

DECLARATION OF YAJAIRA ELIZABETH GRANDE AGUILAR

I, Yajaira Elizabeth Grande Aguilar, 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 Yajaira Elizabeth Grande Aguilar. I am 20 years old and from El Salvador.
3. I am currently detained at the Camp East Montana ICE Detention Center, located in El Paso, Texas. I was detained by ICE in Virginia on September 8, 2026, was later transferred to Richwood Correctional Center in Louisiana, and then on around September 12, 2026 I was transferred to Camp East Montana. Before I was detained by ICE, I lived in Herndon, Virginia for about 4 years. I lived with my mother and brother and my US citizen son.
4. When I was first brought to Camp East Montana, officials put me in a holding cell for approximately 7 hours in total before being moved to the unit. In that time, I saw medical staff briefly. The room was small and there were three benches in it when we arrived. There was nowhere to rest. I told officials that I had asthma and I wanted to talk about the experiences of postpartum depression and anxiety I felt I was having. The people in the nurse office did not speak Spanish, which is my language. I needed to see someone that could understand me when I spoke in Spanish. I have asthma and chronic sinusitis. I was given a rescue inhaler.
5. Medical staff do not always respond timely to emergencies. Around mid-September 2026, I saw the lack of response from the medical staff and guards during a medical emergency when I was in the Alpha-12 unit. My roommate accidentally fell off the top bunk and hit her head very hard when she fell out of the bed onto the hard floor. We tried to get medical help and the guards' attention since she was not responding and had passed out. The medical staff never came by to help.
6. **Mental health care.** I suffer from feelings of postpartum depression and anxiety, which I understand I have had since June 2025. From when I first arrived at intake at Camp East Montana on or around September 12, 2026, I tried to get mental health care. On September 29, 2026, I was finally taken to the psychologist to get a mental health evaluation. They asked me several questions. They then told me that they were concerned about my responses and said that they were going to be watching me, and that if things got worse they would send me to another room so they could watch me there too. When I returned to the unit from my appointment, I didn't receive any new medication to treat

my conditions until approximately October 4, 2026. No one came to check on me until approximately October 4, 2026, when I finally started getting my medications called something like hydroxyzine and Sertraline twice a day. The pills made me feel dizzy, and gave me headaches, and chest pain. The pills did not noticeably address my mental health concerns.

7. On or around October 2, 2026 at approximately 4:30 PM I was sent to medical but no one told me why. I was locked in a room for three hours. An official would watch me during that time. Then the officials took me to a room with an interior room, and then two nurses arrived. Guards asked me if I was pregnant and I said no. They started laughing after I said that I was not pregnant. They seemed confused about why I was in the room. An ICE agent then came into the room and said that he had my court documents but he didn't know if I had a court date on the 20th or 27th. Then he left. Then I was kept in the room for another approximately two hours because count had started. I was returned to my unit, Alpha-13, at approximately 1:45 AM. It was confusing.
8. **Recreation.** Since I have been detained at Camp East Montana, I have rarely had outside recreation. I saw a poster on the wall that says we are supposed to get fifteen minutes of recreation every day, but we are not taken to recreation daily. We are taken to the recreation-type area approximately once a week for about half an hour to an hour. There is a chain fence and part of the top area of the recreation area is covered, so I often do not have access to the sun. It feels like we are always locked up. There is nothing to do in recreation. This has all affected my mental health and made me feel sad and stressed. It's so easy to lose track of the days and our connection to nature.
9. **Hygiene and Cleanliness.** It is difficult to stay clean and maintain hygiene while detained at Camp East Montana. There appears to be rust in the showers. There is an awful, strong scent coming from both the bathroom and the showers. Sometimes the unit gets so dirty that we clean the bathrooms, showers, and the room ourselves. Sometimes, we get a broom and a mop to clean with, but we don't get any soaps or cleaning chemicals.
10. We don't get enough shampoo, especially for us girls with longer hair. It is very difficult to stay clean with the small packets of shampoo that we get. In our unit we only have one working shower out of the five in the unit, and we only get 5 minutes to shower a day. The guards have not done anything to fix the broken shower. It is very difficult to get clean in the shower, and the water pressure is very low. Because of this, sometimes I am unable to shower even for six days and my hair is very dirty. The last time I was able to wash my hair was about four weeks ago, I feel filthy. Drying off after a shower is very

difficult, our towels are the size of hand towels, it is hard to get properly dry with them or have privacy when we are drying off.

