

SECOND SUPPLEMENTAL DECLARATION OF GERALD AKARI ANGYE

I, Gerald Akari Angye, 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. My name is Gerald Akari Angye. I was previously detained at Camp East Montana, an immigration detention center in El Paso, Texas. I was brought to Camp East Montana on or around April 22, 2026 and was there until approximately the week of July 25, 2026.
2. In the time that I was at Camp East Montana, the conditions were consistently horrible. Since I last signed a declaration regarding conditions at Camp East Montana on May 27, 2026 to the time I was transferred and deported, nothing had significantly changed at this detention center. This declaration details the conditions I experienced at Camp East Montana toward the end of my time there, which was approximately July 2026.
3. The food at this detention center continued to lack in both quantity and quality. The quantity was small: approximately 10 bites of food per meal. The food did not fill the containers it was in. The containers were significantly larger than the food contained inside. The quality was lacking. The top layer of food often came out cold even when some of the food underneath was warm. The food sometimes smelled like it was spoiled. We had no choice but to eat the food because there was no alternative. There was no commissary and no vending machines. Even if there had been access to commissary or vending machines, I would have struggled to pay for additional food while in detention.
4. There was still dust almost everywhere. I could see the dust suspended in the air when wind was blowing against the tent. When the wind blew outside, the dust came inside in our housing units. For months, I and others in my housing unit were coughing because of the dust. I had this experience in Alpha-10, Alpha-9, Bravo-9, and Bravo-11 during my total time at Camp East Montana. I often couldn't sleep because of my own cough and other people's coughing at night. Upon waking up, I would find my blankets often covered with brown dust bits.
5. Through the end of my time at Camp East Montana, I did not have regular access to soap. It came in a very small flat packet that was not enough to even wash just my hair with, let alone the rest of my body. Because there was not enough soap to go around, I sometimes gave part of my limited soap to others who had none. I did this because I thought it was the right thing to do. We also did not have access to hand sanitizer for when we used the toilet. At another detention center I was at in New Mexico, there was hand sanitizing soap available on the wall. This was not the case at Camp East Montana. Because they didn't give us enough, I and others sometimes could not wash our hands with soap after we used the toilet or before we eat.

6. Toilet paper also remained a scarcity. For example, one time there was no toilet paper in the unit. I happened to have saved some by my bedside, but other people had none. During my attorney visit on that day, I was anxious that other people may have used my toilet paper while I was in the visitation booth and I would be left without any.
7. There were regular searches of my bed area, including where my legal materials were. These searches started after the lawsuit against Camp East Montana was filed. Often, these searches would happen when I was away from my bunk, such as when I was in the medical unit or at recreation. I would find out that the guards searched my bunk because my bunkmates would tell me when I returned to the unit. I also believe that the guards went through my legal papers, because sometimes my documents would be all shuffled around under my mattress when I returned to my bunk. When I was away from my bunk, I would worry that a search would happen.
8. The laundry situation remained problematic. I believe we were supposed to have three pairs of clothes such as pants, shirts, socks, underwear, and one sweater, since this is what I was originally issued at this facility. However, clothes went missing in the laundry, so I usually did not have three pairs of these clothes. I was anxious about sending clothes to the laundry because they routinely went missing. I tried to ask for additional clothes when people were about to be deported so I could finally wash a shirt and still have another one if it went missing. I always tried to wash my socks and underwear by hand because I did not want to lose those, but this was difficult because we did not even have enough soap or shampoo to wash ourselves.
9. Recreation continued to take place in a covered tent, so we could not see the sky above us. I missed seeing the sun. My body felt weak without it, and we were not provided with vitamins to make up for the lack of sun exposure. Human beings need to see the sun. It feels horrible to go as long as I did without seeing the sun. Frequently, there was no guard outside with us when we were in the recreational area. This caused issues because when people played soccer, for example, sometimes there were injuries or emergencies. During recreation, we were locked in the covered tent and had no way to obtain help ourselves. It was risky to not have a guard there in case of an emergency. This made me nervous about getting hurt during recreation.
10. In or around July 2026, I and others were recently moved from Bravo-9 to Bravo-11 because of water flooding in the housing unit from the toilet. Water was flooding daily from the toilet area down to the common area where we eat meals and watched TV and tried to relax. The toilets were so close to this common area that we could smell urine and feces in the common area when someone was using the toilet. The water that pooled from

