

DECLARATION OF DAT QUOC LY

I, Dat Quoc Ly, 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 Dat Quoc Ly, and I am currently detained at Camp East Montana. I am 40 years old.
3. I have been detained here at Camp East Montana for about two days. Before that, I was housed at the El Paso Service Processing Center (“EPSPC”) for about two and a half months. Prior to that, I was housed at Camp East Montana for about a month and a half.
4. I have lived in the United States since 1995. I arrived to the United States from Vietnam when I was about 8 years old. I turned 9 about a month after arriving in the United States, and I was a permanent resident here.
5. I have two U.S.-born children, a 17-year-old son and a 6-year-old son. My immediate family are all U.S. citizens, including my mother, father, sister and brother.
6. I have a criminal conviction from around 2012 or 2013. I served my sentence in a jail in Minnesota, which with good time credits was about eight months, and was released. About a year or two later, ICE detained me. I think it was around 2015. I received a phone call from someone who identified themselves as the police, and I was told that police officers wanted to meet with me, so we met at a McDonald’s in downtown Minneapolis. They turned out to be ICE agents and took me into custody for about three months. I had no idea what was going on. I thought it was related to my previous criminal offense but I had already served my time. I was told to sign some papers so I could get released right away. I am not sure what I signed but I signed because I was scared, I did not know how much longer I would be detained, and because I knew nothing. I was released a couple of hours after signing that paper. I never saw a judge during my about three-month-long detention in 2015.
7. Prior to being detained now, I was living in Savage, Minnesota, where I ran my own business of remodeling and painting. I was also involved in my temple and would help them out whenever they needed things to get fixed, touch ups or any other

service I could provide. I was involved with the Vietnamese community and would help with festivals.

8. The day of my arrest, I was getting ready to go to work. I was in my car, which was parked in front of my house, and about to start the engine when ICE officers knocked on my car window. I was surrounded by ICE agents who came to get me. ICE agents told me they had a warrant for me, but they never showed it to me. I was not told why I was being arrested. ICE officers rushed me out of my car and threw me into another car. I had no warning that this was about to happen.
9. I was taken into custody at the Minneapolis Detention Center and placed in a holding cell. The toilet was overfilled and it was never fixed while I was there. I was there for about 27 hours. I was then transported onto a bus, then an airplane, and arrived at Camp East Montana on or around January 18, 2026.
10. My experience while I was detained at Camp East Montana was really bad.
11. When I arrived at the facility, I was placed in an intake room for about a day and a half. The intake room was small. There were about 48 or 49 people with me in this intake room so it was overcrowded. I, along with everyone else, had to sleep on the cement floor. We were really close to one another. If I extended my arm, I would touch another person. I was not given a blanket, mattress, or pillow. I was still in my street clothes (the clothes I was wearing when I was arrested).
12. I was in the intake room where I slept on the floor before I underwent the medical check. The medical check process was in a different area than the intake room where I first slept on the floor. The medical check process began after I had already been clustered with other people. The medical process lasted a long time – almost 18 hours. The reason for this is because we had to wait for every person to complete the medical check before we could be escorted to a different area, according to staff. So even if your medical check was completed, you had to wait for the last person to be done as well. During these almost 18 hours of completing the medical intake process, the group I was with was not allowed to lay down and sleep. Our options were to sit on a bench or stand up. If someone laid on the floor, staff would tell the person to stand up.
13. During the medical check, medical staff asked me if I had any allergies, heart problems, whether I had received a TB injection to test whether I had a reaction, whether there was any medication I needed to take, and other similar questions. I was not asked if I felt sick at the time. This medical intake was not private. Nothing is

private there because it is like a cubicle with the top section open, and other detainees were sitting near me and waiting their turn. They could hear everything I told the medical staff during the screening.

