

DECLARATION OF FRANCISCO RAMON ROSSA CHANCHAMIRE

I, Francisco Ramon Rossa Chanchamire, 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 Francisco Ramon Rossa Chanchamire. I am 35 years old and from Venezuela. I am bisexual and HIV Positive. I have been HIV positive for approximately five to six years.
3. I am currently detained at the El Paso Service Processing Center in El Paso, Texas. I was formerly detained at Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I was at this facility in February 2026 and April 2026. Between these two times, I was in an ICE detention facility in New York and then at the Port Isabel Detention Center in Los Fresnos, Texas.
4. At Fort Bliss, I was held in the following units: D8, D1.
5. **Medical care.** When I was first transferred to Camp East Montana, the facility didn't give me my HIV medication for approximately five days. I told the workers that I've been taking HIV medication for approximately five to six years and need my medicine. The facility responded that they didn't have the medication because ICE can't cover it, so a foundation would need to donate the medication. After five days, the facility told me that a foundation is going to send the medication to the facility. But even after the foundation started sending my HIV medication, there were days when the guards at Camp East Montana didn't give me my medication at all. For approximately ten or eleven non-consecutive days, I never received my HIV medication.
6. During my first week at the facility, the workers took a CD4 blood test to confirm that I have HIV but they told me they lost one of the blood samples. Afterwards, they told me that my CD4 blood count was good, but when I asked to see my results, they said I needed to fill out an authorization form. The workers never took another blood sample and they never gave me an authorization form to fill out.
7. When I was back at Camp East Montana the second time in April 2026, I never received the correct dosage of my HIV medication. There were also days when I didn't receive any medication, like when I was in solitary confinement. Because I've had HIV for approximately five to six years, I know that my HIV dosage needs to be at least 600 milligrams to be fully effective. But Camp East Montana only prescribed me HIV medicine that was less than 500 milligrams. When I told the medical staff that I needed 600 milligrams of HIV medication, they responded that in the United States, there is no 600-

milligram HIV medication. When I told the facility worker that I received 600 milligrams of HIV medication in New York, the facility worker responded that the 600-milligram HIV medication in New York was old and doesn't exist anymore. I told the facility worker not to lie to me and she said, "It doesn't matter because you can just go back to Venezuela." But I can't go back to Venezuela because I am afraid I will die there. I have six friends in Venezuela who died because they couldn't get their HIV medication.

8. **Dental care.** I also suffered inadequate dental care at Camp East Montana. When I told the medical staff that I have a broken molar, they responded that there is no dentist at Camp East Montana and I'd have to wait six months for dental services for an extraction. I was already transferred from Camp East Montana at six months and I never got my broken molar taken out.
9. **Treatment by the guards.** Because of my sexuality, I was sexually harassed by the other detainees in my pod and all the guards did was laugh. For four days, the detainees harassed and threatened me. It was awful. Instead of doing something to stop this, the guards laughed along. It was like a game to them. Those four days, I made approximately six or seven requests pleading for help and asking to be moved to a different pod. On the fourth day, I told the guards, "If you don't help me, I'm going to call PREA." When I said that, all the guards came and they moved me from D8 to D1. They didn't move any of the detainees that were sexually harassing me. Then, Camp East Montana sent me to another detention facility in New York.
10. **Food and Water.** The food at Camp East Montana was rotten and gave me acid reflux. I saw a sticker on the frozen meal indicating the food was made in November 2025. That was in April 2026.
11. For approximately fifteen days, the facility gave us the same meal for breakfast, lunch, and dinner. The meal consisted of sausage, carrots, and a tortilla. Because the food gave me acid reflux, I didn't eat it. The guard told me that if I didn't eat the food, he'd send me to SHU, which is solitary confinement. When I couldn't eat the food because of the acid reflux, the HIV medication made me feel extremely sick because it is meant to be taken with food.
12. **Solitary Confinement.** I was in solitary confinement for approximately three days because my body couldn't tolerate the food. In solitary confinement, the guards only gave me an apple and a cookie, which I ate. Around 10 or 11 PM at night, the guards woke me up and said that I needed to sign a blank piece of paperwork but wouldn't tell me what for. I signed the paperwork so I could go back to bed. Afterwards, while I was still in SHU, I asked to speak with the mental health providers because I was so frustrated to be in solitary confinement for not being able to tolerate the food and because the mental health providers were the only ones who listened to me. The mental health providers evaluated me and told Lieutenant Gonzalez that I shouldn't be in SHU because I wasn't participating in a hunger strike. Then, Lieutenant Gonzalez talked to the guards because apparently the blank paper

I signed in the middle of the night was part of ICE paperwork that said I was voluntarily in solitary confinement for participating in a hunger strike. Lieutenant Gonzalez told the guards I wasn't doing a hunger strike because I ate the apple and cookie, and that the issue was my body not tolerating the food, which is not grounds for solitary confinement. That day, I was taken out of solitary confinement.

13. **Dust.** There was dust everywhere at Camp East Montana. It covered the tables in our pod and made us all sick. When the dust storms happened, all of us would cover ourselves with blankets to protect us from the dust.
14. **Continuity of Care.** In April 2026, I was transferred from Camp East Montana to the El Paso Service Processing Center. Staff at the Processing Center told me they didn't have a document telling them that I was a patient with a chronic illness. I know from my experience being transferred from one detention center to another that usually a detention center sends a medical summary of my medication so the next detention center will know about it. Staff at the Processing Center told me they didn't see this type of transfer documentation when I arrived at the Processing Center. I knew I needed my medication, so I asked the Processing Center staff to check my belongings and that's when they found the 30-day supply of my medication for HIV. Approximately four or five days later, I saw a doctor at the Processing Center and he told me there were no online records of any medical exams conducted at Camp East Montana, including for the CD4 blood test and HIV viral load. The CD4 blood test was the test where Camp East Montana told me they lost one of the samples and never showed me the test results. Because there was no evidence of any medical exam conducted at Camp East Montana, the Processing Center had to order new medical tests, including the CD4 blood test and test for the HIV viral load.
15. Being in Camp East Montana was hell because I didn't receive adequate HIV medication, I was sexually harassed by detainees in front of guards who laughed it off, and I was put in solitary confinement for not being able to tolerate food that made me sick. I am writing this declaration in case I am returned to Camp East Montana and to help those detained there, even if it can't change what I have already suffered.

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 8 th of octubre, 2026 in El Paso, Texas.

Signature: Francisco R

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, **Charlotte Weiss**, certify that I am fluent in both English and Spanish. On October 5, 2026, I personally spoke with **Francisco Ramon Rossa Chanchamire** and read the foregoing declaration to them, translated into Spanish faithfully and accurately. **Francisco Ramon Rossa Chanchamire** affirmed that they 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: Charlotte Weiss Date: 10/8/2026
NAME: Charlotte Weiss