

DECLARATION OF BRAUMER REYLET RODRIGUEZ SANCHEZ

I, Braumer Reylet Rodriguez Sanchez, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. My name is Braumer Reylet Rodriguez Sanchez, and I am 43 years old. I am originally from Venezuela.
2. I lived in the United States for seven years without ever being detained or incarcerated. I was detained for the first time on January 5, 2026, near Burnsville, Minnesota, while picking up my friend to go to a coffee shop. When getting in the car to go to the coffee shop, my friend and I were detained by ICE officers around 10 AM. The ICE officers took us to an ICE detention center near Bloomington, Minneapolis. At around 4 PM that same day, they sent us to Camp East Montana. On or around January 11, 2026, I was transferred to Torrance Detention Center. On or around March 22, 2026, I was transferred to the El Paso Service Processing Center. On or around April 7, 2026, I was transferred again to Torrance Detention Center. On or around April 9, 2026, I was transferred back to Camp East Montana. On or around May 26, 2026, I was transferred back to the El Paso Service Processing Center, where I have been ever since.
3. My first time going through the intake process at Camp East Montana was on or around January 5, 2026. I was held in the intake room for three days. We were not allowed to shower and only given sandwiches and cookies for food. There were about 72 people in the room with me. I think that the room was about six-by-six meters. During this time, we had to sleep on the floor, but we could not all fit lying down since the room was so crowded. I had to sit the whole first night and then I would take turns lying down with others so we could all get a turn to lie down. There were people in the room who were coughing a lot; they told me they thought they had colds. I have PTSD and issues with my back, and there were also other people in the room who told me they had these issues too. Additionally, there was another individual in my room who told me they had issues with their blood pressure. They said that they normally take blood pressure medication, but during those three days, they were not given any medication. The officers told us that we were not going to get our medication until they processed us, which took approximately three days. I saw people who had told me they had diabetes who did not receive insulin until they saw the medic, which did not happen until the third day. When I saw the doctor, I asked if I could take the medicine I brought with me, but they said I was not allowed to take my medication. They offered Tylenol, which did not help me with my chronic back pain and PTSD. During my medical evaluation, they asked if I had a chronic medical condition and took my vitals, my weight, my temperature, and my height.

4. The second time I was in the intake room was months later on or around April 9, 2026, I was there from approximately 4 PM to 2 AM. There were about 26 people in the room with me that day. The room was the same as last time, about six-by-six meters. People were lying down on the floor then. In my property, which was at the facility but not with me in the intake room, I had my medication that was prescribed to me from Torrance Detention Center, but when I asked the officers for it, the officers told me I was not allowed to have it. I have PTSD, fibromyalgia, and three spinal hernias. Without my medication, I experience immense pain, suffer from my mental health conditions, and have trouble sleeping. It took about two days for me to get my medications that I had already brought with me from Torrance Detention Center. During my medical screening, the medical staff asked if I had a chronic medical condition, took my vitals, my weight, my temperature, and my height. They also asked me if I had received a tuberculosis exam and I told them no. I received a skin scratch test for tuberculosis during the medical exam. I told medical staff during the screening that I was prescribed medications and asked them for them. The staff at Camp East Montana did not give me the prescribed medications that I had from Torrance and they told me that I needed to wait to see the specialist to get the medications and any medication that I brought from Torrance was going to my property and I wouldn't be able to access them.

Food

5. The food at Camp East Montana was bad both times I was there, with really small portions of about 200 grams, the size of a small fist. During my first time at Camp East Montana, I received food that had maggots in the meatballs and with pasta that looked like little worms in the meatballs. This happened two times while I was at Camp East Montana. This was repulsive, and I chose to go hungry when this happened. After this would happen, I wouldn't eat for several days unless it was food that seemed like it was okay.
6. When I was in unit E 10, again during my first time at Camp East Montana, I discovered that the food we were being given was expired. I knew this because our food had a printed label and then a sticker that covered the label. If you peeled off the sticker, you would see that the label underneath said that the food had expired. I could not believe that the staff would hide this information. I told the others in my room, and everyone started taking off the sticker. They all said that their food had also expired.
7. During my second time at Camp East Montana, the portion sizes still were not enough for me and the food had a foul smell to it, so I went hungry the whole time. I lost weight while I was there and felt weak due to constant hunger. During my initial screening, staff told me that I weighed 170 pounds. When I went through intake at the El Paso Services

Processing Center, staff told me that I now weigh 155-160 pounds. It was much less food, and poorer quality food, than I have received at other detention facilities. The food I got at Camp East Montana was the worst food I have received while I have been in immigration detention.

