

EXHIBIT 1

SUMMARY OF DECLARATIONS

TABLE OF CONTENTS

PUNITIVE CONDITIONS 1

 Use of Force.....1

 Harassment, Coercion, and Unprofessional Conduct by Staff 9

 Excessive and Unprofessional Body Searches 16

 Conditions in and Misuse of Solitary Confinement 19

 Degrading, Prolonged, and Inadequate Intake Process 25

 Handbook, Rules, and Orientation.....34

 Housing Layout and Lack of Windows 35

 Dust and Sand Intrusion.....42

 Unhygienic Living Conditions, Inadequate Cleaning and Cleaning Supplies 49

 Lack of Soap, Personal Hygiene, and Grooming Supplies.....58

 Excessively Cold Living Conditions 65

Idleness and Inadequate Programming and Recreational Opportunities	66
Tablets	77
Inadequate Nutrition and Water	79
Lack of Language Access	87
Comparison to Jail, Prisons, and Other ICE Detention Centers	89
Grievance System	92
INADEQUATE HEALTH CARE	95
Untimely and Incomplete Medical Screening	95
Inadequate Tuberculosis Screening and Protocols	99
Lack of Continuity of Care Upon Arrival	101
Lack of Privacy for Healthcare Encounters	104
Healthcare Encounters Late at Night or Early Morning	107
Inadequate Sick Call Process	108
Inadequate Medication Administration	118

Inadequate Specialty Care	125
Inadequate Chronic Care	126
Inadequate Response to Urgent or Emergent Medical Situations	129
Infectious Disease Controls and Quarantine Protocols	131
Failure to Provide Medical Records to Patients and Their Representatives	136
Continuity of Care Upon Release or Transfer	137
Inadequate Mental Health Care	138

<u>PUNITIVE CONDITIONS</u>	
Use of Force	
Angye Decl., ECF No. 2-27, ¶¶ 8-10	“I have experienced violence from officers while I have been detained at Camp East Montana. On or around the evening of April 30, 2026, an officer at Camp East Montana told me that I had to take my things out of my housing unit because I was going to be moved.... [My deportation officer] ... came back with documents that he tried to have me sign. I declined to sign the documents and I told him that I didn’t want to sign anything without talking to a lawyer first. [He] then left the room and came back in the room with a lot of guards, approximately 21 guards....” “I was sitting on the floor and had my hands behind my head. Officers shackled my legs. At that time, four other guards stormed into the room behind me. I remained calm with my hands still behind my head, though I was scared. One of the guards then forcefully twisted my left wrist and left hand....” “In pain, I was shouting out things like ‘You will break my hand!’ and ‘You are hurting my hand.’ However, the guard kept twisting my hand. Another guard twisted my little finger on my right hand. At that point I tried adjusting my arms because my wrist and hands were hurting so much. At that point, more guards stormed into the room. One of the guards smashed my lower spine with his boot and another guard had his knee on my neck. My nose was injured during this time. I could not stand due to the intense pain in my back. My spine and left hand in particular were in incredible pain....”
Angye Second Suppl. Decl. ¶ 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.”
ZOR Decl., ECF No. 2-30, ¶¶ 39, 54	“I have seen the guards also use force against people for minor things.... For instance, if someone refuses to leave the tables after 10pm because they are eating something or waiting for their medication, they can get in trouble. Sometimes people also get upset because they are not given their medications, not given enough food, or because they feel like their rights are not respected. When that happens, several guards will come - sometimes 3, sometimes 10 - and they will pepper spray people who are getting upset, put their knees on their necks, and take them to ‘the hole.’ If you could see the footage from the cameras in the housing units you would see the abuse and treatment we get from the guards.”

	“I have seen them beat up detainees for very minor things. I worry what they will do to me if they find out that I am speaking out against their abusive treatment of people at the facility.”
Ly Decl., ECF No. 2-9, ¶ 37	“I witnessed a use of force incident when I was at Camp East Montana.... [A] guy was banging things because we had not received our food that day that we should have received hours before.... I looked through the window and saw when a man was pushed down on the ground by multiple guards in the hallway. He was small in stature and there were about five guards on top of him. I felt sad and scared when I saw this.... I felt worried: what if they do this to me?”
Moreno Rodriguez Decl., ECF No. 2-15, ¶ 8	“The guards saw me standing in the room and ordered me to come forward and get on the van. I pled with the guards again and told them that I was Cuban, that I was scared for my life to go to Mexico. I did not want to go to Mexico. A guard then grabbed me and slammed me down to the floor. The guard threw me against the floor and approximately 4 or 5 guards came down on me. The guards stepped on me so that I would not move, and one of the guards put his knee behind my neck and pressed down forcefully. I was struggling to breathe and was scared I would pass out. I yelled out at them to stop and told them I would go with them. The guards cuffed my hands and feet and pulled me to stand. This caused pain to the back of my head and my back. I was in pain for over two weeks.... Other people later told me that the guards had also beaten several other people for refusing to go to Mexico.”
Do Decl., ECF No. 2-17, ¶ 25	“The guards have mostly been okay to me but I’ve seen them hurt other people. Sometimes they’ll bring about 20 guards at a time to take down one person. I saw that happen to a Cuban who didn’t want to go to be deported to Mexico. Staff left and came back an hour or two later with 20 or so guards to forcibly remove him from the pod. I saw them have to drag one guy out. To see that level of force made me scared to ask for help.”
PKP Decl., ECF No. 2-23, ¶ 27	“We called for the guards to come quickly and help [an elderly man having a seizure]. The guards came and yelled at us to return to our bunk bed. As I started to return back to my bunk bed, a guard impeded my walkway preventing me from returning to my bunk. I told the guard that he should help the man and that I was just trying to return to my bed. The guard then yelled at me and said, ‘Get back to your fucking bed.’ I responded in English ‘Don’t talk to me like that,’ even though I am not fluent in English. The guard then hit my upper right chest and moved me to the side. I was nowhere near the man who had collapsed, and I was not impeding the walkway. I responded to the guard that he should never do that, and I returned to my bed. The guard just laughed at me. When I was back at my bunk bed, the guard came to me and said, ‘Don’t fight with me because I like you.’ I asked the guard ‘Don’t ever hit me like that ever again, please.’ But the guard responded, ‘Or what?’ I interpreted the guard’s response as a threat

	even though I was just asking him to treat me with respect and that he did not hit me. At night, while I tried to sleep (but I could not sleep well because I was upset and a bit scared), the guard kept walking next to my bunk. In the morning, during the 5 AM count, the guard grabbed my bracelet and threw it into my face while I was laying down.”
HOK Decl., ECF No. 2-25, ¶ 30	“We all started to ask the guards to help the man [having a seizure] or at least pick him up off the ground. The guards came and yelled at us to return to our bunk bed. When I returned to my bed, I saw that as another detainee, PKP, was walking back to his bunk bed a guard impeded his walkway and was acting aggressively towards PKP. I overheard that PKP said that he was just trying to return to his bunk and pointed to his bunk, which is near to my bunk. That’s when I saw that the guard hit PKP on his upper right chest with a closed fist. After that, I just heard that PKP said something to the guard in a calm manner and then returned to his bunk bed.”
CCD Decl., ECF No. 2-26, ¶ 31	“I also know that there was also another detainee, PKP, who was physically assaulted by Officer Garcia.”
Navdeep Decl., ECF No. 2-28, ¶ 18	“On May 11, 2026, as we were coming back from yard (recreation) ... a guard asked me to put my arms behind my back. I was in pain, so I put them gently behind my back, but I was not able to all the way. I asked if I could explain and I tried to explain to the guard that I could not put my hands behind my back in that moment because of pain from existing injuries. However, the guard refused to listen and got agitated and said ‘put your hands behind your back!’ and he pulled me out of line and put cuffs on me very tightly for refusing to follow his orders. He cuffed me very aggressively, causing me a lot of pain. He also twisted my shoulder, which caused additional pain. Still, I did not resist. I repeated that I could not put my hands behind my back because of my existing injuries. He threw me in intake and said I refused a direct order. Then, 5-6 people from the DCT (disturbance control team) came. I was not resisting or being violent. I was already in pain, which is why I had not been able to put my hands behind my back initially. DCT officers cuffed me again, bruising my left hand and arms in the process.”
Nelson Decl. ¶¶ 17-19	“[At] around 1 pm, about 12 or 15 guards from the DCT team came into my pod. They were all dressed in black. They opened the door, took the tables out of the room, and started spraying everyone with pepper spray. They yelled at us to go to our bed. I was also sprayed. I ran to the water fountain to wash my face with water. One guard was walking around the pod pushing people forcefully and telling them to go to their beds. I was washing my face with water when he pushed me and told me to go to my bed. I did.”

	“There was total chaos in the room and in the adjacent pods. I saw a Dominican man lying on the floor. He was having trouble breathing. Three guards picked him up from the floor and when they did, he passed out. The guards dragged him out of the room from his hands and feet. I also saw people who were pepper sprayed while they were in their beds and guards were telling them to get down. We were very confused about what we were supposed to do or where we were supposed to go. I saw men whose eyes were closed shut from the pepper spray get shackled and thrown on the ground face down. I saw four guards drag a Colombian man through the ground.... Before the guards grabbed him, the man was laying in his bed. He wasn’t doing anything, but the guards came, sprayed him in the face and dragged him away. He was bleeding above his eye. I never saw that man again. Most of the people that the guards took out of the room never came back to the pod. All the people that were visibly hurt or bleeding never came back. They guards took approximately 14 people out of the room.” “Once the DCT team left the room, the staff did not treat anyone for the pepper spray exposure or let us out of the pod. I told people to wash their faces with milk or water. There are no windows in the pods, and there is no ventilation. The guards did not open the door either, so the pepper spray lingered in the air for hours and until the next day.”
Rivero-Gonzalez Decl. ¶ 9	“I suffered abuse by guards when I was at Camp East Montana.... I was in my unit and guards came for me. I was in my wheelchair, and they pulled me outside to the hall. I went outside in the hallway to talk to ICE officials. The ICE officials told me that I had to agree to be deported to Mexico and that they were going to take me, even if I did not want to. They handed me a piece of paper to sign which I refused to sign. I asked if I could get my personal belongings and legal file related to my habeas case, but the ICE officials told me no. Suddenly, the guards started to push me down the hallway to take me to the bus outside, even though I had not signed anything. In protest, I threw myself to the ground and that’s when the guards jumped on top of me, punched me, inserted their knuckles into my ears, and forced handcuffs onto me, injuring my arms and hands. The guards kept closing the handcuffs on my wrists and forcing them into my bones which was extremely painful and caused a dent on my wrists. Then they placed a cover over my head, I told them I was claustrophobic, but they did not care. They forced me back onto my wheelchair and forced my hands behind my wheelchair to handcuff them, worsening my permanent injury to my right shoulder and upper back, which had permanent nerve damage. Then I was taken to a small isolation cell, and the guards tried to bend my legs behind my back to cuff them.”

Rodriguez Sanchez Decl. ¶¶ 23-27

“[T]he guards asked me to put my hands in the air above my head and escorted me out of the room. As I was being escorted away, other detained people in the room left their beds and came to see what was happening, asking for an explanation from the guards for why they were taking me out of the room. This angered the guards even more, and they called for backup. The other guards that had left came back into the room to escort me out and took two other people into the hallway where they started beating them. I witnessed this myself, and the people being beaten were not fighting back. Two guards carried me out of the room into the hallway, throwing me against the ground face first so hard, I blacked out and for a moment lost awareness of what was happening around me. I wasn’t being violent or disruptive or anything.”

“When the guards threw me against the ground, my head, nose, chin, and chest hit the ground, and my lip split open. There was a lot of blood that was coming out of my nose and my mouth.... I hit my head so hard, I started experiencing a momentary lack of recognition and understanding, vision loss, and couldn’t breathe. I was coming in and out of consciousness and I thought I was going to die. Once I was on the ground, they put handcuffs on my wrists and one guard had his knee on my neck, another guard with both of his knees on my back, two other officers both standing with their full weight on each glute. This was a profoundly painful....”

“After they all got on me, other officers started kicking me on my sides and my legs and I kept begging them to stop hitting me because I had serious injuries on my cervical column and hernias. They responded with, ‘te vamos a tratar de matar con nuestros puños, aquí somos nosotros los que mandamos y te lo vamos a demostrar, maldito loco.’ After I started yelling from the pain, they told me, ‘no nos importa maldito loco. Ya te dijimos que te vamos a matar.’”

“Another guard seemed to put his knee on my neck and made it difficult for me to breathe. Additionally, the handcuffs were so tight on my wrists that they caused discoloration and bruising on both wrists. It was like burns that were red and purple bruises on my hands and wrists. They demanded that I get up and walk into the processing room, but due to the immense pain and sustained injury, I could not move or react. The staff just threw me in there instead. I lay on the ground motionless for about two and a half hours.”

“... [T]hree different guards came back to the processing room where I was and told me that they were going to try to hang me or find another way to kill me. They also started kicking me in

	the abdomen and the back repeatedly with their green combat boots. They also hit my head with closed fists multiple times. I waited for approximately two hours, the longest and most terrifying two hours of my life. This triggered the PTSD I had from my past torture experiences, and all I could think about was my wife and daughter finding me dead. While I waited, I could not breathe from the pain, especially to my ribs. I also could not feel my two legs and half of my body was numb. Vision in my right eye was blurry as well, and I remained in a state where I could not talk or see well.”
Barreto Decl. ¶¶ 31-34, 35, 37	“I saw the man then get out of bed and walk over to the officers, to ask for his towel back. I then saw the officers surround him, put their hands on him, and lift him from the ground and carry him out of the room. They started hitting him over and over again in the hallway. I saw this happen personally when they took me out to the hallway too.” “I got up to see what was happening along with several others in my room since we could hear this man in the hallway screaming from the beatings. The person in front of me told the officers that it wasn’t okay to treat that [sic] our roommate that way. The guards started coming towards the person who had spoken out and then out of instinct to protect him, I tried to grab him to pull him back towards me so that the officers wouldn’t get him and carry him out too. Then the guards got upset at me and pushed me against the wall and circled me.” “I tried to place my crutches in front of my foot so they couldn’t step on my foot.... They didn’t issue any orders or directions to me but instead grabbed me and carried me out of the room with my feet, back, and arms. They carried me out of the unit to the hallway.” “Even though I was not resisting, the guards forcibly carried me out of the room by my feet and my back and arms. I was not resisting or threatening to hurt myself or others. But the guards, threw me on the floor and then put on my handcuffs. Even after they placed these handcuffs, I was not resisting at all. But, the guards grabbed my feet and legs and pressed them against my back. This was incredibly painful as they twisted my broken foot and pressed it against my back, I asked them to please be careful during this and told them that my foot was fractured.” “When they threw me on the ground face first, I hit my forehead, my chest and my ribs. My arms and wrists hurt from how tight the handcuffs were. Then several guards were on top of me. As best as I could tell, there was one guard who was pressuring his knee on my neck, there was

	another guard who was stepping harshly on my back and my foot, and there were two guards stepping on my legs and foot. I had the red lines and irritation on my wrists from the handcuffs and bruises from the impact of their behavior on my body for about fifteen days.” “I saw and heard them bring in an Asian man on or around July 21, 2026, and I could hear how the officers kept beating and beating him as he continued screaming. The man in the solitary cell in front of the Asian man’s cell could see as the officers beat him severely as the rest of us yelled at the officers to stop as we heard the screams of the Asian man.”
Reina Decl. ¶¶ 20-21	“I was still sitting on the edge of the bed when Officer Ortiz grabbed my left arm and pulled me up to stand. I was in a bottom bunk bed, so I hit my shoulder in the top of the metal bed frame as I was getting up. Officer Henry then approached my bed. Officer Ortiz then pulled and twisted my left arm forcefully. I screamed out in pain and told him to stop. Officer Ortiz kept twisting and I heard my arm pop. Officer Henry then grabbed my right arm and kicked my right shin with a lot of force. Officer Henry grabbed my right foot and Officer Ortiz grabbed my left arm. They dragged me out of the unit like this, with half of my body suspended in the air.” “Outside of the pod, the guards told me to put my hands behind my back. I told them I couldn’t do it because they had hurt my arm. I told them I was injured. Officer Ortiz again grabbed my arm and pulled it behind my back to handcuff me. I screamed out in pain. The guards then took me to a room by myself where they removed the handcuffs.”
Santos Jesus Flores Decl. ¶ 8 (Hernández Decl., Exhibit 3)	“Then, I saw the guards grab Geraldo [Lunas Campos] while he was still handcuffed and force him into the cell. When the guards closed the door of his cell, I could no longer see Geraldo but I could still hear what was happening. I heard the sounds of the guards punching Geraldo, the clanking of Geraldo’s handcuffs, and the sound of shoes scraping against the floor. Then, I heard Geraldo saying, ‘I have asthma. I can’t breathe.’ I also heard Geraldo say, ‘Me estas asfixiando,’ which means ‘You’re asphyxiating me.’ Then, there was silence. I heard the sounds of the handcuffs being taken off and thrown on the ground.”
Santos Jesus Flores Suppl. Decl. ¶ 4 (Hernández Decl., Exhibit 4)	“They took me and three other people out of D2 even though we had done nothing. These three persons in military uniform hit my face against the wall. I still feel numb above my lips because of the hits.”
Henry Negrin Bolano Decl. ¶ 10 (Hernández Decl., Exhibit 5)	“I then heard a struggle ensue. Various guards were there with him. It sounded like the slamming of a person’s body against the floor or the wall. I heard other detainees yell for help, and I heard Geraldo [Lunas Campos] scream that he could not breath [sic].”

Antonio Frometa Ascon Suppl. Decl. ¶ 6 (Hernández Decl., Exhibit 6)	“[O]ne of the guards put his finger in my nose and he pushed me towards the bed.”
Jenrry Melendez Decl. ¶ 6 (Hernández Decl., Exhibit 7)	“[T]he officials forced Geraldo [Lunas Campos] and I heard them putting the handcuffs back on him. I heard the scraping of the shoes and the clanking of the metal. I heard this for around 3-5 minutes. The last thing I heard was Geraldo say in a voice that sounded like he couldn’t breathe. He said, ‘Suelteme, me estan asfixiando.’ This means, ‘Let go of me. They’re asphyxiating me.’ Then, there was silence.”
Mayron Pazpuerto Decl. ¶¶ 7, 12-13 (Hernández Decl., Exhibit 8)	“A few minutes later, I heard what sounded like Geraldo [Lunas Campos] being put in handcuffs and beaten. I am familiar with how these interactions look and sound because I have witnessed guards handcuff and beat other detainees in the past.” “While we were in the middle of our call, approximately 50 anti-disturbance guards rushed to D-7. They immediately tried to break our group up by force. A guard tackled one of my peers, and in response, I made my way toward both of them and attempted to break them up. As I did this, I was grabbed by two guards, they pulled my arms behind my back, handcuffed me and, and took me back to SHU.” “[The guards] approached us while we were on the phone with a reporter, tackled my peers, and handcuffed me when I tried to break them away from him.”
Claudina de Paula Decl. ¶¶ 26-28	“I turned back confused and then felt approximately 6 officers grab me.” “Officer James told me to put my hands in front of me. I did that. Officer Becker then kicked my feet, so as to make me fall to the ground. I asked him why he was doing that. I wasn’t resisting. Another officer, Officer Ortiz, then grabbed my left hand and started twisting my arm.... I told him he didn’t need to do that and that he was hurting me. He then told me to put my hands behind my back.” “Officer Becker then again tried to push my feet with his hands. There was a wood divider next to me. I told him if he pushed me, I would hit my head in the divider. Officer James then put his hand under my arm and over the back of my neck and pushed my head down. Officers Ortiz and James then took me out of the pod walking like this, with my head pushed down very close to my knees. I told the officers they were hurting me. Officer Ortiz then said, in Spanish, ‘callate

	pendejo, te duele? A ver si te quejas de la comida ahora.’ Approximately a week earlier, I told officers in the pod that the food they gave us was spoiled, and we could get sick. I understood Officer Ortiz to be referring to this complaint.”
Harassment, Coercion, and Unprofessional Conduct by Staff	
Ascon Decl. ¶ 13 (Hernández Decl., Exhibit 2)	“They tried to remove me to Mexico four times before everything happened with Geraldo [Lunas Campos], but the fourth time was a month ago. I found it strange that they tried to get me to sign paperwork to go to Mexico and threatened to lock me up in this facility for my entire life the day after I spoke with the journalist [about Geraldo’s death].”
Rodriguez Flores Second Suppl. Decl. ¶ 13	“On or around July 9, 2026, when I arrived back at Camp East Montana and I was in the intake room, an ICE official gave everyone in the intake room a third-country removal form. The ICE official explained to me that if we filled out and signed this form that I would be deported to Mexico. I filled out the form because, after being transferred to Torrance, my experience at Torrance, after ICE losing my personal belongings, and after being at Camp East Montana for a long time in terrible conditions, I reached my breaking point. I just wanted to be out of Camp East Montana. But I did not sign or turn in the form. I did not have my personal belongings, and I would be deported without any money, cell phone, clothes, or personal belongings. But if I had those items, I think I would’ve signed the form because I am just so stressed and depressed about being here.”
Ly Decl., ECF No. 2-9, ¶ 40	“At Camp East Montana, I’ve heard guards call people ‘f*ggot,’ ‘homo,’ and ‘gay’ to their face in front of the rest of us.... Guards at Camp East Montana and EPSPC call us Asian people ‘chino.’ But I’m not Chinese; we’re not all the same.”
RES Decl., ECF No. 2-20, ¶ 41	“The stress is really high, very intense. It seems like they put all this pressure and stress and pat downs and everything to make us so desperate so that we will agree to self deport. ICE officials and guards put pressure on me, telling me my case is lost and bringing me papers to sign so I can self deport quickly.... There’s no other reason to treat people like this. The staff won’t do anything for us. It’s only God that helps us here.”
Senevilay Decl., ECF No. 2-10, ¶ 27	“It’s the way they treat us - I don’t feel like a human being anymore. There’s just no rhyme or reason on how they do things here. The conditions here made me want to leave the country. I’ve asked to be deported. I can’t stand it here anymore.”
Navdeep Decl., ECF No. 2-28, ¶ 17	“[The ICE officer] told me he was giving me the option to sign a voluntary departure form and threatened that I would be here for a very long time if I didn’t sign. He told me that under the Trump Administration, I would not be able to win my immigration case. He told me that if I signed the voluntary departure form, I could come back legally. He told me where I needed to

	sign on the form and told me that if I do not sign the form, it would cause negative impacts for me. He told me the judge will see it as the detainee being uncooperative, and it would reflect poorly on me. I felt threatened and intimidated, but I refused to sign the form, especially without the ability to talk to my attorney first.”
Fernandez-Gastelum Decl., ECF No. 2-14, ¶ 11	“[A] guard told my housing mates about the fact that I have HIV. He then had them vote on whether I should be removed from the housing unit because I have HIV. I felt sad, frustrated, and helpless about this treatment. I was ultimately removed from Charlie-2.”
Do Decl., ECF No. 2-17, ¶ 26	“I think the night guards get really bored and will mess with us. A few months ago, one of the night guards woke me at 3:00 am to sweep the hallways. He said I had to get up to do this. It was frustrating because I have trouble sleeping and I didn’t understand why we needed to sweep the hallways in the middle of the night. I’ve heard about other people randomly being asked to do this other times too.”
NYG Decl., ECF No. 2-24, ¶¶ 40-41	“Almost everyday guards and detainees argue verbally.... There’s no one I feel like I can turn to for help on staff, because they just threaten or yell at us.” “Even with the change in contractor, the guards have stayed the same. I have noticed that the guards are much stricter in terms of not giving us enough hygiene products and being more verbally strict and abusive.”
ZOR Decl., ECF No. 2-30, ¶¶ 36-38	“About six times since I arrived at Camp East Montana ICE officers have tried to get me to sign my own deportation to either [REDACTED]. The worst time was the first time this happened. About four days after I arrived at Camp East Montana, at around the end of September 2025, ICE officers came to me and told me to pack up my things. They told me they wanted to talk to me about my immigration case, but they lied. They took me on a bus with my hands and feet cuffed. I had no idea this was happening until I was shackled in the bus so I could not leave. I was in the bus with a group of about 45 other men. When we got to the border, near Santa Teresa I think, masked men were there. The masked men told us to get out and jump across to Mexico because Mexico had given us asylum. I asked to see proof that Mexico had given me asylum and refused to leave without that proof. I was not given any paperwork. I was not able to call my attorney or make any other calls. One of the ICE officers told me I was wasting his time, that I would be sent to Africa or sit in detention for a long time unless I left for Mexico. I refused and was eventually returned to Camp East Montana with only approximately 11 others.”

