

SUPPLEMENTAL DECLARATION OF ERIK IVAN RODRIGUEZ FLORES

I, Erik Ivan Rodriguez Flores, 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 Erik Ivan Rodriguez Flores. I am 26 years old and from Venezuela. I am a named plaintiff in *Angye v. ICE*.
3. On or around 2:00 a.m. on June 28, 2026, while I was detained at Camp East Montana, guards woke me up and told me that I was being transferred. No one from ICE or the facility explained why I was being transferred or where I was being transferred to. I saw that approximately 80 other detained men were transferred with me. At Camp East Montana, we were kept in a small intake cell for about 8 hours during which I was handcuffed. There were approximately twenty handcuffed men in this small intake room with me. There was not enough room for us to sit at the same time, so some of us had to stand. There was a toilet in that room that we had to use where others could see us. While I was in this cell, I had difficulty getting up and laying down, and my knee got swollen. About forty of us boarded a bus with me and we were told we were going to the Torrance Detention Facility in New Mexico. We arrived in the afternoon.
4. When we arrived at Torrance, I and the other transferred detainees were placed in a quarantine unit, where I remained for approximately one week. During that time, I was not formally processed or assigned to a housing unit. No one told me why I was in quarantine. I did not receive medical care for my swollen knee during this time either. I only received a basic medical screening that included measuring my blood pressure, weight, and height, and I was not asked what medical conditions I had. In that moment, I told medical staff about my severe knee pain and that I needed pain medication. The medical staff did not tell me anything in response.
5. When I was at Torrance, I requested to speak with ICE officials about why I had been transferred, and I never received a response from anyone. Guards told me that I could not speak with an ICE official because they were not in that area of the detention center. I felt all alone. During this time, I was not offered the opportunity to call my attorneys to let them know where I was. I also did not have my attorneys' phone numbers because those were in my personal belongings, which I would later learn were lost. While I had a tablet, I could not make any calls because I did not have any money to add to the tablet and my family had no idea where I was at.

6. While I was at Torrance, I was not permitted to go out to recreation or yard, library, law library, or participate in any activities. We were just kept in a large room with about 60-70 beds. In terms of medical care, the only follow-up I got was a chest x-ray for Tuberculosis.
7. On or around 4:00 a.m. on July 4, 2026, I was awakened by the guards at Torrance, and I was told that I was being transferred to another location. The guards did not tell me why I was being transferred back or where I was being transferred. Before leaving Torrance, I asked the guards for my personal belongings that included legal documents, a list of phone numbers (including my lawyers' contact information), my cell phone (which contained personal pictures), my watch, my chain gifted by my partner, my wallet, and my personal clothes and shoes. I said that I did not want to leave Torrance without my personal belongings. That's all I have left. The Torrance facility staff told me that my belongings had never arrived at Torrance and that they were likely lost during my transfer from Camp East Montana. They rushed me out onto the bus.
8. About two hours into the bus ride, I found out that I was being transferred back to Camp East Montana. I felt devastated that I was being brought back to Camp East Montana and that my personal belongings were lost. This felt like an injustice; I felt broken, and this felt like torture.
9. When I returned to Camp East Montana, I was held in the intake area for approximately twelve hours. During that time, I was required to sleep on the floor because no bed was provided. There was no mattress, blanket, or pillow. The cell was small, there were about 20 of us crammed in a small cell, and there was one toilet for us all out in the open for us all to see and smell. I had to sleep right next to other people on the floor. I felt humiliated and degraded. The intake procedure was just as bad as it had been when I first arrived at Camp East Montana.
10. Sleeping on the floor caused my knee to swell up even more and made it painful for me to walk or put weight on it. During my intake medical screening, after sleeping on the floor, staff took my blood pressure, temperature, and weight. I asked for a knee brace or knee sleeve to help support my knee. The nurse told me that the facility did not have the money to provide one. All I was given was a pain medication that helped me a little.
11. Because of my knee pain, I have difficulty walking around the facility and participating in physical activity in the recreation yard. My knee continues to hurt when I put pressure on it. I have repeatedly asked the medical staff (a nurse) at Camp East Montana for a knee brace or sleeve since I've been back, but I have always gotten the same response that they cannot afford one. Since I arrived back at Camp East Montana, I've seen the