Medication

8. Both times I was at Camp East Montana, I believe we were supposed to receive our medications twice a day. The first round of medications was supposed to be administered to us at 8 AM, but they were often late and we would receive them closer to 10 or 11 AM. The night medication was supposed to arrive at 8 PM, but they were late administering them too, so we often would receive them around 9 or 10 PM.
9. The second time I was at Camp East Montana, we sometimes would not get our night medications once the lights went off. This made it exceedingly difficult to manage my pain from my back injuries and fall asleep.

Housing Unit

10. The first time I was at Camp East Montana, I was housed in Echo-10.
11. The second time I was at Camp East Montana, I was housed in units A and B. I was also housed in Unit D when I was quarantined for COVID. I was moved about ten times; I do not know why I kept moving between units. It was very disorienting to keep being moved and be housed with new people.
12. The second time I was at Camp East Montana, I was told that they switched contractors. After the contractor changed, we would get our food 15 minutes before count, and we would have to throw our food away if we were not finished with eating in time. I would sometimes have to go hungry because the guards said that if we were still eating during count that we would be sent to solitary. Other times I had issues with digestion because we had to inhale our food which gave me stomach aches and indigestion.
13. We often received our medications late. The tardiness with our daily medications happened about two to three times a week. We did not receive our morning medications until 11 AM most days until the day I left.
14. From about April 15, 2026, to May 15, 2026, we went more than a month without shaving and access to a barber. It felt very disorganized and dehumanizing.

15. We did not have sufficient access to hygiene products either time I was at Camp East Montana. We received a small shampoo packet about the size of a tea bag. It was not enough to properly shower with or even wash my hands and face with, so it was not enough to clean my whole body. The lotion packets we received may have been spoiled because they would leak a yellow oil. Some people started having allergic reactions to the lotion. I had a reaction on my skin that was treated while I was at El Paso Service Processing Center. I got small red bumps on my skin that were irritated and caused my skin to peel like when you get a bad sunburn. I was given a steroid shot and prescribed a lotion at the El Paso Processing Center once I was transferred from Camp East Montana that I rubbed over my body to treat the skin condition I developed at Camp East Montana.
16. The dust inside the tent was terrible at Camp East Montana. This was a problem in every housing location I was in. I felt dirty constantly because of the dust in the room and could see the dust in the air and on the beds. I could tell the air conditioning ducts were never cleaned or maintained. I think that is how the dust was getting in. The air duct was visibly covered in dirt and dust. The dust irritated my throat and possibly contributed to the throat infection I contracted while at Camp East Montana. I was prescribed antibiotics for my infection, but I only received them for a day and a half. After eight days of not receiving antibiotics, for some reason, the medical staff I saw during a doctors visit started prescribing me antibiotics again. Medication delays happened often at Camp East Montana; people's sicknesses often worsened while they waited for their delayed medications.
17. I could not sleep from the nightmares for a month after the assault, and whenever I heard the keys from the guards at the El Paso Service Processing Center. I also lost sleep from the excruciating pain. I have PTSD from the abuse I experienced in the Venezuelan prison, since I was held in their military intelligence prison. I received a psychological evaluation and told the staff that I needed psychological help during my intake process at Camp East Montana. I asked to get therapy once a week. The visit I had with the psychologist was only five minutes long, and it was not like the real therapy that I got with psychologists in Minnesota.