	“Approximately a few weeks after that they told me again that I would be deported to Mexico, and I again refused to sign anything. Maybe a month after that ICE officers came to get me and told me I had an appointment with my lawyer; in reality, they took me to a room where they again asked me to sign my deportation to Mexico. They threatened me saying I would be sent to Africa instead or I would remain incarcerated at Camp East Montana for a long time if I refused to sign. But I did not sign and eventually they returned me to my housing unit.” “Another problem with the guards is that they are unnecessarily aggressive with people. For instance, when they do searches of our personal possessions, they will throw our things on the floor and sometimes throw our personal possessions in the trash. And they seem to target certain people for repeated searches, almost as if to provoke them. They did this to me once where they searched my personal possessions 3 days in a row. On the last day the guard took my crucifix and when I told him that we are allowed to keep those under the handbook rules he just threw it in the trash.”
Gonzalez Ramirez Decl. ¶ 12	“After being at the facility for about two months, ICE tried to get me to agree to be deported to another country that was not my home country, Cuba. ICE told me that they were going to deport me to Mexico. They took me out of my unit and into another room for deportation. I refused to sign and refused to let them take me, but I had at staff’s direction changed my clothes back to my regular clothes (that is, the clothes I had on when I was arrested by ICE and not the uniform they give us at Camp East Montana) and staff made me go through the intake process again.”
Baccam Decl., ECF No. 2-11, ¶¶ 27, 42	“The guards kept saying we were illegal, and some guards would tell us, ‘You guys can always self deport and get away faster.’ When we tried to raise concerns, guards would tell us, ‘If you don’t like it, you shouldn’t be here.’” “Since I’ve been in detention, ICE officers have tried four times to get me to sign a paper saying if another country (not Laos) takes me, they can send me to that country.”
Majok Decl. ¶ 11	“I told the nurse that I felt like I was going to harm myself and she told me to do it. When the nurse told me that, it made me feel like there was no hope. I stopped asking for help for my mental health after that.”
Moreno Rodriguez Decl. ECF No. 2-15, ¶¶ 6-7, 10-11, 15-16	“About two weeks after I first arrived at Camp East Montana, guards called me to sign and fingerprint some documents. The guards then told me I had to go to Mexico. I refused to sign the papers and told them ‘no.’ I told them I am Cuban, not Mexican. In that moment, I was scared

	for my life because I would be a foreigner in Mexico. The guards then took about 3 to 4 people from my pod to the front office and locked us in a room for two hours. There were other detainees there.” “A guard told us we were being taken to Mexico. A guard called my name but I did not go up to the door. I understood that the guards would put me on a bus and take me to Mexico. I was scared for my life.” “Then, the guards took me on a bus with approximately thirteen people to be a part of the border called Santa Teresa, which is near El Paso. My wrists and ankles were cuffed. They put a sort of iron belt around my waist and attached my cuffed wrists to it. I continued to feel a lot of pain because they had slammed me against the floor.” “When we arrived at what I understand to be Santa Teresa, the guards took off our metal cuffs and put plastic cuffs on us. There is a sign as you approach the border that says ‘Santa Teresa.’ The area was on what appeared to be a large hill and it seemed high enough that my ears started to clog like when on an airplane. There were other people there who were wearing black masks on their faces with only a hole for their eyes. They told us to walk toward the Mexican bus.” “Sometime between October and November, facility staff tried to take me to Mexico again. An ICE guard stood outside the door to the pod and called people out by name. The officer had materials, including ink and some papers, to take our fingerprints and signatures to consent to go to Mexico. I said ‘no’ and told them I was not going to sign.... The guards told me they would deport me to a different country and would press charges against me. I told them I wanted to stay in the United States. That time, I did not get on the bus. They continued to tell me that they would send me to jail and to another country in Africa, but I continued to tell them ‘no,’ and they put me back in my housing unit.” “The experience of the guards trying to trick us into signing documents and trying to force us into Mexico made me very scared. Now, I feel like I don’t know who to trust or what to do.... In early April, approximately 7 or 8 detainees who I believe to be Cuban came back into my pod after being called out by the guards. The detainees said ICE had put them in a van and tried to deport them into Mexico, but they refused.”
--	--

Rodriguez Sanchez Decl. ¶¶ 21, 28	“One of the guards started looking through all of my personal court documents and receipts. I kindly asked him to stop and to return my documents, since he knew the TV remote [they were looking for] was not in my folder. He called me a ‘sapo’ (which means ‘snitch’) and threw my documents on the ground, scattering my documents around the room.” “We crossed an area that was full of sand and rocks between the tarps. I could not move or walk [because I was on a wheelchair because of my injuries], but the guards kept taunting me.”
Reina Decl. ¶¶ 19, 35	“... Officer Ortiz came back and ordered me to get up again. I told him he had already searched my bed, that I was feeling sick, and needed to lay down. He replied, ‘I told you to get up.’ I sat up in bed and showed him my things. I only had three shirts and three pants, so I showed him that. I was feeling very sick and weak. Others around me started telling Officer Ortiz to stop bothering me, that I was sick and that he was only doing it to mess with me. Officer Ortiz told us that we were ‘worse than women.’” “Many guards here are abusive and demeaning, and many have been here since I first got here.... There was a man that was sick, and I told the guards to help him. Officer Ortiz called me a woman and said he had seen me crying in segregation. He was mocking me. He said that in the pod, where other people could hear him. It was humiliating. I told him they should help people. Another time, I also heard a guard say that it was a shame that they couldn’t do what they wanted with us. When the contractors changed, the guards just changed their uniforms, but they are the same people and things are still the same here.”
Reina Suppl. Decl. ¶ 19	“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.”
LLH Decl., ECF No. 2-32, ¶¶ 10, 13	“... ICE tried to deport me again to [REDACTED] I but was not able to for the same reason of my lack of citizenship documentation of [REDACTED] (again, that’s what ICE officials told me).” “Then, on or about December 15, 2025, ICE attempted to deport me again to [REDACTED]. But, they could not, and I was told it was for the same reason - I didn’t have citizenship documentation for [REDACTED].”
CCD Decl., ECF No. 2-26, ¶ 29	“Later that night, after returning to my housing unit, I told the other office [sic] that I wanted to shower because I felt dirty after [I was sexually assaulted by a guard during a pat down]. While I was showering, Officer Garcia stared at me through one of the clear tarp windows of the shower.

	He later approached my bunk multiple times during the night saying, ‘Are you going to sleep, mijo?’ and ‘I don’t think you want to go to sleep, mijo.’ I understood these comments as threats of sexual assault. He also repeatedly came to my bunk during the morning count at 5:00 a.m., scanned my bracelet multiple times after count was already complete, and continued making comments like, ‘Wake up, mijo, it’s count time.’ Another officer in the unit later told me he thought Garcia’s behavior toward me was inappropriate and encouraged me to file a PREA complaint.”
Angye Second Suppl. Decl., ¶ 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. ... Guards hiding their identity from view at Camp East Montana made me feel insecure and nervous and like things weren’t happening properly there.”
Claudina de Paula Decl. ¶¶ 19-20, 23, 29, 47	“Mistreatment by guards at Camp East Montana was a constant issue. Many guards were very cruel.” “... Officer Becker came close to my bed, ripped my towel off the edge of the top bunk bed, and threw it on top of my bed. He yelled ‘Let’s go, Brazil.’ Officers at Camp East Montana often referred to me as ‘Brazil’ because of my nationality.” “I then ... put the towel back where it was on top of the bunk bed, and sat on my bed to call my family. A few minutes later, Officer Becker approached my bed again, snatched the towel away, and said ‘Fuck you, Brazil. I am keeping it.’ Officer Becker then walked away and took my towel. It was the only one I had.” “... I did not see them wearing any name tags on the day of the incident [when I was assaulted by guards].” “[A] guard told me to grab my things. I asked the guard where I was going. A guard told me I was being deported. I told him my case was still ongoing and I had filed a habeas petition. I asked to speak to an ICE officer. The guard told me he would tie me up and take me. I was scared they would hurt me again, so I got on the bus. Approximately 20 hours later, I was taken back to Brazil.”

Piñango Decl. ¶ 7	“Most of the guards in the facility do not wear visible identification or name tags. I am worried that if something happens or if the guards act inappropriately, I won’t be able to identify who they were.”
Romero-Paredes Decl. ¶ 16	“Guards do not wear their name tags throughout Camp East Montana. As a result, I cannot tell the identity of the guards around me. This makes me feel unsafe and nervous because, if something happens, you do not know which officer was involved.”
Rossa Chanchamire Decl. ¶ 9	“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.”
Aguilar Decl. ¶¶ 7, 16-18	“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.” “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.” “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....”

	“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.”
Monroy Decl. ¶¶ 18-19	“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.” “... I experienced aggression from another person in my unit ... 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.”
Excessive and Unprofessional Body Searches	
Gonzalez Ramirez Decl. ¶¶ 14, 32	“I am searched and patted down by the guards each time I leave or enter the unit, including when I go to my virtual legal visits, to the doctor, leave or return from the hospital, or when I go and return from the yard. I am an old man, I am not a danger to anyone, and I do not know why they are always searching my body. I feel that this is an invasion of my privacy.” “Every time I go [to the medical unit], staff touch me all over my body to search me. The same thing happens every time I come back. It makes me not want to go, but I don’t have a choice.”
Rodriguez Flores Decl., ECF No. 2-6, ¶ 31	“... [W]e have been subjected to invasive pat downs by guards every day. We are subjected to pat downs each time we leave and return from the yard, visit counsel virtually, for in-person visits, visit the barbershop, or visit the library. The guards insert their hands on the top of our underwear, and they open our waist band, and pat down our entire bodies. Since I’ve been here, I have never seen a guard find contraband or something on a person during a pat down. These invasive pat downs make me feel like I am a criminal, and I am not comfortable with being touched so much by the guards.”
Ly Decl., ECF No. 2-9, ¶ 23	“When we left to go to recreation the first time I was housed at Camp East Montana, we were not pat searched on the way to recreation but sometimes we would be pat searched on our way back to the housing unit after recreation – it all depended on which guards were working. Since I got back this time, we are pat searched whenever we leave the housing unit and whenever we

	return. Being pat searched makes me feel uncomfortable because it is not like I and others are in prison for doing something bad.”
Senevilay Decl., ECF No. 2-10, ¶ 5	“Here in Camp East Montana, we’re pat down every time we leave or return to the housing unit. It wasn’t like that in jail.”
Baccam Decl., ECF No. 2-11, ¶ 24	“Each time we went to recreation, guards would pat us down and use a metal detector wand. Every time we went out of or came back into our housing unit, we were searched in that way. During the pat searches, a staff person puts his or her hands on your shoulders, waist, legs, and other body parts. It felt invasive and like I was a criminal.”
RES Decl., ECF No. 2-20, ¶¶ 7, 29	“Here, anytime we go to the recreational area (which is totally enclosed), we are patted down on the way in and way out.” “When you go to the outdoor space, and when you come back to the housing unit after, the guards pat us down and use a metal detector on us like we’re criminals. They do that every time we leave the unit for any reason, including to go to the barbershop or to the doctor or even just to go out into the hallway. It’s a total body search, where they put their hands on your collar, under your sleeves, socks, legs, everything.”
CCD Decl., ECF No. 2-26, ¶¶ 27-28	“Officers conduct invasive pat-down searches several times each day. Every movement is controlled by a pat down. We have to put our hands up and we are searched worse than in state prison, because in state prison we were just patted down quickly. But here, the guards touch us inappropriately. We get searched this way anytime we leave or return from the yard, medical appointments, or attorney visits. During these searches, guards inspect inside our waistbands and touch our bodies in ways that feel intrusive and degrading.” “On my way to the medical tent, Detention Officer Garcia placed me against the wall. I raised my arms and spread my legs. During the search, Officer Garcia told me, ‘I am going to be a little rough on you.’ He then ran his hands up my legs toward my buttocks, grabbed my waist near my genitals, and pulled my body against his body so that my buttocks pressed against his genital area. I felt his penis. It felt sexual and inappropriate. I pushed him away and asked why he was searching my body like that. The incident triggered memories of childhood sexual abuse and caused me severe emotional distress. Two female officers witnessed what happened, and one encouraged me to report it.”

ZOR Decl., ECF No. 2-30, ¶¶ 23, 38	“Every time we leave or return to the housing unit we are patted down by guards. The guards will sometimes touch us inappropriately, like in the groin area, when patting us down, and it seems as if they are trying to provoke us. For example, I have experienced guards putting their hands inside my pants, pulling the top of my pants up very hard, and giving me a wedgie in the process. Guards have also put their hands under my pants, moving from the inner thigh area to the area near my penis and testicles.” “And [the guards] seem to target certain people for repeated searches, almost as if to provoke them. They did this to me once where they searched my personal possessions 3 days in a row. On the last day the guard took my crucifix and when I told him that we are allowed to keep those under the handbook rules he just threw it in the trash.”
ZOR Suppl. Decl. ¶¶ 4, 19	“Guards still conduct pat down searches all the time. Other men in my pod and I are patted down every single time we leave or enter the room for any reason.... Some days you are searched and patted down as many as 10 times in one day. The way and amount of times guards touch me makes me uncomfortable and I feel like my body, my dignity, and my privacy are being disrespected.” “I struggle constantly with my mental health here, especially when dealing with the constant pat downs and searches, and the treatment from the guards.”
JLE Decl., ECF No. 2-31, ¶ 30	“We also receive invasive pat downs all over bodies, including checking inside our waist band, any time that we leave or enter the unit. I feel very uncomfortable because the guards insert their fingers inside my waist band near my private genital areas.”
LLH Decl., ECF No. 2-32, ¶ 28	“We also receive multiple pat downs every single day. That means that guards inspect our entire bodies, including near our genitals (or sometimes checking our genital areas) for contraband.... We get patted down when we go or return to yard, when we go for attorney or in-person visits, when we leave the unit for any reason.”
PKP Decl., ECF No. 2-23, ¶ 22	“We receive several invasive pat downs each day when we go and return from the yard, when we go or return from a virtual or in-person counsel visit, or when we go see the nurse. The pat downs are invasive as guards look inside our underwear and pat down our bodies. I have seen that guards have sometimes conducted pat downs in ways that are inappropriate and invasive of our privacy.”
NYG Decl., ECF No. 2-24, ¶ 32	“We are also subjected to multiple pat downs every day. That means that the guards inspect our entire bodies, including looking and touching into our underwear area for contraband. We get

	patted down by the guards anytime we enter or leave the unit. For example, we get patted down to go and turn from yard, when we go talk to counsel (either in-person or virtually), when we go for an in-person visit, or anytime we leave the unit. These are very invasive to our privacy as the guards touch your entire body areas.”
HOK Decl., ECF No. 2-25, ¶ 26	“Every day we get invasive pat-down searches several times. Almost every movement requires a search. We are searched when we leave for or return from the yard, medical appointments, attorney visits, or family/personal visits. Officers check inside waistbands and touch our bodies in intrusive ways.”
Navdeep Decl., ECF No. 2-28, ¶ 16	“Anytime we step out of the pod for anything, like recreation, medical, visits, or anything, they pat us down. They usually ask us to put our hands against the wall and they stand behind us and frisk us. The old company would usually only frisk us when they were taking us to court, but the new company frisks us for everything.”
Conditions in and Misuse of Solitary Confinement	
Rodriguez Flores Decl., ECF No. 2-6, ¶ 24	“[W]e have to decide between staying sick in our bunks or unit without saying anything or saying that we are sick and being taken to solitary.”
NYG Decl., ECF No. 2-24, ¶¶ 38-39	“[G]uards regularly threaten us with solitary confinement.... [S]omeone in my unit refused to take his medication and the guard threatened to take him to solitary. Although he was not taken to solitary, it’s really scary to hear that from the guards.” “The guard told me that if I defecated my pants while in the yard then I would have be sent to solitary confinement. So, I had to wait and I had a severe stomach ache after.”
Majok Decl. ¶ 11	“Approximately four times, the facility told me that they were going to take me to the psychiatrist, but then they would take me to ‘the hole’ where I’d wait for hours and then be returned to my regular housing unit without ever seeing anyone.”
Rodriguez Sanchez Decl. ¶ 30	“The [staff member] laughed at me, signing a paper that I think indicated that I was in good enough condition to go to solitary and handed it to the guard. She also high-fived the guard, as if she was celebrating sending me to solitary.”
Rivero-Gonzalez Decl. ¶¶ 16-17	“I was not arguing or being combative [when asking about my lost belongings], but the guards then sent me to the ‘hole,’ or a punishment solitary cell. The guards pushed my wheelchair and pushed me into the solitary unit. The guards told me that they were punishing me for asking for my personal belongings. That’s the only reason they gave me why I was there. I was left alone in solitary for about two hours.”

	“The solitary unit is a square cell with a toilet in the corner and a metal bench to sit in. I did not receive any written notice or anything else in writing about why I was in the segregated housing unit.... They did not explain to me how long I would be in the solitary cell. When I was there, I started to cry out in pain, and I fell to the ground when I tried to use the toilet because there was no support for me. I was on the ground for about an hour, crying in pain. I had severe back, leg, knee, and body pains....”
Reina Decl. ¶¶ 23, 27, 29-30	“[The captain] told me they were taking me to ‘the hole.’ He said there would be a hearing or sort of trial and that I would have a right to present witnesses. I told him everyone in my pod was a witness that I didn’t do anything. A few minutes later, two guards handcuffed me and walked me to ‘the hole.’” “Approximately 2 days after I was taken to solitary, a guard came to see me. I believe he was a captain.... I also told him that I was very sick and not feeling well that day. I asked him to watch the camera recordings. He said I was taken to the hole because I attacked an officer. But I didn’t attack anyone. I was shocked to hear this. It is not true. I asked him to show me the camera recordings and told him I had witnesses that saw what happened. I was told I would be able to present witnesses and had not been able to. He didn’t respond to this. The guard said he would give me 25 days in segregation and 5 days without a tablet so I would learn to get up from my bed next time.” “During my time in segregation, I received a series of documents from staff.... I received all these documents in English. I tried to make sense of them but could not fully understand what they said. One of the documents ... says I shoved Officer Ortiz into the sink multiple times while being escorted out of the pod. That is lie.... The description also says that I told officers they would have to ‘make me get out of bed.’ That is not true. I have witnesses that saw and heard what happened.” “I understand [the ‘Detainee Rights – IDP’] paper to say that I have a right, among other things, to be assisted by a staff member before a disciplinary hearing, and to present witnesses on my behalf. I did not receive any staff assistance for a hearing and despite multiple requests, was not allowed to present witnesses or review evidence. The document also says I have a right to appeal the decision. I was never told I had a right to appeal the segregation decision.”

