

DECLARATION OF ADAMS PICO PIÑANGO

I, Adams Pico Piñango, 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 Adams Pico Piñango. I am 22 years old and from Venezuela. Before being detained by immigration officials, I lived in Denver. I have a 2 year-old son born in the U.S.
3. I was detained by immigration officials on or around June 10, 2026. On or around, August 24, 2026, I was taken to Camp East Montana in El Paso, Texas. I was placed in Delta-6 unit. On the identification bracelet that officials at Camp East Montana gave me, my name appears as "Adam Pico Pengano," but my name is Adams Pico Piñango. When I arrived, I did not receive a handbook. I learned about recreation time, the barbershop, and how to get soap, among other things, from other people detained in my pod.

Living conditions at Camp East Montana

4. Conditions at Camp East Montana are bad. We do not get enough food here. If we feel hungry, there is no way for us to get additional food and we have to stay hungry. There is no commissary to buy food and we are not allowed to save food to eat later. Most people do not go to sleep until 10 or 11 pm but guards bring in our last meal of the day around 4:30 or 5 pm. We don't eat anything for the rest of the day. The water we drink here tastes like chlorine and other chemicals.
5. The pods are usually filled with dust. I heard people around me complain that if they slept in the top bunk bed, they would wake up covered in dust. While I was held in Delta-6, I only saw a maintenance crew come in once. The air we breathe makes a lot of people sick, including me. During my time here, I have suffered from a lot of allergies. I sneeze a lot, my eyes get watery, and my nose feels congested. At any given time, there were multiple people sick in my pod.
6. In the pod, we only get a small packet of shampoo every day. We are supposed to use the shampoo as soap too when washing our bodies or hands. If we need more, we need to ask the guards for it but at times we're told that they don't have any, or we're simply told no. So, we often are unable to wash our hands with soap before eating or after using the bathroom.

7. Most of the guards in the facility do not wear visible identification or name tags. I am worried that if something happens or if the guards act inappropriately, I won't be able to identify who they were.

Conditions in Special Management Unit

8. On or around September 7, 2026, an ICE officer and a guard from Camp East Montana told me that I would be held in the SMU for a total of 50 days. They said that I insulted the guards in my unit on or around September 1, 2026, when there were other issues happening in my unit. However, I did not insult guards. I am still in SMU now.
9. My time at the SMU has been very difficult. For approximately 30 days now, I have been held by myself in a small cell with only a bed, a toilet, and a sink. I have no access to natural light in the SMU cell and I am all alone, so I have very little sense of what time of day it is. There is only a small window in the door that looks out to the cell immediately in front of mine. There is a bright white light right above my cell that stays on from around 6:30 am until 10 pm. This makes it difficult for me to rest and sleep. There is also something that looks like a camera pointing right at me which makes me feel uncomfortable to change my clothes or use the restroom.
10. On or around September 17, 2026, at approximately 4:20 pm, I received a meal which consisted of rice and ground beef. I knew that it would be my last meal of the day, so I saved it to eat closer to the time I get my medication. I am currently taking medication for anxiety and to help me sleep. I was prescribed this medication after the September 1, 2026 incident. I finished eating my meal at around 8 pm, when I received my medication. Shortly after, I started feeling nauseous and felt a sharp pain in my stomach. On a scale of 1 to 10, my pain was a 9. I could not lay down or sit straight. I sat on the edge of the bed with my head between my knees. I couldn't drink water because it made the nausea and pain stronger and I had difficulty breathing. My stomach felt bloated and hard.
11. There was a group of guards outside my cell. I told one of them that I was in pain and wanted to see a doctor. The guard said he would submit a request, but I was not taken to the doctor until approximately 5 hours later. When I was finally taken to see the doctor, the whole interaction lasted less than 10 minutes. She quickly examined my stomach. I told her that it hurt when she pressed it. She prescribed Tylenol and a pill for heartburn. I told her I did not have heartburn but she insisted that I take the pill. I was still in severe pain when I was taken back to my cell. I could not sleep at all that night. I spent the entire night crouched down on the edge of the bed. I was scared and did not know what was happening with my body.

12. The next morning around 8 am, a guard came into my cell with food. I did not eat that morning and told the guard that I was still in a lot of pain and asked to see the doctor again. The guard said he would submit a request, but I was never taken to the doctor. The intense pain eventually started subsiding on its own. I did not receive any more medication for the stomachache or medical follow-ups.
13. I have almost nothing to do while in SMU. It is very sad here. I spend some of my time at the SMU reading the Bible.
14. On days when I am taken out to recreation, which is not every day, I am there by myself. The recreation area is an enclosure with a tarp covering and a chain link fence surrounding it. I walk around the recreation area to pass time. It feels like just another cell. I feel trapped.
15. There are times when I am locked in my isolated cell for approximately 72 hours without being taken out for recreation or to shower. We are not allowed to shower on weekends and are not taken to recreation on weekends, so I spend the entire weekend in my cell. For example, sometimes I will be taken to recreation around 8:30am on Friday for around one hour and then spend the entire weekend in my cell after that. If it rains or the guards don't take me to recreation for another reason, then I'm trapped in the cell for longer without knowing when I might be able to step out.
16. I am not allowed to keep soap/shampoo in my SMU cell. So, I am not able to wash my hands before eating or after using the bathroom. I am also not allowed to shower daily. I am only allowed to shower 2 or 3 times a week and I am only given a clean set of clothes when I shower. So, I have to wear the same clothes for 2 or 3 days without showering, even if they get dirty. On shower days, I am handcuffed to be transported to the shower area, and I am only given 10 or 15 minutes to shower. The guards only remove the handcuffs during that short period of time when I am showering.
17. I have not been taken to the barbershop during the entire time I have been in SMU. I have not been able to have my hair cut for over 30 days. My hair grows out fast and I feel very uncomfortable, itchy, and unkept with long hair. I consider myself to be a clean person and not being able to maintain good hygiene here has been very difficult for me. It makes me feel less than human.
18. In the last 30 days, the maintenance crew has only come in to clean my SMU cell approximately once. I try to keep my cell clean by wiping the surfaces and the floor with wet toilet paper. I have also asked the guards for cleaning supplies, but I was not given any.

19. There have been heavy rains in El Paso recently, so the recreation area and the path to get there are constantly flooded or filled with soft, wet dirt. My uniform, including the socks and sandals we are given to wear, have gotten wet and dirty when I am taken out. My feet sink into the mud and water and get covered in dirt. When I return to my cell, I am not given an extra set of clothes to change into and I am not allowed to shower. I sometimes rinse my socks with water and clean my shoes and the dirty floor with toilet paper.
20. I am submitting this declaration because I am worried about what could happen to me here, especially while I'm alone in an isolation cell in this tent camp where I do not know when I will be removed from this detention center.

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.

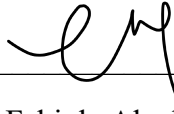
Executed on the 2 of October, 2026 in El Paso, Texas.

Signature: Adams Pico

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Perla Fabiola Alvelais, certify that I am fluent in both English and Spanish. On October 2, 2026, I personally spoke with **Adams Pico Piñango** and read the foregoing declaration to him, translated into Spanish faithfully and accurately **Adams Pico Piñango** 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.



Perla Fabiola Alvelais

10/03/2026

Date