

DECLARATION OF LUIS RIVERO-GONZALEZ

I, Luis Rivero-Gonzalez, 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 Luis Rivero-Gonzalez. I am 42 years old and from Cuba.
3. On or around July 9, 2026, I was released on habeas from ICE custody at Camp East Montana. Since then, I have been living in Miami, Florida with my family.
4. Before arriving at Camp East Montana, on or around December 9, 2025, while I was detained at Alligator Alcatraz, I was assaulted by another detainee. As a result, my right leg and knee, left ankle, my right shoulder and wrist were seriously injured, as were five discs in my lower back. I was at the hospital for about a week after the attack, and I became physical disabled meaning that I could not walk independently without a wheelchair or crutches, and I had limited mobility.
5. Because of the guard assault that I experienced both at Camp East Montana (explained below) and at Alligator Alcatraz, I have recurring nightmares, hear voices, PTSD, anxiety, and depression. I require medication to treat my mental health symptoms.
6. When I was at Alligator Alcatraz, I received medication for my mental health and pain in my legs, but I was not given a wheelchair, even though I needed it and I requested it several times. I was forced to walk on my injured legs, which resulted in me falling down.
7. On or around January 9, 2026, I arrived at Camp East Montana. At intake, I was forced to sleep on the floor for about three days. I had difficulty walking around and was not given a wheelchair, walker, crutches, or cane. It should have been obvious to anyone who saw me that I needed help walking because I was hopping around on one foot crying in pain and I struggled to walk. The guards saw this, and I believe ICE officials saw me struggling to walk as well. On the fourth day, I received a medical evaluation. I told the nurse that I needed a wheelchair and support, and I got a wheelchair at that moment.
8. After intake, I think I was in unit Delta-2, but the unit did not have wheelchair accessible bathrooms or showers. The bathrooms and showers also did not have grab bars. I had difficulty accessing the bathroom because I could not use the wheelchair inside the bathroom area, which is separated from the main living area, to use the toilet. So, I had to physically push myself off the chair and onto the toilet at a distance of about two or three feet. The guards would see me struggling to get into the bathroom, but they did not offer to help me. I did not ask the guards for help because it was obvious that I was in a wheelchair and that I could not use the bathroom comfortably. I thought that if there was a unit that had wheelchair accessible bathrooms, that I would've been assigned to one.

Each time I pushed myself off the wheelchair, I experienced severe pain in my right arm which I used to push myself off the wheelchair. This pain stayed with me for hours and throughout the night. The guards never helped me. It was a similar situation when I had to take a shower because the wheelchair did not fit in the shower. There were no grab bars in the shower or chairs for me. I struggled a lot to shower because I had to stand up and this caused me a lot of pain in my body. There were many times when I fell in the shower and I had to painfully get up on my own without any support. I felt a lot of physical pain every time I had to take a shower. I felt degraded because this felt like I was being tortured. The guards knew I had mobility issues, and they never helped me. I felt isolated.

9. I suffered abuse by guards when I was at Camp East Montana. On or around February 9, 2026, I was in my unit and guards came for me. I was in my wheelchair, and they pulled me outside to the hall. I went outside in the hallway to talk to ICE officials. The ICE officials told me that I had to agree to be deported to Mexico and that they were going to take me, even if I did not want to. They handed me a piece of paper to sign which I refused to sign. I asked if I could get my personal belongings and legal file related to my habeas case, but the ICE officials told me no. Suddenly, the guards started to push me down the hallway to take me to the bus outside, even though I had not signed anything. In protest, I threw myself to the ground and that's when the guards jumped on top of me, punched me, inserted their knuckles into my ears, and forced handcuffs onto me, injuring my arms and hands. The guards kept closing the handcuffs on my wrists and forcing them into my bones which was extremely painful and caused a dent on my wrists. Then they placed a cover over my head, I told them I was claustrophobic, but they did not care. They forced me back onto my wheelchair and forced my hands behind my wheelchair to handcuff them, worsening my permanent injury to my right shoulder and upper back, which had permanent nerve damage. Then I was taken to a small isolation cell, and the guards tried to bend my legs behind my back to cuff them. A medical provider came to evaluate me quickly (which lasted only about one minute) and said I was fine, but I told the medical provider that I was injured seriously and that I needed medical attention. But the medical provider did not believe me or evaluate me further. Then I was taken to the bus, forced to board an airplane, and then taken to Port Isabel.
10. On or around February 10, 2026, I was transferred to Port Isabel where I was forced to sleep on the floor for a night. Then the next day, I was transferred to Del Valle Detention Center. Then I was transferred to Miami, and then I was transferred to Alligator Alcatraz where I was detained until on or about June 15, 2026.
11. On or about June 15, 2026, I was transferred back to Camp East Montana for a second time. No one told me why.
12. During the intake process at Camp East Montana in June 2026, I was held in an intake room from about 5 pm until about 8 am the next day. When I was in intake, I requested to use a wheelchair and I was provided it. Again, I was forced to sleep on the floor that night. There were about 10 other people in the intake room for me, and we all had to sleep on the floor together without a blanket, mattress, or pillow. There was one toilet in