Antonio Frometa Ascon Decl. ¶ 8 (Hernández Decl., Exhibit 2)	“The next day, the day Geraldo [Lunas Campos] died, I saw Geraldo keep asking the guards for his asthma medicine. The guards still wouldn’t give him his medicine. Geraldo again started knocking on the door to get the guards’ attention but they wouldn’t give him his medicine. Instead, the guards said, ‘If you keep kicking the door, we’ll take you to the hole.’ The hole is solitary confinement. Geraldo responded, ‘If you give me my medicine, I’ll stop kicking the door.’ The guards wouldn’t bring Geraldo his medicine. Then, Geraldo said, ‘You can take me to the hole but just give me my medicine.’”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶ 29	“When we voiced our concerns, the guards would often threaten me and other detainees with solitary confinement.”
PKP Decl., ECF No. 2-23, ¶ 26	“A guard approached me and told me that it was against the rules for me to sit in [my friend’s] wheelchair. I told the guard to show me the rule prohibiting me from sitting on a wheelchair. The guard did not show me the rules. Instead, the guard told me that he was the authority figure and that if I did not obey him, I would be taken to the solitary confinement.”
Angye Decl., ECF No. 2-27, ¶¶ 17-18, 20, 24-25	“From the hospital, I was taken to the clinic at Camp East Montana. I was still in a wheelchair at that time. I was then immediately placed in segregation....” “... [A]n officer said I was placed in segregation because I violated code 198, which is ‘interfering with a staff member on duty.’ They told me the crime for this was to be put in segregation for fifteen days and to have five days without a tablet to call anyone. There was no hearing about this violation and I was told about the violation while I was still in severe pain. I tried to explain that I had been hurt by officers and did not understand why I was being punished and I asked for clarification about why I was being punished. I did not receive an answer. Later, I was given a paper about the violation signed by someone whose name I believe is Londono. There has been no process to contest this violation or explain what happened to me.” “On or around May 1, 2026, staff asked me to sign a document called ‘Incident of Prohibited Acts And Notice of Charges.’ The ‘Description of Incident’ on that document is false. That’s not what happened. The ‘Description of Incident’ also says: ‘No injuries to involved officers or the detainee were reported.’ I don’t know how they could say I wasn’t injured. I told them I wouldn’t sign it because I didn’t trust them and wanted them to bring me my own copy first.” “On or around May 2, 2026, staff brought me one page of a CEM-26-00, Institution Disciplinary Panel Report (Cont’d). I think I am missing a page, because it starts at section ‘IV. Findings.’ I

	told the staff person who delivered it to me that it was an injustice, that I had been injured, and that there was evidence of what had happened to me. I was really upset. I asked him if he had watched the camera footage of what happened to me. He just said, ‘This is their decision.’” “I filed a grievance about the sanctions I was given, but it was denied the next day. No one came to talk to me about my grievance before it was denied. It made me feel like no one cared about me and that there was no point in trying to ask for help. Everything up until then showed me that there was nothing I could do to try to help myself.”
Navdeep Decl., ECF No. 2-28, ¶¶ 15, 22, 24, 28, 30-31.	“The other day during recreation, two guys got into a conflict about dribbling. Other detained people tried to get them to calm down because they were worried that guards might use force against them. The guards came and took two of them to SMU. Then they came back and took three others to SMU who weren’t even fighting.” “I already felt sad and depressed before being put in SMU, and I felt even worse when in there.” “During my time in SMU, I felt depressed. At first, there was nothing in the room, not even a bedsheet on the mattress. I just sat on the floor for many hours when I arrived in the small room. For several days, I did not eat any meals because I didn’t feel hungry. I was too sad being completely alone. Being in there made me miss my family a lot. Being in that room felt creepy, especially at night. It’s hard to explain, but it was scary to feel like I was completely alone in a cell in a tent in the desert.” “... I never received a hearing or any of the other promises written on the papers I was given about the panel hearing. I never had a chance to present my side.” “I tried to follow this outlined process to use the grievance procedure to challenge my designation as a higher security level. Almost right away, on May 16, 2026, which is well within the 15-day period after I was released from SMU and my designation was changed, I submitted a grievance challenging the decision to change my security classification.... On May 17, 2026, I received a denial of my grievance with the response ‘Go onto tablet and write a classification request.’ The reason I used a grievance form to submit my request was because I was trying to follow the process that had been outlined in the Detainee Rights form. It felt like going in

	circles. I then followed the process for a re-classification request on the tablet, but it was declined within the same day.” “It seems like they can just throw us into SMU if they feel like it.”
ZOR Decl., ECF No. 2-30, ¶¶ 16, 39	“I have seen people being taken to ‘the hole’ for wanting to sit at these tables after 10pm.” “Sometimes people also get upset because they are not given their medications, not given enough food, or because they feel like their rights are not respected. When that happens, several guards will come - sometimes 3, sometimes 10 - and they will pepper spray people who are getting upset, put their knees on their necks, and take them to ‘the hole.’”
LLH Decl., ECF No. 2-32, ¶ 30	“Our unit refused to go to bed that night in protest over the lack of food. Other detainees made noise and a few remove [sic] the mattresses from the metal bed and were very upset.... The guards said that there was nothing that they could do about the food because the supplies had run out. The guards told the detainees to wait a few days. The guards took those who removed a mattress to the ‘hole’ and I never saw them again. Later, I learned that there were other units that were protesting too.”
Gonzalez Ramirez Decl. ¶ 20	“I only go out to the yard when it is obligatory, even though I’d like to stay in the unit, but I must go because otherwise I will be sent to the punishment cell (the ‘hole’).”
Nelson Decl. ¶ 21	“I told the guards [that I did not want to go to the yard because of the conditions in the yard and my medical conditions] but they told me yard time was mandatory and if I didn’t go, they would send me to the ‘hole.’ I understand the ‘hole’ to be solitary confinement. I did see guards take some people there for refusing to go to the yard.”
Barreto Decl. ¶ 38	“... I was taken to my solitary cell. When I was brought in to solitary, the officers claimed that I tried to hit the guards with my crutches and that I tried to get in the way of the guards. But that was not true. They told me that I would be in solitary for 25 days. They also told me that if I behaved well, they would reduce the days that I was in solitary.”
Claudina de Paula Decl. ¶¶ 30-31, 39, 41, 42-44	“Two different officers ... took me to an isolation cell [after I was injured by officers]. The cell was very small, approximately 3 square meters. There was a bed, a toilet, and a sink. I was in that cell for about an hour. I was crying. I felt a lot of pain in my left arm and I felt humiliated.... My left arm started turning a deep shade of purple from my wrist to my elbow. I could not move my left hand.”

	“There were no windows to the outside in [the solitary confinement] cell. There was only a small window in the door that looked out into a hallway.” “When I returned to Camp East Montana after the hospital, while I was at the medical unit speaking to the doctor, Captain Johnson came in and told me that I would be put in solitary confinement. She said I pushed Officer Becker. That was not true. I asked Captain Johnson if she had seen the recordings from the security cameras. I was sure that if she had, she would not be saying that I pushed Officer Becker. Captain Johnson said they would investigate and that I would be allowed to present witnesses.” “Lieutenant Curry then said I would be kept in solitary confinement for 30 days. I asked him why, I didn’t understand. Lieutenant Curry said he was ‘following orders from above.’” “During my time in solitary confinement, I was taken out the cell once a day around 7 pm to take a shower. I was also taken out to recreation once a day by myself. I felt depressed. I didn’t want to eat. Due to my arm injury and the pain, I had a hard time sleeping and I couldn’t exercise. I spent a lot of time reading the Bible. I cried many times during my time in solitary. I didn’t know why that was happening to me. It felt very unfair. I was already detained and then on top of that I am assaulted by a guard that is supposed to care for us.” “I did not have a tablet for approximately the first two days in solitary confinement. When I finally got one, I could not do video calls with my family, only audio. In the pod, I would do videocalls with them almost every day.” “In total, I was in isolation for approximately 12 days.”
Piñango Decl. ¶¶ 8-9, 13, 15	“[A]n ICE officer and a guard from Camp East Montana told me that I would be held in the SMU for a total of 50 days. They said that I insulted the guards in my unit.... However, I did not insult guards.” “My time at the SMU has been very difficult. For approximately 30 days now, I have been held by myself in a small cell with only a bed, a toilet, and a sink. I have no access to natural light in the SMU cell and I am all alone, so I have very little sense of what time of day it is. There is only a small window in the door that looks out to the cell immediately in front of mine. There is

	a bright white light right above my cell that stays on from around 6:30 am until 10 pm. This makes it difficult for me to rest and sleep. There is also something that looks like a camera pointing right at me which makes me feel uncomfortable to change my clothes or use the restroom.” “I have almost nothing to do while in SMU. It is very sad here. I spend some of my time at the SMU reading the Bible.” “There are times when I am locked in my isolated cell for approximately 72 hours without being taken out for recreation or to shower. We are not allowed to shower on weekends and are not taken to recreation on weekends, so I spend the entire weekend in my cell.”
Rossa Chanchamire Decl. ¶ 12	“I was in solitary confinement for approximately three days because my body couldn’t tolerate the food..... Around 10 or 11 PM that night, the guards woke me and said I needed to sign a blank piece of paperwork but didn’t tell me what for. I signed the paperwork so I could go back to bed.... 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 piece of paper I signed in the middle of the night was part of ICE paper 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.”
Aguilar Decl. ¶ 11	“For two and a half weeks I was so sick that I couldn’t eat the food at all.... 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.”
Degrading, Prolonged, and Inadequate Intake Process	
LLH Decl., ECF No. 2-32, ¶¶ 7, 11, 15	“When I arrived, I was taken to the Intake Processing room for about two days. There were about 50-60 other people with me in the room. I would estimate that the room was about 20 x 25 feet. We were packed on the floor sitting down. We all slept on the floor without any blankets, not even the metallic survival blankets. The lights were also kept on 24 hours a day. We also huddled on the floor next to each other. It was cold and uncomfortable, and hard to sleep. When I was there, people were coughing and people appeared to be sick. To eat, we only received a small sandwich about every 8 hours, and it only contained a thin slice of cheese and ham, and we also got tap water.”

	“For a second time ... I was taken to Intake Processing. This time, I was at intake for two nights. I was in a smaller intake room. There were about 30 other people there with me. We were forced to sleep on the cold floor huddled up next to each other, without blankets. The lights were also kept on 24 hours a day. There is also a toilet in the room where people are forced to use the bathroom in front of other people. There’s no privacy. We were only given sandwiches and tap water, like the first time I went through intake. Again, there [sic] were sick because they were coughing and said they had a fever.” “For the third time, I was taken to the intake processing center. This time I was there for about 15 hours. I was forced to sleep again overnight. This time there [sic] about 45-50 people in the larger room. I saw a sign in the room that said the capacity was supposed to only be 30 people. We were forced to sleep on the cold floor and huddled up next to each other, without blankets. The lights were also kept on 24 hours a day. There is also a toilet where people are forced to use the bathroom in front of other people. We were only given sandwiches and tap water. Again, people were sick because they were coughing and had a fever.”
Rodriguez Flores Decl., ECF No. 2-6, ¶ 8	“I had the same clothes for all three weeks [during the intake process], and I had to use the same dirty underwear every day. I was not given a spare set of clothes or fresh laundry.”
Rodriguez Flores Second Suppl. Decl. ¶¶ 3, 9	“At Camp East Montana, we were kept in a small intake cell for about 8 hours during which I was handcuffed. There were approximately twenty handcuffed men in this small intake room with me. There was not enough room for us to sit at the same time, so some of us had to stand. There was a toilet in that room that we had to use where others could see us. While I was in this cell, I had difficulty getting up and laying down, and my knee got swollen.” “When I returned to Camp East Montana, I was held in the intake area for approximately twelve hours. During that time, I was required to sleep on the floor because no bed was provided. There was no mattress, blanket, or pillow. The cell was small, there were about 20 of us crammed in a small cell, and there was one toilet for us all out in the open for us all to see and smell. I had to sleep right next to other people on the floor. I felt humiliated and degraded. The intake procedure was just as bad as it had been when I first arrived at Camp East Montana.”
Mbabid Decl., ECF No. 2-8, ¶¶ 10, 12	“I spent the first night at Camp East Montana in the waiting room waiting to be processed. In the waiting room, I slept on the floor next to other people. They only gave us thin silver sheets to keep warm. They didn’t give us masks.”

	“It took the entire day for staff at Camp East Montana to finish processing us.”
Ly Decl., ECF No. 2-9, ¶¶ 11-12	“When I arrived at the facility, I was placed in an intake room for about a day and a half. The intake room was small. There were about 48 or 49 people with me in this intake room so it was overcrowded. I, along with everyone else, had to sleep on the cement floor. We were really close to one another. If I extended my arm, I would touch another person. I was not given a blanket, mattress, or pillow. I was still in my street clothes....” “The medical process lasted a long time – almost 18 hours.”
Baccam Decl., ECF No. 2-11, ¶¶ 9-10	“We were put into an intake room that had benches but no beds, mattresses, blankets, or pillows. There was one toilet in the room for the approximately 36 of us in there. We were so tired that we tried to lay down on the floor to sleep. The guards wouldn’t let us do that during the day, but they weren’t able to process us all when we arrived. Staff kept saying, ‘we’re so busy.’” “I and about 35 others spent our first night at Camp East Montana trying to sleep on the floor of the intake room together. We didn’t get blankets or pillows or anything. It was hard to sleep. Throughout that night, staff kept taking me and others out of the room, to another room for processing, like to get our ID checked or to give them any money we had on us, and then they’d put us back in the intake room. I think I was taken out three or four times that night. When we were outside the intake room, staff wouldn’t let us sleep or lay down or try to rest. They would say, ‘Sit up,’ ‘Can’t lay down,’ ‘Can’t sit on the floor, sit on the bench.’ They wouldn’t even let us lean against the wall. We kept telling them we were tired and had been up for 24 hours already, but they wouldn’t listen and told us, ‘Sit up and stay up.’”
Bounvongxay Decl., ECF No. 2-12, ¶ 6	“When I was transferred to Fort Bliss, I was held in an intake room with roughly 30 other people from around 4 p.m. on February 11th to early morning, around 3-4 a.m. on February 12th. The room seemed to be about 16 feet x 20 feet, although it’s hard to estimate, and it had metal benches, but no other furniture. There was only space for about half of us to sit on the benches.”
Camarillo-Gonzalez, ECF No. 2-16, ¶ 3	“When we arrived at Camp East Montana, the guards left us cuffed on the bus for about five hours. They didn’t allow us to go to the bathroom during that time. Then, guards put me in a small room with about 45 other people. The room was cold, which caused pain on the side of my body because I have what I believe are kidney stones. Me and the other detainees were left in that cold room for approximately three days. The guards only gave us bread and water during that time.”

UEG Decl., ECF No. 2-18, ¶ 4	“When I first got to Camp East Montana, I spent a long time waiting to get through the intake process. I arrived in the evening around 8:00pm. We had to sit and wait for a long time. Some people were already very exhausted and fell asleep in the waiting room, laying down on the floor. There were no blankets or pillows, only the clothes that we came into the facility with. We all had to sleep on the floor because there were so many of us and everybody was tired and wanted to lay down. There were a few metal benches but not all of us could fit on those benches. All that they gave us for food was a sandwich. Around 11:00pm, a guard came in who made us our identification badges. The guards came around a few times and shouted at us that we couldn’t sleep on the floor but there wasn’t anywhere else for us to sleep and so people would go back onto the floor after the guard closed the door or left.”
PKP Decl., ECF No. 2-23, ¶ 8	“When I arrived to Camp East Montana, I arrived at the Intake Processing Center. I was at the Intake Processing Center for about two nights, three days (from Saturday morning until Monday). I slept on the floor without any blanket, mattress, pillow, or covers and without being given access to a shower during that time. There was not enough room for all of us detainees to move around because the room was small. There were about 64 people in a room where it was standing room only and less than half could lay on the ground next to each other at one time. I saw that there was a sign posted stating that the capacity was for 30 people. The room was about 10x20 feet. We were all huddled next to each other on the floor or standing up. There was a toilet in the room, and we all had to use the restroom in front of others. I felt uncomfortable using the bathroom and people did not want to use it, but it was their only choice. When I had a bowl [sic] movement and use [sic] the toilet, I could reach up and grab the hand of another man all around me and other people were looking at me. The water we received was tap water that came out of the sink that sat on top of the toilet. The toilet does not have a seat cover and so the sink was dirty with spit and dust. When I was there, I noticed that there were people in the room with me who were sick as they were coughing, on the floor saying that they had a fever, and who otherwise appeared physically unwell. For example, a man was banging on the walls because he had severe pain in his teeth. Other people expressed that they needed their medication. But the guards did not care or listen. People were frustrated because we were all enclosed in a small space. For food, we received two pieces of white bread, a single slice of ham and cheese, an apple, and a small cookie; three times a day. That’s it.”
NYG Decl., ECF No. 2-24, ¶ 8	“I was in the intake processing center for one night and then transferred into the general population.... When I was at the intake processing center, I was forced to sleep on the floor (with no mattress) with many other people, huddling next to each other for warmth because it

	was so cold. I estimate that there were about 100 people in a large room with me. There was definitely not enough space for all of us, we were crammed in there. There was also one toilet for us without any coverings, meaning that we had to use the toilet in front of everyone. This was degrading. When I was there, people were coughing and visibly sick.”
CCD Decl., ECF No. 2-26, ¶¶ 12-13	“When I arrived at Camp East Montana, I was brought to intake on a Saturday morning, and I left intake on Sunday night. There were about 25 people in a small intake room. People were sleeping on the floor without blankets, pillows, or mattresses. There was one toilet that we all shared that was in the open air, so every time I used the bathroom, everyone could see me. There was a security camera in the intake room that could see us when we used the bathroom. There was a faucet on top of the toilet where we had to drink water from. The water and intake unit smelled bad.... [W]e had to drink water from the dirty sink on top of the toilet. The room itself was filthy. There was dust and sand everywhere, urine on the toilet, and discarded food on the floor.” “During intake, on Sunday after sleeping on the floor I had to take a shower because I was dirty after sleeping on the floor. I had to take a shower where other people could see me.”
HOK Decl., ECF No. 2-25, ¶ 6	“They did not give us clean change of clothes [during intake]; I had to wear the same clothes that I was arrested in. I had to wash our own clothes in the sink with the single use packets shampoo/body wash that I got. They only gave us small packets of toothbrush, toothpaste, and shampoo (which were single use). But there were days when we did not receive these hygiene supplies. We used shampoo to wash our body, wash our hands, and clean ourselves.”
Navdeep Decl., ECF No. 2-28, ¶¶ 6-7	“When we arrived [to Camp East Montana], I was placed in a room with approximately 40 other people. We were wearing our ‘outside’ clothes, which were the regular clothes we were wearing when we had been going about our daily lives before we were taken into custody by ICE.” “We spent approximately 3 days on the floor of that small room wearing the same clothes we had arrived in. The floor was very messy and dusty. After a couple days, when I touched the floor, I could draw a picture with my fingers in the dust that covered the floor. We were not given any blankets or other materials for comfort or warmth. I slept on the floor, just like most of the others in the room. The only water we had access to was from a fountain directly above the toilet seat in the room we were in. We did not receive toothpaste. We were given approximately three sandwiches per day.”

ZOR Decl., ECF No. 2-30, ¶¶ 9-10	“When I arrived at Camp East Montana, I was placed in an intake room for about a day and a half. We were told we had to wait to be processed and assigned a housing unit. The intake room was small, maybe about the size of a bedroom, and very cold. There were about 20 to 30 people with me in this intake room, so it was really crowded. We had to sleep on the cement floor, and that was if we could sleep at all because it was really cold and we got no blankets or anything else to keep us warm.” “During this intake, we were only fed small, cold sandwiches and a cookie. These meals were very small and did not taste very good. I was very hungry. We had to drink water from the sink in the bathroom that is located in the intake room.”
JLE Decl., ECF No. 2-31, ¶ 6	“[During intake] I received a small bag with a sandwich with a salty piece of ham and white bread. There is a camera in the room which can also see when we use the restroom. We have to use the restroom in the toilet in the room with others around and the camera looking at us.”
Gonzalez Ramirez Decl. ¶¶ 7-9, 12	“During the intake process when I first got to Camp East Montana, there were hundreds of people in the intake area. We were put in rooms we called ‘las hieleras’ (the ‘freezers’) because of how cold they are. I was placed in a small room with about 10 other people. There was only one toilet visible to everyone, and there was a security camera inside the room.... I had to sleep on the floor during this time without a blanket, mattress, or pillow for two nights. When I was in the room, people were very sick. People were coughing and sneezing with colds all around me, and there wasn’t anything I could do to protect myself. I saw that the guards came to get many people on a stretcher and took them away somewhere. For food, we only got a small sandwich and cookies for all three meals.” “I asked a guard if I could be put in a special unit at Camp East Montana because of my old age and disabilities. It was hard for me to sleep on the floor around other people; I don’t see or hear well, which can cause misunderstandings, and I don’t move well, which makes getting onto and up from the bare floor difficult and painful. While I was in intake, a guard told me that even if I were 100 years old, I would have to comply with the rules of this place and stay in that cold room. I begged the guard to be merciful towards me because I was 84. I was asking her for help with the cold room and to be provided with at least a blanket to keep myself warm. But the guard didn’t give me anything.”

	“When I was in the cold intake room, I understood what being in a concentration camp was like. It is cold, depressing, and we are there to be tortured.” “I spent about two or three nights in the intake room again [after ICE tried to deport me to a third country].... I was so sleep-deprived, exhausted, and hungry.”
Nelson Decl. ¶ 5	“I did not receive food or water throughout almost the entire intake process. Around 3 am, I finally received a sandwich, some cookies, and a small glass of water. I was finally taken to my pod around 4 am.”
Majok Decl. ¶¶ 6-7	“When I first arrived at Camp East Montana, I was put in the processing area for about seven days. I slept on the floor underneath the metal benches with no blanket. For about seven days, I was in the street clothes I was arrested in with no access to a shower. I was with about twenty-four other people in the processing area, and we all slept on the floor together. It was so crowded that I couldn’t even put my arm out without touching another person. During this time, my stomach felt like it was ripping apart because the facility didn’t give us enough food. For those approximately seven days, the facility did not give me my medication for diabetes, high blood pressure, and depression. During those seven days, I felt like I was going to die.” “After those approximately seven days, the facility brought me to the general population to sleep on the beds for about three or four hours and then returned me to the processing area for another approximately three or four days.”
Rodriguez Sanchez Decl. ¶¶ 3-4	“My first time going through the intake process at Camp East Montana was on or around January 5, 2026. I was held in the intake room for three days. We were not allowed to shower and only given sandwiches and cookies for food. There were about 72 people in the room with me. I think that the room was about six-by-six meters. During this time, we had to sleep on the floor, but we could not all fit lying down since the room was so crowded. I had to sit the whole first night and then I would take turns lying down with others so we could all get a turn to lie down.” “The second time I was in the intake room was months later on or around April 9, 2026, I was there from approximately 4 PM to 2 AM. There were about 26 people in the room with me that day. The room was the same as last time, about six-by-six meters. People were lying down on the floor then.”