Access to Counsel

18. In the units at Camp East Montana, I did not see any posters with information on how to contact a lawyer, the American Bar Association, or human rights organizations either time I was there. No staff person gave me any information on how to try to get legal help.
19. One of the other people detained at Camp East Montana with me gave me the phone numbers of two organizations, the Texas Access Justice Organization and the Texas Bar Lawyer Organization. When I tried calling both organizations, there was an automatic

message from both numbers saying, "If you call this number, we will block your account." I immediately hung up rather than asking for help. I was afraid that they would block my account and that I would not be able to talk to my family anymore.

Use of Force

20. On or around May 24, 2026, around 10 PM – midnight, the remote control for the TV in Unit B-2 was declared as lost by a guard. This initiated a series of searches of our personal documents and possessions. Approximately 20 staff members searched our room for about an hour and a half. During the search, they also confiscated the snacks we were keeping for later in the evening which we kept since we would get hungry in the evenings, which left us hungry and upset.
21. One of the guards started looking through all of my personal court documents and receipts. I kindly asked him to stop and to return my documents, since he knew the TV remote was not in my folder. He called me a "sapo" (which means "snitch") and threw my documents on the ground, scattering my documents around the room. Confused by this behavior, I requested to speak to the captain. The captain told me that after the search, he would come by my bed to investigate. About five minutes after, a guard found the TV remote in his pocket, and they ended the search. As the captain was walking out, I called out to him three times, but he did not turn around to address me and closed the door. Since others in my unit also heard me calling out to him, they also started calling out to him as well.
22. I saw and heard an individual from Honduras started banging on the door from inside the unit with his hand and said the guards needed to apologize for subjecting us to the search when they had the remote. This angered the staff who had searched us, and he came back into the room looking for the person that had been banging on the door. They asked me if I had done it, since I had asked to see the captain when he was walking out of the room. I said that I had not done it. I refused to tell them who had done it out of fear that the individual from Honduras would get punished for this.
23. After this, the guards asked me to put my hands in the air above my head and escorted me out of the room. As I was being escorted away, other detained people in the room left their beds and came to see what was happening, asking for an explanation from the guards for why they were taking me out of the room. This angered the guards even more, and they called for backup. The other guards that had left came back into the room to escort me out and took two other people into the hallway where they started beating them. I witnessed this myself, and the people being beaten were not fighting back. Two guards carried me out of the room into the hallway, throwing me against the ground face first so hard, I blacked out and for a moment lost awareness of what was happening

around me. I wasn't being violent or disruptive or anything; I don't know why they would hurt me like that.

24. When the guards threw me against the ground, my head, nose, chin, and chest hit the ground, and my lip split open. There was a lot of blood that was coming out of my nose and my mouth. I was able to read the name of one of the guards, Captain Bueno but I couldn't read the name of the other individuals. I also noticed that some of them did not have their name on their sleeve like Captain Bueno. I hit my head so hard, I started experiencing a momentary lack of recognition and understanding, vision loss, and couldn't breathe. I was coming in and out of consciousness and I thought I was going to die. Once I was on the ground, they put handcuffs on my wrists and one guard had his knee on my neck, another guard with both of his knees on my back, two other officers both standing with their full weight on each glute. This was a profoundly painful due to my prior spinal and back injuries and hernias from being tortured by the Venezuelan government.
25. After they all got on me, other officers started kicking me on my sides and my legs and I kept begging them to stop hitting me because I had serious injuries on my cervical column and hernias. They responded with, "te vamos a tratar de matar con nuestros puños, aquí somos nosotros los que mandamos y te lo vamos a demostrar, maldito loco." After I started yelling from the pain, they told me, "no nos importa maldito loco. Ya te dijimos que te vamos a matar."
26. Another guard seemed to put his knee on my neck and made it difficult for me to breathe. Additionally, the handcuffs were so tight on my wrists that they caused discoloration and bruising on both wrists. It was like burns that were red and purple bruises on my hands and wrists. They demanded that I get up and walk into the processing room, but due to the immense pain and sustained injury, I could not move or react. The staff just threw me in there instead. I lay on the ground motionless for about two and a half hours.
27. After approximately two and a half hours, three different guards came back to the processing room where I was and told me that they were going to try to hang me or find another way to kill me. They also started kicking me in the abdomen and the back repeatedly with their green combat boots. They also hit my head with closed fists multiple times. I waited for approximately two hours, the longest and most terrifying two hours of my life. This triggered the PTSD I had from my past torture experiences, and all I could think about was my wife and daughter finding me dead. While I waited, I could not breathe from the pain, especially to my ribs. I also could not feel my two legs and half of my body was numb. Vision in my right eye was blurry as well, and I remained in a

