

DECLARATION OF LLH

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. I have lived in the United States most of my life. I arrived in the United States when I was 8 years old. I've lived in Alabama, where I was under ICE supervision since 2014. I then lived in Fort Stockton, Texas, with my partner for about four years. I worked as a construction worker.
4. On or about November 13, 2025, I was detained at Fort Stockton, Texas, by ICE agents. I was transferred to Otero detention facility.
5. On or about November 24, 2025, I was deported to [REDACTED] but because I did not have citizenship documentation for [REDACTED], I was returned to the United States (that's what ICE officials told me).

Intake and Housing Conditions

6. On or about November 24, 2025, I was sent to Ft. Bliss Camp East Montana.
7. When I arrived, I was taken to the Intake Processing room for about two days. There were about 50-60 other people with me in the room. I would estimate that the room was about 20 x 25 feet. We were packed on the floor sitting down. We all slept on the floor without any blankets, not even the metallic survival blankets. The lights were also kept on 24 hours a day. We also huddled on the floor next to each other. It was cold and uncomfortable, and hard to sleep. When I was there, people were coughing and people appeared to be sick. To eat, we only received a small sandwich about every 8 hours, and it only contained a thin slice of cheese and ham, and we also got tap water.
8. During my intake, I did not receive a medical intake exam. The guards only gave us the uniforms and then sent me to my unit. I was not screened for tuberculosis, COVID-19, or measles. They did not ask me if I was sick, felt sick, was on any medications, had a rash, had been throwing up, or had a fever, or anything like that.
9. I was then transferred to Delta-2, which is a high security unit. When I arrived, there were a lot of people in the unit with flu and COVID-like symptoms, like people coughing, fevers, and sneezing. Shortly after I arrived, I got very sick and had bad symptoms of fever, sore throat, cough, and yellow phlegm. I was sick for about 15 days with fever. I pleaded to the guards that I wanted to see the doctor. The guard told me that I had fill out a sick call request. I asked for a face mask but the guards said that they did not have any, so I was not given one. I filed out about five sick call requests, but I was never seen by a

doctor or other medical staff. I did not receive any medicine. When I was finally seen by medical staff about two weeks later, I was only given Tylenol, but they didn't do an evaluation or anything. By that time, I was already feeling better.

10. A couple weeks after I was put in Delta-2, on or about December 9, 2025, ICE tried to deport me again to [REDACTED] but was not able to for the same reason of my lack of citizenship documentation of [REDACTED] (again, that's what ICE officials told me). After this, I returned to Delta-2 Unit.
11. For a second time, on or about mid-December, I was taken to Intake Processing. This time, I was at intake for two nights. I was in a smaller intake room. There were about 30 other people there with me. We were forced to sleep on the cold floor huddled up next to each other, without blankets. The lights were also kept on 24 hours a day. There is also a toilet in the room where people are forced to use the bathroom in front of other people. There's no privacy. We were only given sandwiches and tap water, like the first time I went through intake. Again, there were sick because they were coughing and said they had a fever. I was not given a medical evaluation this time either.
12. After two nights in the small intake room, I was taken again to Delta-2. When I was there I filled out a sick call request. The nurse came and took me into the hallway, took my blood pressure, gave me a COVID-19 test, and asked why I put in a sick call request. The hallway was public and there were other guards, nurses, and detainees in the hallway being evaluated by the nurses. We were close to each other. We were seen five people at a time. All five had to wait in the hallway while we each evaluated by the nurse, so we could see and hear what people were talking with the nurse about. I told the nurse that I had the same symptoms: a cough, dry throat, loss of taste, and loss of smell. I received a COVID-19 test, but I was not told whether it was positive or negative. The nurse just gave me Tylenol and allergy medication.
13. This time, I was in Delta-2 for about another week. Then, on or about December 15, 2025, ICE attempted to deport me again to [REDACTED] But, they could not, and I was told it was for the same reason – I didn't have citizenship documentation for [REDACTED]
14. On or about December 15, 2025, I was returned to Camp East Montana.
15. For the third time, I was taken to the intake processing center. This time I was there for about 15 hours. I was forced to sleep again overnight. This time there about 45-50 people in the larger room. I saw a sign in the room that said the capacity was supposed to only be 30 people. We were forced to sleep on the cold floor and huddled up next to each other, without blankets. The lights were also kept on 24 hours a day. There is also a toilet where people are forced to use the bathroom in front of other people. We were only given sandwiches and tap water. Again, people were sick because they were coughing and had a fever. This time I was given a medical evaluation. The evaluation was brief: a nurse measured my weight, height, blood pressure, temperature, and asked for my medical needs. I shared that I had an infection in one of my teeth, chronic sore throat, and a

urinary tract infection. The nurse told me that I needed to submit a sick call request when I made it to my unit. That was it.