the room and it did not work; it did not flush. We told the guard that we could not use the toilet, but the guard said that if we needed to urinate or had a bowel movement, we had to go there and not flush. Other detainees used the bathroom, and we could not flush the toilet. That meant that a lot of urine and feces was in the open lid toilet in the room and we could smell it. The stench was terrible.

13. I had difficulty using the toilet in the intake room because there was no grab bar and the wheelchair did not fit next to it so I could transfer easily. Because of injuries, I have difficulty sitting and standing. I had difficulty laying down on the floor because I had severe lower back pain, as well as pain in my knees, my legs, and ankles.
14. The wheelchair did not fit in the area where the toilet was in the intake area. There was no privacy when I had to use the toilet. There is a small covering that is a few feet high, but if you stand to wipe, others can see nearly all of your body. I had difficulty using the toilet, but I had to push myself from my wheelchair onto the toilet, at a distance of about 4 feet back.
15. On or about 6 pm on my first night at Camp East Montana in June 2026, I received a small sandwich that consisted of two pieces of white bread, a slice of cheese and ham, an apple, and a cookie. At around 3 am, I was so hungry and we asked the guards if they could please give us more food. But the guards refused.
16. On or about 3 am, I asked the guard about my personal belongings which have some important things for me, like some family jewelry, phones, wallet, and about \$2,000 dollars in cash. In response, the guards told me that they did not have my personal belongings, and I asked why they did not have them. The guards did not tell me where my personal belongings were. They said that if the personal belongings appeared, they would file a report and tell me. They instructed me to change into clothing to be sent to general population. But I said that I did not want to go into the general population until they found my personal belongings. I was worried about my personal belongings because these were important items for me. I was not arguing or being combative, but the guards then sent me to the "hole," or a punishment solitary cell. The guards pushed my wheelchair and pushed me into the solitary unit. The guards told me that they were punishing me for asking for my personal belongings. That's the only reason they gave me why I was there. I was left alone in solitary for about two hours.
17. The solitary unit is a square cell with a toilet in the corner and a metal bench to sit in. I did not receive any written notice or anything else in writing about why I was in the segregated housing unit. The guards told me that I had to wait for an ICE official to visit me and to explain to me about my personal belongings. They did not explain to me how long I would be in the solitary cell. When I was there, I started to cry out in pain, and I fell to the ground when I tried to use the toilet because there was no support for me. I was on the ground for about an hour, crying in pain. I had severe back, leg, knee, and body pains. That's because when I spend a long time sitting down, in the wheelchair for example, I get serious leg cramps, and I get severe back pain. But I need help standing up and supporting myself. I did not get support standing up in the solitary unit.