Rivero-Gonzalez Decl. ¶¶ 7, 12, 14-15	“At intake, I was forced to sleep on the floor for about three days. I had difficulty walking around and was not given a wheelchair, walker, crutches, or cane. It should have been obvious to anyone who saw me that I needed help walking because I was hopping around on one foot crying in pain and I struggled to walk. The guards saw this, and I believe ICE officials saw me struggling to walk as well.” “During the intake process at Camp East Montana in June 2026 [the second time I was there], I was held in an intake room from about 5 pm until about 8 am the next day. When I was in intake, I requested to use a wheelchair and I was provided it. Again, I was forced to sleep on the floor that night. There were about 10 other people in the intake room for [sic] me, and we all had to sleep on the floor together without a blanket, mattress, or pillow. There was one toilet in the room and it did not work; it did not flush. We told the guard that we could not use the toilet, but the guard said that if we needed to urinate or had a bowel movement, we had to go there and not flush. Other detainees used the bathroom, and we could not flush the toilet. That meant that a lot of urine and feces was in the open lid toilet in the room and we could smell it. The stench was terrible.” “The wheelchair did not fit in the area where the toilet was in the intake area. There was no privacy when I had to use the toilet. There is a small covering that is a few feet high, but if you stand to wipe, others can see nearly all of your body. I had difficulty using the toilet, but I had to push myself from my wheelchair onto the toilet, at a distance of about 4 feet back.” “On or about 6 pm on my first night at Camp East Montana in June 2026, I received a small sandwich that consisted of two pieces of white bread, a slice of cheese and ham, an apple, and a cookie. At around 3 am, I was so hungry and we asked the guards if they could please give us more food. But the guards refused.”
Pedro Juan Decl. ¶ 8	“On or around September 7, 2025, I was taken to Camp East Montana at Fort Bliss. I arrived at Camp East Montana around 6 pm and was put in a small room with 38 or 40 other women. We were kept in that room for approximately two days. There was no air conditioning and the temperature was very hot. There was no place to lay down so we had to sleep on the bare floor. We were only given a thin foil blanket to cover up, but we weren’t given a mattress or pillow.”
Claudina de Paula Decl. ¶¶ 6-8, 14	“When I arrived at Camp East Montana, I was held in an intake room for approximately 5 days. During that time, I was not allowed to shower and was not given a toothbrush, soap, deodorant,

	or brush for my hair. I was also not allowed to call my family during those 5 days. There were approximately 20 people in that intake room. There was a toilet with a sink in one corner of the room. If we needed toilet paper, we had to ask the guards for it. We didn't have any soap to wash our hands." "Guards would bring us a paper bag with a sandwich, a cookie, and an orange or banana approximately three times a day. Each person received only one bag at a time. There was no fixed schedule to eat. We had to keep asking the guards to bring us food. We also had to ask for water. If we didn't ask for water, the guards would not give us any." "The [intake] room felt like it was freezing. We did not have any blankets or anything warm to cover ourselves with. I could see people shivering from the cold and a lot of people were coughing or sneezing. After two days, the guards gave us foil sheets to cover ourselves with. There were three metal benches in the middle of the room. There was nowhere else for us to sit or lay down, and there wasn't enough space for all approximately 20 of us to sit on the benches. We had to sit, eat, and sleep on the bare floor during that time. The only window was a very small window on the door that looked out to a hallway, rather than to the outside. There were bright LED lights that were turned on the entire time I was there. I heard a lot of people crying." "During the five days I was held in intake, I was not allowed to speak to my family. Then, when I was taken to a housing unit, it took approximately 7 days for the facility to give me a pin to be allowed to use the tablet and call my family. In total, I was not able to speak to them for about 15 days. My family did not know where I was throughout that time."
Romero-Paredes Decl. ¶ 5	"When I was transferred to Fort Bliss, I arrived by plane with approximately 75 other people at around 1pm.... It was very crowded, hot, and loud. The booking process took around 8 hours to complete.... I received 4 pairs of used underwear, 4 pairs of used socks, 4 t-shirts, and a sweatshirt. I know the underwear and socks were used because they all appeared to be stained yellow and the socks had holes. I was also provided with a facility handbook. I did not receive any food or drinkable water at Camp East Montana until the morning after I arrived, around 7am, roughly 24 hours after my last meal from my prior facility."
Monroy Decl. ¶¶ 5, 7	"The [intake] 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." "During intake, we received only a small sandwich and a few cookies three times each day."
Aguilar Decl. ¶ 4	"The [intake] room was small and there were three benches in it when we arrived. There was nowhere to rest."
Handbook, Rules, and Orientation	
Angye Decl., ECF No. 2-27, ¶ 7	"At Camp East Montana, I was not been [sic] given the facility handbook and ICE's general handbook despite asking for it multiple times. One officer told me I won't need it because the longest anyone stays here is two weeks. Another officer told me he didn't even know there was a handbook."
Ly Decl., ECF No. 2-9, ¶ 34	"I did receive a handbook the first time I was here but no one ever reviewed it with me. It was not an actual orientation. Some of the things in the handbook were not followed by staff but they expect us, the detainees, to follow the handbook. For example, the handbook says recreation time is one hour each day however recreation time usually happened twice a week and never the full hour. Since I got here a few days ago, I was not given a handbook."
LLH Decl., ECF No. 2-32, ¶¶ 22, 46	"Every time I arrived for intake at Camp East Montana, the guards played a video in English with Spanish subtitles explaining the general rules of the facility. The video, however, contained footage of other detention centers.... When I entered the facility, nothing that was on the instructional video was reality." "Though I went through orientation four times, staff never explained the rules of how to get medical and dental care."
RES Decl., ECF No. 2-20, ¶ 40	"When I went through intake here, there was a video running all the time with fake images. The video showed windows being opened, beautiful food being served, people who were well fed, everything being clean, and people who were well dressed."
Rivero-Gonzalez Decl. ¶ 43	"I never received a handbook with the rules at Camp East Montana. Even if I had, there would have been no way for me to read it."
Baccam Decl., ECF No. 2-11, ¶ 35	"I got an orientation handbook at Camp East Montana.... The handbook didn't seem to be related to Camp East Montana, though. Like, it said there's a commissary, but we didn't have commissary. The guards seemed to make up the rules."

Do Decl., ECF No. 2-17, ¶ 5	“I didn’t get a handbook when I arrived at the facility but there was one in the pod. The first few months I was detained, it was really chaotic and nobody understood any of the rules. Staff is only consistent at being inconsistent. They don’t seem to follow rules in the handbook. I read the handbook very closely. I kept asking them for things in the handbook, like commissary, but they said that they didn’t have it.”
SNM Decl., ECF No. 2-22, ¶ 7	“The day that I arrived to E-unit I did not receive any handbook with the rules, but we were explained basic rules by a guard, such as the count times, rules for TV, and sleeping times. When I arrived, no one explained to me the process for filling a sick call to get medical attention.... Similarly, when I arrived no one explained the grievance process to me.”
ZOR Decl., ECF No. 2-30, ¶¶ 12, 13	“... [W]henever I ask for something as simple as my regular meal, going to the barber, or being allowed to go to mass, the guards ignore the rules. The rules only work one way here. There’s no reciprocity. Maybe it is not even worth to speak about equality here; they violate our rights every day.”
Claudina de Paula Decl. ¶ 13	“I did not receive a handbook at Camp East Montana, so I did not know how anything worked at the facility, including recreational time, barbershop, or calls to family.”
Piñango Decl. ¶ 3	“When I arrived, I did not receive a handbook. I learned about recreation time, the barbershop, and how to get soap, among other things, from other people detained in my pod.”
Monroy Decl. ¶ 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.”
Aguilar Decl. ¶ 16	“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.... 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.”
Housing Layout and Lack of Windows	
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 4-5, 12	“The unit is in a soft-sided tent. The tent is divided into different sections, and my section was called E-11. There were about 72 of us in E-11 when I was there. There were 18 bunk beds (four beds per bunk bed), 9 on each side of the unit. The mattresses on top of the metal beds were incredibly thin (about 2 inches), and I could not sleep properly because I was so uncomfortable. The bunk beds were not separated by a wall or partition, and there is no privacy. You can see and hear everyone else in the unit.”

	“There were no windows in the unit, and I did not see the sunlight or moonlight at all during this entire time. The only way I and others could know if it was night or day is by a small gap between the canopy roof and the tarp wall that is a few inches wide. None of the units that I’ve been to have windows, and the layout is the same in each. There is a light that is kept on all night at the front entrance of the unit that bothers us and prevents those who are closer to the door from sleeping. The guards do not let them place a towel or item of clothing over their eyes to sleep.” “All the units I’ve been in have the same layout and the same problem of sand and dirt.... There are no walls or partitions between the bunkbeds. There are no windows and so we do not see the sunlight during the day.... We only see the sunlight if we are allowed to go out to the yard, and even then it’s only from the side chain linked fences. In the middle of the unit there are five lunch tables. There are two TVs, one on each side of the room hanging on the ceiling. There are 6 toilets and 6 showers that are on the other end of the unit. The toilets and showers are not private.... The walls between showers and toilet stalls are made of plastic tarp. Sand and dirt get everywhere in the unit. Because the toilets are close to the bunkbeds, we get the foul smell of urine, feces, and body odors. We get this smell when we eat, while we are sleeping, and all day. For about 24 hours a day, I’m in that windowless room. If I’m not taken outside for ‘recreation’ or I’m not working as a barber, I’m inside that room.”
Senevilay Decl., ECF No. 2-10, ¶¶ 17, 19	“The conditions in each unit have been the same; the same layout, the same structures, the same sand coming in.” “When it’s windy outside, you can hear the tent sides and roof flapping, and it’s really noisy. You can’t sleep when that happens. Sometimes it goes on for six hours straight.”
Bounvongxay Decl., ECF No. 2-12, ¶ 5	“At CEM, I was held in the Delta unit. In my unit, there were about 70 bunk beds, which were arranged in rows against two opposite walls. All but about 6 or 7 of the beds were filled. In the middle of the room were several round tables. The bathroom was connected to the room, and there was no separate recreation or dayroom area: we ate, slept, and spent almost all of our time in that one room.”
Mbabid Decl., ECF No. 2-8, ¶ 14	“I spent approximately two weeks in the medical tent at Camp East Montana. It was a tent with beds in it, and I was put in a room by myself. The room wasn’t sealed; the walls were tall didn’t quite go up to the ceiling (some air could pass through).”

Ly Decl., ECF No. 2-9, ¶¶ 14, 21	“Camp East Montana has large tents where people live, which are divided into housing units. Each housing unit has about 72 beds. The housing unit is about the length of a basketball court but not as wide as a basketball court. I think a baseball field is bigger than the unit I am in.... [T]he roof of these rooms were not sealed on the top. The top is open. So if anyone got sick, the air they breathed could spread throughout the tent and into other housing units because the rooms were not sealed off.” “The first time I was housed at Camp East Montana, myself and other detainees were kept inside a windowless tent almost 24/7.”
Fernandez-Gastelum Decl., ECF No. 2-14, ¶ 4	“At Camp East Montana, I am currently held in the housing tent Delta-6. There are approximately 50 people in Delta-6. The housing tent is not made out of solid walls like concrete. Instead, it seems to be made from a sort of tarp material with metal tubes and pillars.... There is also always some sort of noise outside the tent, like trucks bringing supplies to the camp and construction happening.”
Moreno Rodriguez Decl., ECF No. 2-15, ¶ 5	“The conditions in all of the housing units I was in were bad and the guards/officers treated all of us like animals. The mattresses they give us to sleep were so thin that we were practically sleeping on just the metal frame of the bunk bed.”
Do Decl., ECF No. 2-17, ¶¶ 10, 19	“There is a hallway down the middle of the tent, and on either side are the pods, which have four walls but no ceiling other than the top of the tent high above. The walls are about 10-12 feet high but there’s no ceiling that connects to the walls. You can toss things from one pod into another. I’ve been hit by things people throw from another pod before. When you’re in your pod, you can hear what’s being said in the hallway outside your pod or in the next pod.” “I feel uncomfortable in the pod because I can see that there are cameras looking into the showers and bathrooms.”
UEG Decl., ECF No. 2-18, ¶ 10	“The tents that we are housed in are not real buildings and it makes me worried for my safety. There are no windows.... When the wind blows very hard, you can hear it very loudly and it is unbearable. I have trouble sleeping or resting when the wind is blowing.... There is no privacy. It is an open layout room and I can hear the people around me clearly because the dividers between the housing units don’t go up to the ceiling.”
RES Decl., ECF No. 2-20, ¶¶ 10-12	“Every unit I’ve been in has the same layout. They all have about 72 beds which are divided into two rows of 9-four-person bunk beds: one row on each side. There are about four big metal

	lunch tables in the middle of the unit, and there are about six toilets and showers across from the lunch eating area. There are also two televisions. There are no walls between the bunk beds, and we have no privacy while we sleep. There is not enough space for all of us to eat at the lunch tables together. The others have to eat at their bunk beds.” “The walls are wooden boards (which create the units within the large tent), and the floor is also wood boards. The ceiling/roof is made of a tarp-like material, which is kept up by these machines that blow air.” “There are no windows in the unit. This means that I cannot see the sun or clouds during the day. There is also no clock in the unit, so the only way I can tell time is by looking at the tablet whenever we get an opportunity to use them or when the guards tell us when to wake up, go to sleep, eat, clean, or go to the yard. All of the days fell the same.”
SNM Decl., ECF No. 2-22, ¶¶ 9-10, 13	“There were about 72 other people in that housing unit when I was there. There were about six toilets (porta potties) and six showers for us all to share. There were not enough toilets and showers for us all and there were issues because the unit was dirty.” “In all the units I have been in, there have not been any windows at all. We cannot see the sunlight during the day. I feel depressed because I cannot see the sun. We do not get sufficient vitamin D or C either through direct sunlight exposure or the food. The only opening is between the wall and ceiling of the tarp, which is where all of the dust and sand from the outside comes inside.” “There are no walls that separate the bunkbeds from each other. There is no privacy between us.”
PKP Decl., ECF No. 2-23, ¶¶ 12, 14-15, 32	“The housing unit where I am detained has approximately 72 beds organized into 9 four-person bunk beds. Each side of the unit has nine of the four-person bunks. There are no windows anywhere inside the unit, so we cannot see sunlight, the sky, trees, or anything outside. There are also no clocks. Because of this, it is very hard to know what time it is or even distinguish one day from another. The only ways we can tell time is by checking the shared tablet or asking officers. Not being able to see daylight or the outside world has affected me mentally and emotionally. I often feel angry, desperate, anxious, and depressed because every day feels identical.”

	“The lighting inside the dorm is very harsh and remains on throughout the entire day from 5:00 AM until about 10:00 p.m. Even after the main lights are turned off at 10:00 PM, one bright light above the front entrance stays on all night. In every housing unit where I have stayed, that light has bothered me when I try to sleep because the light shines directly toward where I sleep. Because of this, I have difficulty resting at night and rarely sleep well.” “The middle of the unit contains a common area with approximately five metal lunch tables and two televisions mounted on both sides of the room. Behind the tables are about nine toilets and nine showers, in A-14. The bunks are about three feet apart from each other, and there are no walls separating the bunk beds, which means there is almost no privacy, even while lying down. The toilets and showers are enclosed only with tarp-like partitions instead of solid walls.... While we eat meals, we can see other people using the restroom or bathing, and we can also smell sewage coming from that area. The lack of privacy feels humiliating and degrading.” “Since being here, I have felt the symptoms of chronic anxiety because there are no windows, I feel trapped here, and feel that I cannot get any fresh air.
NYG Decl., ECF No. 2-24, ¶¶ 28-29	“All of the units have the same layout. There are 72 beds, arranged in 18 bunkbeds of 4 beds each. There are 9 four-person bunk beds on each side of the room. Each set of four-person bunk beds is about 3 feet apart from one another. There are no walls between the bunkbeds.” “There are no windows and so we do not see the sunlight during the day. We cannot see the sun, clouds, or trees. We only see the sunlight if we are allowed to go out to the yard and we can only see it through a chain-link fence. In the middle of the unit there are lunch tables. There are two TVs, one on each side of the room hanging on the ceiling. There are 6 toilets and 6 showers that are on the other end of the unit. The toilets and showers are not private.”
HOK Decl., ECF No. 2-25, ¶¶ 15, 18-19	“Every housing unit I have stayed in at this facility is set up basically the same way. My unit has 72 beds made up of four-person bunk beds lined along both sides of the room. There are no windows or clocks anywhere inside the unit, so we cannot tell whether it is day or night or see any sunlight. The walls are plain white, and the bright overhead lights are on from about 5:00 a.m. until 10:00 p.m. every day. The days blur together and it is hard to keep track of time. We rely on officers or the shared tablet to know the schedule and the time. Being cut off from

	daylight and the outside world has affected me emotionally and psychologically. I frequently feel anxious, frustrated, and trapped.” “The lights inside the dorm stay on during the day and they are very bright. Even after the main lights are shut off around 10:00 p.m., a bright light near the entrance remains all night. Because I sleep near the main entrance to the unit, the light bothers me when I sleep.... Since being detained here, I often feel exhausted because I do not sleep well.” “In the middle of the unit there are about five metal tables, but when the dorm is full, there is not enough seating for everyone. There are two televisions on one side of the unit. Next to the tables, there is an area with about 9 toilet stalls and about 9 shower stalls. The bunk beds are right next to each other without any privacy.... We can also see and smell the restroom area while eating meals nearby.”
CCD Decl., ECF No. 2-26, ¶¶ 16, 19, 21-22	“The housing unit where I am detained contains about 72 beds arranged in four-person bunk beds on both sides of the dorm. There are no windows or clocks anywhere in the unit, so we cannot see sunlight or tell the time of day. All of the walls are white and bright because of the lights that stay on from about 5 a.m. to about 10 p.m. every day. Because every day looks the same, it is difficult to distinguish one day from another. We depend on officers or the shared tablet to know the time and schedule. The lack of daylight and connection to the outside world has affected me emotionally and mentally. The lack of sunlight has worsened my mental health. I often feel very anxious, depressed, desperate, and hopeless. Officers control when I wake up, eat, go to the yard, and sleep.” “Being in the enclosed windowless tent reminds me of when I was in the SHU. I feel trapped inside here. I feel very anxious being inside here.” “The dorm lights remain bright throughout the day and most of the night. Even after the main lights are turned off at around 10:00 p.m., a strong light near the entrance of the unit stays on all night. The light shines into the sleeping area and makes it difficult for me to rest. Since arriving at this facility, I regularly feel exhausted and sleep deprived.” “The center of the housing unit has about four metal tables (each with about 5 or 6 seats) and two televisions on one side of the unit. There are not enough tables for us all to sit at the same

	time. Behind that area are the toilets and showers. The bunk beds are placed close together with no walls separating them, so there is no privacy.... We can see and smell the restroom area while eating meals.”
ZOR Decl., ECF No. 2-30, ¶¶ 14-15	“Camp East Montana is not like the other ICE detention center I was at before. It is a tent facility. Each housing unit has about 72 beds. I am currently in housing unit A-13, and during my time at Camp East Montana I have also been in housing units D-2, B-2, and D-8. All the housing units I have been in are pretty much the same. There are bunk beds on either side of the tent, four tables in the middle, and the bathrooms are towards the back of the tent against the back tent wall. The tents are windowless and there is no natural light coming in to the housing units from anywhere.” “The bunk beds are set up really close to each other. I estimate there is about 2-3 feet of space between the bunk beds. When I first arrived at Camp East Montana in September of 2025, my housing units were very full, with about 60 to 70 people in them.”
JLE Decl., ECF No. 2-31, ¶¶ 9, 11	“The housing unit where I am at has about 72 beds organized into 9 four-person bunk beds. Each side of the unit has nine of the four-person bunks. There are no windows anywhere inside the unit, so we cannot see sunlight, the sky, or anything outside. We can only hear the sound of the trap [sic] clanking against the metal frame of the unit, because of the strong winds, which sometimes keeps us up at night. There are also no clocks. Because of this, it is very hard to know what time it is or even distinguish one day from another. The unit is a big white trap [sic] that has bright lights inside. I feel desperate and anxious by not being [sic] to see daylight or the outside world has affected me emotionally. We rely completely on the guards to tell us when to wake up, eat meals, go outside to the yard, and go to sleep.” “The center of the dorm has metal tables and there are two televisions on one side of the unit, with about six toilets and six showers next to the metal tables. There are not enough tables for us all to use at the same time when the unit is full. The bunks are close together and there is little privacy.... While eating meals and throughout the day, we can see who is in the bathroom (unless we cover it with our own clothes) and smell the human waste coming from the restroom area.”
LLH Decl., ECF No. 2-32, ¶¶ 16, 25	“There are 72 beds with 18 four-person bunk beds.... There are no windows anywhere in the unit. It’s hard to know what time it is because we can’t see the sun and there are no clocks in the unit.”

	“The units I have been in have large metal lunch tables in the middle of the unit, one television on each side, and there are six toilets and six showers behind the lunch tables. There are no walls, screens, or other barriers that separate the four-person bunk beds from each other, and they are about 3 feet apart from each other. There is no privacy in my unit at all. The walls of the toilet and shower stalls are made of tarp....”
Gonzalez Ramirez Decl. ¶ 15	“The conditions in my unit are terrible. There is no sunlight because there are no windows. The room is cold and brightly lit all day, which makes it harder for me to see and move around the unit. Even at night, there’s a light that stays on which makes it difficult for me to sleep. I am very tired all the time – it’s really disorienting not to be able to see daylight or know what time it is. I feel like I am dying here.”
Rodriguez Sanchez Decl. ¶ 11	“I was moved about ten times; I do not know why I kept moving between units. It was very disorienting to keep being moved and be housed with new people.”
Barreto Decl. ¶ 11	“In Bravo-5 conditions were so bad that people in my housing unit would go on hunger strikes or peacefully protest.”
Claudina de Paula Decl. ¶ 16	“There are no windows in the pods, so I did not know if it was day or night. When the nurses came in to give other people their medication, I would ask them if it was sunny or rainy outside. I just wanted to know. At times, I didn’t see the sky or the sun for over 5 days.”
Dust and Sand Intrusion	
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 11, 12, 45	“When I arrived ..., the unit was very dirty with sand coating the surfaces of tables and beds. I think the sand comes in from the gap between the roof and the walls. We asked the guards if they could send a crew to clean, but they did not. The beds were full of sand. So, the detainees started to clean the common area and their bunkbeds and the sand went everywhere. The sand got into my lungs, eyes, and on my body.” “All the units I’ve been in have the same layout and the same problem of sand and dirt.” “Since arriving, I have had serious issues with breathing because of the dust and sand that is all around us that gets inside. There is so much dust and sand that it gets on top of our bunks, lunch tables, showers, toilets, on the floors, such that we have to clean it multiple times a day. But sometimes we choose not to clean it because the dust and sand will just spread around. The guards use facemasks, but we are not given any masks. When I am sleeping, I wake up multiple times because I cannot breathe properly and I lack sufficient oxygen going into my nose,

	because it is clogged. Sometimes I want my nose to fall off because of the dust. I feel like the dust is eating me from the inside.”
Ly Decl., ECF No. 2-9, ¶¶ 27, 29, 32, 33	“There are a lot of sandstorms at Camp East Montana. All the sand and dust from outside comes down on us in the housing unit.... The sandstorms are pretty bad there. I can hear the tent rattle because the winds are so strong. Myself and others would inhale all the dust from these sandstorms. The dust made me feel sick. I could feel it in my nose and mouth and all over my hair. I had to blow my nose often and spit to get rid of the dust. I asked for masks, but the guards would deny my request or they’d say ‘maybe tomorrow’ and not give us anything the next day either.” “The sand and dust also caused me to experience coughing, watery eyes, and a runny nose.” “Dust covered every surface area, including our beds and the table area. Whoever slept on the top bunk was covered the most with dust. I slept on the top bunk the first time I was here so I was always breathing in dust. When these sandstorms happened, we would ask for cleaning supplies but staff would not give them to us so we could clean and clear the dust in our living space.” “No staff person ever told us that the sand and dust could be dangerous for our health or how to protect ourselves. The guards often wear masks, but we usually aren’t given any.”
Majok Decl. ¶ 18	“When the facility turned the air conditioning system on, dust would come in from everywhere and we’d be coughing from the dust. My bed was right below the pipe where the dust came from, and I had to cover myself with a blanket and a towel to try to protect myself from the falling dust. I used a combination of a blanket, towel, or t-shirt to try to cover myself because the blanket wasn’t long enough to cover my entire body. My podmates did this too.”
Navdeep Decl., ECF No. 2-28, ¶ 34	“I didn’t have sinus problems before arriving at Camp East Montana, but now I do.... The dust collects in our tent. Whenever there is even a little movement, the tent moves and there is dust that falls on us. The air isn’t clear and we can see particles in the air. The dust affects my health. From the top of my nose all the way through my throat feels uncomfortable, like I am breathing hot air. Sometimes my throat gets blocked. It hurts to breathe. My eyes get very red and itchy. I have been taking allergy medication at night, which seems to help for approximately 10 hours, but then my symptoms start up again, including sneezing, a runny nose, red and watery eyes, and my throat feeling swollen.”

