to the facility, including grievances to ICE, medical request forms, and requests for things like clothing. Most of the materials in the tablet are in English only. For example, the grievance forms and medical request forms are only available in English. Some courses and other materials in the tablet are in Spanish. Because we use the tablets for so many things, and there are a limited number of tablets per housing unit, it is very hard to find time to get access to the tablets. Fights sometimes break out over the use of the tablets. The tablets also break and it takes the facility a while to fix them when they do.
21. The bathrooms in the housing units have about six toilets and six showers. They kind of look like the types of port-a-potties they have in construction sites, but they are hooked to plumbing. It is common for toilets to clog and for sewage to spill into the housing unit. When this happens, it takes the people who fix the toilets a day or more to come and fix the issue. The guards do nothing to clean the sewage during that time or to try to fix the plumbing issues. We have to continue to live and eat in the housing unit with the sewage filth sitting there, which is very unhygienic. Also, the showers do not all work at the same time. Water from the showers will leak outside of the shower area and we have to clean it ourselves. It makes the ground slippery and dangerous to walk on.
22. The water temperature in the showers is inconsistent. Sometimes it’s lukewarm, sometimes its cold, and sometimes it’s scalding hot. When it’s very hot, the water irritates

my skin by drying it out. It also causes my scalp to flake. I have asked for medical shampoo, but I was only given it once and never again.

23. Recreation time is about 40 minutes to an hour. It is supposed to happen every day, but sometimes they cancel recreation without giving us a reason. The timing is also unpredictable; sometimes recreation time will be early in the morning, sometimes in the afternoon. We never know when recreation is happening. The guards also tell us that recreation time is mandatory, so we have to go out whether we want to or not. Every time we leave or return to the housing unit we are patted down by guards. The guards will sometimes touch us inappropriately, like in the groin area, when patting us down, and it seems as if they are trying to provoke us. For example, I have experienced guards putting their hands inside my pants, pulling the top of my pants up very hard, and giving me a wedgie in the process. Guards have also put their hands under my pants, moving from the inner thigh area to the area near my penis and testicles.
24. The guards here seem inexperienced and they seem to not know what they are doing in the position they are in.
25. Recreation time happens in one of two types of spaces: an outdoor cage with a roof or an outdoor cage without a roof. I never know which recreation space I will be visiting on a particular day. I only get to see the sunlight when I go to the cage without a roof, which I estimate happens about half of my recreation times. The recreation cages are also very small and have no equipment or benches. It is just a dirt floor, so you have to sit on the dirt if you want to sit down. The guards will sometimes give us a ball and we try to play soccer, but the cages are so small and people have nowhere to sit so it is hard to play.
26. I am Christian and my faith is really important to me. While at Camp East Montana I went to a religious service once at the very start of my time here. After that, however, they never offered religious services again and I have not been able to attend. People who are religious like me have to pray in the housing units with all the other detainees around watching TV or doing other things. There is no privacy.
27. The housing units are not very clean. The cleaning staff from the facility come and clean about once a week. In between those cleanings we try our best to keep the housing unit clean, but it is hard. We have nothing to disinfect the tables or other common areas. Sometimes our clothes or linens will not come back from the laundry and we will have to fill out a form to write down what is missing. It usually takes one to two days to get replacement clothes or linens.
28. The housing units are always dusty and dirty because the tents are not sealed and dust is constantly coming in. The a/c units also blow dust everywhere every time they turn on. The dust is worse when it is really windy outside; the tents will move around a lot when

that happens and even more dust comes in to the housing units. When that happens, people on the top bunks get the worst of it because a lot of dust falls on them directly. Water also leaks into the housing units when it rains, as it has recently. That means that our bedding, our clothing, our possessions, and all surfaces are always dusty and sometimes also wet from the rain. The guards do nothing when our things get really dusty or wet from the rain. Instead, we just have to sleep somewhere else and wait for the laundry rotation to come around to clean our things.

