

DECLARATION OF DANIEL FERNANDO CHAJON MONROY

I, Daniel Fernando Chajon Monroy, 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 Daniel Fernando Chajon Monroy. I have no criminal record here or in my home country. I am 31 years old. I am from Guatemala and have lived in the United States since approximately 2023 as a person seeking asylum. Before I was detained, I lived in Pompano Beach, Florida. I lived with two of my brothers and my cousin. My brothers and eight of my cousins are all citizens, and one of my cousins is in the army. I worked for a roofing company while in Florida, and paid U.S. taxes for two years.
3. I was first detained in Alligator Alcatraz, from on or about July 31, 2025 until on or about August 11, 2025, then spent approximately four days in a tent center in El Paso while being transferred. I arrived at Camp East Montana on or about August 15, 2025, and was detained there for approximately seven months, until on or about March 20, 2026. I was then moved to El Paso Processing Center, where I was from on or about March 20 until on or about June 19, 2026. I was then moved to Cibola Correctional Center where I was detained until on or about late September, 2026.

Intake

4. When I first arrived at Camp East Montana, on or about August 15, 2025, I spent approximately six hours in the bus before entering. From the bus, I could see workers constructing sections of the center, installing windows and doors. There were approximately 48 people on four different buses. We were taken into the center in small groups while they continued working on some of the units.
5. The entrance room was very small, and there were approximately 40 people inside with me. I spent about 48 hours on the floor waiting to be processed, and they didn't finish processing me until a month after my arrival. People were either standing on the floor to make room for others, or lying on the floor to try and sleep. We were not provided with blankets or pillows. The only thing to do was talk to the others. I couldn't sleep at all because there was no space and the floor was hard. I saw people being processed, but more people arrived approximately every few hours, so the room was always full.

6. My lawyer told me he could not contact ICE. He tried to contact them regularly, both over the phone and over email, and could not reach them.
7. During intake, we received only a small sandwich and a few cookies three times each day.
8. I did not receive a medical exam during my intake. I eventually received a basic exam approximately a month after I first entered CEM.
9. I was not asked about my mental health during my intake.
10. I was not asked about disabilities or any need for accommodation during intake.
11. I was not allowed to call anyone during the intake. We did not receive access to the phones to call anyone until approximately a week after my arrival. I asked the officials verbally if I could call my attorney, both during the intake and after. They told me that only ICE could control who could make calls. Officers told me that there were only 10 ICE officials assigned for the whole facility. Around 4 of these officials were working remotely, from other states, only available through calls.
12. During intake, we never had an orientation or received any instructions. We didn't know how the rules worked. The guards didn't have a sense of the rules either, not even of a dress code. They didn't seem to have a manual or anything to rely on.

Housing Conditions, Safety, and Guard Misconduct

13. During the entirety of my stay at Camp East Montana, I wore a blue uniform which I understood to mean that I was in the low security wing. I do not have a criminal record. I was in the alpha-9 unit for approximately four months, then was moved to delta-9 for approximately 1 month, then moved from Delta-12 to Charlie-11 to Charlie-9 for the remainder of my time in Camp East Montana. The frequent moving as was hard for me, psychologically, because I was always living with new people, and it was very isolating. It was also harder for my family to call me because they often did not know where I was.
14. Often there was fighting at Camp East Montana because officers did not give us enough food, leaving many people very hungry. The portions were very small and insufficient for our bodies. This caused a lot of tension between us, including over who could eat first. In terms of food, January and February 2026 were the worst months because we were given even less food than usual.

15. When I was in Alpha-9, there were many conflicts due to guards not intervening when a group of detained people tried to control the room, such as by controlling who could use the telephone or the tablets and who was able to eat first.
16. The situation with the tablets was especially difficult because there were 18 tablets split between approximately 72 people. It was very difficult for me to obtain a tablet, which I needed to talk to my family. It was impossible to plan a call, even with my lawyer, because there were so few tablets, and if someone was using it, they would often refuse to give it up. I would sometimes spend an hour trying to call someone, and then when they finally picked up, someone would want the tablet after 20 minutes. Many times, because I wanted to avoid conflicts, I would just shorten my calls. The situation was frustrating, because at times I had specific questions for my lawyers, and they couldn't call at the hours when I was able to use the tablet – my lawyers were only available during work hours.
17. I was also unable to communicate regularly with my family because I didn't have consistent tablet access. This was very difficult psychologically – it increased my sadness and feeling of isolation and hopelessness.
18. I also noticed that most of the guards were either very young and inexperienced, or very old. The majority didn't appear to have worked in an environment like that before, and there was high turnover – many said they had been in their position for just a few weeks. The officers who worked the night and early morning shift seemed to often be practically sleeping. The guards did not seem to have the experience necessary to keep control of situations or keep us safe at Camp East Montana.
19. After being moved to Delta-9, on or about December of 2025, I experienced aggression from another person in my unit. He used force to skip the food line to receive food earlier, and he hurt me in the process. Three guards were watching, but they did not intervene right away. After some time had passed and I had already been injured, they finally intervened. I was taken to the medical area, where I waited for approximately an hour and a half and was then examined by the doctor.
20. I reported this incident various times through different petitions on the tablet, but all my reports were ignored. My lawyer tried to report it as well, and communicated with ICE directly, but I understand that he was also ignored.
21. The situation was made worse because it was very difficult to communicate with my lawyer; we could not have communication with our lawyers except through the tablet, and it was difficult to have communications that weren't recorded and that were confidential and secure. Before Camp East Montana, I was in Alcatraz in Florida. There,

