

DECLARATION OF TIAGO CLAUDINA DE PAULA

I, Tiago Claudina de Paula, hereby declare under penalty of perjury under the laws of the United States of America 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. If called to testify, I could and would do so competently and truthfully to these matters.
2. My name is Tiago Claudina de Paula, and I am 33 years old. I was born in Brazil, where I currently live.
3. On or about September 25, 2025, I was detained by immigration officials in Massachusetts. Throughout the following week, I was taken to various immigration detention facilities, including in Concord, Massachusetts, Buffalo, New York, and later, El Paso, Texas.
4. Before being detained, I lived in Boston, Massachusetts with my 6 year-old daughter. She is a U.S. citizen.

Arrival and intake at Camp East Montana

5. On or about September 28, 2025, I was taken to Camp East Montana in El Paso, Texas. I was detained at Camp East Montana for approximately seven months.
6. When I arrived at Camp East Montana, I was held in an intake room for approximately 5 days. During that time, I was not allowed to shower and was not given a toothbrush, soap, deodorant, or brush for my hair. I was also not allowed to call my family during those 5 days. There were approximately 20 people in that intake room. There was a toilet with a sink in one corner of the room. If we needed toilet paper, we had to ask the guards for it. We didn't have any soap to wash our hands.
7. Guards would bring us a paper bag with a sandwich, a cookie, and an orange or banana approximately three times a day. Each person received only one bag at a time. There was no fixed schedule to eat. We had to keep asking the guards to bring us food. We also had to ask for water. If we didn't ask for water, the guards would not give us any.
8. The room felt like it was freezing. We did not have any blankets or anything warm to cover ourselves with. I could see people shivering from the cold and a lot of people

were coughing or sneezing. After two days, the guards gave us foil sheets to cover ourselves with. There were three metal benches in the middle of the room. There was nowhere else for us to sit or lay down, and there wasn't enough space for all approximately 20 of us to sit on the benches. We had to sit, eat, and sleep on the bare floor during that time. The only window was a very small window on the door that looked out to a hallway, rather than to the outside. There were bright LED lights that were turned on the entire time I was there. I heard a lot of people crying.

9. Approximately two days after I arrived at Camp East Montana, on or about September 30, 2025, I was given a wristband which said I had arrived that same day. That date was incorrect. I had already been at Camp East Montana for at least two days.
10. On or around the fourth day in the intake room, I saw a female guard walking by our door. I knocked on the door and told her we had been there for a long time. She opened the door and checked my wristband. I told her the date was wrong and we had actually been there longer. She seemed surprised.
11. Finally, on or about October 2, 2025, after five days in that intake room, I was taken to see a medical provider. The provider took my blood pressure and temperature and asked if I took any medication. She told me that my blood pressure was high. I thought it might be because I had not been sleeping or eating well for the past five days. I asked her if they would do any tests for Covid or tuberculosis. She said no. I asked this because while I was in the intake room I heard from guards and other detainees that there was an outbreak of Covid and tuberculosis at Camp East Montana. This was the first time I saw a medical provider since I arrived at Camp East Montana.
12. After the visit with the medical provider, I was finally taken to a pod or housing unit inside Camp East Montana.

Conditions at Camp East Montana

13. I did not receive a handbook at Camp East Montana, so I did not know how anything worked at the facility, including recreational time, barbershop, or calls to family. The announcements and instructions were usually given in Spanish, but I do not speak Spanish fluently. I speak Portuguese.
14. During the five days I was held in intake, I was not allowed to speak to my family. Then, when I was taken to a housing unit, it took approximately 7 days for the facility to give me a pin to be allowed to use the tablet and call my family. In total, I was not able to

able to speak to them for about 15 days. My family did not know where I was throughout that time.

15. During my time at Camp East Montana, I was held in 5 or 6 different housing units or pods, including Charlie-7, Alpha-8, Alpha-7, Alpha-11, Alpha-5, and Alpha 12.

