

ZOR DECLARATION

SUPPLEMENTAL 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 now [REDACTED] and from [REDACTED]. I am a named plaintiff in *Angye v. ICE* (W.D. Tex.). I have been detained at Camp East Montana for approximately 10 months, since on or about September 21, 2025. I am currently being held in unit Alpha-13.
3. Conditions at Camp East Montana have remained the same since my last declaration on May 28, 2026.
4. Guards still conduct pat down searches all the time. Other men in my pod and I are patted down every single time we leave or enter the room for any reason. On or around July 22, 2026, for example, we were taken out of the pod for recreational time. I was patted down as we were leaving the pod. I was then searched again as we came back. Later, I had a meeting with my lawyer. Again, I was searched as I was taken out of the pod for my appointment and then again when I returned from my meeting. That morning I also requested to go to the barbershop. I was not taken, but if I was, I would have been searched two more times that day. Some days you are searched and patted down as many as 10 times in one day. The way and amount of times guards touch me makes me uncomfortable and I feel like my body, my dignity, and my privacy are being disrespected.
5. I am still drinking water from the bathroom sink. The water from the water fountain has a foul smell. After I drink that water, the cup I used smells like dead fish. Other detainees have mentioned the smell too. The water from the water fountain is also very cold which gives me a headache. I have to drink water from the sink in the bathroom because of how bad the fountain water smells and makes me feel.
6. Food at Camp East Montana is still an issue. Sometime in mid-July at around 5:30 pm, staff came into the pod to bring food. People got in line to get their food. By the time it was my turn the guard told me that they didn't have any more food, they only had "diet" meals available. These meals are for people with medical needs or on a religious diet. I did not want to eat that food. The diet meals are even worse than the normal food and have even less flavor. I told one of the guards that I had not eaten anything. She said it wasn't their fault. She said it was our fault because detainees were stealing. I told her I could not control what others did and it was on them, the guards, to keep control, not me. I also told her I could get beaten up if I tried to stop others from stealing. I am sure the guards would not intervene to protect me. As I described in my last

- declaration, I have seen the guards stand by and do nothing to protect people, including me, from violence from other detainees. I felt like I was being punished. I just wanted my food. I did not eat that night.
7. I rarely submit a sick call request if I feel sick. That's because when I do, the guards usually wake me up in the middle of the night to go to the doctor. It is really difficult to sleep at Camp East Montana, so being woken up in the middle of the night is very distressing. Every morning, starting at 6 or 6:30 am, the noise starts: the bright lights come on, people start talking or turning on the TVs, staff comes in with breakfast and loud chatter or communications come in through the guards' radios. I cannot sleep past 6 or 6:30 am, no matter how hard I try. During the day there's always loud noise, including from the device the guards use for head count, which makes a loud beeping noise. At night, the lights go out at 10 pm, but there's noise until at least midnight. I am only able to sleep well between midnight and 6 am. There are 50 or 60 people in my pod right now. That's 50 or 60 people of different cultures, backgrounds and very different habits all in one room. The noise is even worse if the pod is at capacity. There is no privacy.
 8. I requested ear plugs approximately 4 times during doctor visits and in written requests to guards. They told me they don't have earplugs or that I can't have them. I made my own earplugs with foam from the sole of my sandals but they don't work very well.
 9. I also feel discouraged to submit sick calls because it takes 2 or 3 days after the request to see a doctor and, by then, my symptoms have already passed. I sometimes get very intense headaches, and I have asked the nurses that distribute medication for Tylenol. The nurses told me I had to submit a sick call. We must submit a sick call even if we need lozenges for a dry throat or something as simple as Vaseline. It usually takes multiple days to be taken to the doctor after a sick call, so there's no point in even submitting one. I just let it pass.
 10. I still have the blisters or irritation on my face. After I shower, my face gets very irritated. It feels as if I touched it with something very spicy. It looks like a red itchy spot in between my eyes. Often, my eyes also feel irritated, itchy, and watery. I have asked for medical help but was only given Vaseline. After a while, I received an ointment. However, I told the doctor it is not working because the irritation is not getting any better. She told me that was all they had. The irritation bothers me almost every day.
 11. Dust and dirt remain the same. A crew is supposed to come in to clean every Monday. When they leave, however, the unit is as dirty as before. There is a lot of dust, hair, and debris accumulated under the beds and in the corners of the room. That is still there when the maintenance crew leaves. Sometimes we try to clean ourselves.