we had a limited amount of free phone minutes each month, and it was easier to call family and attorneys. At Camp East Montana, we had to pay for all our calls.

22. When we had court dates, officers would take us out of our rooms the day before and have us wait in a room for up to approximately ten hours. Several times, when I had a court date, I was removed from my room overnight and taken to a room with no beds or chairs to wait. We had to sleep on the floor, and the transport would come at approximately 6:30 in the morning.
23. After arriving at the court, we would have to wait for several hours in the bus. It was very difficult to go through all of this before even arriving at court. I would arrive to court without having slept well, worried about the court date, and feeling disordered, on a day when I wanted to present myself well. Once we arrived at court, we waited in a room with no chairs or benches or anywhere to sit other than the floor, and we could not leave the building until everyone's appointments were over. It took as long as two hours for the bus to come to go back to the facility. While at Camp East Montana, I went to court four times, in approximately August, December, February, and March. Each time, it was almost 24 hours of torture just to go to court.
24. Many times my lawyer would send me documents, and I wouldn't receive them. Using a tracking number, my lawyer could see the documents had arrived at the facility, but it usually took a week or two for me to actually get them after they arrived, and sometimes I never received them at all. I would ask the officials and provide the packet number and everything, but would still not receive them. At times, there were documents that I needed to sign for my case, and my lawyer would have to send them multiple times.
25. With a group of others in my unit, I decided to report the behavior of six others in our unit who were intimidating people because we didn't feel safe. We submitted sixteen reports to staff collectively in one day, using paper slips to submit them directly to officials, but the reports caused more problems once the group saw us submit them. It was also difficult, because there was no guarantee that the staff had submitted or processed the grievances, and we did not receive any proof. An officer came to the unit and told us that we needed to learn how to live together, but nothing actually changed and they didn't punish anyone. And we then received threats from others in our unit because we had submitted the complaints. I felt after this that it was better to just stay in my corner and avoid contact with the others as much as possible, especially because there was no system to resolve issues.
26. I worked in the law library at CEM for approximately four months, from November until March, but it wasn't even really a library. You could hardly access any legal resources. In

the library, my job was to help people use the computers, the copy machine, and help them look up information for their cases and fill out basic legal forms. I signed a contract in November saying that I would receive one dollar per day for this job, but I never received any pay.

27. There were other language access issues as well. About half of the guards spoke Spanish, so although I had issues communicating with some of the officers, there was usually someone around who spoke Spanish well. But I noticed it was more difficult for others who didn't speak English or Spanish. When I was in Charlie-9, there was a person who only spoke Chinese. Another person who spoke both languages translated for him, but there was no formal translation and he could not communicate with any of the guards.

Medical Conditions and Quarantine

28. The housing conditions were very unhygienic. I did not receive enough soap, and the bathrooms were never clean. During the time I was in Camp East Montana, I received approximately two small packets of soap every week, each about half the size of my palm, and rarely received toothpaste. There was also often no toilet paper. The bathrooms were very unhygienic. While I was in Charlie-9, on or about February of 2026, I asked an official for more hygiene supplies, and he told me that ICE should not waste their money on us.
29. On or about December 2025, the dust from outdoors began to cover everything. The tents were unable to keep the dust out. Our beds became coated in dust. I and others I knew requested masks many times to deal with the dust, but officers never gave us masks. I had problems in my throat and difficulties breathing and eating when the dust was at its worst.
30. When the dust became a problem, around December of 2025, I began requesting help from the guards. I experienced inflammation in my throat, difficulty breathing, and my eyes stung. I was requesting assistance or some kind of treatment practically every day during this period – asking for a mask, asking for the unit to be cleaned or to be moved. They didn't clean the dust inside our rooms at all. After approximately a week, when I and others in my unit were asking the guards approximately everyday about addressing the dust, they sent several nurses to examine us. We did not meet with a doctor.
31. About five or six days after the examination, we received allergy pills. At first, I was taking the allergy pill three times a day, but this made me drowsy, so eventually I just took it once a day. I took the pills for approximately one month, in or about December 2025 and January 2026. The pills did not seem to help, especially since the problem with

the dust was so persistent. We did not receive masks and did not see any type of filtration system installed.

