

# DECLARATION OF JLE

**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 El Paso, Texas, since 2009 with family. I worked as a house cleaner, and I was a homemaker and stayed home to take care of my family. I do not have any criminal record.
4. I was detained by ICE on or about May 8, 2026, as I left my home while my husband and I were running an errand.
5. As far as I know, my petition for residency was approved but I had to visit the [REDACTED] [REDACTED] to receive a pardon.
6. I was taken to Camp East Montana in El Paso, Texas, on or around May 8, 2026. I was taken to intake and there were few people there. I was in intake for about three hours. I received a small bag with a sandwich with a salty piece of ham and white bread. There is a camera in the room which can also see when we use the restroom. We have to use the restroom in the toilet in the room with others around and the camera looking at us.
7. I was given a quick medical evaluation that consisted of staff asking me if I had any medical conditions. They also gave me a tuberculosis shot/skin test that came out as negative. I told them that I have Type II diabetes, and I require insulin shots once per week. The nurse told me that they could not provide me with the same insulin that I was receiving outside because it would cost too much. My blood pressure was also very high and the nurse said that they would give me medication for my high blood pressure, but I have never received it. The only thing I've received has been cough drops.
8. I am currently Alpha-3, which is a low security unit because I do not have any criminal history. I wear blue colored clothing.
9. The housing unit where I am at has about 72 beds organized into 9 four-person bunk beds. Each side of the unit has nine of the four-person bunks. There are no windows anywhere inside the unit, so we cannot see sunlight, the sky, or anything outside. We can only hear the sound of the trap clanking against the metal frame of the unit, because of the strong winds, which sometimes keeps us up at night. There are also no clocks. Because of this, it is very hard to know what time it is or even distinguish one day from another. The unit is a big white trap that has bright lights inside. I feel desperate and anxious by not being to see daylight or the outside world has affected me emotionally. We rely completely on the guards to tell us when to wake up, eat meals, go outside to the

yard, and go to sleep. We are required to sleep at around 10:00 p.m. and wake up at approximately 5:00 a.m. for morning count.

10. There are three counts per day. The first is early in the morning at 5:00 a.m. when we are required to wake up with bright lights on, so that officers can scan our wristbands. During count, we are not allowed to move freely, use tablets, or watch television, and even using the restroom requires officer permission. The second count starts at approximately 12:30 p.m. and is the longest count that goes for over two hours. The third count usually starts around 7:00 p.m. and continues until about 8:30 or 9:00 p.m.
11. The center of the dorm has metal tables and there are two televisions on one side of the unit, with about six toilets and six showers next to the metal tables. There are not enough tables for us all to use at the same time when the unit is full. The bunks are close together and there is little privacy. The showers and toilets are separated only by a tarp with plastic windows that allow people to see inside. While eating meals and throughout the day, we can see who is in the bathroom (unless we cover it with our own clothes) and smell the human waste coming from the restroom area. This feels degrading and very uncomfortable because I have no privacy. Since I have been here, I have not had a good healthy or normal bowel movement. Other women in my unit have also told me that they have not had a good bowel movement either.
12. While we have access to hygiene and feminine products, these are limited and we have to ask the guards in the unit for them every day. Sometimes these run out. The hygiene products are single use. We do not have hand soap in the bathroom to wash our hands. Instead, we have to use whatever remaining shampoo/body wash we have from our single use packets. Or we have to wash our hands with just water.
13. There is very little to do during the day. The lack of activities and constant confinement has made me feel anxious and hopeless.
14. On Sundays, sometimes we receive Catholic church service, which is in another unit which has people in orange and blue colored shirts. Church service is inconsistent. For example, on or about May 24, 2026, we were not taken to church service.
15. We also have access to yard but there is not a set schedule. Sometimes we go out in the afternoon when it is very hot. Other days we go out in the morning when it's cold, and women in the unit do not want to go out. Sometimes we are obligated to go outside, and no one can stay in the unit. Other days, it is not obligatory. Other days we do not go out because it's too hot and windy and there's a lot of dust and sand in the air. Half of the yard is covered by a roof tarp, and we cannot see the sun or sky above us. On the other half, we see and feel the sun, if the sun is out that day or at the time that we go out. There is artificial grass and dust and sand everywhere. There is only a soccer ball and football for us to use, and there's a water cart. Most of us just stand outside and talk.