16. After that, I was put in Delta-4. There are 72 beds here with 18 four-person bunk beds. There are 9 four-person bunk beds on each side. There are no windows anywhere in the unit. It's hard to know what time it is because we can't see the sun and there are no clocks in the unit. We can only tell time by looking at the shared tablet or by asking the guards. The only way that we know to get up or sleep is because the guards tell us to.
17. When I slept in Delta-4 and Delta-2, I could not sleep well. There is a light kept on during the night that is on top of main door into the unit. People who sleep in the bunks near the main door place a towel over our eyes to help us sleep, but the guards tell us to remove it. I cannot sleep well because I sleep near the front main door of the unit and so the light prevents me from sleeping well at night. I am tired all the time and sleepy during the day. I also cannot sleep well because the mattresses are about 2-inches thick and don't provide much cushion.
18. I was in Delta-4 for about two weeks.
19. On or about February 7, 2026, I was transferred to Florence Detention Center in Arizona. I was in Florence for about two weeks. I was housed in a unit for deportation/removal. I was not given any change of clothing. After about a week in Florence, I was told that I was going to be transferred to another detention center. But an ICE official told us that we were being removed to Mexico. I spoke up and said that I did not want to be removed to Mexico. I'm not from Mexico and have never been there. Then, I was moved to another room, and I was told that the other remaining people were removed to Mexico. I was kept in Florence for about another three days. Then, I was taken to Eloy Detention Center. ICE attempted to deport me again, but I was told that they did not have enough room for me on the flight. So, I returned back to Eloy. After two weeks of total time spent at Eloy and Florence, I was removed back to El Paso Camp East Montana. When I was detained in Arizona I was given an antibiotic for my tooth, and my tooth eventually fell out on its own.
20. For a fourth time, on or about February 21, 2026, I was transferred back to Camp East Montana.
21. For the fourth time, I was taken to the intake processing center again. This time I was there for about 8 hours. At around 3:00 a.m. I was processed and then taken to Unit Delta-4. This time I was given a quick medical evaluation. I did not receive a mental health evaluation. The medical evaluation was brief: a nurse measured my weight, height, blood pressure, temperature, and asked for my medical needs. I shared that I had lost my tooth (it fell out when I was in Arizona), I had a chronic sore throat, and I had a urinary tract infection. That night I was administered a lab test for my UTI. But, to this date, I have not received any updates about that test.

22. Every time I arrived for intake at Camp East Montana, the guards played a video in English with Spanish subtitles explaining the general rules of the facility. The video, however, contained footage of other detention centers that showed big portions of good quality food, stated that people could get special diets, that there were cooks preparing the food fresh daily at the facility, a big open yard without a roof blocking the sun, showed a clinical wing with full medical services, showed a big library, religious services, and other programming. When I entered the facility, nothing that was on the instructional video was reality. The video is a false image of what reality is like at the detention center. The reality here is much worse. The video is a lie. This place is horrible and I feel that I am tortured and punished here.
23. I was in Delta-4 from February 21, 2026, until on or about April 6, 2026.
24. Then I was in C-14. Most recently, I am currently in A-14, and have been there since on or about April 27, 2026. A-14 has the same layout and structure as Delta-2 and Delta-4 units as I was before. The only change is that I now have a mattress that is a little thicker than the ones I had before, which helps me sleep more comfortably.
25. The units I have been in have large metal lunch tables in the middle of the unit, one television on each side, and there are six toilets and six showers behind the lunch tables. There are no walls, screens, or other barriers that separate the four-person bunk beds from each other, and they are about 3 feet apart from each other. There is no privacy in my unit at all. The walls of the toilet and shower stalls are made of tarp. There are two plastic windows cut into that tarp to allow the guards or another detainee to look inside while people are using the toilet or showering. When we are eating, we can see who is using the toilet or shower.
26. Starting on or around April 18, 2026, when the new contractor took over the facility (that's what staff told us), counts have been extended. Now there are three counts. The first is 5:00 AM until about 6 AM and we are woken up for it. The second count is at 12:30 PM, immediately after lunch which is served at around 12:15 PM, and that count lasts until around 2 or 3 PM. But, starting on or about May 13, 2026, the second count was shortened and lasted until about 2 PM, but it still occurs during lunch. The third count starts at about 7PM and ends at about 8 PM, this also happens after dinner and we are given only a short time to eat. There used to be three counts per day but the early morning count was a head-count, which meant that we did not have to wake up at 5 AM for the count or have our bracelets scanned. And, before, the counts in total lasted about 30 minutes each back when the facility was at full capacity. But, now, the count is lasting for hours. During each count, we have to go back to our bunk beds and we cannot use our tablets, and we have to wait for guards to count each person in the unit.
27. My unit is very cold and my clothing does not keep me warm.
28. We also receive multiple pat downs every single day. That means that guards inspect our entire bodies, including near our genitals (or sometimes checking our genital areas) for contraband. That doesn't make sense to me because there's nowhere to go and nothing to