16. There are no windows in the pods, so I did not know if it was day or night. When the nurses came in to give other people their medication, I would ask them if it was sunny or rainy outside. I just wanted to know. At times, I didn't see the sky or the sun for over 5 days.

17. The guards at Camp East Montana did not take us to recreation consistently. There was a schedule posted on a wall in the pod, but the guards did not seem to follow it. Some weeks, we were not taken to recreation at all. We had to beg the guards repeatedly to take us out. I couldn't really sleep while I was at Camp East Montana, so I would pass time reading the Bible or watching television. Going to recreation was my only outlet, and the guards didn't even give us that consistently. I just wanted to be out for a little bit and play soccer. I needed it to clear my mind. The space where we went for recreation is a tent structure, surrounded by a metal fence. Some days, we were given a football, but the football was often flat. We played with it anyway.

18. Food at Camp East Montana was terrible. On or around March 26, 2026, I received a plate of spoiled food for lunch. The food appeared to have larvae in it. I told the guards on duty about this and they took photos of the food. When I asked for other food, they offered the same food that was spoiled. I refused to eat that. A few days later, on or about March 30, 2026, I received a plate chicken for lunch. The chicken looked spoiled. Again, I told the guards about it. They said they could not do anything. There was an ICE officer in the pod that day. I showed the ICE officer the food.

Use of force and mistreatment by guards

19. Mistreatment by guards at Camp East Montana was a constant issue. Many guards were very cruel.

20. On or about April 21, 2026, at approximately 4 am, I was woken up and taken to the medical unit to get medication for my psoriasis. I was then taken back to my pod where I tried to sleep and rest. I was being held in Alpha-8 at the time. At around 6 or 6:20 am, Officer Becker came into the pod yelling at us to "get up". For the last two

weeks approximately, at around 6 am, Officer Becker came into the pod screaming “let’s go, let’s go.” There was no reason for us to be getting up that early. That morning, Officer Becker came close to my bed, ripped my towel off the edge of the top bunk bed, and threw it on top of my bed. He yelled “Let’s go, Brazil.” Officers at Camp East Montana often referred to me as “Brazil” because of my nationality.

21. I slept in a bottom bunk bed, and my towel was hanging on the edge of the bunk right above mine. I had asked a captain if I could keep my towel there to dry. He said yes. We did not have any space to keep our things besides our beds.
22. When Officer Becker ordered me to get up, I got up and approached another officer in the pod. I told him I was tired from my 4 am visit to the medical unit and wanted to rest. The other officer told me he would speak to Officer Becker so he wouldn’t bother me. I told him I didn’t want any trouble.
23. I then took one of the tablets from the tables where the guards sat, put the towel back where it was on top of the bunk bed, and sat on my bed to call my family. A few minutes later, Officer Becker approached my bed again, snatched the towel away, and said “Fuck you, Brazil. I am keeping it.” Officer Becker then walked away and took my towel. It was the only one I had.
24. I got out of my bed and walked over to speak to another officer. I asked him to speak to Officer Becker and asked for my towel back. I felt so confused and worried I would be left without a towel. We only get one and without it I did not have anything else to dry or clean myself with. At this point, Officer Becker was standing next to me and the other officer. Officer Becker was holding my towel in his hand.
25. Another detainee saw and heard everything and started asking the officers why they were picking on and bothering me.
26. I then started walking away to the bathroom. I wanted to step away from that situation. As I was walking away, I heard Officer Becker call the Disturbance Control Team (“DCT”) and mention “Brazil.” I turned back confused and then felt approximately 6 officers grab me. Some of those seemed to be DCT and some did not. I could differentiate them based on their uniforms. The DCT officers wear long sleeves and a uniform that is completely black. The officers were speaking in Spanish. There was only one officer speaking in English.