nurse twice. I told them that the pain medication was not helping me anymore. Each time I've seen the nurse, I have asked for a knee brace, and I get the same response that they cannot afford to provide one. I have explained to the nurse that I have trouble standing up for long periods of time, getting up from my bed, getting up when I am sitting down, walking for extended lengths of time, and exercising in recreation because my knee gets swollen, and that I feel lots of pain, and I cannot move well. Also, I have a lot of difficulty getting up and getting off the top bunk because I experience lots of pain in my knee. For these reasons, I am mostly confined to my bed to avoid the pain. I have asked guards if I can get a bottom bunk because of my knee, but they tell me that they cannot do so because the beds are full. They also tell me that because I am a young guy, I should be on the top bunk.

12. I am concerned that I may be transferred again without warning or explanation. I feel as if I was kidnapped in the middle of the night. Because I am a named plaintiff in *Angye v. ICE* (W.D. Tex.), I worry that my transfer may have been related to my participation in that case, although no one has told me why I was transferred. Since I returned to Camp East Montana, I have requested to speak with ICE about why I was transferred, but they have not responded to my requests on the tablet.
13. On or around July 9, 2026, when I arrived back at Camp East Montana and I was in the intake room, an ICE official gave everyone in the intake room a third-country removal form. The ICE official explained to me that if we filled out and signed this form that I would be deported to Mexico. I filled out the form because, after being transferred to Torrance, my experience at Torrance, after ICE losing my personal belongings, and after being at Camp East Montana for a long time in terrible conditions, I reached my breaking point. I just wanted to be out of Camp East Montana. But I did not sign or turn in the form. I did not have my personal belongings, and I would be deported without any money, cell phone, clothes, or personal belongings. But if I had those items, I think I would've signed the form because I am just so stressed and depressed about being here. I am being treated worse than an animal. I also asked the ICE official if they had an update about my case, but they said no and brushed me aside, and that I should contact my lawyer. ICE did not offer me a free call to my attorneys. And I cannot call my lawyers for free unless they make an appointment with me. I can only call my attorneys on the tablet in a recorded line, but I do not have money in my account to pay for a call with my lawyers.
14. I am currently in the Bravo-1 unit, a low security unit, and all of the conditions remain just as terrible as before I was taken to Torrance. For example, I have not been to the barbershop for about three months; the food remains just as terrible; and all the conditions I described in my previous declaration dated May 21, 2026, remain just as

terrible; except for us being provided razors in my housing unit to shave under guard supervision. Things are worse now because there are more people in here. The food now has a lot of oil which makes me feel nauseous, sick, and feel like I need to vomit. Nothing has improved.

15. Things are still terrible. For example, on or about July 9, 2026, I saw a man, from my unit, in the yard get hit in the head with the heavy soccer ball. The man collapsed and could not get up. I saw that he could not move half of his body. The man had told me that he had a preexisting head injury and told me that he wasn't able to move half of his body. He was later given a wheelchair. He was in my unit using a wheelchair for about 5 days. I saw that he struggled to move around the facility in the unit because of the wheelchair. I don't think that he even showered because the wheelchair does not fit in the shower and there are no grab bars. I am not sure how he could even access the toilet because the wheelchair does not fit there, and there is no bathroom that is specifically for someone in a wheelchair. On or about the morning July 13, 2026, this man was no longer in my unit. I am not sure where he is now.
16. My mental health has worsened a lot. Each day feels eternal. This place is destroying my soul. I don't know what I am going to do. I have given up. I feel trapped here. I am imprisoned here. I am a human being. I do not deserve to be treated in such a degrading and inhumane way. I am not a criminal. I just want to see my family and be free.

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.

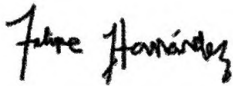
Executed on the 22th of July, 2026 in El Paso, Texas.

Signature: 

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Felipe De Jesus Hernandez, certify that I am fluent in both English and Spanish. On July 13, 2026, and July 20, 2026, I personally spoke with Erik Ivan Rodriguez Flores and read the foregoing declaration to him, translated into Spanish faithfully and accurately. Erik Ivan Rodriguez Flore affirmed that 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.



July 20, 2026

Felipe Hernandez, Staff Attorney

Date

American Civil Liberties Union