do here. We get patted down when we go or return to yard, when we go for attorney or in-person visits, when we leave the unit for any reason.

Hygiene and Cleanliness

29. There is a lot of dust and sand in our unit. When there are dust storms outside, all the sand falls all over our beds, which makes it difficult for them to stay clean. We have to clean ourselves because the cleaning crew only comes about once a week. The other days we try to clean the unit ourselves. The guards give us a broom, mop, and toilet brush. We get some chemical agent to clean the toilet, but it's not enough to clean the unit, so we use only water to mop the floors and clean other areas of the unit, including common surfaces many people touch regularly, like bathroom sink handles, table surfaces, and the metal chairs attached to the lunch tables. The guards tell us to clean every day. The water that we use to mop is dirty because of the amount of sand and dirt in the unit. We have asked guards if they could give those who clean extra food, but the guards have said no. So, I see that people are not motivated to keep the areas clean. But we have to clean because of the amount of sand everywhere.

Food

30. Food has always been an issue here. We receive small portions. Each time I've been here, there have been these issues with the food. There have been hunger strikes from how bad the food is. People also refused to go to sleep and stayed up all night to show the guards that they were unhappy with the food in a peaceful protest. On or about December 24, 2025, when I was Delta-2, there was a big strike by detainees because of the food. People went on strike because the guards told us that we were not going to get fruit, milk, or cereal; we just got oatmeal. The guard told us that ICE did not want to give us extra food, like a piece of fruit. People became upset. It's hard to explain how important food is here. There's nothing to do, nothing to see, nothing to occupy your mind, and feeling hungry constantly, day after day, can be unbearable. Our unit asked to speak to the Captain but the guards ignored us. The night guard crew arrived but we told them that we needed to speak with the Captains or supervisors. Our unit refused to go to bed that night in protest over the lack of food. Other detainees made noise and a few remove the mattresses from the metal bed and were very upset. The Captain and about six guards came to observe and take notes. Later, the guards came and people in the unit shared their complaints about the food. The guards said that there was nothing that they could do about the food because the supplies had run out. The guards told the detainees to wait a few days. The guards took those who removed a mattress to the "hole" and I never saw them again. Later, I learned that there were other units that were protesting too.

31. During Easter week, we received either mashed potatoes with small protein balls or carrots in water for 10 days and for breakfast, lunch, and dinner. We did not get any fruit, cookies, or crackers during this time. The guards told us that they were not allowed to give us any other food. I am on the Kosher diet, and I did not get any fruit, cookie, or crackers. I originally went on the Kosher diet because the "regular" food was so bad and the Kosher was a better alternative for me in terms of seasoning and taste, although it still was not enough to keep me full.

32. On the fourth day of receiving this Easter meal, about 6-7 of us complained to the guards. We told the guards that we could not just eat carrots in water or potatoes for all three meals. We protested by returning the meals. The guards told us that if we did not want that food then we would not get anything else. Around the 10th day, we returned to the regular food. There are instances when you complain about the food, they won't give you food anymore, and it took 2 days to get food again. The food is still terrible and the portions are still small. For breakfast, for example, we now get two small servings of carrots, one serving of potatoes, and a thin protein patty with a potato on it.
33. Since I've been here since November 2025, the food has stayed the same in terms of bad quality and small portions. The food they give us is not enough, I have noticed that people here have lost weight. I have lost about 10 pounds since being here. We drink water and sleep to try to pass the hunger.
34. Sometimes we get rotten or spoiled food. On or about May 4, 2026, we received a small portion of chicken, pasta penne with broccoli and cream sauce. For my Kosher meal, I receive beans with sausage. I split my meal with another detainee who received the chicken penne pasta dish. When I smelled the pasta sauce, it smelled sour and spoiled. I took a few bites and then other detainees started to complain that the food was spoiled. Others complained and the Captain arrived. Other detainees returned the food and did not eat. The guards told us that if we did not eat it, that the food would be thrown away. But we could not eat it because the food was spoiled. The food was thrown away and we did not get any replacement dinner.