state where I could not talk or see well. Eventually, they came in with a wheelchair to take me to the nurses' unit in another tarp across the yard.

28. We crossed an area that was full of sand and rocks between the tarps. I could not move or walk, but the guards kept taunting me. Once I was evaluated at the clinic, I was told I needed to go to the hospital, about 30 minutes after my arrival. I was then forced to take a bus, not an ambulance or any other form of transportation. They handled me like an animal, throwing me on the bus with chains on my belly, feet, and hands. I was in the worst pain I had ever felt.
29. Once we arrived at the hospital close to Camp East Montana, they took X-rays of my back. I requested to get X-rays of my back and ribs since I had been severely injured and still could not feel or control my legs. They did not do any additional X-rays or MRI scans. They gave me several shots for the pain, but they did not tell me what they were injecting me with. They also gave me several pills; the doctor told me it was Meloxicam and sent me back to Camp East Montana the same day. I was already taking Meloxicam for my spinal injuries prior to being detained, but when I returned to Camp East Montana, they did not increase my dosage.
30. Upon arriving back at Camp East Montana, I went straight to the mental health unit where they did an "evaluation" on my mental health by asking me how I felt after coming back from the hospital. They knew what the guards had done and some of my prior history with PTSD, so I responded by telling them, "How do you think I feel like right now?" The lady laughed at me, signing a paper that I think indicated that I was in good enough condition to go to solitary and handed it to the guard. She also high-fived the guard, as if she was celebrating sending me to solitary.
31. I was transported to my solitary cell, also called "the hole." They did not tell me how many days I would be there for. They tried getting me to sign a paper that stated my rights in the hole. If I did not sign, they said that they would not tell me how long I would be in the hole. They came to give me my medicine that evening. The next morning, I started peeing blood, so I called the guard. I asked to go to the medic because I was concerned about my health. The guard told me that I was not allowed to go to medical while in the hole. Then, I told him that if they did not take me, I might die. While we were in solitary, staff came and asked me to sign a voluntary departure form. He told me that there were two flights going to Venezuela that week and that if I chose to sign the form I could get a visa and visit my wife and daughter. I was scared that he knew about my wife and daughter and that he mentioned them when they tried to get me to sign the voluntary departure form. I refused to sign it.

32. Three hours after requesting a medical appointment, a guard came into my room and asked me to recount the story of what happened the day before. I told him that I did not want to say anything about what happened, afraid that my story would somehow get twisted and used against me. I told him that he should ask the other guards and check the cameras. He also asked if I would need assistance with the charges they were going to make against me. I asked if I could contact my lawyer; he said that I was not allowed to speak with a lawyer and that I had to choose a guard to help me with the charges.
33. The next day guards removed me from Camp East Montana and said that I had asked for a transfer about two months ago. I asked to be transferred on or around April 9, 2026 and got transferred on or around May 26, 2026. I suspect that they wanted to get rid of me to avoid conducting an investigation of what happened to me. I could not get attorney access for a week at the El Paso Service Processing Center after they transferred me.
34. Since I was transferred to El Paso Services Processing Center after being assaulted by guards at Camp East Montana, no staff person has come to ask me about the assault I experienced at Camp East Montana.
35. At Camp East Montana when I first arrived and asked for medical help, they told me that if I wasn't actively dying, they would not give me medical care. They also told me that if I ended up in the hospital that I would have to pay my medical bill.
36. I used to take Pregabalin for my Fibromyalgia; and Naltrexone and Tramadol for pain from the torture that I experienced in the Venezuelan prison. I continue to experience severe pain and cannot sleep because the medication they gave me at Camp East Montana and the El Paso Processing Center does not work like the medications I used to have before being detained.