12. The rules here are unclear and inconsistent. Different guards enforce different rules. Guards also remain very inexperienced and untrained. For example, head count every day takes at least 2 hours. Guards are very strict about the rules during this time. Between 1 and 3 pm, approximately, we are not allowed to move from our beds. However, whenever I ask for something as simple as my regular meal, going to the barber, or being allowed to go to mass, the guards ignore the rules. The rules only work one way here. There's no reciprocity. Maybe it is not even worth to speak about equality here; they violate our rights every day.
13. There are printed notices in the pod that say that my pod is supposed to go to the barbershop on Wednesdays from 8 am to 4 pm. There is also a notice that says there is a religious service on Sundays at 3 pm. In the 10 months I have been here I have only been allowed to go to mass twice. I ask the guards every Sunday morning to please take me to mass, but they tell me that it is not for people in my pod, that there is no mass, or that they don't know anything about it. Practicing my religion gives me hope. I have been going to mass since I was a little kid. I feel disappointed and sad for not being able to practice my religion. I try to find peace within myself, but it is so frustrating that the guards here don't follow the rules. I don't understand why they have those papers up if none of what they say is true.
14. When I shower, my towel or clothes get wet, naturally, but the guards don't let us hang them up to dry. I ask them: where am I supposed to put them? If I send something over to the laundry, like my towel or blanket, it often doesn't come back. I don't have anywhere to put my things, like a locker, box, or plastic bag. I have to keep my books, pamphlets, legal documents, two changes of clothes, any extra soap or fruit I am able to get, and toothbrush, all on top of my bed at all times.
15. We are supposed to go out for recreation time every day, but guards cancel often. One time they told us recreation time was cancelled because there was no personnel. I try to pass time by reading the Bible or religious pamphlets. I also try to call my family as much as I can, but I sometimes run out of money. Also, reception here is very bad so I struggle to hear and understand my wife and kids when we speak. There is no privacy so everyone in the pod can hear our conversations.
16. I started weaving necklaces out of food wrappers or foil to pass time. I made one with a cross out of black plastic bags and foil wrappers. I wear it around my neck every day.
17. One time I didn't have enough money to talk to my family for 20 days. My wife is by herself, and I worry about my family. My youngest son was born with a cleft palate. He is only 8 years old and has already had three surgeries.

18. We still don't have supplies to cut our beard and hair and don't have regular access to the barbershop. Guards take us to the barbershop whenever they want. Sometime in mid-July, guards told us to put their name on a list if we wanted a razor. But they only give out about 20 or 30 razors. There are at least 50 people in my pod right now. That is not enough razors for everyone. I was asleep when guards made the announcement. By the time I realized what was happening and tried to write my name down, there were no spots left. So, I didn't get a razor that day.
19. I struggle constantly with my mental health here, especially when dealing with the constant pat downs and searches, and the treatment from the guards. I feel desperate at times. It is hard being locked away when I am not paying for any crime. I am not doing any time.
20. I feel like I don't have any rights. My one-year anniversary in this place is coming up. I have been told that there are laws that protect me from being detained for this long, but I don't believe that is true. My life has been hard, and I have learned to overcome many challenges. Being here, however, I feel like my life is not worth anything to the government. I am at the government's full disposal without any regard to my rights or my life. It is a nightmare. It is the most difficult experience I have been through.

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 29 of July, 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]
[REDACTED] I personally spoke with [REDACTED] and read the foregoing declaration to him,
translated into Spanish faithfully and accurately. [REDACTED] 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. [REDACTED]

7/29/20

Date