29. In addition to making the housing unit dusty, the constant dust in the air has been hard on my health. I never used to have any medical issues but since coming to Camp East Montana I have not been able to breathe well. I also now cough a lot and get migraines. The guards do not provide us with masks or anything else to protect against the dust, even when it is really windy outside.
30. The temperature in the housing units is very cold, even when it is very hot outside. We do not have access to jackets, we were only given one sweater. We only have one sweater, so when it is sent to the wash we have to go a full day without it, which is uncomfortable because it is very cold in the housing unit.
31. It is also hard to stay clean and keep good hygiene at Camp East Montana. We only get two small shampoo packets when we shower. Those two small packets are hardly enough to clean my hair and body. We are not provided soap to wash our hands after using the bathroom or before meals. Instead, we have to use the same shampoo powder, if we have any powder left over after our showers. The guards will not give us extra shampoo packets just to wash our hands.
32. There are also no razors or nail clippers provided. Instead, we have to make an appointment to go see the barbers, who are really other detainees at Camp East Montana who have volunteered to help cut hair and shave facial hair. Many are not really trained or know what they are doing. The barbershop is in the same space as the library. We can make appointments to go to the barbershop every 15 days, but sometimes we have gone longer periods without access to these basic hygiene routines because the barbers were not available.
33. Because there is nothing to do in the housing units, people get really depressed and anxious. Sometimes fights break out because people are so desperate. I think this idleness is one of the hardest things here for me and for many people around me.
34. Movement at the facility is very restricted. I am usually escorted by 2 or 3 guards any time I have to leave the housing unit to go to a legal call or to medical.

35. The food at the facility is meager and tastes bad. They give us frozen food that is reheated. The food tastes bland and the portions are very small. They also will not let us keep food in our personal belongings to eat later in the day; instead, we have to eat when they tell us and throw away any remaining food. They treat us like children in this way. I estimate that I have lost about 10 pounds since I got to Camp East Montana because of the food. I have seen other people lose a lot of weight as well for the same reason. There is no commissary here to buy additional food to supplement what they give us. They keep saying that they will start a commissary, but it never happens. We have to drink water from the sinks in the bathrooms in the housing units. We do not get bottled water and there is nothing else to drink.
36. Another big issue at the facility is the treatment we get from the guards and from the ICE officers there. About six times since I arrived at Camp East Montana ICE officers have tried to get me to sign my own deportation to either [REDACTED]. The worst time was the first time this happened. About four days after I arrived at Camp East Montana, at around the end of September 2025, ICE officers came to me and told me to pack up my things. They told me they wanted to talk to me about my immigration case, but they lied. They took me on a bus with my hands and feet cuffed. I had no idea this was happening until I was shackled in the bus so I could not leave. I was in the bus with a group of about 45 other men. When we got to the border, near Santa Teresa, masked men were there. The masked men told us to get out and jump across to Mexico because Mexico had given us asylum. I asked to see proof that Mexico had given me asylum and refused to leave without that proof. I was not given any paperwork. I was not able to call my attorney or make any other calls. One of the ICE officers told me I was wasting his time, that I would be sent to Africa or sit in detention for a long time unless I left for Mexico. I refused and was eventually returned to Camp East Montana with only approximately 11 others. I think the ones who did not come back jumped over to the other side. I had to go through intake and processing again; it was the same experience I had before, waiting in a cold intake room for a day before I was processed and finally sent to a housing unit.
37. ICE has tried to deport me to either Mexico or [REDACTED] approximately five more times. Soon after that incident where they took me to the border, ICE officers came to me very early in the morning and told me to get dressed because I was leaving for [REDACTED]. Because I knew what happened last time I refused to get dressed and told them that I had withholding relief and could not be sent to [REDACTED]. After some back and forth the officers confirmed I could not be deported to [REDACTED] and they left. Approximately a few weeks after that they told me again that I would be deported to Mexico, and I again refused to sign anything. Maybe a month after that ICE officers came to get me and told me I had an appointment with my lawyer; in reality, they took me to a room where they again asked me to sign my deportation to Mexico. They threatened me saying I would be

sent to Africa instead or I would remain incarcerated at Camp East Montana for a long time if I refused to sign. But I did not sign and eventually they returned me to my housing unit. The last time they tried to get me to sign my deportation was approximately last month approximately in April. They came to my housing unit, told me to pack my things because I was being moved, and then asked me to sign my deportation to Mexico. I refused again and after about 5 or 6 hours they took me back to the housing unit.