32. When I was taking the allergy pills, I did not always receive the pills on time and sometimes did not receive them at all. Many people had this issue with their medication. I knew someone with diabetes who often did not receive medication on time.
33. I made approximately three petitions to access my medical records while in CEM. I made the first two petitions in or about November 2025, after they had finally given me a medical exam in or about September of 2025. I requested my medical records again in or about December 2025. I wanted to send the documents to my lawyer. Officials did not provide me with my medical records and instead told me my lawyer had to request them.
34. While in EPSPC, I received treatment after hitting my head and requested my medical records there. They sent them to me after one request, and those records included some records from Camp East Montana.
35. There was one person in my bunk in charlie-9 who had an illness, I think it was a kidney problem, and issues with inflammation. I saw him spend approximately eight days without being attended to, in bed. He couldn't get out of bed. The rest of us helped him sometimes, including by helping him use the bathroom and bringing him food. He wasn't able to walk. He was older, in his 70s. Officials ignored him and did not provide help even when he asked for it. Another person I knew had a pacemaker and was often in pain because he needed to be attended to, but was ignored.
36. I was quarantined twice: 8 days for COVID and 10 days for tuberculosis. In quarantine, the conditions were the same as in the usual housing units, except we could never leave our rooms. They kept people who were not sick in the same unit as those who were sick. Both times I was quarantined, it was someone else in my unit who was sick. I felt anxious and struggled to sleep during quarantine because I was worried about getting sick.
37. I requested help for my mental health but was refused. I asked the guards multiple times while in the Delta unit and again in the Alpha unit if I could meet with a psychologist, because the stress and my mental health were worse there – there was a lot of stress from living around so much intimidation and violence. I was never taken to meet with a psychologist. Those I knew who received mental health assistance were seriously depressed or in the medical center for other reasons – otherwise they would not let you meet with a psychologist. There was a form that we gave to the housing officials, and the officials were supposed to submit it to the medical area, but even after submitting one

multiple times, I never heard a response, and they never gave me the opportunity to meet with a psychologist.

38. I received my medical intake approximately a month after arriving, when I was in the Alpha-9 unit. During my intake, I requested seeing the dentist for pain in my tooth. I had to wait approximately two months after requesting to see the dentist. Those months were very painful; at times I couldn't sleep from the pain. During these months, I asked the guards many times for medical assistance, but they told me I had to wait for the dentist. I reported this through the paper slips. The problem with the tablet was that you could only make two reports each week. You could make paper reports every day, but they were less secure, and there was no way to know if there was a register of any of our complaints or reports.
39. My tooth was extracted on or about January of 2026. A nurse examined me initially, and decided that it should be extracted. The only option I was offered was extraction. They didn't offer or mention anything else, like fillings or other procedures. I never saw the tooth, because I had no access to a mirror. After the examination, the nurse submitted the form to either the doctor or the dentist, and they authorized the procedure. I received antibiotics for approximately five days before the extraction. I saw that the antibiotics were supposed to be taken for around thirty days. I did not see the dentist until the actual procedure. The dentist gave me two units of anesthesia during the extraction.
40. Afterwards, I asked the dentist if I could receive further antibiotics and different food. He told me they didn't have alternate food to offer, and that he didn't have authorization from the doctor to give me further antibiotics. I then asked a nurse, around four days later, if I would be receiving further antibiotics. I was told again that they didn't have authorization from the doctor. I'm not sure if authorization was never requested, or if the doctor, said no, or what happened.
41. After, on the same day, the guards forced me to just keep working in the library. I asked if I could rest, and they told me to just keep working, even after I asked them multiple times. I was given pills for pain approximately five days after. I requested different food as well, but I was refused. It was difficult to eat because of the pain and because of how the injury affected me.
42. I am no longer detained in Camp East Montana and thankfully have since returned home to my family in Florida. I am sharing my experiences because I do not want anyone to have to endure the conditions that I lived through while in Camp East Montana.

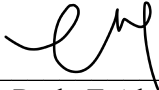
Everything in this declaration is true and correct to the best of my knowledge and recollection.
This declaration was read back to me in Spanish, a language in which I am fluent.
Executed on the 7th of October, 2026, in Pompano Beach, Florida.

Signature: _____

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Perla Fabiola Alvelais, certify that I am fluent in both English and Spanish. On October 6, 2026, I personally spoke with **Daniel Fernando Chajon Monroy** and read the foregoing declaration to him/her, translated into Spanish faithfully and accurately. **Daniel Fernando Chajon Monroy** 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.

Signed: 
NAME: Perla F Alvelais

Date: 10/9/2026