Senevilay Decl., ECF No. 2-10, ¶¶ 18-19	“The sand comes in when it’s windy outside, but the wind is constant, so it comes in a lot. About two months ago, there was a sand storm every week, and the housing unit filled with sand. There was sand in the food and in your hair. I’d wake up with a dry mouth. I never had a dry mouth like that until I got here to Camp East Montana. When we swept the unit, there would be piles of sand.” “When it’s windy outside, you can hear the tent sides and roof flapping, and it’s really noisy. You can’t sleep when that happens. Sometimes it goes on for six hours straight.”
Angye Decl., ECF No. 2-27, ¶ 37	“The dust is so terrible here at Camp East Montana. For example, even when I wipe my hand on the table in the attorney visit room, you can see the red dust that is left on my hand. When I’m eating, the dust gets all over my food. The dust makes me cough. There is sometimes blood that comes out when I cough from the dust.”
Bounvongxay Decl., ECF No. 2-12, ¶¶ 17-19	“The biggest problem was the dust, which felt and looked like a red sand, kind of like gravel. There was visible dust in the housing unit at CEM any time there was heavy wind. CEM is made of tents. The dust comes in from gaps in the tarp they use to cover the whole tent. I could see light coming in at all the places where the tarp connects, including the roof, corners, and sides. When the wind blows, you can smell and feel the dust. About three to four times while I was at CEM there was so much in the living areas that when you swiped your hand on the table your hand would turn red.” “When dust got into the medical area, it did not seem to be cleaned.” “I wore a mask to sleep whenever it was windy because the dust made it hard to breathe. I believe this happened at least four times while I was at CEM. I was able to get masks from the guards at our unit or from the medical unit, because I went there most days. But the guards in our unit sometimes ran out of masks, and when they did, other people in my unit would just have to wait for them to get more.”
Baccam Decl., ECF No. 2-11, ¶¶ 19, 22, 38	“There was dust everywhere at Camp East Montana in the housing unit. I mean everywhere. You couldn’t escape it. It was on the bed, on the tables, on the floor. When you wake up and blow your nose, it’s nothing but dust. I was on the top bunk, and I could see the dust suspended and moving in the air, backlit by the lights. When people moved around the unit, the dust would kick back up into the air.”

	“The recreation yard was so dirty. It was very windy there, and dust storms would come in. We’d feel sick from the dust.” “When there’s a big dust storm, you can see and feel the dust come in.”
Fernandez-Gastelum Decl., ECF No. 2-14, ¶ 4	“There is a lot of windiness and air from the outside that gets in. As a result, dust fills the housing tent. The dust doesn’t just come from below. It comes from up top, bottom, and any exposed part of the tarp. The dust causes me to experience allergies. Many of us, myself included, experience sniffles, congestion, and have a hard time breathing as a result of the dust.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶ 7	“There was a lot of dust that came into the tent and made us feel sick. The dust made me feel very congested, as if I had a cold, and I would sometimes get nosebleeds.... In the units, I could see a layer of dust on top of all surfaces including the beds and the tables where we ate every day. People that slept in the top bunk beds would wake up covered in dirt and dust. This happened at every unit I was housed in.”
Do Decl., ECF No. 2-17, ¶¶ 14, 16	“It is very dusty and sandy in the pods, especially when there are dust storms. After a dust storm, there’s a layer of dust on top of everything in the dorm and it’s hard to breathe. In or around March there was a bad dust storm and there were a lot of guys in the pod who were sneezing a lot or couldn’t breathe at all.” “Now it’s starting to get too hot to be comfortable outside and it’s very dusty so you breathe in a lot of dust at recreation.”
UEG Decl., ECF No. 2-18, ¶¶ 7, 10	“Since being transferred to Camp East Montana, I use the inhaler 3 or 4 times a week. I have to use it more at Camp East Montana because there is so much wind and dust.... I have never had any problem with asthma or breathing until I got to immigration detention.” “Sand and dust is always coming into the unit.”
RES Decl., ECF No. 2-20, ¶¶ 13, 18, 36	“When it’s windy outside, sand and dust get into the unit. It can take days before it’s cleaned up.” “The tarp covering that serves as the roof of our unit is not fully sealed, allowing water and dust to enter the unit. That means that when it rains, rain gets into the unit and falls on people, particularly those who are on the top bunk. The same is true when it’s windy outside; dust and sand get into the housing unit and are particularly bad for people on the top bunk. In other units,

	I have slept on the top bunk where water fell on me when it rained, my face and body were covered by dust/sand throughout the night and day.” “The sand and dust here are really bad. When there’s wind outside, the entire unit gets covered in dust and a sandy substance. We’ve asked guards for masks to cover our mouths and noses, but they won’t give us any. Most of the time I have to sleep in those conditions. My throat gets really affected and starts aching and itching, and I start to sneeze. I’ve gone to medical staff about it here and explained what’s happening, but they just say, ‘No, you don’t have anything, here are two lozenges’ and tell me to drink water.”
ZOR Decl., ECF No. 2-30, ¶¶ 28-29	“The housing units are always dusty and dirty because the tents are not sealed and dust is constantly coming in. The a/c units also blow dust everywhere every time they turn on. The dust is worse when it is really windy outside; the tents will move around a lot when that happens and even more dust comes into the housing units. When that happens, people on the top bunks get the worst of it because a lot of dust falls on them directly.... That means that our bedding, our clothing, our possessions, and all surfaces are always dusty and sometimes also wet from the rain. The guards do nothing when our things get really dusty or wet from the rain. Instead, we just have to sleep somewhere else and wait for the laundry rotation to come around to clean our things.” “In addition to making the housing unit dusty, the constant dust in the air has been hard on my health. I never used to have any medical issues but since coming to Camp East Montana I have not been able to breathe well.”
JLE Decl., ECF No. 2-31, ¶ 17	“There is a lot of sand and dust that goes into the unit through the openings between the tarp and the metal frame. The sand from outside goes onto our bunk beds, in the toilets, showers, on the floor everywhere, on our clothing, lunch tables, and on our bodies. We breathe in this sand and dust every single day, which makes it hard to breathe. The women who sleep on the top bunk get dust/sand on their faces and bodies while they sleep. I constantly have a dry throat. My eyes and nose is dry and sometimes my nose [sic] bleeding. My eyes are regularly itchy as well. My skin is dry and my head hurts regularly. The only thing we get to help alleviate these symptoms are cough drops that we get sometimes.”
LLH Decl., ECF No. 2-32, ¶ 29	“There is a lot of dust and sand in our unit. When there are dust storms outside, all the sand falls all over our beds, which makes it difficult for them to stay clean.”

Nelson Decl. ¶ 11	“The air quality at Camp East Montana is also horrible. There is always too much dust in the pods. I slept on a top bunk at Camp East Montana and every day I would wake up with dust and dirt in my face and hair. When I arrived there in September, I started coughing a lot and getting nosebleeds. I have asthma but had never felt like I needed an inhaler until being detained at Camp East Montana.”
Rodriguez Sanchez Decl. ¶ 16	“The dust inside the tent was terrible at Camp East Montana. This was a problem in every housing location I was in. I felt dirty constantly because of the dust in the room and could see the dust in the air and on the beds. I could tell the air conditioning ducts were never cleaned or maintained. I think that is how the dust was getting in. The air duct was visibly covered in dirt and dust. The dust irritated my throat and possibly contributed to the throat infection I contracted while at Camp East Montana.”
Barreto Decl. ¶ 18	“Dust gets into our units every day. In less than 2-3 weeks after coming, even if you came in here as a healthy individual, you will get very sick. The dust affected [sic] during my time in Camp East Montana. I am regularly congested, have irritation in my throat, and difficulty breathing. I was given a nasal spray to help with the symptoms. I had to use it everyday to help with my symptoms.”
ZOR Suppl. Decl. ¶ 11	“Dust and dirt remain the same. A crew is supposed to come in to clean every Monday. When they leave, however, the unit is as dirty as before. There is a lot of dust, hair, and debris accumulated under the beds and in the corners of the room. That is still there when the maintenance crew leaves. Sometimes we try to clean ourselves.”
Reina Decl. ¶ 13	“There is a lot of accumulated dust and dirt under the beds and in the corners of the room.... We breathe all of this dust and dirt every day.”
Pedro Juan Decl. ¶ 9	“Dust gathered under the beds and on top of surfaces. You could also see dust particles in the air when you looked up. During my time at Camp East Montana, I suffered from a lot of allergies. My nose felt congested and my throat was itchy. I sneezed and coughed often and, as a result, had a hard time falling asleep.”
Moreno Rodriguez Decl. ECF No. 2-15, ¶ 25	“Throughout my time at Camp East Montana, I also noticed a lot of dust coming into the units. Every morning, I would wake up feeling congested and with cold-like symptoms. Our clothes were often covered in dust and when I showered, I could feel the dust or dirt in my skin. The top of the bunk beds would often be covered in a layer of dust. We were not given any face covers, so we breathed all the dirt in.”

Angye Second Suppl. Decl. ¶ 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.... Upon waking up, I would find my blankets often covered with brown dust bits.”
Claudina de Paula Decl. ¶ 46	“The pod was dirty and had a lot of dust. While I was there, I experienced a lot of allergies, nasal congestion and a runny nose.”
Romero-Paredes Decl. ¶ 15	“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 makes me feel like I’m choking when I sleep and makes my throat very itchy. I clean the unit daily with other individuals in my unit because the dust and sand are so bad. I tried to cover my face with a white shirt to put a barrier between my face and the dust while cleaning, but the guards forbade me from doing so. I have also asked for a medical grade mask, like the ones most of the officers get to wear, but was denied. Due to the dust and sand, I must blow my nose frequently and often have a very sore throat. The nurse has only provided salt water to gargle or a cough drop. These do not solve the problem of the dust entering our tents each day.”
Piñango Decl. ¶ 5	“The pods are usually filled with dust. I heard people around me complain that if they slept in the top bunk bed, they would wake up covered in dust.... The air we breathe makes a lot of people sick, including me. During my time here, I have suffered from a lot of allergies. I sneeze a lot, my eyes get watery, and my nose feels congested.”
Rossa Chanchamire Decl. ¶ 13	“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.”
Monroy Decl. ¶¶ 29-31	“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.” “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.” “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.”
Aguilar Decl. ¶ 12	“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.”
Unhygienic Living Conditions, Inadequate Cleaning and Cleaning Supplies	
Ly Decl., ECF No. 2-9, ¶¶ 25, 27, 32	“At Camp East Montana, the other detainees and I had to clean our housing unit to try to keep it clean. We didn’t get enough cleaning supplies to do it regularly, however. Even when we asked for supplies, it could take days before the guards would give us anything. It’s the same now that I’m back again.” “The staff do not clean it up frequently enough. I have had to breathe [the sand] in constantly both times I’ve been here. The staff would clean the housing unit once per week and wouldn’t clean more often, even when there was a sandstorm, and so then the sand would remain in the housing unit until the next weekly clean.” “There was always dust. There were also rocks, mice, and crickets that entered the tent. I was glad I never saw any snakes. When these sandstorms happened, we would ask for cleaning supplies but staff would not give them to us so we could clean and clear the dust in our living space.”
Senevilay Decl., ECF No. 2-10, ¶ 20	“When it rains hard outside, sometimes water leaks into the housing unit.”
Angye Decl., ECF No. 2-27, ¶ 34	“On or around May 19, 2026, there was water on the floor of the unit because the toilet was not flushing. It took approximately two hours before officials came to check on the water and move us to a different unit temporarily. The water seemed to be coming from under the seat of the toilet. I was on the other side of the unit, but from what I could see it seemed like poop-filled water. It was stinky – I could smell it from where I was.”

Angye Second Suppl. Decl. ¶ 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.”
Rodriguez Flores Decl., ECF No. 2-6, ¶ 38	“Our unit is constantly dirty because the cleaning staff only comes to clean maybe once a week. The detainees have to take turns to clean our unit, but we are not given any supplies to do so. We have to use some of our personal hygiene products to clean the unit. The guards bring over a cart to clean that has brooms, mop, and toilet brush, but it does not have any disinfectant or soap. Sometimes we use our own personal towels or shirts to clean the unit. We clean only with water.... It’s impossible to keep the areas clean because of the amount of dirt and dust that constantly enters the unit and the large number of people using the toilets, tables, showers, and other common areas.”
Navdeep Decl., ECF No. 2-28, ¶¶ 8, 10-12	“After intake, they brought me to the Echo Unit. I have been in many housing units during my time here. Along with the Echo Unit, I have been in Bravo, Charlie, back to Echo, and multiple units within Alpha. All of the pods have a similar structure with approximately 72 beds. But each of the units have specific problems. In my experience, Bravo does not have a functioning drainage system, Echo has very thin mattresses, and Alpha has no cold water.” “We get in trouble for requesting even the most basic things here, like access to water and to live in a hygienic place. There was one time when there were no cups in the housing unit. We need cups to drink out of the fountain in the unit. Our housing area was also dirty and had not been cleaned.” “Two or three times, when I was in the Bravo Unit, the water was overflowing from the toilet. If I remember correctly, it was the third toilet. It would not flush because it seemed like something was stuck in it and it started overflowing. The toilets here use a vacuum system. When the

	vacuum system breaks, everything gets pushed out rather than in. I was on the right side of the unit, and the water came all the way up to the bed area where I was sleeping. The water was smelly and dirty.” “The bathrooms here are consistently dirty. There is often urine all over the seats and feces all over the bowls. We try our best to designate certain toilets for urination only and others for #2 (defecation) only to try to keep the seats cleaner and avoid clogs, but it does not always work. When new people arrive, our self-created system quickly breaks down.”
Navdeep Second Suppl. Decl. ¶¶ 2-3, 5	“Through June 2026, the food continued to be very bad at Camp East Montana. For four days of the week out of seven, it was hard to force myself to eat the food because it was so bad. For example, the scrambled eggs came in a container filled with water. A third of the container was filled with water. Often, the food seemed uncooked or severely undercooked.” “Sometime around June 2026, I was moved from the Alpha Unit to the Bravo Unit where the toilets did not flush consistently.” “Around this same time [in June 2026], the facility stopped cleaning the unit. Cleaning would sometimes occur on Mondays, but the facility stopped those Monday cleanings. This made the unit very dirty.”
Bounvongxay Decl., ECF No. 2-12, ¶¶ 5, 20	“The room was cold and often dusty, and ants and flies got in our living area.” “The cleanliness at CEM was bad, so I washed my clothes in the shower to try to stay clean.”
Baccam Decl., ECF No. 2-11, ¶ 21	“The guards would move us about once every two or so days, purportedly to clean our section of the housing unit, and we’d have to wait in an even more dirty section of the housing unit with even more dust/sand for hours. When we were put back in our section, it didn’t seem like it was much cleaner. It looked the same, and the sand and dust were still there.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶¶ 5, 8	“The units are very dirty. When I first arrived at Camp East Montana, the bathrooms were often broken. The showers and the bathrooms would all overflow with water. The overflowing from the bathrooms happened up until late November, approximately. Detainees had to bang on the doors to beg the guards to do something to address it. I felt frustrated that we had to resort to things like banging on doors just to get basic issues like this addressed. We also had to beg for cleaning supplies so we could clean the unit ourselves. The guards would not proactively bring us things to clean with.”

	“Water would drip into the ceiling of the housing tents where I was held. This caused puddles inside the housing tent and the areas outside.”
Do Decl., ECF No. 2-17, ¶ 15	“There is also mold in the pods. Before I was detained by ICE, I did water damage and mold remediation so I know what mold looks and smells like. I’ve told the guards about the mold in the pod right now but they haven’t done anything about it. It’s been there at least since the middle of April when I got to this pod. I think the mold makes it harder to breathe at night especially. I often have itchy eyes and a dry throat.”
RES Decl., ECF No. 2-20, ¶¶ 13, 17, 25	“The tarp covering that serves as the roof of our unit is not fully sealed, allowing water and dust to enter the unit. That means that when it rains, rain gets into the unit and falls on people, particularly those who are on the top bunk. The same is true when it’s windy outside; dust and sand get into the housing unit and are particularly bad for people on the top bunk. In other units, I have slept on the top bunk where water fell on me when it rained, my face and body were covered by dust/sand throughout the night and day.” “The housing unit is not cleaned adequately.... There are five or six toilets that are shared between 72 men. The toilets are often dirty with urine and feces, which are everywhere, including dirty and used toilet paper. It reeks everywhere in the unit of urine. Staff only clean the toilets once a week. That is not nearly enough. On the other days, guards expect us to clean the unit, toilets, showers, and common areas. The guards bring us a mop, broom, toilet scrubber and tell us that we can clean the unit if we want or just keep it dirty. We are not given any disinfectants, and we must clean with just the tap water. We are often mopping the floors with just water which is dirty because of the sand and dirt that enters the unit. The facility does not provide us with any food or pay if we ‘volunteer’ to clean the unit. In comparison to the county jail, the facility was cleaned every day.” “On or about May 10, 2026, four of the toilets were clogged and sewage was seeping out of the toilets. People had no choice but to continue using the toilets, even though sewage was seeping out onto the floors next to the bathroom. The sewage water seeped into the corridor where the individual toilet and shower stalls are and where we must walk to go into the shower or toilet. The dirty sewage water just sat on the corridor floor. We had to walk through the dirty water with human feces. The guards saw the need for the toilet/shower area to be cleaned. On or about May 12, 2026, a maintenance crew came to unclog the toilets and drains and then the guards

	only brought us brooms, hand gloves, and water buckets for us to clean, but detainees did not want to clean because it was dirty with sewage, toilet paper, and human waste. The facility did not send a cleaning crew to clean and sanitize the area. So, the toilet and shower area remained dirty with human feces on the floor until on or about May 12, 2026, when the detainees had enough and detainees cleaned the toilet area, but we were not given disinfectant to sanitize the area. The detainees who decided to clean were also not given any hand soap, face masks, or any other supplies to properly protect themselves while they cleaned or clean themselves after they cleaned. The detainees used their own personal towels to clean and wipe the floors. That was degrading to us all. During the time when the toilets were clogged and the area was dirty, the smell was horrible. I also felt nauseous and felt like vomiting. Even when I had to go pee, I had to hold my breath. When I could not hold my breath, and I had to breathe in the air, my stomach hurt. During this time, I made all possible efforts to not use the bathroom. I also could not have my normal bowl movements during this time. I also could not sit at the lunch tables or watch TV because the smell was horrible and prevented me and others from using those common areas. I could smell the sewage and human waste during our meals and at night while I slept, preventing me from sleeping well. The facility only sent a maintenance cleaning crew on or about May 13, 2026, only after the detainees had already cleaned the area.”
NYG Decl., ECF No. 2-24, ¶¶ 33-34	“The facility is dirty.... Because the toilets are close to the bunkbeds, we get the foul smell of urine, feces, and body odors. We get this smell when we eat, while we are sleeping, and all day. That’s because we’re almost always in the housing unit, and there aren’t separate rooms.” “Our unit is regularly dirty because the cleaning staff does not come to clean it enough. The cleaning staff maybe comes by once a week. So, instead, the detainees clean the bathrooms, common area, bunkbeds, and unit but we are not given any proper cleaning supplies to do it. There are a lot of common, shared surfaces, like tables and sink handles and chairs that a lot of us touch throughout the day, but that aren’t cleaned regularly.”
SNM Decl., ECF No. 2-22, ¶ 23	“The showers and toilets are also dirty as the cleaning staff only come by maybe once a week to clean. For the other days, we must clean the showers and toilets, but we are not given adequate cleaning supplies to do so properly. We are given a spray bottle with some sort of blue cleaning liquid, broom, mop, and toilet scrubber. Sometimes they do not give us gloves. Sometimes, we use hand rags or shirts, towels to clean our bunk beds, toilets, showers, and lunch tables.”
HOK Decl., ECF No. 2-25, ¶¶ 16, 20	“When it rains in the unit, people get wet because the roof leaks. For example, on or about May 27, 2026, it rained from about midday until about 5 PM. People on the top bunks across the unit

	and sitting on the lunch tables got wet because of leaks in the roof. This has happened in other units that I've been in." "The units I have been in have always been dirty. The facility sends a cleaning crew about once a week, but sometimes they do not go. So, on the other days we are essentially forced to clean. The guards bring us a broom, mop, toilet brush, but they do not bring any disinfectant (as far as I can tell). I personally clean. We often have to use whatever remaining shampoo/body wash we have from our single-use packets to clean."
CCD Decl., ECF No. 2-26, ¶ 17	"The unit is very dirty, and the staff clean it maybe once a week. Even when they do, they do not do a good job. Even the guards have admitted to me that the facility is dirty. The other days we are the ones who have to clean it."
ZOR Decl., ECF No. 2-30, ¶¶ 21, 27	"The bathrooms in the housing units have about six toilets and six showers. They kind of look like the types of port-a-potties they have in construction sites, but they are hooked to plumbing. It is common for toilets to clog and for sewage to spill into the housing unit. When this happens, it takes the people who fix the toilets a day or more to come and fix the issue. The guards do nothing to clean the sewage during that time or to try to fix the plumbing issues. We have to continue to live and eat in the housing unit with the sewage filth sitting there, which is very unhygienic. Also, the showers do not all work at the same time. Water from the showers will leak outside of the shower area and we have to clean it ourselves. It makes the ground slippery and dangerous to walk on." "The housing units are not very clean. The cleaning staff from the facility come and clean about once a week. In between those cleanings we try our best to keep the housing unit clean, but it is hard. We have nothing to disinfect the tables or other common areas. Sometimes our clothes or linens will not come back from the laundry and we will have to fill out a form to write down what is missing. It usually takes one to two days to get replacement clothes or linens."
ZOR Suppl. Decl. ¶ 5	"I am still drinking water from the bathroom sink. The water from the water fountain has a foul smell. After I drink that water, the cup I used smells like dead fish. Other detainees have mentioned the smell too. The water from the water fountain is also very cold which gives me a headache. I have to drink water from the sink in the bathroom because of how bad the fountain water smells and makes me feel."