16. Each four-bunk unit shares a tablet for phone calls, messages, and limited entertainment, but everything on the tablet costs money. We are not allowed to send or receive any messages or photos as these must be reviewed and approved by the facility. Sometimes my family will send me photos and they do not arrive. For example, my son said he sent me pictures of his dogs and that has not been approved. Because the tablet is shared among multiple detainees, access is limited. The housing unit also has only a small number of video kiosks, and there is no privacy when using them because other detainees nearby can hear conversations and see the screen.
17. There is a lot of sand and dust that goes into the unit through the openings between the tarp and the metal frame. The sand from outside goes onto our bunk beds, in the toilets, showers, on the floor everywhere, on our clothing, lunch tables, and on our bodies. We breathe in this sand and dust every single day, which makes it hard to breathe. The women who sleep on the top bunk get dust/sand on their faces and bodies while they sleep. I constantly have a dry throat. My eyes and nose is dry and sometimes my nose bleeding. My eyes are regularly itchy as well. My skin is dry and my head hurts regularly. The only thing we get to help alleviate these symptoms are cough drops that we get sometimes.
18. We have also seen rats in the unit.
19. Our unit is very dirty with toilet paper, trash, hair, sand, and dirt. Since I've been here, from on or about May 8, 2026, I only saw that the facility staff cleaned the unit once. The other days, the detainees have to clean the unit. The detainees do not want to clean, but we have to, otherwise the unit will just stay dirty. The women in my unit take turns cleaning. The guards bring us a broom, some chemical spray, and detainees use toothbrushes, hand cloths, extra shirts, and water to clean the sinks, beds, floors, bathrooms, lunch tables, and showers. The detainees are not paid for cleaning the unit.
20. The food is terrible and unhealthy. I must eat because if I do not, then my blood pressure drops. For example, the oatmeal we have in the morning is hard and not well made. These are all pre-package meals that are heated up by the staff. The food is enough at all. I am hungry here all of the time and we drink water to help pass the hunger. Because of the lack of food, I feel weak and tired all the time. The food quality is bad, it's badly seasoned, very sour, has a terrible season, and tastes horrible.
21. On or about May 11, 2026, I started receiving a special diet. The food says "medical." But the food is exactly the same as the food that the other detainees are receiving. It's rice, potatoes, beans, chicken, and vegetables. It's the same as what others are eating. Even when I eat this "special diet," I still feel nauseous and lightheaded, headaches, because the food is not good, not enough quantity, and badly seasoned (it has a sauce that is sour and tastes horribly).
22. Since May 8<sup>th</sup>, I have not received a second medical health care evaluation. Instead, the only way I have seen the doctor is by making sick call requests.