27. Officer James told me to put my hands in front of me. I did that. Officer Becker then kicked my feet, so as to make me fall to the ground. I asked him why he was doing that. I wasn't resisting. Another officer, Officer Ortiz, then grabbed my left hand and started twisting my arm. I was able to identify Officer Ortiz because he had a bag attached to his waist with his last name on it. I told him he didn't need to do that and that he was hurting me. He then told me to put my hands behind my back.
28. Officer Becker then again tried to push my feet with his hands. There was a wood divider next to me. I told him if he pushed me, I would hit my head in the divider. Officer James then put his hand under my arm and over the back of my neck and pushed my head down. Officers Ortiz and James then took me out of the pod walking like this, with my head pushed down very close to my knees. I told the officers they were hurting me. Officer Ortiz then said, in Spanish, "*callate pendejo, te duele? A ver si te quejas de la comida ahora*" Approximately a week earlier, I told officers in the pod that the food they gave us was spoiled, and we could get sick. I understood Officer Ortiz to be referring to this complaint.
29. I did not know the names of the officers involved, except for Officer Ortiz, until after the incident occurred. I learned their names, including Officer Becker and Officer James, when I spoke to Captain Johnson later that day. I did not see them wearing any name tags on the day of the incident.
30. Two different officers then took me to an isolation cell. The cell was very small, approximately 3 square meters. There was a bed, a toilet, and a sink. I was in that cell for about an hour. I was crying. I felt a lot of pain in my left arm and I felt humiliated. I was worried that Officer Ortiz had broken my arm. My left arm started turning a deep shade of purple from my wrist to my elbow. I could not move my left hand.
31. There were no windows to the outside in that cell. There was only a small window in the door that looked out into a hallway. I looked out into the hallway and saw an officer I had interacted with before. She seemed surprised and asked what I was doing there. I showed her my arm. She then called Captain Johnson. I explained what happened to Captain Johnson and asked to be taken to the doctor.
32. Approximately one hour later, two officers came to escort me to the medical unit. At that point, my pain was at a 10 on a scale of 1 to 10. The doctor in the medical unit asked me to close my hand. I could not do it. She examined my arm and saw that it

was almost black. My shoulder was also swollen and was hurting a lot. I heard her telling the officers that my arm could be broken and that I had to go to the hospital.

Emergency room visit and care

33. The officers escorted me out of the medical unit and put me in a cell. After approximately 10 minutes, another officer came into the cell, put chains in my feet and my right hand, and took me to a van. The officers drove me to Las Palmas Medical Center, in El Paso, Texas.

34. I was brought into the hospital through the Emergency Room and was immediately put in an examination room. I arrived there at between 8:30 and 9 am. Two Camp East Montana officers were with me at all times. A nurse examined my arm and told me it could be broken. The nurse then took me to do X-rays of my hand, shoulder, and arm. Later, the doctor told me my arm was not broken. She put a sling on my left arm and gave me 4 pills, a prescription, care instructions. It was approximately 1 pm by the time I was discharged.

35. The officers drove me back to Camp East Montana. I was taken back to the medical unit where the doctor made copies of the prescription and care instructions.

36. I started receiving the pills that the hospital prescribed approximately one or two days later. I was supposed to be taking that medication every 12 hours but the nurses would come in at different times throughout the morning and night. I never knew when I would get the medication. I was also prescribed an adhesive patch to place on my skin. I started receiving that approximately 3 days after it was prescribed.

37. I was never taken to the doctor or hospital again for follow-ups. I wore the arm sling for approximately 20 days. The doctor at Camp East Montana did not tell me how long I was supposed to wear it and did not follow up with me about my care. For the next month or two after the incident, I felt a sharp pain in my arm. On a scale of 1 to 10, my pain was constantly at about 5. During that time, I could not exercise and I struggled to perform basic tasks like showering and getting dressed.