JLE Decl., ECF No. 2-31, ¶¶ 18-19	“We have also seen rats in the unit.” “Our unit is very dirty with toilet paper, trash, hair, sand, and dirt. Since I’ve been here, from on or about May 8, 2006, I only saw that the facility staff cleaned the unit once. The other days, the detainees have to clean the unit. The detainees do not want to clean, but we have to, otherwise the unit will just stay dirty. The women in my unit take turns cleaning. The guards bring us a broom, some chemical spray, and detainees use toothbrushes, hand cloths, extra shirts, and water to clean the sinks, beds, floors, bathrooms, lunch tables, and showers.”
Nelson Decl. ¶ 7	“During my first night at Camp East Montana, half of the housing unit flooded. Water from the restrooms was seeping into the room. It was dirty water. It smelled putrid. Water would seep into the pod every time people showered so the water stayed in the pod for about 2 months. Me and other detainees would push the water away from the beds and common areas with a broom. It wasn’t until we pushed the water to where the guards were standing that they finally called someone to clean the pod. Water would continue seeping into the sleeping area after that.”
Gonzalez Ramirez Decl. ¶ 6	“I fear that I am going to die in this terrible dirty place.”
Majok Decl. ¶¶ 15, 18	“In the unit where I lived, there regularly was fecal matter around the toilet bowl and the water with fecal matter sometimes overflowed from the bathroom to the bed area. People would put on sandals because they didn’t want their feet to touch the floor, or they’d sit in bed so the water wouldn’t touch them. It was particularly bad on three occasions. Those three times, overflowing water with fecal matter was so severe they had to move us out of the unit.” “In the one month I was at Camp East Montana, the facility never cleaned the unit I was in. Because of this, we would clean our own unit using a garbage can, a dustpan, washing rags, and spray bottle that the facility provided. Sometimes, we got a dollar or extra food for cleaning. We mainly used the supplies and water to clean the dust.”
Barreto Decl. ¶¶ 12-13, 17	“Conditions at the facility are so bad that we felt the need to speak up because we felt desperate and frustrated that nothing was improving. We are treated like animals in the facility. The facility is dirty....” “We started making a lot of noise and wouldn’t lay down when asked during count so that they would clean our unit and fix the bathrooms which would overflow with sewage. The unit was also covered in dust and covered everything, making it dirty. This smelled terrible and I started

	getting sick from the dust, the people in my room and I were getting desperate to have a cleaner room.” “In Bravo-5 we would often try to clean our unit ourselves because of how dirty things were.... When we asked to get cleaning materials, staff would only bring a cart with water but no soap or detergent or other cleaning products. We cleaned anyways as best we could with just water because we couldn't live in the filth. We requested the cleaning materials every 5 days or so.”
Pedro Juan Decl. ¶¶ 9-10	“The bathrooms in the pod were damaged. Water from the bathrooms and showers lined with feces and urine would seep into the sleeping area. The smell was really bad and made it hard to sleep. The unit was also very dirty. There were about 72 women in the pod in total (including me) and we would go days without staff cleaning the pod.” “One time, I asked a guard for supplies to clean and told her I would clean the pod myself. The guards didn't give me anything until about a week after when, at 1 or 2 am, a guard came into the pod and announced they had a broom we could use if we wanted to clean. I was already asleep but I got up and started cleaning. This happened approximately eight other times.... We weren't given any disinfectant or cleaning supplies—just a broom. We did what we could, but the pod would still be dirty, with piles of dust.”
Fernandez-Gastelum Decl., ECF No. 2-14, ¶ 5	“We have to maintain the housing area by cleaning it ourselves. Usually, we take shifts to clean the housing area. The toilets routinely get clogged. In addition, water from the toilets and shower floods into the housing area from the bathroom area. A small sewage drain was installed, but the water continues to flood into the housing area. Sometime around the end of January, there were pest control issues. People killed a rat that was running around.”
Romero-Paredes Decl. ¶ 10	“It is difficult to stay clean and maintain hygiene while detained at Fort Bliss.... In each unit, the only cleaning supplies are a brush, bucket, and a mop. I have submitted approximately 3 grievances for cleaning supplies and soap but have not received any responses. We are occasionally given latex gloves by the guards to use while cleaning showers, toilets, sinks, and tables, but some guards have told us to just use our hands to clean the toilets. Cleaning the communal toilets with just my bare hands makes me feel sick to my stomach and like I am going to throw up. I feel like I have no other choice.”
Piñango Decl. ¶¶ 18-19	“In the last 30 days, the maintenance crew has only come in to clean my SMU cell approximately once. I try to keep my cell clean by wiping the surfaces and the floor with wet toilet paper. I have also asked the guards for cleaning supplies, but I was not given any.”

	“My uniform, including the socks and sandals we are given to wear, have gotten wet and dirty when I am taken out. My feet sink into the mud and water and get covered in dirt. When I return to my cell, I am not given an extra set of clothes to change into and I am not allowed to shower. I sometimes rinse my socks with water and clean my shoes and the dirty floor with toilet paper.”
Rivero-Gonzalez Decl. ¶ 21	“I was then sent to Charlie-8 and there were other people who were using crutches. I could not use the bathroom and showers in this bathroom because the sewage system backed up frequently, causing dirty black water to seep into the unit.”
Reina Decl. ¶ 13	“The staff only cleans once a week, but they don’t do a good job. In late July, for example, a cleaning crew came into the pod with a leaf blower and started blowing all the dust up.... After the crew left, the beds were covered in dust and dirt. The pod was worse than before the crew came. Now all the dust and trash that was on the floor and under the beds, was in the air and on top of our beds and belongings... Sometimes, we try to clean the unit ourselves. We request supplies but we don’t get any disinfectant. We only get a broom, a mop with used or dirty water.”
Reina Suppl. Decl. ¶¶ 8-10	“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.” “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.”

	“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.”
Aguilar Decl. ¶¶ 9, 13	“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.” “There are leaks from the roof and when it rains it comes into our room from the ceiling.”
Lack of Soap, Personal Hygiene, and Grooming Supplies	
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 36-37, 40	“There is no soap at the facility to wash our hands.” “There is not enough shampoo to properly take a shower. To shower, they give us sample-size shampoo packets, but we often have to ask for more packets when we run out.... When we ask the guards for supplies, they say they will bring it but it usually never arrives.” “Since on or about April 13, 2026, we did not get any barbershop, nail clipping, or beard trimming service for about a month.”
Rodriguez Flores Second Suppl. Decl. ¶ 14	“I am currently in the Bravo-1 unit, a low security unit, and all of the conditions remain just as terrible as before.... For example, I have not been to the barbershop for about three months; ... except for us being provided razors in my housing unit to shave under guard supervision.”
Baccam Decl., ECF No. 2-11, ¶¶ 18, 28-30	“At Camp East Montana, we never had enough soap, and I constantly had to wash my hands without soap, even when everyone around me was getting sick. I’d ask the guards, and they would say they ran out of soap and I should wait for the next shift and ask. But I would get the same answer then. We didn’t get a bar of soap and didn’t have access to a soap dispenser. All we got was a tiny packet of shampoo. It was so small, like the condiment packages from a gas station. That’s all we had to shower with or wash our hands with or wash our clothes. It wasn’t enough.”

	“The guards told us we couldn’t have nail clippers or razors. I was never able to go to the barber shop because the waitlist was long and guards would cancel the barber shop at their discretion.” “When we asked what we were supposed to do without nail clippers, the guards said, ‘You can just bite your nails.’ When I asked what I was supposed to do about my toenails, the guards said, ‘If you can bite them, bite them.’” “My fingernails and toenails got long when I was there. It was uncomfortable and demeaning. I don’t understand why it was like that. When I was in county jail, we were given razors and nail clippers. No one there told me to bite my toenails. That’s disgusting.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶ 9	“Throughout my time at Camp East Montana, we were not regularly given hygiene products like soap....”
RES Decl., ECF No. 2-20, ¶¶ 19-22	“We are not given a bar of soap, and there are no soap and [sic] dispensers in the housing unit. We are only given small packets of shampoo that we are supposed to use for everything – for when we take a shower and clean our hands. That’s not enough. They’re tiny packages, like a single-use ketchup package you get at fast food restaurants. We have to tear them open with our teeth. If you poured it onto your hands, you would use up the entire packet with one hand wash.” “Because we don’t get enough shampoo, I often can only wash my hands with water. Sometimes I’ll grab a little piece of toothpaste and rub it against my hands under water to try to stay clean. But I also want to be able to brush my teeth, so I don’t want to use up all my toothpaste that way.” “When I ask the guards for more shampoo, they won’t give me any and instead tell me something like, ‘No, I’ve given it to you already. I’m not going to give you any more.’” “Since the new contractor took over, we did not have access to that area and so could not shave, cut our hair, or cut our nails. Sometime last week, on or about May 13, 2026, the barbershop reopened. I had not been able to cut my hair or my nails for two months.”
SNM Decl., ECF No. 2-22, ¶¶ 20-22, 24	“The staff also provide us with limited hygiene supplies that include small bags with packets of shampoo, bodywash, body lotion, toothpaste, deodorant, and toothbrush. The quantity does not last beyond a single use, and so we must keep on asking for more supplies. Every day we ask for new supplies which are kept at the guards’ desk near the front door. But the facility runs out of

	supplies and takes about a day to arrive upon request. Guards keep toilet paper on their desk for us to use, but sometimes this also runs out. I think that there have been times where people have to use the bathroom without toilet paper.” “Since on or about April 13, 2026, detainees were no longer being used as barbers to cut hair or shave/trim our beards. We stopped receiving barbershop services and the guards told me that they are no longer having detainees work as a barber to cut hair. We were also not receiving any services to trim our nails or shave our beards.” “On or around May 13, 2026, I received a haircut from the barbershop after not having one for about a month. I also cut my nails and trimmed my beard. Other detainees were the ones who cut my hair and trimmed by beard.” “There is no hand soap in the bathrooms and, so, we must use some of the remaining hygiene products, like the bodywash packet, wash our hands, or just go without washing our hands. There are no hand sanitizers for us. So, I think people sometimes have unclean hands or just wash them with just water after using the toilet or before eating. There have been times where I do not have soap to clean my hands and I just use water to clean my hands. That’s happened to me when I ran out of hygiene supplies.”
PKP Decl., ECF No. 2-23, ¶ 21	“On approximately April 18, 2026, barber services closed and we were told by the staff that they would hire an outside vendor to come in to cut our hair. For about a month, I did not get a haircut, shave, or clip my nails until on or about May 13, 2026, when I was told the barber shop was available again and another detainee cut my hair there.”
HOK Decl., ECF No. 2-25, ¶ 25	“Barbershop services are inconsistent. For about a month that I was here, there were no barbershop services. For that time, I was unable to get a haircut, shave, or trim my nails until other detainees volunteered to cut hair.”
Angye Decl., ECF No. 2-27, ¶ 33	“During the time that I had to wear the same clothes, I felt nasty. I felt like I should keep to myself because I was worried I smelled bad. It did not feel hygienic to live that way.”
Angye Second Suppl. Decl. ¶¶ 5-6, 8, 12	“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.”

	“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.” “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.” “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.”
Navdeep Decl., ECF No. 2-28, ¶¶ 9, 35	“When we were taken out of intake and placed in the Echo Unit, we were still not given fresh clothes to wear. I was still wearing my own clothes that I had been wearing when ICE picked me up. I had already been wearing those clothes during my plane journey from Minnesota to Texas and during the approximately three days in the intake area. I had no choice but to continue wearing those clothes for approximately 19 additional days in the Echo Unit. I felt so dirty.... At night, I and others would try to wash our pants in the sink and would have to sleep without our pants while waiting for them to dry. The next day, I would put my still-damp pants on and would do the same thing with my t-shirt. I would wash it in the sink and keep it off while waiting for it to dry. I had to keep wearing the same underwear day after day after day after day. It was humiliating and disgusting, but there was no other choice. No one came to give us fresh laundry. Finally, after approximately 22 to 23 days of wearing the same clothes, we were given uniforms.” “I didn’t have dental problems before arriving at Camp East Montana, but I do now. They only give us a tiny bit of toothpaste here and it does not seem very good.”
Navdeep Second Suppl. Decl. ¶ 6	“Around this same time [in June 2026], I believe barbers used to be compensated with either food or credits, but I believe the facility stopped offering those incentives, so the barbers stopped working. The only place to trim your nails at Camp East Montana was at the barbershop. Without access to the barbershop, I could not trim my nails. This did not feel good and it did not feel hygienic. Some people started using their teeth to chew and trim their nails, but I didn’t

	want to do that. However, I did not feel good having such long nails without knowing when I might be able to trim them.”
ZOR Decl., ECF No. 2-30, ¶¶ 31-32	“It is also hard to stay clean and keep good hygiene at Camp East Montana. We only get two small shampoo packets when we shower. Those two small packets are hardly enough to clean my hair and body. We are not provided soap to wash our hands after using the bathroom or before meals.” “There are also no razors or nail clippers provided. Instead, we have to make an appointment to go see the barbers, who are really other detainees at Camp East Montana who have volunteered to help cut hair and shave facial hair. Many are not really trained or know what they are doing.”
JLE Decl., ECF No. 2-31, ¶ 12	“While we have access to hygiene and feminine products, these are limited and we have to ask the guards in the unit for them every day. Sometimes these run out. The hygiene products are single use. We do not have hand soap in the bathroom to wash our hands. Instead, we have to use whatever remaining shampoo/body wash we have from our single use packets. Or we have to wash our hands with just water.”
Nelson Decl. ¶¶ 8, 10	“When I arrived at Camp East Montana I got a small bag of shampoo, the size of a quarter of the palm of my hand. I did not get a toothbrush, deodorant, soap, or toothpaste. Whenever I would get more shampoo, I would save it because I knew we might not get it later. One day, a guard said I couldn’t have it. I tried to explain why I kept it but he took it all away.” “On or around September 2025, I also spent 14 days wearing the same clothes. I asked guards for new clothes but they never gave them to me. Around that same time, we were only given a small bag of shampoo for the entire week.”
Majok Decl. ¶ 14	“I was never given access to soap while I was housed at the facility. Instead, the staff gave us tiny shampoo packets to wash our hands, our bodies, and our hair. Those were the same shampoo packets we used to wash our clothes with. Because we had to use shampoo packets to wash our hands and clothes, sometimes I’d just wash my body with water because the shampoo packets ran out.”

Rodriguez Sanchez Decl. ¶¶ 14-15	“From about April 15, 2026, to May 15, 2026, we went more than a month without shaving and access to a barber. It felt very disorganized and dehumanizing.” “We did not have sufficient access to hygiene products either time I was at Camp East Montana. We received a small shampoo packet about the size of a tea bag. It was not enough to properly shower with or even wash my hands and face with, so it was not enough to clean my whole body. The lotion packets we received may have been spoiled because they would leak a yellow oil. Some people started having allergic reactions to the lotion.”
ZOR Suppl. Decl. ¶ 18	“We still don’t have supplies to cut our beard and hair and don’t have regular access to the barbershop. Guards take us to the barbershop whenever they want. Sometime in mid-July, guards told us to put their name on a list if we wanted a razor. But they only give out about 20 or 30 razors. There are at least 50 people in my pod right now. That is not enough razors for everyone. I was asleep when guards made the announcement. By the time I realized what was happening and tried to write my name down, there were no spots left. So, I didn’t get a razor that day.”
Reina Decl. ¶¶ 8, 10-12	“I try to wash my clothes in the sink or shower myself, but we only get two small packets of shampoo/soap per day. Some guards scan my bracelet when they give me the packet of shampoo/soap, so I can’t ask for more later. The packet is smaller than half the palm of my hand and only about a third of the packet is filled with liquid. I have to use this shampoo/soap to either shower or wash my clothes.” “On December 2025, while I was in Delta-8, the guards told us the facility had run out of shampoo/soap, toothpaste, and toothbrushes. This went on for about two weeks. We had to ration any toothpaste and soap we were able to get or had kept from before. I also had to shower with just water, no soap, and I couldn’t always wash my hands with soap after using the toilet or before eating. The toothbrushes we get here are only good for one or two uses. They break very easily. During those two weeks, we had to keep using the same toothbrush even if it broke.” “Sometime in early July 2026, guards told us that if we wanted a razor to shave, we had to write our names in a list. Guards have been coming into our pod every Wednesday to give out razors. However, there are only 25 razors, approximately, available each week. When guards bring the list, people rush to write their names in. If you don’t make the list, then you don’t get a razor.”

	“I also requested a visit to the barbershop for about 4 or 5 weeks. The process of visiting the barber is the same as requesting razors. We have to sign up on a list with limited spots. I believe there are only 25 spots available to go to the barber on a given day. When I was finally allowed to go, the barber told me that he wasn’t going to cut hair anymore. The barbers are other detainees who volunteer.”
Reina Suppl. Decl. ¶¶ 12, 14	“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 [while the barbershop was closed]. 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.” “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.”
Pedro Juan Decl. ¶¶ 11-12	“We would get very little soap each day at Camp East Montana, less than half the size of my palm. We were supposed to use that soap as shampoo as well. Many times, we did not have enough soap to shower, and wash our hands regularly after using the restroom, after cleaning, or before eating. We also had to wash our underwear in the sink with the little soap we were given to try to stay clean. We only got two pairs of underwear and laundry only came once a week.” “We didn’t get any sanitary pads or tampons to keep with us. If we needed them, we had to ask the guards for them but they often didn’t have any. The guards told us to use toilet paper but sometimes there wasn’t any toilet paper. At times, we bled through our uniforms and didn’t have clean clothes to change into. I don’t wish that on anyone. It made me feel degraded and like staff didn’t care about us.”
Bounvongxay Decl., ECF No. 2-12, ¶ 20	“The cleanliness at CEM was bad, so I washed my clothes in the shower to try to stay clean.”
Romero-Paredes Decl. ¶¶ 10, 12	“It is difficult to stay clean and maintain hygiene while detained at Fort Bliss. We are provided with small packets of shower gel and no other personal hygiene materials.” “I should have access to a barber once a week based on the facility handbook, but I have only been able to go once since arriving at Camp East Montana. I have not used a nail clipper or received a haircut since on or around September 3, 2026. Without access to the barber, I feel frustrated, unclean, and trapped.”

Piñango Decl. ¶¶ 6, 16, 17	“In the pod, we only get a small packet of shampoo every day. We are supposed to use the shampoo as soap too when washing our bodies or hands. If we need more, we need to ask the guards for it but at times we’re told that they don’t have any, or we’re simply told no. So, we often are unable to wash our hands with soap before eating or after using the bathroom.” “I am not allowed to keep soap/shampoo in my SMU cell. So, I am not able to wash my hands before eating or after using the bathroom. I am also not allowed to shower daily. I am only allowed to shower 2 or 3 times a week and I am only given a clean set of clothes when I shower.” “I have not been taken to the barbershop during the entire time I have been in SMU. I have not been able to have my hair cut for over 30 days. My hair grows out fast and I feel very uncomfortable, itchy, and unkept with long hair.”
Monroy Decl. ¶ 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.”
Aguilar Decl. ¶ 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.”
Excessively Cold Living Conditions	
Ly Decl., ECF No. 2-9, ¶ 31	“The temperature in my unit was always cold and is still cold now that I’m back. We are not given thick enough blankets and there is no pillow. The bedding provides hardly any warmth. We don’t get jackets or anything. Just one sweater. But just the sweater is not enough to keep warm.”

Senevilay Decl., ECF No. 2-10, ¶ 21	“We just get a sweatshirt and a thin blanket here. We’re not given a jacket. It can be really cold here, especially at night. A lot of people in my unit complain about that, especially at night and early in the morning.”
Do Decl., ECF No. 2-17, ¶ 18	“Even though it’s getting very hot outside, it’s too cold in the pod. All of the guards wear jackets, but we detainees don’t get jackets - we just get one sweatshirt.”
ZOR Decl., ECF No. 2-30, ¶ 30	“The temperature in the housing units is very cold, even when it is very hot outside. We do not have access to jackets, we were only given one sweater. We only have one sweater, so when it is sent to the wash we have to go a full day without it, which is uncomfortable because it is very cold in the housing unit.”
LLH Decl., ECF No. 2-32, ¶ 27	“My unit is very cold and my clothing does not keep me warm.”
Aguilar Decl. ¶ 14	“The temperature in the unit is either super hot or super cold. We only get one blanket that is very thin.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶ 3	“The room was cold, which caused pain.... Me and the other detainees were left in that cold room for approximately three days.”
Idleness and Inadequate Programming and Recreational Opportunities	
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 19-20, 22-23, 28, 29-30	“Yard time is inconsistent every week and varies in each unit that I’ve been in.” “When we are allowed to go out to the yard, we are just given one small soccer ball. There is no direct access to sunlight because the top is covered. The only sunlight access we can get is through the chain-link fence on the sides, which is where the people who do not play soccer stand to try to stay out of the way. That’s the only time we get exposure to some sunlight. We only feel the sun on part of our body. When the unit is full, there is no space for us all to be outside comfortably, and there is only room for some people to play soccer, the rest of us just watch. The area is about fifteen meters wide and twenty-four meters long. It’s like being in an enclosed cage. All of the units that I have been in have had the same yard setup.” “The yard time changes every day....” “Since the new company took over on or about April 18, 2026, yard time has been mandatory, meaning that when go [sic] out we are not allowed to skip it or stay inside even if it is windy and dusty outside or even if we are sick.”

