

DECLARATION OF ALEJANDRO GONZALEZ RAMIREZ

I, Alejandro Gonzalez Ramirez, 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 Alejandro Gonzalez Ramirez. I am 84 years old and from Cuba.
3. Before being detained by ICE, I lived in El Paso for about 45 years. My whole family is in El Paso, Texas, including my son who is a U.S. citizen. I worked in construction and, most recently, as a taxi driver for about 25 years.
4. Long ago I became a lawful resident and held a green card. Every year I met with immigration services, like ICE. For over 39 years, I had no issues with the law since being in El Paso. But, in or around 2008, the DHS took my residence card away because I had a criminal record that was over 40 years ago. I was taken to an immigration detention center for three months in El Paso. They were never able to deport me to Cuba, so they released me, and I went back to my life in El Paso and continued to report to immigration services and I received permission to work every two years.
5. On or about October 26, 2025, I was detained by ICE in El Paso, and I was brought immediately to Camp East Montana at Ft. Bliss. I've been at Camp East Montana since that time. I am dying here. At any moment, I can die here because of my old age, medical neglect, and the lack of food and proper healthcare. I am partially deaf, blind, and have serious mobility issues. I do not know how much longer I can survive here.
6. Please, I am begging for help. Please help me. Being here is worse than being in prison. I have told my son to stop visiting me here because of how terrible it is and so that he does not see me suffer. I fear that I am going to die in this terrible dirty place.

Intake

7. During the intake process when I first got to Camp East Montana, there were hundreds of people in the intake area. We were put in rooms we called "las hieleras" (the "freezers") because of how cold they are. I was placed in a small room with about 10 other people. There was only one toilet visible to everyone, and there was a security camera inside the room. I had difficulty using the toilet because there was no grab bar to support myself. I had to sleep on the floor during this time without a blanket, mattress, or pillow for two nights. When I was in the room, people were very sick. People were coughing and sneezing with colds all around me, and there wasn't anything I could do to protect myself. I saw that the guards came to get many people on a stretcher and took them away somewhere. For food, we only got a small sandwich and cookies for all three meals.
8. I asked a guard if I could be put in a special unit at Camp East Montana because of my old age and disabilities. It was hard for me to sleep on the floor around other people; I

don't see or hear well, which can cause misunderstandings, and I don't move well, which makes getting onto and up from the bare floor difficult and painful. While I was in intake, a guard told me that even if I were 100 years old, I would have to comply with the rules of this place and stay in that cold room. I begged the guard to be merciful towards me because I was 84. I was asking her for help with the cold room and to be provided with at least a blanket to keep myself warm. But the guard didn't give me anything.

9. When I was in the cold intake room, I understood what being in a concentration camp was like. It is cold, depressing, and we are there to be tortured. Even the people who had been in prison told me that prison was much better and had better conditions than Camp East Montana. We were just warehoused there together, not even treated like humans.
10. During the intake process, I received a quick medical evaluation. A medical staff person checked my temperature and blood pressure. I told them about my prostate problem, that I am prescribed two pills a day to control my pain from prostate, and that if I don't get my medication, I can't control my prostate which causes me serious pain and mobility issues. During the evaluation, I was not prescribed any medication, given an eye exam, or given a hearing exam.
11. When I was in the intake room, I got sick from a cold. Then, after leaving the intake area, I got the flu and Covid. About fifteen days after entering the facility, I got influenza and I was taken to quarantine with a few people. Then, about 30 days later, I got COVID-19. I know this because the medical provider did a test and said I was positive with COVID-19. I had been in quarantine with other people who had COVID-19 for about 21 days.
12. After being at the facility for about two months, ICE tried to get me to agree to be deported to another country that was not my home country, Cuba. ICE told me that they were going to deport me to Mexico. They took me out of my unit and into another room for deportation. I refused to sign and refused to let them take me, but I had at staff's direction changed my clothes back to my regular clothes (that is, the clothes I had on when I was arrested by ICE and not the uniform they give us at Camp East Montana) and staff made me go through the intake process again. I spent about two or three nights in the intake room again. In the room where I did the second intake process, I had an episode of sleepwalking that lasted for about 8 hours. The guards found me in the hallway where I was sleepwalking and talking to the wall. During that sleeping walking episode, the guards took me into a room and then to a clinic. The guards then took me to a room on my own where I waited for the medical provider to come and see me. In that room, I did not get any food. Before this, I did not have a history of sleepwalking. I think I slept walk because I was so sleep-deprived, exhausted, and hungry.

