

SUPPLEMENTAL DECLARATION OF ALFREDO ANTONIO REINA

I, Alfredo Antonio Reina, 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 Alfredo Antonio Reina. As I stated in my previous declaration dated July 29, 2026, I have been detained at Camp East Montana since on or around October 25, 2025. Since my last declaration, I have been moved across various housing units at Camp East Montana, including Delta-6, Charlie-10, and Charlie-12.
3. Most recently, on or around October 1, 2026, I was moved to Delta-5 housing unit, where I am currently being held. There are approximately 40 people housed in my unit right now.

Medical visit and records

4. On or around August 23, 2026, I submitted a handwritten sick call request. As stated in my previous declaration, I have suffered from allergies since I arrived at Camp East Montana and I wanted to see the doctor to request allergy medication. I was taken to the doctor approximately 2 or 3 days after I submitted the request. The doctor gave me one allergy pill. My allergy symptoms subsided for a few hours but returned later that day.
5. During the medical visit, I also asked the doctor for a copy of my medical records. The doctor said he could not give them to me and that I could receive them by mail to my home address once I left Camp East Montana. He said I would be charged for it.
6. I was not given a manual when I entered the facility, so I do not know how else to request my medical records.

Living conditions

7. Conditions at Camp East Montana remain essentially the same as in my first declaration at the end of July 2026. We still don't get enough food and are not taken to recreation consistently.
8. Since I first arrived at Camp East Montana, water has seeped into the housing units through the ceiling. Over the past few months, there has been especially heavy rain in El Paso. Most recently, on or around September 28, 2026, there was a big storm while I was in the Charlie-12 unit. I heard the raindrops hitting the top of the tent throughout the afternoon and night. Water started leaking into the unit shortly after the rain started. The leaks created puddles on the floor of the unit. I counted at least six large puddles on the side of the unit where I sleep. I did not check the other side for leaks or puddles. Some of the top bunk beds were getting wet so people started moving to bottom bunk beds but the guards said

we were not allowed to move bunks. I do not know what people are supposed to do if water is falling on top of them and they are not allowed to move to a dry area.

9. The guards don't do anything about the water seeping into the unit or the puddles on the floor. Me and other people in my pod have requested cleaning supplies to clean the water ourselves. If someone leaves behind a towel, we use that to clean the floor. We are only allowed to keep one towel, so we can only do this if we're able to find an extra towel. I am worried someone could slip and fall due to the wetness on the floor.
10. The units at Camp East Montana remain very dirty. The maintenance crew only comes approximately once a week at most. People in my unit are still requesting cleaning supplies to try to clean the unit ourselves; we try to clean at least every other day. We still don't get any disinfectant to clean, so we are only able to clean the surfaces, toilets, sinks and showers with water. We sometimes use our own shampoo to clean, even though we have limited shampoo to use to even clean ourselves.
11. For the last two weeks, while I was held in Charlie-12 unit, we heard construction going on in nearby pods until late at night. I heard it as late as 11 pm. It sounded like someone was using an electric saw and striking something hard with a hammer over and over. The loud noises made it hard to sleep.

Hygiene

12. I was not taken to the barbershop in approximately a month and a half. The last time I went was on or around August 20, 2026 and then again on or around October 1, 2026. When we asked the guards why we had not been taken to the barbershop, they said they didn't have information. We are only allowed to cut our nails when we go to the barbershop, so I was also not able to cut my nails in approximately a month and a half. My nails got very long. I felt dirty to have such long nails, especially since we do not have enough soap or cleaning supplies and dirt gathers under my nails.
13. The shampoo/soap that we are given here severely irritates my scalp and gives me dandruff and scabs. On or around July 2026, I submitted a sick call request about the irritation to my scalp. The doctor gave me a special shampoo. I started using it and it was helping alleviate the irritation in my scalp. However, after approximately 15 days, a guard in my pod threw my special shampoo out and said I was not allowed to have it. The guard said I needed to have a prescription but I told her the doctor did not give me a prescription, but had still given this shampoo. The scalp irritation and scabs have returned. It is very painful and uncomfortable. I scratch my head all day and I don't feel any relief.
14. Recently, the facility also changed our toothbrushes. The new toothbrushes are small and fragile. They seem too fragile even for children. They only have approximately 3 small clumps of bristles.

15. Since on or around September 28, 2026, the guards told us that we have to reuse the disposable cups they give us to drink water. However, we do not have anywhere to keep the cups and they get dirty from all the dust in the pod. There are also a lot of flies in the unit and I am worried they will get in the cup. We don't have a way to clean the cups either. The guards do not provide more cups if they run out, so if we do not reuse the cups, then we're not able to drink water from the fountain.
16. I feel uncomfortable and frustrated because we are denied access to basic hygiene to keep us clean and feeling like ourselves.

Approximately one year at Camp East Montana

17. I do not feel like the guards will keep me or others in my pod safe. I have told guards about issues at the facility and in the pod that have even made me feel unsafe, but they don't care. They know what is happening here and they don't care. I don't think they would protect me if I ever needed them. They only protect themselves.
18. I still feel pain from when Officer Ortiz injured my arm on or around March 8, 2026. I described the incident in my last declaration. I have to massage my arm and keep moving it throughout the day or it feels numb.
19. Guards here have told me that Camp East Montana is supposed to be a place where people come in and out quickly, but I have been here for approximately an entire year, eating the same thing, getting sick frequently, being mistreated, and feeling ill from the food. It feels like I have no rights here. If we try to change things, by doing a peaceful hunger strike, for example, the guards threaten to take us to "the hole." Most guards also still do not wear visible name tags, which makes me feel like they are trying to escape responsibility or get away with doing things they should not be doing. It feels like nothing has meaningfully changed or improved here in the time I have been here.
20. I only find joy when I speak to my family, especially when I see my daughter on a video call. She is only approximately a year and a half old. I only feel happy then, knowing that she is okay, even though I am heartbroken to be away from her. I want to care for her and see her grow up. I want to be there for her. My family is struggling to get by without me. I cannot say that there are any other moments of joy or peace here besides the moments of connection with my family. Joy does not exist here.
21. I am worried for myself and others who are detained at Camp East Montana. Conditions have already been unsafe, unhygienic, and dehumanizing here for such a long time, and I am worried that things could still get even worse. There's so much injustice and abuse. We're abandoned here and it feels like no one can help us. I am submitting this declaration in hope that things can change and improve.

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 02 of October, 2026 in El Paso, Texas.

Signature: AAR

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 **Alfredo Antonio Reina** and read the foregoing declaration to him, translated into Spanish faithfully and accurately **Alfredo Antonio Reina** 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