	“We are not allowed to make arts and crafts and are not given any arts and crafts supplies. To pass the time, we tried to use white plain paper, cracker boxes that we recycle, and plastic bags to make little shoes as a group. This takes us about two days to make it. But the guards take this away from us and throw it away in the trash and say that this is contraband, and they threaten us with solitary confinement. But we made these pass the time and help with our stress. I feel that it’s necessary to do this to deal with my stress and anxiety, but we are not allowed to. The guards told us that we are not allowed to make these, but I have not seen a written rule saying that.” “There is no educational, vocational, or meaningful programming at all at the facility. Because of the lack of programming, I feel anxious and depressed because of everything going on and there’s nothing to keep my mind or body in a productive and healthy way.” “There are no formal religious services here even though we have requested them and I don’t know of any chaplain or spiritual advisor I can talk with at Camp East Montana. Instead, the detainees organize themselves into prayer circles, and we sing every day. Sometimes the guards tell us to ‘shut up’ but we do it anyway.... Since I’ve been here I have questioned my faith on some days because of the horrible conditions that I am suffering here.”
LLH Decl., ECF No. 2-32, ¶¶ 37, 39-40	“There is nothing to do all day. We just sit on our beds or on the tables. There is no educational programming.” “While there is a library, it only has a few books in Spanish and the majority are in English. The library is small.” “Yard time is also inconsistent. While there is a posted schedule in the unit, guards do not take us during those times. The times change daily.... There’s nothing to do at the yard. It’s just another cell. The yard ceiling is fully covered with another tarp which means that we cannot see the sky, clouds, or sun. The only bit of sunlight we can get is from a side chain linked fence on one of the sides of the yard. There’s nothing to do outside but to play soccer with a very heavy soccer ball. The rest of us just have to stand on the sides and talk among ourselves. We cannot exercise or walk around. The grass is also artificial is covered with sand and dust.... One thing is for sure, the rules around yard time are inconsistent.”
JLE Decl., ECF No. 2-31, ¶¶ 9, 13-15	“I feel desperate and anxious by not being [sic] to see daylight or the outside world has affected me emotionally.”

	“There is very little to do during the day. The lack of activities and constant confinement has made me feel anxious and hopeless.” “Church service is inconsistent.” “We also have access to yard but there is not a set schedule. Sometimes we go out in the afternoon when it is very hot. Other days we go out in the morning when it’s cold, and women in the unit do not want to go out. Sometimes we are obligated to go outside, and no one can stay in the unit. Other days, it is not obligatory. Other days we do not go out because it’s too hot and windy and there’s a lot of dust and sand in the air. Half of the yard is covered by a roof tarp, and we cannot see the sun or sky above us. On the other half, we see and feel the sun, if the sun is out that day or at the time that we go out. There is artificial grass and dust and sand everywhere. There is only a soccer ball and football for us to use, and there’s a water cart. Most of us just stand outside and talk.”
NYG Decl., ECF No. 2-24, ¶¶ 35, 37	“Yard time is inconsistent. Although the yard schedule is posted in the units, the guards do not follow it. Sometimes we go out early in the morning, other times late in the day. The yard is just another tarp with a roof covering, with artificial grass, and with lots of sand and dirt. We cannot see the sun because the yard is covered with a tarp. The only way we can get access to some sunlight is if you stand on one side of the yard with a chain linked fence that filters some sunlight (and assuming that it’s not cloudy or too windy to stand there).” “Aside from yard and the TV, there is nothing meaningful here to do. We are trapped in a windowless tarp all day.”
HOK Decl., ECF No. 2-25, ¶¶ 21, 24, 28-29	“There are no productive or supportive programming or vocational activities in the unit. Most days feel empty and repetitive. There is very little to do here. I feel trapped here and anxious.” “While there is a small bookshelf [in the library], but I have only seen about three books that are in Spanish. I read those three short books with about 100 pages each with a large font. I read them all quickly.” “The ‘yard’ has artificial grass, covered in dust and sand, and there’s nothing to do there. There is not enough space for us all to be out there and exercise. Sometimes we play soccer using a

	heavy thick plastic ball. Currently, in A-14, only half of the ceiling is covered which allows us to see the sun when the sun is out. But, in all of the other units, the roof is completely covered, and we cannot see or feel the sun or sky. In those units, we can only feel the sun through a side chain linked fence. We line up next to the fence to try to feel it.” “There are no regular or weekly religious programs that I am aware of. We pray together every day, but this isn’t a service that’s provided from the facility.”
CCD Decl., ECF No. 2-26, ¶¶ 23, 26	“There are no regular educational programs, counseling services, vocational classes, or organized activities. The days feel repetitive and empty, which has made me feel anxious and emotionally distressed. Unlike my time in state prison, there’s nothing to do here.” “There is access to a very small library shelf near the barber area. This library does not have anything for us to use.”
Navdeep Decl., ECF No. 2-28, ¶¶ 13-14, 16, 45	“There are signs posted on the walls of Camp East Montana that say we are supposed to get recreation every day, but this still does not happen. It feels like the guards just take us to recreation whenever they want to. I have seen two types of yards here. One of them is a smaller space that is covered with a ceiling so it is not possible to see the sky. The other one is half covered and half open. Most of the time, if they take us to recreation, they take us to the small yard that is covered. They put approximately 50 of us in there. The amount of space is too small for so many people. I get hit by balls often during recreation. I want to be able to feel the sun and be outdoors and experience recreation, but the way the guards are offering us recreation feels stressful rather than stress-relieving.” “The way things operate in here is very inconsistent and unprofessional. For example, sometimes we have no yard time at all. Other times they tell us we have to go to yard or suffer consequences.” “There is no programming here. We usually just stay in our pod. Anytime we step out of the pod for anything, like recreation, medical, visits, or anything, they pat us down. They usually ask us to put our hands against the wall and they stand behind us and frisk us. The old company would usually only frisk us when they were taking us to court, but the new company frisks us for everything.”

	“There is still no scheduled law library visit. It is all very inconsistent and uncertain.”
Navdeep Second Suppl. Decl. ¶ 4	“In June 2026, the facility reduced our yard time to approximately 3 days a week for approximately 40 minutes each time. A guard said there weren’t enough guards to watch us, so our yard time was limited as a result. Even when we were allowed to have recreation, it took place in a covered area where I could not see the sky above me or the sun. The yard was a cramped cage where it was not feasible to even take a walk or anything. The cage we were taken to from the Bravo Unit was even smaller than the one we were taken to when we were in the Alpha Unit. Because it’s not really possible to do much during yard time in that small cage, I and others would just sit down in a square formation with our backs against the cage. We had nothing to do.”
ZOR Decl., ECF No. 2-30, ¶¶ 17, 19, 23, 25, 33	“The housing unit is where we spend the majority of our time.... Now there are no games provided at all.” “There are no other books for me to read in the housing unit. The library at the facility has 8 computers and maybe 8 to 10 books in English. I finally recently found 1 book in Spanish that I borrowed after putting my name on the list.” “Recreation time is about 40 minutes to an hour. It is supposed to happen every day, but sometimes they cancel recreation without giving us a reason. The timing is also unpredictable; sometimes recreation time will be early in the morning, sometimes in the afternoon. We never know when recreation is happening.” “Recreation time happens in one of two types of spaces: an outdoor cage with a roof or an outdoor cage without a roof. I never know which recreation space I will be visiting on a particular day. I only get to see the sunlight when I go to the cage without a roof, which I estimate happens about half of my recreation times. The recreation cages are also very small and have no equipment or benches. It is just a dirt floor, so you have to sit on the dirt if you want to sit down. The guards will sometimes give us a ball and we try to play soccer, but the cages are so small and people have nowhere to sit so it is hard to play.” “I think this idleness is one of the hardest things here for me and for many people around me.”
Gonzalez Ramirez Decl. ¶¶ 19, 29	“There’s nothing to do at recreation – you just stand around in a small area where some people play with a ball. I wish there was an outdoor space where I could sit down, feel the sun, and rest,

	but there's nothing like that in the recreation yard here. We cannot feel or see the sun well, because there is a dome above us that covers the sky and sun. There are no places to sit – you just have to stand. I do not want to go to recreation because the grass is artificial and there is sand and dust everywhere.” “There's nothing for me to do to keep my mind occupied in these many months I have been confined here.... So, I'm just left to sit on my small bunk bed day after day. It's nothing but suffering.”
Nelson Decl. ¶¶ 20-24	“When I first arrived at Camp East Montana, we were not taken outside for an entire month.” “We complained to the guards about [recreation], and they finally started taking us out twice or three times a week for about an hour. But the yard is like a dog pound. It is surrounded by a chain-link fence and doesn't get any direct sunlight. There were days when the weather was very cold and windy and I did not want to go out because I have asthma and did not want to get sick. I told the guards this but they told me yard time was mandatory and if I didn't go, they would send me to the 'hole.’” “In the yard, the guards gave us a few basketballs, but none of them had air. There was also no basketball court or hoop. The space is just an empty room with turf. There was nothing else there. Some of my podmates played soccer with the deflated basketball.” “There was a space in Camp East Montana that serves as the barbershop and library. I believe they also held mass there once. I went to the library about 4 or 5 times in the seven months I was there. There were some books in the library, most in English. There were religious books, some nonfiction, encyclopedias, no legal books. There were also 6 computers, but they were all blocked. We could only access a blank page to type and a USCIS webpage.” “During February and March, the guards posted a schedule that said our pod was allowed to go to the library on Thursdays. If we wanted to go, we had to put our name down on a list the day before. However, Thursday often came around, and we were not taken to the library. Sometimes people had to print things urgently for their immigration hearings, and the guards would not let them go to the library. Before the guards posted that schedule, they would take us to the library maybe once or twice a month.”

Majok Decl. ¶ 16	“In the one month I was at Camp East Montana, they only took me outside for recreational time once.”
ZOR Suppl. Decl. ¶¶ 13, 15-16	“There is also a notice that says there is a religious service on Sundays at 3 pm. In the 10 months I have been here I have only been allowed to go to mass twice. I ask the guards every Sunday morning to please take me to mass, but they tell me that it is not for people in my pod, that there is no mass, or that they don’t know anything about it.” “We are supposed to go out for recreation time every day, but guards cancel often. One time they told us recreation time was cancelled because there was no personnel.” “I started weaving necklaces out of food wrappers or foil to pass time. I made one with a cross out of black plastic bags and foil wrappers. I wear it around my neck every day.”
RES Decl., ECF No. 2-20, ¶¶ 24, 26, 28-30	“There is a small library where the barbershop used to be, but since the new contractor took over last month, we no longer have access to it. That doesn’t make much of a difference to me; the books were mostly in Spanish, and I don’t read (or speak) Spanish.” “It’s very hard and highly stressful for me here. It is very difficult for me to keep a calm spirit. I have my Bible and some brochures with prayers that I brought with me from [another ICE facility]. That’s all that we have. There is very little to do to pass the time.” “There is a television in the unit, but the whole unit is meant to share it and it’s usually on a Spanish-language channel because most of the people in my unit speak Spanish.” “There is a small outdoor space that they sometimes take us to. It has a cover on top, so even when you’re out there, you can’t see the sun and sky.” “The schedule for going outside is pretty inconsistent. Sometimes I have gone three days in a row without being allowed to go outside. And we are not outside for very long. Usually after 45 minutes they tell us to go back in.”
UEG Decl., ECF No. 2-18, ¶¶ 8-9	“We go out for recreation for one hour every day. I don’t see the sun when I go to recreation because they bring us to a fenced area that has a covering on top. You can’t really see through the fence. It lets some air come through but you can’t see clearly to the outside.”

	“Besides for the one hour that we go for recreation, I spend the rest of my time in the housing unit. Sometimes we play card games or watch TV but there isn’t really anything to do. There aren’t enough chairs for everyone so we’re usually sitting on our beds.”
PKP Decl., ECF No. 2-23, ¶¶ 12, 16, 20	“Not being able to see daylight or the outside world has affected me mentally and emotionally. I often feel angry, desperate, anxious, and depressed because every day feels identical.” “I have talked to people who feel desperate enough and have commented that they want to take their own life because they feel trapped here.” “There is a small bookshelf outside the unit, where the barbershop is at, with a very small library shelf, but I have not seen any books in Spanish when I have gone. The books are all in English. Since I’ve been here, I’ve been to the library about three times because there are no books for me to read there. I don’t read English, so I cannot access the books.”
Do Decl., ECF No. 2-17, ¶¶ 7, 13, 16	“The recreation yard for Alpha has a partial covering, so you can see the sun in part of the area. The recreation yard for Delta was divided into four separate yards, and there was a covering over the yards.” “I spend most of my time here in bed because there isn’t anything else to do.” “We get one hour of recreation almost every day. Sometimes the guards say it’s mandatory and sometimes they say it’s optional. There’s a schedule up in the dorms but it doesn’t seem to mean anything.... We get one soccer ball and one football at recreation. I sometimes get hit in the face with the soccer ball when people are playing because there isn’t any separation between the people playing soccer and the people not playing soccer. I saw someone get hit and their glasses broke.”
Baccam Decl., ECF No. 2-11, ¶¶ 23, 38	“I hated going to recreation. It was nothing but dust storms and wind. There was astroturf everywhere, so you’re not on real grass. It looks like a dog cage; you’re separated like an animal. There was barbed wire everywhere. There’s a canopy over the yard, so I could only get partial sun, and only then if I stayed on one side of the yard.” “There was nothing to do at Camp East Montana. I was stuck inside of a windowless room. All you see is the roof of the tent blowing around when it’s windy.... There were two TVs, but it was hard to get access to them. Everyone wanted to watch TV, because there was nothing else to

	do. Because almost everyone spoke Spanish, it was rare that a TV would be on an English channel. I would just try to sleep to pass the time, but the TV volume would always be at full blast during the day so that was hard to do. It was so loud in the unit at all times.”
Senevilay Decl., ECF No. 2-10, ¶ 8	“You have to try to make a routine to avoid going crazy. I just walk around the pod, just walk in a circle. That’s all I can do to pass the time here. There’s nothing else to do.”
Ly Decl., ECF No. 2-9, ¶¶ 21, 26, 35	“The first time I was housed at Camp East Montana, myself and other detainees were kept inside a windowless tent almost 24/7. When we were given recreation time outside, it was barely an hour long. We received recreation time maybe once or twice a week. The recreation area is a metal cage, about the length of a basketball court. There are four of these cages. The metal cage is tall but the roof did not protect us from sand or rocks blowing in. We were given a soccer ball and basketball ball but no basketball hoop. We used both balls as a soccer ball. If the weather was bad, like when there’s a lot of wind, staff told us we could not have recreation time.” “I spend most of my time at Camp East Montana watching television. There are two big televisions in the housing unit that we all have to share, but they are usually on Spanish language channels and I don’t speak Spanish. There isn’t much else to do to pass the time.” “There is a small library at Camp East Montana. Staff told us that we are not allowed to check out books. We were told that if you want to read a book, you have to read it while you’re at the library. A trip to the library could last 1-2 hours. I did not go once staff told me that you could not check out a book, because that wouldn’t be enough time to read a book.”
Angye Second Suppl. Decl. ¶¶ 9, 11	“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.... During recreation, we were locked in the covered tent and had no way to obtain help ourselves.” “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 [sic] 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.”

Claudina de Paula Decl. ¶ 17	“The guards at Camp East Montana did not take us to recreation consistently. There was a schedule posted on a wall in the pod, but the guards did not seem to follow it. Some weeks, we were not taken to recreation at all. We had to beg the guards repeatedly to take us out. I couldn’t really sleep while I was at Camp East Montana, so I would pass time reading the Bible or watching television. Going to recreation was my only outlet, and the guards didn’t even give us that consistently. I just wanted to be out for a little bit and play soccer. I needed it to clear my mind. The space where we went for recreation is a tent structure, surrounded by a metal fence. Some days, we were given a football, but the football was often flat. We played with it anyway.”
Romero-Paredes Decl. ¶¶ 8-9, 14	“Since I have been detained at Fort Bliss, I have rarely had outside recreation. We are only able to go outside for recreation approximately every 3-4 days, for one hour. Recreation does not take place at a regular time. I have had recreation at approximately 7am some days and approximately 5pm or 6pm other days. Recreation takes place on synthetic grass under a large tarp that blocks any sunlight. The dust is incredibly bad during recreation because there are roads around the outside, and vehicles passing through will kick up the dust. This makes it hard to breathe and worsens my allergies. We only have one soft plastic soccer ball.” “I have not seen the sun since approximately the day I arrived on August 31, 2026.” “There is a limited library at Camp East Montana with books only in English. A lot of the books are children’s books, and there appear to be no books on law, history, geography, or human rights. I have only been able to go to the library once since arriving to Camp East Montana, on or around September 3, 2026.”
Piñango Decl. ¶¶ 14-15	“[While on solitary confinement,] [o]n days when I am taken out to recreation, which is not every day, I am there by myself. The recreation area is an enclosure with a tarp covering and a chain link fence surrounding it. I walk around the recreation area to pass time. It feels like just another cell. I feel trapped.” “There are times when I am locked in my isolated cell for approximately 72 hours without being taken out for recreation or to shower. We are not allowed to shower on weekends and are not taken to recreation on weekends, so I spend the entire weekend in my cell.”

Fernandez-Gastelum Decl., ECF No. 2-14, ¶¶ 14-15	“Since I have been detained at Camp East Montana, I have rarely experienced outdoor recreation. We went outside for recreation for approximately an hour on or around February 20th or 21st, 2026. Before that, we had not been outside for approximately fifteen days. The area where they take us outside for recreation is roofed. You cannot see the sky when you look up. The sides of the recreation area have a schoolyard-type net and there is a light that comes in from the side. The ground is artificial turf. Usually at least a week passed before we were allowed to go to the recreation area.” “There is a limited library at this facility with pamphlets and some other recreational books, but you can’t take them with you to your room.... There is a computer in the library area, but we can’t access anything except an ICE page.”
SNM Decl., ECF No. 2-22, ¶¶ 58-61	“We are not offered any educational, vocational, or meaningful activities. We only have two communal Televisions for the whole unit and the guards keep the TV controller on them. So, if we want to change the channel, we have to ask the guards for permission.... The majority of the people spend their time in bed because we are depressed, and a few people watch TV. There are only a few chairs in the TV area.” “I spend most of my time reading. Our ‘library’ is a small bookshelf with about 30 books. These books are shared with everyone at Camp East Montana. The majority of the books are in English, with only a few in Spanish. Sometimes, I go and there are only 10 books available. The books are very limited. We are only allowed to take one soft cover book to our bunk beds, which are very few. We are allowed to read hard cover books but only when we are at the library. The majority of the books are fiction. We may be taken to the library once every week or once every other week. I wish there were more books to help pass the time. Currently, there are fewer books than before.” “Outdoor recreation is limited and inconsistent. The guards post up yard times, but they do not meet those yard times. Sometimes guards take us out early in the morning at around 8 a.m. or 9 a.m. and force us to go outdoors to ‘recreation.’” “The yard is small, it has artificial grass full of sand, and there is not enough space for everyone in our unit to be out there at the same time. There is one soccer ball and nothing else to do. People cannot walk or run or exercise because the yard is small and because people are playing

	soccer and if we walked we would get in the way and get hit.... There are no benches or chairs or places to sit. Guards give us tap water to drink. In other units, we could not see the sun because the yard is fully covered from above. Sunlight would only entered through the chain linked fence on the side. In my current unit, A-14, there is a roof covering half of the yard and the other half of is uncovered. Usually, when we go to recreation, people just stand or sitting on the sides.”
Aguilar Decl. ¶ 8	“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.”
Tablets	
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 25-26	“We are given one tablet to share between four people from 6 am to 10 pm. The tablets are taken away twice a day during the counts. While we can make as many calls as we want, the calls cost about 9 cents per minute for domestic calls and 21 cents per minute for video calls. For international calls, they charge me 25 cents per minute. These calls are expensive. Because of this, I only call my family in Venezuela about every 15 days. We also get charged for sending and receiving SMS text messages and for receiving photos from our family. For this reason, I do not make many calls because neither I nor my family can afford it.” “The tablets have like games like ‘Candy Crush,’ ‘Zombie,’ ‘Solitaire.’ We are charged 4 cents a minute to play the games. The tablets have about 40 pre-loaded movies in them that we can watch. We are charged 4 cents a minute to watch the movies. We can also listen to some music but it’s limited, and we are charged about 3-4 cents a minute to listen to music. I usually do not use these applications because they cost me and my family money and we cannot afford it. When I first received the tablet from the facility, I was not informed that the entertainment apps or communication apps (SMS, phone, video calls) would cost me money. I think that there are free e-books on the tablet but I’m not sure which language they’re in or what they are. The tablets are shared between people and are usually in demand from people who want to use the phone, so I wouldn’t be able to read on it for uninterrupted periods of time.”
NYG Decl., ECF No. 2-24, ¶ 30	“We are given tablets to make phone calls but they cost about 7 cents per minute.”

HOK Decl., ECF No. 2-25, ¶ 22	“Each four-person bunk shares one tablet that detainees to use for phone calls, video calls, and SMS messages. Calls and video calls are charged by the minute and also include extra fees. But for about a month we did not have access to video calls. The tablet system is very expensive. Everything on the tablet costs money, including games, messages, music, movies, and receiving photographs. All SMS messages and photographs have to be approved by the facility. For example, my wife has sent me pictures of my kid, but I have not received those. Because several of us must share the same tablet, access is also limited.”
CCD Decl., ECF No. 2-26, ¶ 24	“Each four-person bunk shares a single tablet used for phone calls and messaging. Phone calls cost money by the minute, along with additional fees. We also get charged for making video calls, watching movies, playing music, or playing games on the tablet. Using the tablet is expensive, especially because we have no way to earn money while being here. Because the tablet is shared among multiple detainees, access is limited.”
ZOR Decl., ECF No. 2-30, ¶ 20	“There are 18 tablets in the housing unit. These tablets are shared with everyone in the housing unit. We use these tablets for making calls to our families, but only for those of us with money in our accounts.... Most of the materials in the tablet are in English only. For example, the grievance forms and medical request forms are only available in English. Some courses and other materials in the tablet are in Spanish. Because we use the tablets for so many things, and there are a limited number of tablets per housing unit, it is very hard to find time to get access to the tablets. Fights sometimes break out over the use of the tablets. The tablets also break and it takes the facility a while to fix them when they do.”
JLE Decl., ECF No. 2-31, ¶ 16	“Each four-bunk unit shares a tablet for phone calls, messages, and limited entertainment, but everything on the tablet costs money. We are not allowed to send or receive any messages or photos as these must be reviewed and approved by the facility. Sometimes my family will send me photos and they do not arrive.”
LLH Decl., ECF No. 2-32, ¶ 38	“Each four-person bunk bed unit is given one tablet to share. With the tablet, we can make phone calls – about 9 cents per minute for a phone call, and 21 cents per minute for a video call.... The tablet has games, but they cost 4 cents per minute to play. I do not use the games often because I do not have enough money. We can also SMS text, but we are charged money to send and receive SMS messages and receive photos from our family. The tablet also has movies in English but these cost money. I do not watch the movies. We also get charged to play music on the tablet. I only use the tablet at night to call my girlfriend.”
RES Decl., ECF No. 2-20, ¶ 27	“There’s a tablet that they give four people to share at a time, and it has music and movies on it, but you have to pay for all that. I don’t have any money, so I can’t listen to music or watch

	movies on the tablet. I was the sole breadwinner for my family before I was detained by ICE, and now my family is in debt. I call my wife maybe once or twice a week on the tablet. I don't have enough money to call her every day. When I call my family and friends, I try to keep calls short so that I can make the funds in the tablet last a bit longer. I don't usually talk to them for longer than 10 minutes at a time."
Baccam Decl., ECF No. 2-11, ¶¶ 36-37	"At Camp East Montana, four people would share one tablet. You could make phone calls, play games, and watch videos on the tablet, but it would cost you money." "[I]t was hard to use the tablet to make phone calls as much as I wanted because I had to share the tablet with other people."
Monroy Decl. ¶¶ 16-17	"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. 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."
Inadequate Nutrition and Water	
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 17-18	"The food here is very minimal. I am hungry all the time.... Because of the lack of food, I feel low energy, tired, anxious, and stressed. At around 9 pm or 10 pm all of us start to get really hungry right before bedtime. There's nothing really to take our minds away from hunger. It makes us irritable." "Sometimes we also get spoiled food."
NYG Decl., ECF No. 2-24, ¶¶ 44-45	"The food is terrible. For example, we usually get some kind of ground meat, a bit of rice, and a small amount of veggies. It's not enough. I am always hungry. I just eat it anyway because I need to. But the food portions are inconsistent and once they took away our dinner. In response, we protested by not eating and complained to the guard. The guards told us that they do not care."