Rules and Access to Counsel

35. There is no way to make outgoing confidential calls to our attorneys on the tablet. We can only make outgoing calls on our tablets, and those calls are all recorded (and we can only use tablets in the housing unit, where there are lots of people around to overhear). The only way to get access to a lawyer is if our families or friends on the outside hire or contact one for us or if we get lucky and some legal organization gets our information and sets up a virtual or in-person appointment. Otherwise, we cannot call an attorney from inside the facility in a way that is private, confidential, or free.
36. On the fourth time that I arrived at the facility, on or about February 21, 2026, staff gave me a document entitled, "Camp East Montana Local Supplement of the ICE National Detention Center Detainee Handbook." A true and correct copy of that document is attached hereto as Exhibit A. On or about February 21, 2026, staff also recently gave me a document entitled, "Camp Montana East Manual de Immigrante," by "AGS An Akima Company." A true and correct copy of that document is attached hereto as Exhibit B. On or about May 6, 2026, I got the document entitled, "National Detainee Handbook," from another detainee in my unit. A true and correct copy of which is attached hereto as Exhibit C.

Recreation and Lack of Programming

37. There is nothing to do all day. We just sit on our beds or on the tables. There is no educational programming.

38. Each four-person bunk bed unit is given one tablet to share. With the tablet, we can make phone calls – about 9 cents per minute for a phone call, and 21 cents per minute for a video call. But when the new contractor entered, on or around April 18, 2026, video calls were blocked and we could make them for about a month. Starting on or about May 14, 2026, we started to receive access/permission to make video calls again through the tablets and video kioks. The tablet has games, but they cost 4 cents per minute to play. I do not use the games often because I do not have enough money. We can also SMS text, but we are charged money to send and receive SMS messages and receive photos from our family. The tablet also has movies in English but these cost money. I do not watch the movies. We also get charged to play music on the tablet. I only use the tablet at night to call my girlfriend.
39. While there is a library, it only has a few books in Spanish and the majority are in English. The library is small.
40. Yard time is also inconsistent. While there is a posted schedule in the unit, guards do not take us during those times. The times change daily. When we do go out, yard time (with the new company), is now mandatory. That means that we cannot refuse to go. There's nothing to do at the yard. It's just another cell. The yard ceiling is fully covered with another tarp which means that we cannot see the sky, clouds, or sun. The only bit of sunlight we can get is from a side chain linked fence on one of the sides of the yard. There's nothing to do outside but to play soccer with a very heavy soccer ball. The rest of us just have to stand on the sides and talk among ourselves. We cannot exercise or walk around. The grass is also artificial is covered with sand and dust. So when there are strong winds or people play soccer, the sand and dust goes everywhere and we have trouble breathing because of the sand and dust everywhere. Sometimes yard is mandatory and sometimes it is not, we do not know why. One thing is for sure, the rules around yard time are inconsistent.
41. Since I arrived, I asked the guards for a job at the facility along with others, but we have not gotten a job. During intake we get a notice telling us that we can work at the facility and that we will get paid \$1 a day. But when we get to the unit, the guards tell us that there are no jobs at the facility that we can do. I want to work because I've done so in all of the detention centers I've been in and it can be nice to have a purpose and something productive to do to pass the time. I could use the \$1/day to make more phone calls and not use my girlfriend's money.

Guard Mistreatment

42. On or about May 13, 2026, at around 11 PM, I was at my bunk bed talking to others. I saw a person who was sitting down at the lunch bench table who had an arm sling. He was sleeping and he looked very sick. Suddenly, the man collapsed and fell on the floor. We called the guards for help. When the Captains arrived, we asked why there were not helping the man or picking him up. The captains told us to shut up. The medics arrived and brought a gurney. But I saw that the man himself picked himself up and struggled to get on top of the gurney without any help. Some detainees did not want to go back to

their beds, and the captains were yelling at us to go back to bed. As some people were walking back to their beds, the guards physically pushed the detainees. Another detainee continued to complain, and a guard went up to his face to yell at him. The guard was very aggressive and told the detainee to fight him. Since then, I have not seen the man that was sick and taken away. That experience made me scared to ask the guards for help.