14. Camp East Montana has large tents where people live, which are divided into housing units. Each housing unit has about 72 beds. The housing unit is about the length of a basketball court but not as wide as a basketball court. I think a baseball field is bigger than the unit I am in. While I was at Camp East Montana the first time, I saw two rooms that were used to house people who had influenza or COVID. I know this because the door window had a paper sign that labeled each room "Influenza" or "COVID." But the roof of these rooms were not sealed on the top. The top is open. So if anyone got sick, the air they breathed could spread throughout the tent and into other housing units because the rooms were not sealed off. I was worried about getting influenza and COVID because those rooms were not sealed off. I could hear people coughing because the tops of those two rooms were not closed off.
15. When I was transferred back to Camp East Montana a few days ago, I got sick right away and I'm still feeling sick. There are two elderly men in my housing unit in Alpha who seem really sick. They both cough really bad throughout the night, and it sounds like there's mucus in their lungs. One of them also has thrown up repeatedly. I think he's Cuban and in his 80s. I was housed with him the first time I was at Camp East Montana and he seemed sick then, and I saw him fall when he went into and out of the shower. I and other detainees told the guard that they should give him a wheelchair so he wouldn't fall. He got a wheelchair after that, but now he doesn't have one. I don't know why.
16. I received the TB injection to see whether I had a skin reaction multiple times at Camp East Montana. I also got a chest x-ray done but I was never told the result. I was never told by staff that there was a measles outbreak while I was at that facility. I found out that there was measles outbreak after I was transferred to EPSPC. I found out because when I arrived to EPSPC, the group I arrived with was quarantined. Other detainees blamed my group for the measles outbreak. A guard at EPSPC told my group that someone from Camp East Montana had brought the measles to this facility. I think two people who I was transferred with may have had measles because I did not see them again after they showed signs of sickness. Someone from my group had a fever and he was sent to medical. When he came back, he reported to us that he saw one of the two people who had left in medical. I do not know what happened to the second person or the person who remained in

the medical unit. We never saw them again, and I always wondered where they went. I think one of them was from Laos.

17. When I was at Camp East Montana, no staff told us about what measles and tuberculosis are, what the symptoms are, or how to protect ourselves. I didn't understand why they kept giving me the TB reaction test or the x-Ray. Staff didn't explain anything to us.
18. Medical care at Camp East Montana was not good. You have to be really sick, almost to the point of saying, "I'm dying," before you can receive any type of care. While I was there, I re-injured my neck and left shoulder while playing football in the recreation yard. I felt a lot of pain. I submitted a medical slip so I could be seen. A nurse gave me some hot rub but no type of scan was ever done. I never saw an actual doctor while at Camp East Montana. There seemed to be only nurses there. The nurse asked me to take off my shirt to check my injury. She did not even touch my injured shoulder. She just saw it and that was it. There was a bump on my shoulder and I verbally asked them to do an x-ray to make sure things were okay but nothing was done about it. The nurse told me that they would take it further only if there was a bruise or a bone popped out. Since I did not have a bruise and no bone popped out, the nurse declined to do any x-rays. I received a shot of pain killers. For about 3 to 4 days, I was unable to lift my left arm above my shoulder. Even today, my shoulder still hurts and I can't move it all the way. I've been stretching it on my own every day and hoping that will help it get better.
19. I did not receive sufficient food while I was detained at Camp East Montana. All three meals, breakfast, lunch and dinner, are microwaveable but the portions are bad – they are so small. If you fed your kid these portions, they would still be hungry. For us adults, it was not enough. I would eat the food and feel like I was starving an hour later. People are starving every day here. The lack of food causes tension and fights in the unit. Since I got back to Camp East Montana a few days ago, the food seems like it's even smaller portions.
20. For the month and a half that I was at Camp East Montana the first time, I lost about 5 or 6 pounds because of how small the food portions were. There were no vending machines so all I had to eat was what was provided to us. People described the food we received like dog food. It was like microwaveable food in a plastic container. They would reheat it and call it a hot meal. It was served extremely hot to us. The food was one of the main reasons I was praying to get moved out of there because I could not stand the food.