11. **Food and Water.** I also struggle with gastrointestinal issues. The food here is very bad. Officials don't always heat up the food well. Sometimes we will get frozen food. The food is also heavily oiled. You could easily fill approximately half a plastic water cup with the oil that is in our food. I have been getting regular diarrhea, a terrible stomach ache, vomiting, and I feel a regular weakness in my body. A few weeks ago, I had to stop eating due to the symptoms I was having. For two and a half weeks I was so sick that I couldn't eat the food at all. The guards told me that even if I wasn't going to eat the food that I had to grab the food and just to throw it away. Other times guards would tell me to eat the food by telling me that if I didn't eat I would be sent to the hole as punishment. There have also been two days during my time at Camp East Montana when I was not offered food at all. The water also tastes very bad. It tastes very metallic and stagnant. It is hard to feel hydrated with water that tastes so bad. When I first got here, I was constantly dehydrated but I force myself to drink the water because I worried I will become sick or very weak otherwise. I feel that I have lost a lot of weight. When I arrived, I kept my underwear which was very tight. Now my underwear is so loose it falls off.
12. **Irritants in the Air and on Surfaces.** There is dust everywhere at Camp East Montana. It covers our beds, the floor, and I can sometimes see it floating in the air. The dust is everywhere, I wake up approximately every morning with a stuffed and bloody nose from the dust. I struggle to breathe and my throat is irritated because of the dust.
13. **Rain and Leaks.** There are leaks from the roof and when it rains it comes into our room from the ceiling.
14. **Temperature.** The temperature in the unit is either super hot or super cold. We only get one blanket that is very thin.
15. **Legal Access.** It is also very challenging to communicate with my attorney. If I have a meeting with my attorney during a meal time, I have to miss the meal. I have to end up choosing between talking to my attorney and going hungry or eating to ease my hunger. In addition, there is not a way to try to request a call with my attorney or to call them in a confidential space unless my attorney sets up the call with me. Also around September 16, 2026 I asked officials to let me call my attorney and officials would not let me place the call. I was told that no one at Camp East Montana is able to win their cases, and that trying to contact an attorney to fight my case was a waste of time. I was told that if I am

at Camp East Montana it is because I am going to get deported. I have also tried to get a notary appointment and officials won't let me see a notary.

16. **Treatment by Guards.** There has been a lot of disorder amongst the guards. The rules don't seem to be applied consistently, such as the rule about going to bed when the lights dim, which is applied inconsistently, or the rule about who gets to use their tablet during count. In some cases, the guards seem to treat us differently based on the color of our skin. This is humiliating for me. I have noticed how guards seem more lenient on rules and they help people with lighter skin faster than people with darker skin, such as myself. For example, I sent my uniform to wash and they didn't want to return them to me and gave me the clothing of someone else that was used even though I had asked for new clothes. But when this happened to a lighter skinned lady, she asked the same guards to give her new clothing she got all new clothing.
17. I had an issue with a morning sergeant, who lifted my mattress halfway while I was sleeping, she called me a fucker and then walked to the other side of the bed and pretended to punch me. I made a report about the incident, but I didn't know who the sergeant was at the time. The sergeant did not have her nametag displayed anywhere on her uniform, and she was dressed in all black and had a bullet proof vest on. I gave my filled-out complaint to a sergeant on or around September 21, 2026 and received a response that they did not know who did this. I later found out on my own that I think the sergeant's name is Torres.
18. On or around September 15, 2026, I didn't have my bracelet on my wrist because I was sleeping, so I left it on top of my bed so that if the guards walked by they could see my name/information and it would be visible if they decided to do a count. When I got in line to get the food without my bracelet, guards didn't let me have breakfast that day at all. This felt arbitrary and I was left feeling hungry.
19. The conditions in this facility are abysmal. I do not feel safe here.

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 13 of October, 2026 in El Paso, Texas.

Signature: _____

A handwritten signature in black ink, appearing to be "M. Lopez", written over a horizontal line.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, **Yajaira Elizabeth Grande Aguilar**, certify that I am fluent in both English and Spanish. On October 13, 2026, I personally spoke with **Yajaira Elizabeth Grande Aguilar** and read the foregoing declaration to her, translated into Spanish faithfully and accurately. **Yajaira Elizabeth Grande Aguila** affirmed she 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: 10/13/2026