23. When I arrived, my blood pressure was consistently high for three days, according to a nurse who tested it. The nurse explained that they would provide me with medication, but I have not received this medication since I arrived.
24. On or about May 18, 2026, a nurse took me to the medical unit and shared my blood test results which showed that I had very high potassium and she explained that this could indicate a heart problem. The nurse did not tell me anything further or prescribed me any medication. After hearing this, I became very stressed and anxious because I was worried that there was something wrong with my heart and the nurse did not give me any medication or explain anything further. I only received another blood test.
25. On or about May 21, 2026, I made a sick call request to see the medic again to find out my test results. But they did not have my results. I did not receive any medication for this high potassium or for my high blood pressure.
26. On or about May 23, 2026, I made another sick call request so that the nurse could explain my blood test results. I was taken to my appointment at about 1:00 a.m. and I returned to my unit at around 3:00 a.m. The medical provider explained that they were going to check my blood sugar for a week and that the high potassium level would drop on its own with the food here at the facility. I did not receive medication. I explained that the first nurse who saw me on May 8<sup>th</sup> told me that I would receive medication for my diabetes and high blood pressure. The medical provider said that medication was not necessary and that my blood pressure and high potassium would drop on its own. On this appointment, I also asked about my insulin medication which I am supposed to receive once a week, but they said that they did not have it.
27. On or about May 24, 2026, at around 6:30 PM, the nurse came to my unit to administer medications to others in the unit. During this time, I asked the nurse if she had my insulin medication and if they were going to check my sugar. The nurse said that they might have the insulin at the facility but that she did not have it on her at that moment and that she was going to ask. But I never heard back.
28. Since I have not received my insulin (since May 8<sup>th</sup>), I have felt nauseous, dizzy, tired, physically weak, night sweats, inability to sleep, and anxious.
29. On or about May 23, 2026, there was a woman, named M.L., in my unit who had told me that she had severe pain on her lower back. The woman told me that she thought it was her kidneys or her lower lung. She had difficulty breathing and had a high fever. Her body felt very hot. In the morning after waking up, the woman had difficulty getting up from her bunk and struggled to walk. Starting at about 8:00 a.m., she sat on the metal tables, and she was crying in pain for hours. We even went to the barbershop and returned at around 2:00 p.m., and she was still sitting on the lunch table and was crying out in pain, and no guard or facility member had helped her. I ask guard to please call a medic because she needed help. The guard said that she had called the medical team but that the medical team had not arrived. When I returned from the barbershop, the woman sat next to me on the metal table. Then, suddenly, the woman collapsed and fainted. I tried my

- best to hold the woman from collapsing on the ground so that she would not be injured. I was begging the guards to come and help me because I could not carry her. The guards were just yelling at me asking me what happened. The guards told me that they could not help her or touch her. Instead, they just left me there to help support her, but I could not sustain her body weight. I did my best to lay the woman on the ground delicately, and that's when she started to convulse aggressively. Only then is when the medical team arrived with a first aid kit. Then she was placed on a gurney and she was taken away. After that, the guard told me that she was taken to a hospital. I have not seen her since.
30. We also receive invasive pat downs all over bodies, including checking inside our waist band, any time that we leave or enter the unit. I feel very uncomfortable because the guards insert their fingers inside my waist band near my private genital areas.
31. I feel desperate and anxious because I see how terrible other people are doing here with their health. I constantly feel scared and anxious that I will get sick and that I will not receive the proper treatment. People here are constantly getting sick. I see people coughing, sneezing, and fevers.
32. I also feel depressed because I am trapped here and I cannot even see my family. I am not a criminal and I feel that I am being treated worse than a criminal here. I cannot see the sun, I am not receiving my medications, I am stuck in a dirty tarp surrounded by sick people, there's nothing to do all day, and I get searched and patted down almost every day. I feel frustrated and sad. I feel that being here is pressuring me to give up on my immigration case. I have seen many women just give up and agree to be deported even though they did not really want to.
33. We are not allowed to touch our family members when they come to visit. For example, on or about May 21, 2026, my husband came to visit me (since he lives in El Paso), and I was not allowed to hug or touch him. We can only see our family members through Plexi glass. I feel sad that I cannot hug my own husband. I feel that I am being punished here. I would feel better, safe, and loved if I could hug my husband and family.
34. Since being here, I have not been offered the opportunity to call an attorney on a private and free line. Instead, I must rely on my husband to coordinate with an attorney.
35. I do not understand why I am being kept here. I am from [REDACTED] which is only [REDACTED] from the facility. I fear that I am going to be deported to another region in [REDACTED] where I have no family or support, and that my medical condition will worsen during the deportation.
36. While I fear speaking up about the conditions here because of potential retaliation and negative impact, I am doing so because it is the right thing to do and so that our conditions here can improve.

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 [REDACTED] 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 her, translated into Spanish faithfully and accurately. [REDACTED] affirmed that she 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]

**Date**