18. After about an hour on the ground, a guard entered the solitary cell and told me that they made a request to ICE to figure out where my personal property was, and the guard saw that I was crying in pain on the floor and that I was trying to get up. The guard helped me get into the wheelchair. I told that guard to please get me out of solitary and provide me with medication for my pain. I changed my clothes into the red colored clothing they gave me, and then I was sent for my medical evaluation.
19. The medical evaluation was conducted in the hallway where other staff and detainees could see and hear. The first medical provider took my vitals. Another medical provider asked me what my medical needs were. The medical provider told me that they did not have any of my list of medications and medical records from Alligator Alcatraz. So, I had to explain my medical needs. I told them that I needed a wheelchair, that I had severe pain in my back, that I could not move my right leg and knee, and that my left ankle was seriously injured, and that my right hand, wrist, and arm were injured. I tried my best; I told them what medications I was on to the best of my ability based on what I remembered they were for: my anxiety, depression, nightmares, sleeping issues, and severe body pains. The medical provider told me that they would give me medications but that it all needed to be approved.
20. Then, I was seen for a mental health screening. I shared that I needed medication for my post-traumatic stress disorder symptoms, depression, claustrophobia, suicidal thoughts and past attempts, anxiety, sleeping disorder, nightmares, and negative rumination. The staff person stopped the interview and said that we should stop because it was about 4:50 am. I told them that I was very depressed and I was not sleeping well for days, I had insomnia. I told them that them placing me in solitary confinement only worsened my depression where I was alone. The staff person said that they would come by later to my unit to complete the screening, but they never did. Then I was sent to the general population housing unit.
21. I was then sent to Charlie-8 and there were other people who were using crutches. I could not use the bathroom and showers in this bathroom because the sewage system backed up frequently, causing dirty black water to seep into the unit. The wheelchair fit in the bathroom but I had to hold my breath because there was sewage water in there that smelled terrible. While the wheelchair also fit in the shower, I could not shower because the drains were clogged and backed up. There were also grab bars in the shower and bathroom. I was here for about three days. There were only three of us in total in this unit. I could not use the common meal tables because there were benches that prevented me from using them – that is, there were seats/benches attached to the tables, and there weren't any cut-outs for someone with a wheelchair. To use the table, I would have to lift myself up from the wheelchair onto the benches, but I did not have the strength or capacity to do this. I was also unable to access the yard because the hallways between the unit and the recreation yard are made of gravel and there are holes in the ground where the wheelchair wheels would get stuck and I had to push myself through it. The guards would apologize to me because they pushed the wheelchair and I would nearly fall out of the wheelchair anytime I went to the medical unit, for counsel visits, or to recreation

because the walkways between these sites are made of gravel. Because of this, I would often “refuse” to go to the medical unit, to recreation, or to virtual counsel visits because I could fall off my wheelchair. I did not want to get hurt.

22. The mental health screening was completed on or about June 22, 2026, so about a week after I arrived, by chance because I told the nurse, who was giving me Advil in the morning, that I had not been sleeping well, that I spent time alone in Echo-9 with 72 beds (just me and the guard), and that I needed my medication. I asked the guard why I was alone in the unit, and the guard told me that I was there alone because it had a wheelchair accessible bathroom with grab bars and a shower stall that was wheelchair accessible. But I was also aware that there was another unit which had wheelchair accessible bathrooms and showers and had other people there that I could talk to. I knew this because other detainees told me when we were in the yard. I felt that I was tortured and punished because I was left alone in a big unit by myself. I asked the guard if I could be transferred to this other unit to be with others, but I was told that I had to be here alone. The guard never explained why. I was in that unit for about 15 days alone.
23. I explained to the nurse that I had made several sick call requests, about 5 or 6, but that no one ever responded. I also explained that they had not followed up on my TB skin test. That nurse called a supervisor. Then about two or three days later, I was taken to the medical unit. I was in so much lower back pain that I initially refused the medical visit because I knew that the wheelchair would go through a dirt and rocky road which would cause me lots of pain and that I might fall, as had happened before. The pathway isn’t a smooth, level, paved path. The guard told me that if I refuse, they would have me sign a form and send me to the “hole” for 30 days. So, I went to the medical unit. I experienced a lot of pain on the way to the medical unit because the wheels of the wheelchair were getting stuck on holes in the sand and bumping against gravel rocks, which hurt my back and legs. At the medical unit, I was given the x-ray TB test. That’s when I told them that I needed to see the psychiatrist because of my mental health symptoms. The nurse said that by coincidence the psychiatrist was there. By chance, I saw a psychiatrist who finished my mental health evaluation. The psychiatrist said she would request my medications but could not guarantee that they would be provided to me, but she did not explain why. She said that she would see if the medical insurance would cover it. She explained that this was medical insurance that ICE provided. The psychiatrist said that if my medication was not approved, she would see if they could approve a similar medication. Then I returned to the unit and, again, I was in a lot of pain because of the sandy and rocky road.
24. On or about June 25, 2026, a nurse came to administer an anti-depressant (Seroquel), anxiety medication (Wellbutrin), sleeping medication (Trazodone). That was the first time I got those medications at Camp East Montana. I had been on those medications previously at Alligator Alcatraz. For my physical pain, I received Advil and another pain medication.
25. Since receiving my medication, my physical pain reduced slightly but I still felt a lot of pain. I also received a pain patch in my lower back. I told the medical providers several times that I was still feeling severe pain, but they would tell me that this is what was

recommended and that they could not change my medical treatment plan or offer me anything better.