the toilet area was yellow and seemed dirty. Often, the toilets did not have enough air to suck the feces in, so they did not flush. The water rose to the top of the bowl and feces used to come up with it. When we reported it, officials would sometimes come in to take pictures, but the situation often remained unfixed. None of the toilets in Bravo-9 had been fixed for approximately three weeks until we were moved. When we were moved to Bravo-11, the area was extremely dirty, including the toilets, and we had to clean it all ourselves.

11. There are serious issues with access to the law library. Despite the thousands of people at this facility, there were at most two computers that usually seemed to work in the law library. Even on those computers, we could only access blank legal forms and some pre-downloaded documents from Lexus Nexis. There was no Internet for us to search for information specific to our own cases. We usually could not print out documents because the printer was routinely not working. Printing was a critical function because we were only allowed in the law library for a limited amount of time and needed to be able to review and access our documents in our housing units. Access to the law library was inconsistent. Sometimes officers told me that I could not go to the library because there was no male guard available to pat me down. I especially needed to go to the law library because I did not have an immigration or habeas lawyer before I was deported and I needed to work on my case myself.
12. There were also serious issues with inconsistent access to the barbershop, including to trim our fingernails or cut our hair. We were required to sign up to go to the barbershop if we wanted to trim our fingernails or cut our hair. The barbershop was supposed to be open every week but officers only took small groups of people periodically with weeks passing in between. I also sometimes missed opportunities to go to the barbershop because the announcements were made in Spanish. At the barbershop, I saw only two nail clippers that everyone was expected to share. Between each use, they dipped the nail clipper in a blue chemical. For shaving, guards would bring a razor to us in the bunks to use and then we would give that razor back to the guards. We did not have access to mirrors to see our faces while shaving. For the razors, guards would bring one razor to the person in the bunks to use and then the person would give that razor back to the guards.
13. My left wrist and lower back, which were injured after officers at Camp East Montana used force against me on or around April 30, 2026, remain in significant pain. On or around July 13, 2026, my wrist got swollen and painful again. The pain comes and goes, but does not go away completely. When I try to rotate my left wrist, I can sometimes hear a clicking noise that I do not hear in my right wrist. I still cannot bend forward at a 90 degree angle due to pain in my lower back. My left wrist still swells up. I am worried my

left wrist and lower back will never be the same. I worry that this pain will remain permanent.

14. Most guards at Camp East Montana would hide their name badges when they were working. Some would flip their name badges backwards or would tuck it inside their uniform. This caused me to not know who was who. I think guards' names should be exposed without detained people having to beg to ask what their names are. Guards hiding their identity from view at Camp East Montana made me feel insecure and nervous and like things weren't happening properly there.
15. I was transferred from Camp East Montana to the Florence Service Processing Center, which is an immigration detention center in Arizona, late in July 2026 before being deported to Cameroon. The biggest issue I experienced at Florence was that I was transferred without any of my medications from Camp East Montana and I was transferred without the brace for my wrist injuries. When I went to the medical unit in Florence, I was told that Camp East Montana had not sent any records about my medications. When I had been transferred from New Mexico to Camp East Montana, records of my medications had been transferred with me. But it did not seem like Camp East Montana had transferred records of my medications. The medications I had been taking at Camp East Montana included a muscle rub and a medication I would take in the evenings for inability to sleep. Not having these medications when I was transferred made me feel disoriented and in pain. In addition, at Camp East Montana I had a brace for my wrist injury. Without it, I experienced severe pain, especially at night.
16. Even though I am now in Cameroon, I remain committed to this lawsuit and feel it is important to document what I experienced while I was there. Other people remain at Camp East Montana now. I worry for their health, safety, and wellbeing. I hope that there will be justice and relief for everyone who is experiencing the trauma of detention at Camp East Montana.

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

Executed on the 5th of October 2026 in Cameroon.

Signature: _____