21. The first time I was housed at Camp East Montana, myself and other detainees were kept inside a windowless tent almost 24/7. When we were given recreation time outside, it was barely an hour long. We received recreation time maybe once or twice a week. The recreation area is a metal cage, about the length of a basketball court. There are four of these cages. The metal cage is tall but the roof did not protect us from sand or rocks blowing in. We were given a soccer ball and basketball ball but no basketball hoop. We used both balls as a soccer ball. If the weather was bad, like when there's a lot of wind, staff told us we could not have recreation time.
22. Usually, two units were out to recreation at a time. For example, A and B pods would go together and later C and D pods. It was about 50 people in the cage at a time. Sometimes people were forced to go to recreation. Staff told us it was so staff could conduct searches and cleaning of the housing unit. They told us they were looking to see if anyone had extra clothing or extra blankets.
23. When we left to go to recreation the first time I was housed at Camp East Montana, we were not pat searched on the way to recreation but sometimes we would be pat searched on our way back to the housing unit after recreation – it all depended on which guards were working. Since I got back this time, we are pat searched whenever we leave the housing unit and whenever we return. Being pat searched makes me feel uncomfortable because it is not like I and others are in prison for doing something bad. Most of the rules they have are unnecessary for us people who are detained for immigration reasons.
24. In jail, I and others had more freedom, like we could work and go to classes and other programs, like AA meetings and church. When I was in jail, I got to be outside and have recreation more. Sometimes I would be outside all day.
25. At Camp East Montana, the other detainees and I had to clean our housing unit to try to keep it clean. We didn't get enough cleaning supplies to do it regularly, however. Even when we asked for supplies, it could take days before the guards would give us anything. It's the same now that I'm back again.
26. I spend most of my time at Camp East Montana watching television. There are two big televisions in the housing unit that we all have to share, but they are usually on Spanish language channels and I don't speak Spanish. There isn't much else to do to pass the time. Sometimes we have card games. The television is mostly for Spanish speakers and the Asian population is stuck with cards. We do not want to deal with the hassle of fighting for the television.

27. There are a lot of sandstorms at Camp East Montana. All the sand and dust from outside comes down on us in the housing unit. The staff do not clean it up frequently enough. I have had to breathe it in constantly both times I've been here. The staff would clean the housing unit once per week and wouldn't clean more often, even when there was a sandstorm, and so then the sand would remain in the housing unit until the next weekly clean. The sandstorms are pretty bad there. I can hear the tent rattle because the winds are so strong. Myself and others would inhale all the dust from these sandstorms. The dust made me feel sick. I could feel it in my nose and mouth and all over my hair. I had to blow my nose often and spit to get rid of the dust. I asked for masks, but the guards would deny my request or they'd say "maybe tomorrow" and not give us anything the next day either. The few times the guards had masks, there were not enough for the group. For example, there would only be 10 masks for a group of about 60 people.
28. I had a migraine almost the entire time I was at Camp East Montana the first time. I had never experienced migraines like that before in my life. The migraine and headaches began almost a week after my arrival at Camp East Montana. I only received Tylenol for the pain but that did not help – my migraine would not go away. I had ringing in my head. It took a week after leaving Camp East Montana for the headache and migraine to go away. Since I got back to Camp East Montana I am sick and have a migraine again.
29. The sand and dust also caused me to experience coughing, watery eyes, and a runny nose. When I was seen by the nurse, I was told that it might be a cold or a tiny fever. I was given Tylenol for my symptoms. That's all the nurses ever prescribed: Tylenol for everything.
30. Any request I or another detainee made to a guard would take a while because each request had to be approved by someone of a higher rank, like a captain or LT. If a request required approval from someone higher than a captain, the request could take days. It seemed that for every ten requests we submitted, we would get one to two responses back. Our requests were mostly for sick call, masks, clothing and hygiene products. Our requests seemed simple enough, but the guards didn't seem to know what to do or have the power to address even simple concerns.
31. The temperature in my unit was always cold and is still cold now that I'm back. We are not given thick enough blankets and there is no pillow. The bedding provides hardly any warmth. We don't get jackets or anything. Just one sweater. But just the sweater is not enough to keep warm.