26. With my mental health medication, I felt better, but I still struggled to sleep well. I still feel very depressed. I told the psychiatrist about this, and I got the same response that they were going to see if the medical insurance provided by ICE would approve different medications for my mental health.
27. But the medication for my mental health was not working. Specifically, Wellbutrin was not working for me because I still felt very anxious. I still had nightmares almost on a nightly basis.
28. I also needed medication for my claustrophobia but only received it about eight days after I arrived at Camp East Montana. When I didn't receive my medication, I felt like I was suffocating and dying at the facility. And, when that happened, I felt more anxious. There have been many times where I have been caged in a small space by ICE, like when I was placed inside a small box in the van in Alligator Alcatraz. When I was at Alligator Alcatraz, I was receiving medication to treat my claustrophobia, but I never received the same medication at Camp East Montana. At Camp East Montana, I felt my claustrophobia when I went to the medical unit because the guards placed me inside a small cell. I told the guards that being inside that small cell made me feel anxious, feel like I was suffocating, but the guards tell me that there is nothing that they can do.
29. The fear of being stuck in that small cell made me not want to go to medical unit for medical care along with the fear of falling over when I am being transported in my wheelchair and the severe pain I felt due to the jarring and bumpy path to get from the housing unit to the medical clinic. I can be in that small cell in my wheelchair for hours when I am taken to medical. For example, the guards may take me at midnight to medical and I am there until about 6 or 7 am in the morning. I told the medical providers several times that I needed medication for my claustrophobia, but I only received it about eight days after intake.

Food

30. The food at the facility was absolutely terrible. I was always hungry and felt weak and tired all the time.
31. I don't even think that dogs can eat the food they served us. Most of the time, the food was inedible. The food portions were small. The food was frozen, pre-cooked, and it was watery, and it did not have any taste.
32. The food there worsened my anxiety and depression because it was so terrible. I constantly had diarrhea when I was at Camp East Montana, which forced me to go to the toilet regularly, which was difficult because of my mobility issues. Before I was detained, and now that I am not detained, I don't have diarrhea that much.

Disability

33. As I mention above, when I was at Alligator Alcatraz, I suffered a life changing physical assault that left me disabled. The injuries from the assault permanently injured my right leg and knee, left ankle, my right shoulder and wrist, and lower back. I also suffered a serious head concussion and had a fractured nose. I've even lost my hair in that part of my head that was injured.
34. I cannot walk independently and I need a wheelchair to move around because I cannot move my right leg and use my left foot. I cannot stand for any period of time without feeling severe pain all over my body. I cannot use my right hand and arm. I also get dizzy spells and headaches and faint because of the severe concussion that I suffered. I also have blurry vision and cloudy vision.
35. My right hand and right shoulder are permanently injured. I cannot move my right hand, I struggle to form a close grip, I struggle to grab things with my right arm. At Camp East Montana, I was unable to grab my food tray, push my wheelchair, and move around the unit. When I was unable to hold the food tray, I would just wait and not eat. I also had to rely on the kindness of other detainees to help move around the unit, grab my food tray, and help me with other things like making my bed. Sometimes I also could not hold the tablet in my hands for a long time because it would hurt me. I was never offered a stand to hold my tablet.
36. My right leg is permanently injured from my hip down to my toes. The ligament in my right knee is permanently damaged, which means I cannot flex my knee or place my own body weight. If I try to walk, my right knee becomes dislocated and I fall down. I also have a lot of pain in my lower right back and hip, that goes all the way to my testicles, at times. When I get these serious pains, I cannot sit for long and I have to lay down, and when I lay down for too long, I have to sit. When I sit or lay down, my legs fall asleep completely up to my testicles and lower back. I believe that I have severe nerve damage.
37. Even with the wheelchair, it is very difficult for me to get around the facility with the wheelchair. For example, when I am taken to the medical unit or legal counsel visits, the wheelchair must go through a gravel path and I have almost fallen off the wheelchair a few times. It's really painful for the reasons I explained above.
38. When I was at Camp East Montana, I only went out a few times to the yard. But there is nothing there for me to do because I was in a wheelchair and I could not exercise like the others. So, I usually never went outside at all unless the guards forced us to go out to the yard. When I went out to the yard, I had to push my wheelchair through the gravel and there were many moments when the wheels would get stuck and I almost fell over. Sometimes the guards pushed the wheelchair, and other times other detainees helped me. I wish that there was a yard where I could at least go outside and get some fresh air and do some kind of exercise that was good for my body.
39. The head injury I sustained at Alligator Alcatraz caused me to have vision issues. I cannot keep my eyesight fixed on any point of eyesight for longer than about 10-15 minutes.

After that my vision becomes cloudy and blurry, I get dizzy, and I feel that I am going to faint. At Camp East Montana, and because of my vision issues, I had difficulty using the tablet, reading any signs posted around the facility, watching the TV, or looking where I was going. Before being detained by ICE, I never had these issues.