38. Another problem with the guards is that they are unnecessarily aggressive with people. For instance, when they do searches of our personal possessions, they will throw our things on the floor and sometimes throw our personal possessions in the trash. And they seem to target certain people for repeated searches, almost as if to provoke them. They did this to me once where they searched my personal possessions 3 days in a row. On the last day the guard took my crucifix and when I told him that we are allowed to keep those under the handbook rules he just threw it in the trash. That felt very personal and I felt like the guard was trying to get me to fight him so he could charge me with an infraction or a crime. That is what I have seen happen with other people they target for these repeated searches.
39. I have seen the guards also use force against people for minor things. For instance, if someone refuses to leave the tables after 10pm because they are eating something or waiting for their medication, they can get in trouble. Sometimes people also get upset because they are not given their medications, not given enough food, or because they feel like their rights are not respected. When that happens, several guards will come – sometimes 3, sometimes 10 – and they will pepper spray people who are getting upset, put their knees on their necks, and take them to “the hole.” If you could see the footage from the cameras in the housing units you would see the abuse and treatment we get from the guards.
40. I believe that guards beat up someone from my housing unit, Geraldo Luna, and killed him. Geraldo was outspoken about getting his medication, which was often given to him late. When that happened he would get frustrated and demand that the facility give him his medication. One of those times they took him away to “the hole.” We later learned that Geraldo was dead. The guards told us that it was a suicide, but we all know he was killed by the guards. I knew Geraldo and he was not depressed or suicidal. He was a good housing mate.
41. I have also seen the guards do nothing to protect us from violence against other detainees. This happened to me. In around December 2025, I was out in one of the recreation cages and we were trying to play soccer. This other detainee and I ran into each other a few times and we exchanged some words. I told him that I thought he was playing too aggressively. He eventually sat out the rest of the game. Out of nowhere he grabbed me

from behind and kicked me in the face. I felt very dizzy after that. He then hit me in the face again and I fell on the floor. I think he kept hitting me after that, but I was very out of it. Other detainees had to come and stop him from continuing to beat me up. During all of this, the guards just stood outside the cage watching. They only came in once the other detainees had restrained this man who was beating me. There are daily fights that break out and the guards will do nothing to stop them. For example, people will sometimes fight over the food or try and steal food from each other because the portions are so small. The guards don't do anything to address this, so people are sometimes left with nothing to eat. People will also sometimes fight over sheets and blankets and the guards do nothing to stop this. I am deeply afraid that the fights will escalate and myself or other people will get hurt.

42. About 5 or 6 days after that incident, that detainee was returned to my same housing unit. I was very surprised that this happened because he had just beat me up for no reason. Because the other detainees were upset at him, they ended up ganging up on him and beating him pretty badly. I was not a part of that. The guards again just sat around and did nothing until the beating was over.
43. I do not feel safe at Camp East Montana. We are packed into these housing units with 60 or 70 other people. I have seen many fights break out. And sometimes out of nowhere another detainee will have an issue with me, like that detainee who beat me after a game of soccer. There are times when I want to be moved from the housing unit because I do not feel safe but the only way to do that is if you "snitch" and give the guards names of other detainees. I fear it will be worse for me if I "snitch" so I just do nothing. The guards do not care about this; they put us in the same housing units or have us do recreation time together with people who have been in fights with each other.
44. I have had multiple medical issues during my time at Camp East Montana. Soon after I first arrived at the facility, I fell during recreation hour and hurt my right arm. My wrist swelled up, and I think I may have broken it. The guards would tell me that medical help would come, but it never did. I sent five or six requests for medical care after this. Each time I filled out the form to request care the guards told me they could not give me treatment because I had not filled out the form, even though I repeatedly filled it out.
45. I have also had a lot of medical issues as a result of that beating in December. After the incident with this other detainee, the guards eventually took me to medical to see the doctor. I had three broken teeth – one natural tooth that was partially broken and two veneers that were knocked off. The dentist at the facility told me he was not equipped to do an extraction, but because my tooth was partially broken and the nerve was exposed, he had to do an emergency extraction in the end. I also think I had a broken nose, but I was not given x-rays to confirm that. Instead, after the extraction, they sent me back to

the housing unit with Tylenol. I think I may have also gotten antibiotics. I was not taken to the emergency room or to a specialist.