Conditions inside solitary cell

37. My solitary cell at Camp East Montana was a tiny room, about the size of the individual bed, the restroom, and the sink. It was about 2x2 meters or 2x3 meters. To contact the guards, you had to yell from your cell to get their attention. I also only had five minutes to shower, and they would give you a time update every minute until we reached our fifth minute. I did not think this was enough time to shower. If they told us that the time was up and we were not already out of the shower, they would not let us shower the next day. I received meals three times a day but sometimes it would arrive about an hour late. I would receive my medications in the morning and the evening, but they were often delivered an hour or two late. Of all of the places I have been in, solitary was the worst. The light is always on you cannot see outside, and there is no way to leave the very small

confined area. I went to the yard maybe once or twice a week for an hour. I could not see the sun because there was a tarp over my head. This was very disorienting and made my mental health worse. I lost the notion of time.

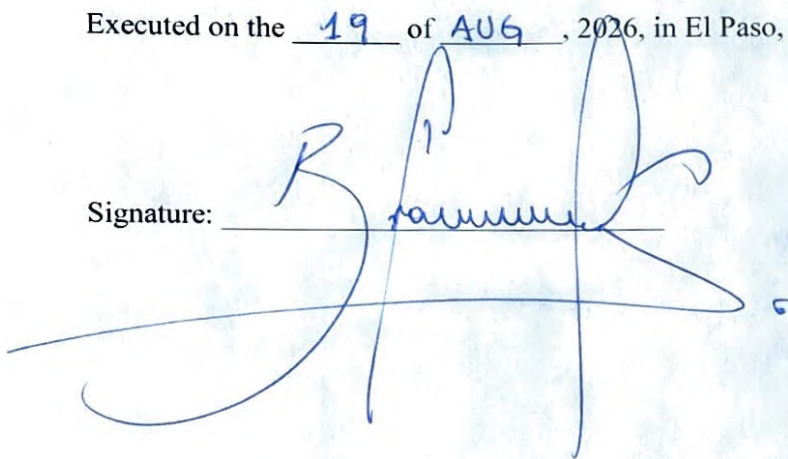
Quarantine

38. We were quarantined for about ten days in Mid-April in the D9 unit at Camp East Montana. Staff told us that someone in our unit had contracted COVID. The person in our room that had contracted COVID told us that he had COVID when he came to get his things. He wasn't wearing a mask at the time; staff just let him back in to pack up stuff from his bed. The guards then took all of us except for the person who had the positive covid test who they sent to a room alone, to quarantine. During this time, we were never seen by the medical staff, and we also were not allowed to see the medical staff. When they gave us the medications, they would give us the pills by opening the door but we didn't have direct contact with the medical staff. From talking to the people in my room, I think that there were six of us, including myself, who contracted COVID while in quarantine. I thought I had covid because I lost my sense of taste and felt very sick but this wasn't confirmed since we were not able to see the doctor during this time.
39. I submit this declaration because I want to advocate about the things I have had to endure while being detained at Camp East Montana and want to expose the conditions where I had to live. I want to help prevent others from having to go through what I experienced in Camp East Montana. I also don't know if I will be moved back to Camp East Montana again.

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 19 of AUG, 2026, in El Paso, Texas.

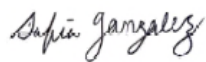
Signature: _____



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, **Sofia Gonzalez**, certify that I am fluent in both English and Spanish. On August 17, 2026, I personally spoke with **Braumer Reylet Rodriguez Sanchez** and read the foregoing declaration to him, translated into Spanish faithfully and accurately. **Braumer Reylet Rodriguez Sanchez** 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 cursive script, appearing to read "Sofia Gonzalez".

Sofia Gonzalez, Paralegal
American Civil Liberties Union

Date: August 17 , 2026