Housing Conditions and Access Issues

13. I am currently in unit A-13, in the high security unit area. I wear a red sweatshirt and pants.
14. I am searched and patted down by the guards each time I leave or enter the unit, including when I go to my virtual legal visits, to the doctor, leave or return from the hospital, or when

- I go and return from the yard. I am an old man, I am not a danger to anyone, and I do not know why they are always searching my body. I feel that this is an invasion of my privacy.
15. The conditions in my unit are terrible. There is no sunlight because there are no windows. The room is cold and brightly lit all day, which makes it harder for me to see and move around the unit. Even at night, there's a light that stays on which makes it difficult for me to sleep. I am very tired all the time – it's really disorienting not to be able to see daylight or know what time it is. I feel like I am dying here.
 16. I struggle to use the bathrooms and showers. I have to grab the wall since there are no handles or bars for me to grab onto for support. I have fainted in the bathroom before and fallen on the floor and I have hit myself on the ground.
 17. On or about April 2026, I was peeing at 7 am and then in that moment I passed out, I went to try to grab the door, but I fell right on the ground and I hit my head. The guards took me to the hospital in an ambulance to get checked, and I got sent back to Camp East Montana that same day. I got a large bill for \$1700 dollars. When I asked an ICE official about this bill, he told me that ICE likely paid it but that the hospital sent a copy of the bill to my home in El Paso. I am unsure whether I have to pay this bill or whether the hospital charged my health insurance, or whether the official is right and ICE paid it.
 18. I have used the wheelchair a few times to go to medical appointments because I have trouble walking and standing after fainting. I faint here regularly over the lack of proper nutrition that I am receiving, lack of adequate sleep, and lack of proper medication. I have passed out about ten times in total since I arrived at this facility. Before entering the facility, I do not remember ever fainting because I was receiving my proper diet, medications correctly, I slept well, and support from my doctors and family. Sometimes I have fainted, but I have not said anything to anyone or I've fallen and no one has seen me fall or is around to help me. Sometimes I faint for about 10 to 20 seconds and, depending on where I am, I try to sit down as I feel myself fainting, so I do not injure myself when I faint. When I faint or if I am going to a medical appointment, my fellow detainees advocate for me to get a wheelchair. When I am taken to the medical unit, sometimes the guards push my wheelchair through a rough terrain of about 200 feet that includes sand and rocks.
 19. I have not been treated well; everyone should be treated with respect and dignity. When we go to recreation, we should have the option to not go. I don't like going to recreation and don't feel safe there, so I would like to not go when I'm not feeling well. There's nothing to do at recreation – you just stand around in a small area where some people play with a ball. I wish there was an outdoor space where I could sit down, feel the sun, and rest, but there's nothing like that in the recreation yard here. We cannot feel or see the sun well, because there is a dome above us that covers the sky and sun. There are no places to sit – you just have to stand. I do not want to go to recreation because the grass is artificial and there is sand and dust everywhere.
 20. When we leave the room to go to yard, the guards pat me down like if you had a pistol– with their hands touching all over our bodies, including my buttocks and testicles

sometimes. When you return, they check you again in the same manner. They are abusing the dignity of the people. I only go out to the yard when it is obligatory, even though I'd like to stay in the unit, but I must go because otherwise I will be sent to the punishment cell (the "hole"). When the yard is not obligatory, I prefer to just stay inside my unit and rest on my bed.

Medical, Disability Accommodations, and Mental Health

21. I have lots of medical and disability-related issues that are not being well treated at this facility.
22. I have difficulty hearing. Before entering Camp East Montana, my hearing wasn't as bad as it is now. But my hearing has worsened because it's so loud in my unit. I keep on hearing a ringing noise in my ears, particularly in my left ear, and I cannot hear my surroundings well, the guards, or others around me. When there are announcements, I often cannot hear what they are telling me with clarity. I can only hear noises.
23. On or about mid-April 2026, I was taken to see a specialist for my hearing issues located at 5959 Gateway West, El Paso. They tested my hearing. The specialist told me that both sides of my hearing are damaged because of the loud noise levels at the facility. The doctor told me there was no cure, and the loud noise at the facility is what caused my hearing to deteriorate so quickly. I was not told whether I needed an auditory device to hear but I feel that I need one. No one here at Camp East Montana has told me what if anything the specialist said I should do or how to treat or accommodate my hearing issues.
24. I am both near and farsighted. When I lived at home in El Paso, I had my prescribed glasses to help me see, but I did not use them that often because my vision was OK. I also had glasses that helped me drive, but I did not use them much either. But, after being at the facility for about 3 months, my vision started to become blurry, cloudy, teary, and strained because of the bright lights that are on from 5 AM until 10 PM. So, now, I do need my glasses and I cannot see well without them. The lighting here is harsh and I feel has damaged my eyesight. I have been waiting to see a specialist for my eyesight, but I have not been taken to a specialist. I cannot see well enough to read, write a letter or read a legal document or even read what's on the tablet screen. I also cannot see long distances (even at arm's length away). Now, I get very dizzy when I try to see without glasses. This did not use to happen to me when I was at home in El Paso. I also fall to the ground often at Camp East Montana because I get nauseous and dizzy because I cannot see well. I have fallen on the hard floor multiple times here. My fellow detainees here help pick me up, the guards do not help. Sometimes I am taken to the medical unit after I fall, others times I am not.
25. I arrived with my prescribed glasses, but the guards took these away and told me that I could not use them because they have little metal tips. During my first two months here, I asked the guards if could get my glasses from my personal property, but they refused. I have been having to go near blind for 7 months because of this. I have made several

