

### DECLARATION OF JAYSON MBABID

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

1. My name is Jayson Mbabid. I am 31 years old, and I am from Cameroon. I am seeking asylum in the United States.
2. From July 18-29, 2025, I was hospitalized at the University of Maryland Capital Region Medical Center with pneumonia.
3. During my July 2025 hospital stay, I was diagnosed with active tuberculosis (TB). The doctors prescribed me with ethambutol, isoniazid, pyrazinamide, pyridoxine, and rifAMPin. I was instructed to take each of these medications one time per day. The doctor told me I would need to take medication for about nine months.
4. When I was discharged from the hospital, the doctors gave me specific instructions regarding TB protocols. They told me that I should not skip doses or stop my treatment early as the treatment usually lasts several months. They said that if I miss any dose, I should contact a healthcare provider immediately. They also said that I should always wear an N95 mask when I am around other people or outside my house and that I should stay at home as much as possible. They said if I have visitors to my house, the visitor should also wear an N95 mask to prevent infection.
5. On October 23, 2025, I was arrested at a check-in at the ICE office in Silver Spring, Maryland. When they arrested me, they took away my work permit and my Cameroonian driver's license. They took me to a holding room in Baltimore, where I stayed for about 3 days.
6. While I was detained in Baltimore, I told staff that I had TB and that I needed to take my medication every day and wasn't supposed to miss a dose. The day I was arrested (October 23), I slept in the same room with lots of other detainees, and we all slept on the floor together. I was later transferred to another room in isolation the following day, on Friday, October 24. I spent Friday, Saturday, and Sunday nights in isolation and that was where staff came and gave me my medication at different times. While I was in Baltimore, I was able to take my medication mostly on schedule because my brother was able to bring my medication to the facility, although they didn't give it to me at the same time every day. There was one day I took it later in the day instead of in the morning, because my brother hadn't brought me the medication yet.

7. On October 27, 2025, a large man came very early in the morning, handcuffed me and some of the other people held in Baltimore, and told us that we would be going to another camp in another state. We got on a bus in Baltimore and took it all the way through Delaware and New Jersey to Newark International Airport. They didn't give me a mask. At the airport, we got on a plane to fly to Louisiana. They left some people in Louisiana, and took the rest of us on another plane to El Paso's Camp East Montana in Texas. I spent about 12 hours in transit between leaving Baltimore and getting booked into detention at El Paso.
8. During my transit from Baltimore to Texas, I missed my medication dose. My medications were all bundled up in my property and I couldn't access them on the buses or airplanes. I told the guards that I needed to take my medications because I am diagnosed with TB, and they said that they couldn't give me any medications and that I would have to wait until we reached the camp to receive any medication.
9. When I arrived at Camp East Montana in El Paso, I told the guards there that I have TB, that I am supposed to take medication daily, and that I am not supposed to miss any dose. The guards told me that there was nothing that they could do until I was processed.
10. I spent the first night at Camp East Montana in the waiting room waiting to be processed. In the waiting room, I slept on the floor next to other people. They only gave us thin silver sheets to keep warm. They didn't give us masks.
11. Very early the next morning, the guards began to process us into the detention facility. I told them again that I had TB and needed my medication. They still would not give me access to my medication.
12. It took the entire day for staff at Camp East Montana to finish processing us. I kept telling any staff person around me that I wanted to see a nurse and that I had TB and needed my medication. Around 7 pm that evening on October 28, 2025, I finally saw healthcare staff. I told him that I had TB, and this was the first time that it seemed like somebody knew what TB was and took it seriously.
13. The healthcare staff person put me in a separate room and kept me there for about an hour. Then, he told me that I was going to be transferred to the hospital unit and that I would not go to the general population of the detention facility.
14. I spent approximately two weeks in the medical tent at Camp East Montana. It was a tent with beds in it, and I was put in a room by myself. The room wasn't sealed; the walls were tall didn't quite go up to the ceiling (some air could pass through). During that time,

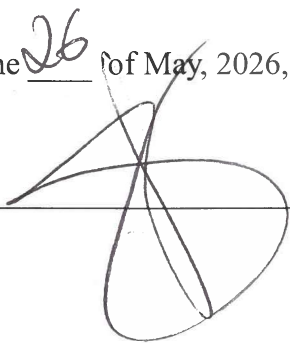
I was segregated from all other people. They didn't let me go out. They gave me a mask while I was in the medical tent.

15. While I was detained in the room in the medical tent, I could not contact my family or my attorney. I asked multiple times to talk to my family and to my attorney but the guards told me that I could not call anyone or receive a call from anyone while I was in the medical tent. There were no windows for me to see the world outside. I was just alone in there with a bed. I asked for a tablet and they told me that calls were not allowed in the medical tent.
16. After about two weeks, sometime in early to mid-November, they did more testing and said that I wasn't contagious for TB and so could be in the general public unit. They transferred me to the general housing unit and I got to contact my attorney for the first time since being transferred to Camp East Montana in Texas.
17. I spent approximately a month in the general housing unit at Camp East Montana before I was released after I filed a habeas petition. While I was detained in the general housing unit, I was taken to the medical tent every morning to get my medications. The healthcare provider told me that I had to come to the medical tent to get my medication because they wanted to make sure that I got the medication and they couldn't count on the security guards to give me the medication in my unit.
18. On or around early December 2025, staff released me from Camp East Montana and took me to a shelter in Texas. They only gave me some of my property, but didn't give me back my work permit or driver's license from Cameroon. They didn't give me any of my medication when they released me. When I was at Reception after being released, an ICE officer gave me some of my belongings. I asked where my documents and tuberculosis medication were. The ICE agent said once I'm released, there's nothing they can do for my medications, and told me that to get my documents I'd have to ask USCIS. They also didn't give me any of my medical records or tell me what, if anything, I was supposed to do to continue to treat my tuberculosis. I didn't know anyone in Texas. I was really lucky my brother was able to pay for a flight for me to get back to Maryland, and someone at the shelter was kind enough to drive me to the airport.
19. When I got back to Maryland, I went back to the medical clinic I usually went to. They asked where I had been, and I explained the situation to them. They put me back on tuberculosis medication.
20. I'm very grateful to be released from detention as I await a decision on my asylum application. I am submitting this declaration because I don't want what happened to me to

happen to others – I want to make sure people are safe. Anyone who is sick should be taken care of. Anyone who is in a condition should be treated with priority. I understand ICE is doing their job, but they should do that with caution. Imagine if it was a life-threatening condition and I had to take that medication to live. What if something happened to me while on the flight? ICE should be cautious when dealing with people, especially those who are sick.

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

Executed on the 26 of May, 2026, in Hyattsville.

Signature: A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke, written over a horizontal line.