46. My nose kept bleeding a lot after I was sent back to the housing unit. It was very painful and I felt like I could not breathe very well. I could feel blood pooling inside my nose. I put in requests to see medical again because of the issues with my nose. I did this maybe 2 or 3 times after that initial visit following the beating. I was given a spray for my nose, but no one explained to me what it did. Again, I was never given x-rays or taken to the hospital or a specialist to see why my nose was so painful and bleeding. I was told to keep taking Tylenol. I would say I could not breathe well for about months following the injury, and I still do not feel 100% back to normal.
47. My mouth was also very painful and bleeding after the beating. I put in medical requests also to see the doctor about a painful blister inside my mouth that kept filling with blood over and over again. I think it put in maybe 4 requests for this issue. I went to see the doctor but I never got an answer about what was happening with my mouth injury. I was simply told to keep taking Tylenol.
48. I had to put in many grievances to ICE to get them to approve new veneers for my cracked teeth. ICE kept telling me to ask medical. Medical kept telling me I had to ask ICE. I think I put in about 3 grievances to ICE asking them to fix my teeth. Eventually, after maybe 3 months of asking, the dentist finally installed the veneers. He told me that it was not work he did regularly because he was just a regular dentist, and that ICE never approved the veneers, but that he paid for them himself and did the work because he thought ICE was never going to fix the issues with my teeth.
49. To see medical at Camp East Montana, you have to submit a medical request form on the tablets. They can sometimes take days to respond to those requests. If you ask the guards about medical or dental care at the facility they will sometimes know the answer, but often they do not and have to ask themselves.
50. I was in a quarantine housing unit with other people because we were told that we were exposed to measles. We were not given any blood tests during the quarantine, but we were given vaccines. During the quarantine the medical staff came in and would ask in the mornings and evenings whether we had any symptoms. We were not able to contact our attorneys while in quarantine.
51. I have had other issues with medical care at Camp East Montana during my time here. For instance, it took about 1 month of waiting before I could get medication for a mental health condition after it was prescribed by the facility doctor. It took that same amount of time to get an ointment for some blisters on my face; before that I was just getting Vaseline from the facility.

52. I am relatively lucky because I do not have serious or chronic medical conditions. But I see other detainees who have more serious medical issues not getting their medications and have to fight with the facility to get care. I see these other detainees become desperate because of that issue of not getting medications. That is what was happening to Geraldo Luna.
53. I have never been provided an interpreter by staff during my time at Camp East Montana. For visits to medical, if there is a nurse who speaks Spanish, that nurse will translate my visits with the doctor. If not, then a guard will be used as a translator. This makes me feel very uncomfortable because I have to discuss my medical issues in front of the guards and have them translate for me. No one has ever told me that I have the right to ask for an interpreter to help me with medical appointments or with anything else at the facility.
54. I am worried about the guards and ICE officers at Camp East Montana knowing that I am involved in this lawsuit. I have already been targeted by the ICE officers when they tried to get me to self-deport to Mexico or [REDACTED]. And the guards have already targeted me for repeated searches of my personal belongings and threw away my crucifix just because I said that I was allowed to keep it. I have seen them beat up detainees for very minor things. I worry what they will do to me if they find out that I am speaking out against their abusive treatment of people at the facility. I am also afraid of the public knowing my identity because I could be in danger if I am ever deported to [REDACTED] like ICE officers have tried to do several times.

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

Executed on the 28 of May 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 [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] 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]