requests to access my glasses from my personal belongings, but I have been denied them each time. A captain told me that they were going to try to help me to get my glasses, but then they wouldn't let me have them because of the metal tips on the glasses. I have been asking ever since for glasses and tinted glasses since the bright lights have really affected my vision and have caused me headaches and loss of vision. To this day, I have not received any glasses.

26. On or about June 2, 2026, I received an eye exam where the medical provider placed big Alphabet letters about 3 meters away. The first letters were so big and I could see those. But as soon as the letters became slightly smaller, I could not see them, and I told the medical provider about this. The medical provider just told me that I "passed" the exam and that I did not have any vision issues and that I did not qualify to go see a specialist and that my vision issues are due to my old age. But I told the nurse that I cannot see in here and that I have difficulty looking around the unit because of the bright lights. But they ignored me. The medical provider said that they could cancel any pending appointment with a specialist because I did not need it.
27. Since being here, I have had a pending appointment with an eye specialist to get eye drops for my eyes since they are very dry. I need eye drops, but I don't get them. This makes my vision worse. But it has been months and I have not received these eye drops.
28. During my time here I have not received hearing aids or glasses, even though I have requested them multiple times through sick call requests and during medical appointments. I've just been told the same thing: that the facility will not provide these for me. That seems so unfair to me because without them I cannot see or hear well at all. I can't even read and fill out forms myself; I have to ask others for help, as to my knowledge none of the forms are available in large print. It makes me intensely isolated. I can't watch TV, read a book, or use the tablet well because my vision disability is not accommodated here. When I need to use the tablet, I ask my fellow detainees here to help me use the tablet, make calls on my tablet, and read documents to me. This is difficult because the friends I make here are moved to different units or are deported, and so I constantly must ask others to help me. I also have difficulty hearing the tablet because it's hard for me to hear. I do not have the same access to the tablet or the unit that others have.
29. There's nothing for me to do to keep my mind occupied in these many months I have been confined here. I'm worried about moving around too much because as I mentioned above I have fallen frequently and because my poor vision makes it more likely that I'll bump into something or someone, and I don't want any misunderstandings or people to be mad at me. So, I'm just left to sit on my small bunk bed day after day. It's nothing but suffering.
30. It's really challenging not to be able to see or hear well because that causes misunderstandings with the guards or other detainees. I can't clearly hear announcements, and the guards don't come over to make sure I understand what they said. This happens every day. I cannot clearly hear what others around me are saying.