40. As a result of my head injury, my face becomes numb periodically and I cannot feel anything in my face. I also have issues with short-term memory loss because of my head injury. For example, the conversations that I had with someone in the morning, I will forget some of the details of what we talked about by the evening that same day. I have never had these issues before. But I can never forget the abusive mistreatment I experienced at the facility because that will always stay with me. While I was at Camp East Montana, I informed the psychiatrist that I had difficulty with short term memory loss, but she told me that the facility did not have enough resources to help me with this. I wish that I would've received some kind of treatment for my short-term memory loss. It was really scary to go through that after the assault.
41. I also had difficulty filling out forms, thinking, and multi-tasking or just thinking through tasks. I never had these issues before I had the severe head injury at Alligator Alcatraz. I need help filling out forms, not because I cannot read them, but because I cannot fill them out or think through them. I feel that there is a block in my brain. I also told this to the psychiatrist at Camp East Montana, but she said that they could not help me with this. So, I always needed help from other detainees to help me fill out sick calls and grievance forms. I also think that I could not access the library, for example, because my head injury made it difficult to concentrate and read.
42. When I arrived at intake at Camp East Montana, both in January and June, I told the medical provider about all of my disabilities and conditions, including my dizzy spells, nausea, fainting spells, memory issues, eyesight issues, and mobility issues. But the medical staff said that they could not really help me with these issues. They could only provide me with a wheelchair and some medication.
43. For my vision issues, I need someone to explain to me what I am reading. I needed a tablet that dictated what I struggled to see. At Camp East Montana, I was not aware of any audiobooks or text-to-speech technology that I could have used to read forms, fill out forms, send and receive messages, read content on the tablet, or books. In the best-case scenario, I asked the guards to help me read forms and any materials and only some would help me. I never received a handbook with the rules at Camp East Montana. Even if I had, there would have been no way for me to read it.
44. When I was at Camp East Montana, I kept hearing a ringing noise in my ears, like a whistle, that makes me feel anxious. I had difficulty hearing what others around me are telling me, even if they were right next to me. I had difficulty hearing and understanding announcements. So, I needed people to repeat what the announcements were about. So, I had to rely on other detainees to repeat the announcements for me. Sometimes guards would repeat the announcements but only if I asked them for help. But because I didn't get much help from the guards in this aspect, I relied on my fellow detainees to help me.

During a medical appointment, I recalled that I asked a nurse to please evaluate my hearing, but they ignored my requests. My hearing was never evaluated properly. Since being released, I still have these hearing issues. People have to repeat what they tell me several times so that I can understand them.

45. When I was released, I did not receive any paperwork listing my medication or diagnosis to take them to another doctor and get these medications. I did not receive a supply of medication to use after being released. Since being released, on or around July 9, 2026, I have not been able to take my required medications because I don't have health insurance and I need to make various medical appointments to be seen by specialists, psychiatrists, and psychologists. It's been very difficult to try to get my medications. So, I have not been able to continue my medical treatment and care since being released. ICE did not even give me my personal belongings, ICE told me that they lost them somewhere.
46. In all, I feel that I was tortured at Camp East Montana. I suffered severe abuse by ICE and guards, they denied and delayed necessary medical attention, subjected me to degrading and inhumane conditions, they treated me different to others because of my disabilities, and I suffered debilitating injuries that will stay with me for the rest of my life.
47. Since leaving the facility, I have had severe stomach and digestive problems. I cannot really eat any solid food at home. I have severe acidity in my stomach all the time. I can only drink water. Sometimes, I vomit food up as my body struggles to digest. I am not able to eat the same foods that I used to be able to eat before I was detained.
48. Since leaving the facility, I am also afraid and paranoid that ICE will come out of nowhere and inflict harm on me. This paranoia makes it difficult for me to sleep and be outside. Everything is so hard for me.

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 10th of Aug, 2026 in Miami, Florida.

Signature: _____

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke, positioned over the signature line.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Felipe De Jesus Hernandez, certify that I am fluent in both English and Spanish. Between August 3, 2026 to August 6, 2026, I personally spoke with Luis Rivero-Gonzalez over the phone and read the foregoing declaration to him, translated into Spanish faithfully and accurately. Luis Rivero-Gonzalez 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.

A handwritten signature in dark ink, appearing to read "Felipe Hernandez", is written over a light gray rectangular background.

Felipe Hernandez, Staff Attorney
American Civil Liberties Union

August 6, 2026
Date