Medical Care

43. Medical care here is terrible.
44. We do not receive face masks to cover ourselves from other sick people or from the dust/sand in the unit.
45. Because of the amount of sand and dust in my unit, I constantly feel a sore throat. Sometimes I request ibuprofen which helps with that. But once that is done my sore throat returns. I regularly have headaches, clogged and runny nose, coughs, and chest pains. I also have body aches. When I get ibuprofen, these symptoms subside but then they return right after the pain medication is done. I didn't have these severe and persistent problems before I came to Camp East Montana.
46. Though I went through orientation four times, staff never explained the rules of how to get medical and dental care. To receive medical and dental care, I was told by the other detainees in my unit that we would fill out a medical request form and give it to the guard.
47. Since I've been here, staff have told us that there have been outbreaks of Covid, measles, and tuberculosis. That's been really scary. When that happened, staff didn't come and give us information or education about what those diseases are, what symptoms to look for, and how to protect ourselves. We weren't given masks or any other personal protective equipment during that time either. Each time my unit would go out to yard, I would see signs posted on neighboring units in the hallway that had signs saying "COVID-19," or "Measles," or "Tuberculosis." Those quarantine units were next to my unit, and the air is circulated between the units because they are open on top.
48. When I was in all of my past units, a lot of people in my unit got sick. I could hear them coughing and sneezing and complaining of fevers and chills, as well as body aches. I saw several people who refused to eat or get out of bed. People coughed yellow phlegm and people had serious nose bleeds. People inserted toilet paper into their nostrils for the bleeding. Even when someone had those symptoms, they were not removed from the unit right away. Instead, they would stay in the unit for days and only later be taken somewhere else. Even the guards were sick as well.
49. When someone in the unit gets sick, they are sent to the medic and do not return, I think because they are taken to isolation, but I don't know for sure. When people don't come back, we suspect that they may have had COVID, Flu, Measles, or TB. The guards or

medical staff do not tell us or test the rest of the unit even if several people in the unit with symptoms leave and don't come back.

50. On or around March 2026, I was given a TB test which staff told me came out positive. Then the staff did an x-ray test. Staff told me it was to find out if I had TB. To this date, staff never came and told me what the results were.
51. I have severe back issues from falling off a house. On or around April 8, 2026, I made a sick call because my back was hurting. I was seen by the nurse in the hallway in front of other guards and detainees where they could hear and see me. I explained to her that I had severe back pain that I fell to my legs. I have these knots in my nerves in my back. The nurse examined me and said that my nerves were likely injured that I cannot sit or lay down for a long time on hard surfaces. I explained that the mattress is 2 inches on a metal bed. The nurse said there was nothing she could do about that. Instead, she prescribed me muscle relaxers. About four days later, I received muscle relaxers which has helped my back feel better. I asked the nurse if I could receive a second mattress to help my back, but the nurse said that she was not allowed to order that for me.
52. When I arrived for the fourth time at the facility, I had a urinary tract infection. I made a sick call and I was taken to the hallway to be examined by a nurse. There were other people in the hallway that I could see them and hear what they were saying to the nurses, even without trying to listen. I believe that they could also hear what I was telling the nurse. I was given an antibiotics for about 10 days. That did not work as I still feel the same pain when I urinate.
53. The first time I arrived to Camp East Montana, I put in a lot of requests to get my tooth looked at from the pain because it was infected. I asked for antibiotics and they wouldn't give me any. The nurse said that they could only give me Tylenol or remove my tooth and didn't want to consider any other options like fixing the infection. The Tylenol didn't make it feel better.
54. When I was transferred to Eloy detention center in Arizona, a dentist checked my tooth, they gave me a paste to put on my tooth which burned my mouth and throat and I couldn't eat. About three days later, my tooth fell out.
55. Each time I have been at Camp East Montana, I have experienced chronic stress, anxiety, and headaches. Since I have been detained by ICE, my mental health and physical health have worsened. I feel like I am being tortured and punished here.
56. Even though the new contractor took over the facility, on or about April 18, 2026, nothing has improved here. Rather, things have gotten worse. The medical care, food, issues with guards, and units remain just as bad.

This page intentionally left blank

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

Signature



ATTESTATION AND CERTIFICATE OF TRANSLATION

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