31. About three months ago, I fell in my unit because I fainted. I hit my head on the floor, injured my wrist, and I was taken by ambulance to the hospital (La Palmas del Sol). I was at the hospital for 3-4 days. That's where the doctors examined me. At the hospital, I think I was given an MRI. The hospital also checked my stomach. After that, I was brought back to the facility.
32. I go to the medical clinic almost every day because I have a lot of medical issues. Every time I go, staff touch me all over my body to search me. The same thing happens every time I come back. It makes me not want to go, but I don't have a choice. I don't want to die here.
33. I have gotten several colds, COVID, and the flu multiple times. I am constantly getting sick here, and the medical providers and guards see me going in and out of the medical unit, but I do not believe that they care.
34. I have rashes, discoloration that turns my skin yellow and red splotches, and bumps on my skin. I have dry pimples all over my arms because of how dry it is in here. These are very itchy. I have them on my arms and hands and they have not gone away, I have seen doctors for this, and they gave me a cream, but it did not get better.
35. I also have prostate issues. I had these issues before arriving here. When I arrived here, I asked for medication for my prostate. It took over 30 days in order for me to get my medication for my prostate. During that time, my prostate was inflamed and swollen, including my testicles. I was in severe pain for about 30 days. During this time, I could not sleep well, I could not walk well, I could only sit and had to bear the pain. I am now receiving this medication, once in the morning and once at night. But I fear that this medication will not be delivered to me regularly given how hard it was to get it in the first place.
36. I receive a prostate medication called Tamsulosin every day, twice a day. I receive Tylenol twice a day as well which I get for my body aches and pains in my testicles.
37. I also get medication to help me sleep and to help with my nausea and fainting. Every time we run out of the medication, we need to go back to the doctor to get it refilled; they don't just refill the medications after they run out automatically. It has been very tiring having to go back to the doctor every time to try to get my medication. Sometimes I am taken to the medical unit in the middle of the night while I am sleeping. For example, on or about June 7, 2026, the guards took me to the medical unit at around midnight, I had to wait in a room for about an hour, then I was seen by the medical provider, and then I was returned to the unit at around 3 AM. I am tired of going to the doctor, so I miss my medication often since they don't do the refills on time. Even if you go, if they prescribe the medication, you won't actually get it for 3-4 days.
38. On or about June 6, 2026, I was interviewed by a nurse about how I was feeling, asked about my medical issues and medications. Then the nurse asked me to sign a

“declaration,” but the nurse did not explain what the declaration was for, nor did she explain what I was signing. I signed the “declaration” innocently because I thought that maybe my signature was necessary to get the medical care that I’ve needed for a long time. This happened to me once before, so twice in total.

39. Since I’ve been here, now I am covered in grey hair. I have lost my vision and my hearing here because of the noise and the harsh lighting. I feel that I am aging horribly here. This isn’t any way to live.
40. I would estimate that I have been to the clinic at Camp East Montana about 60 times. Most commonly it is because I am fainting and falling over. I have also gone because I am getting colds and the flu. Sometimes, when I am waiting to go in the clinic, they take me to a room and forget about me for the whole day. It is very cold in the room.
41. I have been in quarantine about three times, one for having the flu and the other for having COVID, and another for someone in my unit who had measles. During this time, we couldn’t go to the barber shop (and therefore couldn’t shave, clip our nails, or get our hair cut) or go to recreation, as if we were animals. During this time, I had great stress, it greatly affected the way that I looked. It has greatly sped up how quickly I have aged, and has been ending my life here.
42. The ICE officers are being so cruel with the people and are keeping us here for too long, seven months has been killing me and I can’t be deported because my country will not cooperate with the US. It is not my fault. It has been violating our human rights. This feels like a concentration camp made to destroy and torture the people inside.
43. I have seen a psychologist two or three times, they ask me about suicidal ideologies, I tell them that I have a vigorous anger for my situation and am depressed. There are days where I wish they would find me dead instead of having to keep suffering with my pains of being here. At any time I could die from my age, but I could never act on my suicidal ideations.
44. Human rights are non-existent here; I am hoping someone can help me.
45. I also have bad anxiety, I feel like I want to die but of natural causes not from the injustices I have suffered here, I want it to be on my own terms. If I have to stay here for a longer time, I would rather die.

Food

46. The food here is terrible. It’s not even good enough for a dog. It doesn’t sit well in my stomach. I am dying of hunger here. I throw up frequently after eating. I am a skeleton of the person I was before. Any day now, I think I will die here.
47. I also am passing out from hunger; the food they give me here is something I cannot eat. I last weighed myself on or about the week of May 25, 2026. I have lost 20 pounds from the last time that I weighed myself. There is a clinic where I get weighed every week, and they tell me how much I weigh.

48. There is no commissary here where my son can send me money to buy food. I do not eat the food here because it is so bad. As a result, I constantly feel dizzy and nauseous.
49. I have been here for over seven months passing hunger and dying one day at a time. If I spend another 30 days here, I feel I will surely die.

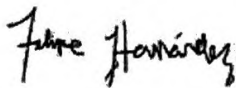
Everything in this declaration is true and correct to the best of my knowledge and recollection.
This declaration was read back to me in Spanish, a language in which I am fluent.
Executed on the 10 th of June, 2026, in El Paso, Texas.

Signature: A GONZALEZ RAMIREZ

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Felipe De Jesus Hernandez, certify that I am fluent in both English and Spanish. Between June 4, 2026, and June 8, 2026, I personally spoke with Alejandro Gonzalez Ramirez and read the foregoing declaration to him/her, translated into Spanish faithfully and accurately. Alejandro Gonzalez Ramirez 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.



June 8, 2026

Felipe Hernandez, Staff Attorney

Date

American Civil Liberties Union