38. Today, I still feel pain when I exercise or move my arm.

Time in solitary confinement

39. When I returned to Camp East Montana after the hospital, while I was at the medical unit speaking to the doctor, Captain Johnson came in and told me that I would be put

in solitary confinement. She said I pushed Officer Becker. That was not true. I asked Captain Johnson if she had seen the recordings from the security cameras. I was sure that if she had, she would not be saying that I pushed Officer Becker. Captain Johnson said they would investigate and that I would be allowed to present witnesses. She said Lieutenant Curry would talk to me later about the results of the investigation. I felt shocked, sad, and frustrated.

40. Captain Johnson did not take any photos of my arm. She had what looked like a DVD. I asked her for a copy of the DVD and their reports, but she said no. He said I had to ask ICE for it. At the medical unit, the doctor measured the injury in my arm with a ruler. The doctor had a drawing of a body where she marked the placement of my injuries.

41. Lieutenant Curry came to speak to me on or around April 24, 2026, three days after the incident. I asked him if he saw the video recordings and if he saw me push Officer Becker. He said no. I explained what happened again. I was not allowed to review any evidence or present any witnesses. Lieutenant Curry then said I would be kept in solitary confinement for 30 days. I asked him why, I didn't understand. Lieutenant Curry said he was "following orders from above." He said he would not suspend my tablet use and that I could go out to the yard once per day for one hour.

42. During my time in solitary confinement, I was taken out the cell once a day around 7 pm to take a shower. I was also taken out to recreation once a day by myself. I felt depressed. I didn't want to eat. Due to my arm injury and the pain, I had a hard time sleeping and I couldn't exercise. I spent a lot of time reading the Bible. I cried many times during my time in solitary. I didn't know why that was happening to me. It felt very unfair. I was already detained and then on top of that I am assaulted by a guard that is supposed to care for us.

43. I did not have a tablet for approximately the first two days in solitary confinement. When I finally got one, I could not do video calls with my family, only audio. In the pod, I would do videocalls with them almost every day.

44. One day, on or about May 3, 2026, an officer came in and told me I would be able to return to the pod. In total, I was in isolation for approximately 12 days. I was taken back to unit Alpha-8. When I left the pod on or around April 21, 2026, there were only 8 people there. When I went back, there were approximately 72 people.

Transfer out of Camp East Montana

45. On or about May 16, 2026, I was transferred out of Camp East Montana and to a detention facility in Torrance, New Mexico. I was detained there for approximately 4 months.

Return to Camp East Montana

46. On or around August 6, 2026, I was transferred from the detention facility in Torrance to Camp East Montana. I was held at Camp East Montana for approximately two weeks. Things had basically not changed since I was last there. I was placed in the Alpha units again. The food was still bad. The pod was dirty and had a lot of dust. While I was there, I experienced a lot of allergies, nasal congestion and a runny nose.

47. On or around, August 18, 2026, at approximately 9 pm, a guard told me to grab my things. I asked the guard where I was going. A guard told me I was being deported. I told him my case was still ongoing and I had filed a habeas petition. I asked to speak to an ICE officer. The guard told me he would tie me up and take me. I was scared they would hurt me again, so I got on the bus. Approximately 20 hours later, I was taken back to Brazil.

48. Even though I am no longer in the United States, I'm sharing my story hoping for justice for other people that have suffered at Camp East Montana and who are still there now. I do not want other people to go through what I experienced there.

Everything in this declaration is true and correct to the best of my recollection.

Executed on the 14th of September, 2026, in Vila Velha, Espírito Santo, Brazil.

Signature:  _____

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, **Perla F Alvelais**, certify that I am fluent in both English and Portuguese. On September 3, 2026, I personally spoke with **Tiago Claudina de Paula** and read the foregoing declaration to him, translated into Portuguese faithfully and accurately. **Tiago Claudina de Paula** affirmed 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.

Signed: 
NAME: Perla F Alvelais

Date: 09/03/2026