32. There was always dust. There were also rocks, mice, and crickets that entered the tent. I was glad I never saw any snakes. Dust covered every surface area, including our beds and the table area. Whoever slept on the top bunk was covered the most with dust. I slept on the top bunk the first time I was here so I was always breathing in dust. When these sandstorms happened, we would ask for cleaning supplies but staff would not give them to us so we could clean and clear the dust in our living space.
33. No staff person ever told us that the sand and dust could be dangerous for our health or how to protect ourselves. The guards often wear masks, but we usually aren't given any.
34. I did receive a handbook the first time I was here but no one ever reviewed it with me. It was not an actual orientation. Some of the things in the handbook were not followed by staff but they expect us, the detainees, to follow the handbook. For example, the handbook says recreation time is one hour each day however recreation time usually happened twice a week and never the full hour. Since I got here a few days ago, I was not given a handbook.
35. There is a small library at Camp East Montana. Staff told us that we are not allowed to check out books. We were told that if you want to read a book, you have to read it while you're at the library. A trip to the library could last 1-2 hours. I did not go once staff told me that you could not check out a book, because that wouldn't be enough time to read a book.
36. I did not work while I was at Camp East Montana because I am in a red uniform. Staff told us that people who wear red or orange uniforms cannot work because they are "high risk." Staff told us that only people wearing blue uniforms can work. I heard you are paid only \$1 per day even if you do work.
37. I witnessed a use of force incident when I was at Camp East Montana. I heard a commotion the first time I was here. I heard loud sounds like banging on a table prior to the use of force from outside my housing pod. I later found out from other detainees that the guy was banging things because we had not received our food that day that we should have received hours before. My housing unit had a door that led into the internal hallway of the tent. The door had a window. I looked through the window and saw when a man was pushed down on the ground by multiple guards in the hallway. He was small in stature and there were about five guards on top of him. I felt sad and scared when I saw this. We are not prisoners or criminals. Even if we

were criminals, we should not be treated that way. Whatever we do, we are still human. I felt worried: what if they do this to me?

38. I am submitting this declaration because I want to help other people when I'm not here, to get the word out that a place like this should not exist, because it's inhumane and it's not right for people to lose their family, life, and job, and be confined like criminals here. It feels like the government is trafficking people and not treating us as even human.
39. Conditions at Camp East Montana have messed with me mentally and made me lose hope. I want to fight for my freedom and family, but it's hard when I've been here so long. I've seen other people here give up from lack of food, healthcare, and fresh air. ICE is making us lose our minds in here. You have to be strong to be in this kind of place. If you're not strong, you'll break down mentally and physically. I've seen it happen with my own eyes. I've seen people lose a lot of weight. There was a guy who was a good friend of mine before I was detained, back when I was in Minnesota. We were detained together at EPSPC and now I don't even recognize him anymore; he walks around and his eyes look hopeless and lost. When I first got there, he talked with me. Now, he doesn't even talk to anyone. He won't even answer when people try to talk to him; he just walks around aimlessly.
40. Jail was so much easier than being detained here. Here, staff and ICE officers don't tell you anything, won't help you with anything, and you can't trust or believe anything they say. At Camp East Montana, I've heard guards call people "f*ggot," "homo," and "gay" to their face in front of the rest of us. That's really dangerous to call someone in a place like this – it could get someone hurt or killed. Guards at Camp East Montana and EPSPC call us Asian people "chino." But I'm not Chinese; we're not all the same.
41. Staff told me that I will be moved out of Camp East Montana after Memorial Day, but they didn't tell me when in particular or if I'm being deported, transferred to another facility, or released.
42. I reviewed the above declaration word-for-word on the video screen during a video visit on May 25, 2026. After reviewing the declaration, I gave Rita Lomio, an attorney with the ACLU, permission to electronically sign this declaration on my behalf.

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

Executed on the 25th of May 2026 in El Paso, Texas.

Signature: /s/ Dat Quoc Ly (signed with permission by Rita Lomio)

ATTORNEY ATTESTATION

I, Rita Lomio, declare that, on May 25, 2026, I met with Dat Quoc Ly through a virtual legal visit. I shared my screen with Mr. Ly so he could read his declaration. Mr. Ly read the contents of the declaration. After doing so, Mr. Ly confirmed that the contents were true and correct and expressly authorized me to affix his signature to the declaration on his behalf.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 25, 2026

/s/ Rita Lomio

Rita Lomio