	On one occasion, the guards took the food away and did not give us any dinner. We went to bed without dinner.” “Since I have arrived, we periodically get food that is rotten, like spoiled potatoes. On or about April 23, 2026, I received rotten potatoes in my unit for lunch and I showed it to the guard. The guard said that he could not do anything because they are just following orders. I threw away the spoiled potatoes. Others complained as well. On or about April 23, 2026, I saw that another detainee had a bug in this food.”
CCD Decl., ECF No. 2-26, ¶ 18	“The food is horrible. It comes frozen or partly frozen. I feel hungry constantly. I have reported the bad quality of food to the supervisors, and they have taken pictures, but nothing has changed.”
Navdeep Decl., ECF No. 2-28, ¶ 32	“The food portions here are very small. They keep us hungry. We don’t have commissary or the ability to receive additional food. Often, the food does not seem edible and I have to throw it away. Even when it is edible, it is not enough.... I wake up and go to sleep feeling hungry.”
Navdeep Second Suppl. Decl. ¶ 2	“Through June 2026, the food continued to be very bad at Camp East Montana. For four days of the week out of seven, it was hard to force myself to eat the food because it was so bad. For example, the scrambled eggs came in a container filled with water. A third of the container was filled with water. Often, the food seemed uncooked or severely undercooked.”
ZOR Decl., ECF No. 2-30, ¶ 35	“The food at the facility is meager and tastes bad. They give us frozen food that is reheated. The food tastes bland and the portions are very small.... We have to drink water from the sinks in the bathrooms in the housing units. We do not get bottled water and there is nothing else to drink.”
JLE Decl., ECF No. 2-31, ¶¶ 20-21	“The food is terrible and unhealthy. I must eat because if I do not, then my blood pressure drops.... The food is enough at all. I am hungry here all of the time and we drink water to help pass the hunger. Because of the lack of food, I feel weak and tired all the time. The food quality is bad, it’s badly seasoned, very sour, has a terrible season, and tastes horrible.” “On or about May 11, 2026, I started receiving a special diet. The food says ‘medical.’ But the food is exactly the same as the food that the other detainees are receiving.”
LLH Decl., ECF No. 2-32, ¶¶ 30, 32-34	“Food has always been an issue here. We receive small portions. Each time I’ve been here, there have been these issues with the food. There have been hunger strikes from how bad the food is.” “There are instances when you complain about the food, they won’t give you food anymore, and it took 2 days to get food again. The food is still terrible and the portions are still small.”

	“Since I’ve been here since November 2025, the food has stayed the same in terms of bad quality and small portions. The food they give us is not enough, I have noticed that people here have lost weight. I have lost about 10 pounds since being here. We drink water and sleep to try to pass the hunger.” “Sometimes we get rotten or spoiled food.”
Gonzalez Ramirez Decl. ¶¶ 46-47	“The food here is terrible. It’s not even good enough for a dog. It doesn’t sit well in my stomach. I am dying of hunger here. I throw up frequently after eating. I am a skeleton of the person I was before. Any day now, I think I will die here.” “I also am passing out from hunger; the food they give me here is something I cannot eat. I last weighed myself on or about the week of May 25, 2026. I have lost 20 pounds from the last time that I weighed myself. There is a clinic where I get weighed every week, and they tell me how much I weigh.”
Nelson Decl. ¶¶ 9, 12-14, 38	“During approximately 1 month, the water fountains were damaged 5 times. One time we had no water for an entire day. The guards did not offer us any water to drink.” “The food quality at Camp East Montana is horrendous. It is frozen and seems to be saturated with salt, condiments, and preservatives. The quantity of food that we get is also minimal. I have high blood pressure and cannot eat much salt, sugar, or fat. The plates are also mostly made of carbs, like sweet potatoes and carrots. On many occasions, I did not eat anything because I was afraid the food would make me sick.” “The food portions are very small. The rations are about half of the palm of my hand.... That amount of food is not enough for me. I was often left feeling hungry. Some people tried to save food for later like milk or cookies, but the guards threw it out if they saw it. They said we were not allowed to keep food after two hours.” “On many occasions, I received spoiled food.... The food in general was really bad.” “I cannot say that the food was ‘medical,’ the heavy salt was replaced with a lot of fat and oil. There were 5 or 6 times when I was not provided with my medical meal. I had to ask

	the guard to bring me a medical plate. Sometimes they didn't and I had to eat the regular Meals."
Majok Decl. ¶¶ 12-13	"At Camp East Montana, I never received dietary meals for my diabetes. The regular meals were a small plastic tray with a sticker that said, '8 ounces.' The regular meals made me have diarrhea and stomach pain. I'd eat the food and run to the bathroom twenty minutes later because the food just ran through me. By the time I went to bed, I was hungrier than I was before I ate. I told the nurse about the problems I was having and that I needed a different meal, but the nurse said that the regular meals were all I could get and there wasn't any special meal for people with diabetes." "[T]he food at Camp East Montana was so little. People were fighting over the tortillas.... Before I got to Camp East Montana, I weighed about 220 pounds. By the time I got to the El Paso Service Processing Center, I lost around thirty pounds."
Rodriguez Sanchez Decl. ¶¶ 5-7, 12	"The food at Camp East Montana was bad both times I was there, with really small portions of about 200 grams, the size of a small fist. During my first time at Camp East Montana, I received food that had maggots in the meatballs and with pasta that looked like little worms in the meatballs. This happened two times while I was at Camp East Montana." "[D]uring my first time at Camp East Montana, I discovered that the food we were being given was expired. I knew this because our food had a printed label and then a sticker that covered the label." "During my second time at Camp East Montana, the portion sizes still were not enough for me and the food had a foul smell to it, so I went hungry the whole time. I lost weight while I was there and felt weak due to constant hunger." "The second time I was at Camp East Montana, I was told that they switched contractors. After the contractor changed, we would get our food 15 minutes before count, and we would have to throw our food away if we were not finished with eating in time. I would sometimes have to go hungry.... Other times I had issues with digestion because we had to inhale our food which gave me stomach aches and indigestion."
Rivero-Gonzalez Decl. ¶¶ 30-32	"The food at the facility was absolutely terrible. I was always hungry and felt weak and tired all the time."

	“Most of the time, the food was inedible. The food portions were small. The food was frozen, pre-cooked, and it was watery, and it did not have any taste.” “The food there worsened my anxiety and depression because it was so terrible. I constantly had diarrhea when I was at Camp East Montana, which forced me to go to the toilet regularly, which was difficult because of my mobility issues.”
Barreto Decl. ¶ 20	“I think I have lost weight while at Camp East Montana since I can’t eat all the food. The food damages my stomach and irritates my hemorrhoids. The food is very processed, pre-frozen, and spicy. The milk we get sometimes is spoiled and looks like cottage cheese. It’s not that I didn’t want to eat, the food just irritates my stomach and is very bad. In my opinion even a dog wouldn’t eat the food we get.”
ZOR Suppl. Decl. ¶ 6	“Food at Camp East Montana is still an issue.”
Pedro Juan Decl. ¶ 13	“Many times, the food we were served smelled spoiled or had mold. I would often get sick from eating it. Other women in the pod also complained of stomach pain or constipation after eating. Once, my belly felt very inflamed; it was big and hard. I had not had a bowel movement for approximately 10 days. I asked the guards to take me to the doctor but they didn’t.”
RES Decl., ECF No. 2-20, ¶ 39	“Actually, I think the conditions are getting worse. The food is worse.”
Do Decl., ECF No. 2-17, ¶ 11	“The food here is really bad and the portions are very small. Everyone here has lost weight. I have always stayed a consistent weight but even I have lost at least 5 pounds since being here. It’s the bare minimum just to keep us surviving. At one point, when I was in a different pod, we found insects in the food.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶¶ 10-11	“There was no commissary at Camp East Montana for us to purchase additional items that we are lacking.” “The food we were given devastated me because it was so bad. The food smelled bad and was watery. It would often make me sick, with vomiting or diarrhea about 3 or 4 times a month.”
Bounvongxay Decl., ECF No. 2-12, ¶¶ 15-16	“Because I am diabetic, I have special dietary needs, and what I eat and when impacts my blood sugar and insulin levels. When I do not get enough to eat, or my food is not tailored to my medical needs, I can feel jittery, weak, and hungry. Sometimes my eye sight goes fuzzy, and I can’t read things, and I can get light headed if I move too fast. This happened 2-3 times per week when I was at CEM, because I was not given enough food. I was given a snack with my insulin,

	but it was only the size of a tangerine, and it was not generally enough to fix the overall lack of food.” “There was no diabetic meal option at CEM, and no way to access snacks throughout the day.”
Baccam Decl., ECF No. 2-11, ¶ 26	“The food at Camp East Montana was terrible. They didn’t give us enough food to eat and there was no way to get extra food – no commissary or anything. I was always hungry. Sometimes detainees would take two trays instead of one because they were hungry, but that meant someone didn’t get a tray and couldn’t eat. There were lots of fights over food because it was so limited.”
Senevilay Decl., ECF No. 2-10, ¶ 11	“At Camp East Montana, you have to eat whatever they give you, or you will starve.”
Ly Decl., ECF No. 2-9, ¶¶ 19-20	“I did not receive sufficient food while I was detained at Camp East Montana. All three meals, breakfast, lunch and dinner, are microwaveable but the portions are bad – they are so small.... I would eat the food and feel like I was starving an hour later. People are starving every day here. The lack of food causes tension and fights in the unit. Since I got back to Camp East Montana a few days ago, the food seems like it’s even smaller portions.” “For the month and a half that I was at Camp East Montana the first time, I lost about 5 or 6 pounds because of how small the food portions were.”
SNM Decl., ECF No. 2-22, ¶¶ 41-43	“Nutrition is really important to me to help my immune system function well. The food we get at Camp East Montana is scarce and bad, which worsens my condition.... The food is not enough.... Since I arrived, I would estimate that I have lost about 10 pounds. Because of the lack of sufficient food and my HIV condition, I often feel very weak, with low energy, and tired. People are not allowed to save some food for later, e.g., like milk and crackers in their bunk beds as it is considered contraband. Any food that we save is thrown away by guards and cleaning crew. We are hungry constantly. To help with my hunger, I drink water throughout the day.” “Sometimes people fight over extra food that is left over because people are hungry all the time. For example, people who clean the unit are promised extra food from the guards. But, other people who do not clean feel that this is not fair. Now, however, with the new contractor, guards have stopped offering extra food to those who clean the unit. As a result, it seems that people are less incentivized to want to clean the unit and I have observed that the unit is more dirty during the week now and being cleaned less often.”

	“On or about May 5, 2026, we received meals that we think had expired. The meal ... tasted sour as if it had expired. We all returned our dinner because it tasted terrible and we didn’t want to get sick. Staff took the trays back but did not give us anything else to eat. We went to sleep without dinner.”
Angye Second Suppl. Decl. ¶ 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.”
Claudina de Paula Decl. ¶ 18	“Food at Camp East Montana was terrible. On or around March 26, 2026, I received a plate of spoiled food for lunch. The food appeared to have larvae in it. I told the guards on duty about this and they took photos of the food. When I asked for other food, they offered the same food that was spoiled. I refused to eat that.”
Romero-Paredes Decl. ¶ 13	“The food and water at Camp East Montana are terrible. As of approximately September 21, 2026, I had lost approximately 15 pounds since my weight was measured during my initial medical evaluation on August 31, 2026.... We are not given enough food at Camp East Montana. The portions are small and leave me hungry. Sometimes the food makes me feel sick. The water tastes bad, is sometimes cloudy, and has concerning density and consistency. When I drink the water, it feels like it sticks in my throat after I have swallowed.”
Piñango Decl. ¶ 4	“Conditions at Camp East Montana are bad. We do not get enough food here. If we feel hungry, there is no way for us to get additional food and we have to stay hungry. There is no commissary to buy food and we are not allowed to save food to eat later. Most people do not go to sleep until 10 or 11 pm but guards bring in our last meal of the day around 4:30 or 5 pm. We don’t eat anything for the rest of the day. The water we drink here tastes like chlorine and other chemicals.”
Rossa Chanchamire Decl. ¶¶ 10-11	“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.” “For approximately fifteen days, the facility gave us the same meal for breakfast, lunch, and dinner. 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.”
PKP Decl., ECF No. 2-23, ¶¶ 7, 9	“Since [a past surgery], I have had severe stomach and digestive issues.... But here at the facility I have not received any special diet.” “I told the nurse that I have severe stomach issues because of my previous surgery and that I need a special diet, like the one that I was receiving at federal prison. I did not see that the nurse wrote this down. The nurse told me that I would not be given a special diet here because the facility does not provide any.”
HOK Decl., ECF No. 2-25, ¶¶ 7-8	“When we got our meals, some of us ate at the tables but there weren’t enough tables. The rest of us ate in our beds and on the floor. For food, we received a sandwich that was two pieces of white bread, a thin slice of baloney, and cheese slice, with fruit or a cookie for a few days. Then, for the rest of the time we received prepackaged meals that usually consisted of rice, beans, and some kind of meat. The food was horrible.” “I lost weight during these three weeks. When I entered, I weighed 205 pound.... About a month and a half later, I went to see the nurse and I was weighed again and who [sic] told me that I weighed 187 pounds.... On May 27, 2026, I weighed myself and I weighed 173 pounds.”
Reina Suppl. Decl. ¶ 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.”
Aguilar Decl. ¶ 11	“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.”
Monroy Decl. ¶ 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.”
Lack of Language Access	
Navdeep Decl., ECF No. 2-28, ¶ 43	“Another challenge is the language barrier. I speak English, Hindi, Punjabi and am familiar with Sanskrit. Even though I didn’t understand a word of Spanish when I arrived here, I’m having to pick some up because the guards here speak almost entirely in Spanish. When the guards come in and do a Public Address (PA), that address is in Spanish. When I can’t understand what they are saying, I ask them to please translate into English because I don’t want to miss the announcements. Sometimes the guards agree to translate into English, but much of the time they refuse to translate from Spanish into English and they turn around and leave. This causes me to miss important announcements”
UEG Decl., ECF No. 2-18, ¶ 11	“Most of the other detained people speak Spanish. I don’t speak any Spanish, so it’s hard to communicate with other people. My native language is Kinyarwanda, and I also understand some English and French. I have never been provided with a translator or interpreter. I just have to use my poor English.”
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 34, 43	“On or about March 25, 2026, I wanted to send ICE a message about the forms that I was given to sign in English but that I wanted them in Spanish (I am not fluent in English and for important information need to read it in Spanish) and to follow-up about my medical forms. But I could not send them a message because I had already sent two messages that week.” “For example, on or around March 24, 2026, ICE provided me with a form in English and told me that my lawyer had reviewed it and approved me to sign it for me to have an interview with ICE regarding a supervised release. I asked ICE for a translated copy of the form, which they denied. Instead, an ICE official came to translate the form for me.”

Baccam Decl., ECF No. 2-11, ¶ 33	“I didn’t know what was going on half of the time I was at Camp East Montana. I don’t speak Spanish, but a lot of the announcements were only in Spanish. Almost every other detainee in my unit spoke Spanish. There were only a few of us who didn’t. When I and others would ask guards to speak in English, guards would say things like, ‘This is El Paso, you better learn how to speak Spanish.’ In the few instances where they did speak English, it was hard to understand them because they had a heavy accent.”
Senevilay Decl., ECF No. 2-10, ¶ 9	“Most of the detainees here are Spanish speakers. The guards only make announcements in Spanish. We try to tell them some of us speak English, and we have to constantly ask to have them make announcements in English.”
PKP Decl., ECF No. 2-23, ¶ 13	“Sometimes I respectfully ask for permission to go to the restroom in Spanish and the guard says. ‘I don’t speak Spanish.’ Then when I ask in English, the guard does not respond.”
Angye Decl., ECF No. 2-27, ¶ 36	“On or around May 19, 2026, I signed up to go to the library. But there was no announcement in English for that, so I only learned that people had gone when I saw a bunch of people come back from the library. I was listening all day for the library announcement, so I think it must have been one of the announcements they make only in Spanish. The officers here mostly speak in Spanish without translating into English or other languages.”
ZOR Decl., ECF No. 2-30, ¶¶ 20, 53	“Most of the materials in the tablet are in English only. For example, the grievance forms and medical request forms are only available in English. Some courses and other materials in the tablet are in Spanish.” “I have never been provided an interpreter by staff during my time at Camp East Montana. For visits to medical, if there is a nurse who speaks Spanish, that nurse will translate my visits with the doctor. If not, then a guard will be used as a translator. This makes me feel very uncomfortable because I have to discuss my medical issues in front of the guards and have them translate for me. No one has ever told me that I have the right to ask for an interpreter to help me with medical appointments or with anything else at the facility.”
Claudina de Paula Decl. ¶ 13	“The announcements and instructions were usually given in Spanish, but I do not speak Spanish fluently. I speak Portuguese.”
Monroy Decl. ¶ 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.”
Aguilar Decl. ¶ 4	“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.”
Comparison to Jail, Prisons, and Other ICE Detention Centers	
Ly Decl., ECF No. 2-9, ¶¶ 24, 40	“In jail, I and others had more freedom, like we could work and go to classes and other programs, like AA meetings and church. When I was in jail, I got to be outside and have recreation more. Sometimes I would be outside all day.” “Jail was so much easier than being detained here. Here, staff and ICE officers don’t tell you anything, won’t help you with anything, and you can’t trust or believe anything they say.”
Senevilay Decl., ECF No. 2-10, ¶ 5	“... I was in jail for about a month 20 years ago. Jail was so much better than Camp East Montana. There, you get access to things, a good meal, officers who know and follow the rules. Here, the officers can’t handle everyone, there’s constant fighting over the TV and food, and people stealing food. Here in Camp East Montana, we’re pat down every time we leave or return to the housing unit. It wasn’t like that in jail.”
Baccam Decl., ECF No. 2-11, ¶ 30	“When I was in county jail, we were given razors and nail clippers. No one there told me to bite my toenails. That’s disgusting.”
RES Decl., ECF No. 2-20, ¶¶ 7-8, 12, 15-17, 19, 24, 31, 42	“I also worked as a guard at the county jail in Maine starting in September 2024, for about 10 months.... The conditions at the county jail were much better than here at Camp East Montana. For example, I had to respect inmates, inmates had access to the commissary, food was better quality, inmates had access to outdoor recreation and educational programming and had better medical care. Inmates at the county jail had access to their own tablet. When they moved from one place to another, inmates did not have to be subjected to pat downs and searches (the only times that they had to be searched was when they had contact with people on the outside like when they worked at the kitchen or had outdoor visitors).” “I have no criminal history at all. Here, I am being treated worse than a criminal and worse than the inmates where I worked at the county jail in Maine.” “When I worked at the county jail, the individual cells had a small window; the unit had windows, and there were clocks around that allowed inmates to know the time of day. When I

	was at Torrance detention center, the individual units also had windows, and we could see the sun and look out during the day.” “When I worked in the county jail, our daily counts were quicker as I already had the names of the people. The control center called me to confirm, and I confirmed this quickly. When I was at Torrance Detention Center, count was done quickly as well and never during eating times.” “At Torrance, there were attorneys that came to visit every week and provided free legal services. They answered our questions and had someone that spoke Portuguese. There’s nothing like that here.” “In comparison to the county jail, the facility was cleaned every day. At Torrance, I cleaned every day and received the proper supplies to clear [sic]; there was a corner that stored all of the cleaning supplies (e.g. gloves, disinfectant, mop/broom, scrubbers), and I received \$5 to clean the unit.” “In Torrance, they had disinfectant dispensers across the entire facility. There is nothing like that here.” “At Torrance, they had a library with a lot more books in many languages, including Portuguese. I also like playing Sudoku and the librarian there would print Sudoku pages for me to pass time. They don’t have anything like that here at Camp East Montana.” “At Torrance, they had exercise equipment like weights and a stationary bicycle, they also had a large open yard with small basketball court and an area where we could play soccer. The guards would take us out every day so I would try to exercise every day. We were able to be in that space for up to two hours each day. This helped a lot with my stress and high blood pressure. I was also able to keep myself busy with work at Torrance.” “Before I was detained by ICE, I myself worked in a jail here in the United States. We were taught to respect inmates, to listen to their needs and fulfill them, respecting the rules of the prison. The inmates had access to razors to shave, nail clippers to cut their nails, coffee, tea, milk, and fruit juice. Here, it’s the opposite.”
--	--

PKP Decl., ECF No. 2-23, ¶¶ 7, 16-18, 27-29, 31-32	“At the federal penitentiaries, I received much better-quality food that was warm. We also had access to commissary where I could buy food, snacks, and extra hygiene supplies.” “That’s really different from when I was in prison, where I had access to, for example, educational services (I earned my GED), church services Wednesdays, Fridays, and Sundays and I led services, we could go watch movies, we had a much bigger library, educational videos, and vocational education. We could also work for pay and learn trades. In comparison at Camp East Montana, there is nothing productive, healthy, or educational that we can do, which makes me feel desperate.” “I am being treated worse than when I was in federal prison; the conditions at Camp East Montana are much worse.” “When I was in federal prison, each person could purchase their own personal tablet for about \$130 but we could use the services on the tablet for unlimited time. We also received 500 free minutes a month of free calls. We also had contact visits with our family where we could hug our families.” “Even when I was in federal prison, I never experienced this level of abuse [from a guard].” “For example, when I was in federal prison, I received physical therapy in my knee and pain medication.” “When I was in federal prison, I was receiving medication and a special diet to manage my high cholesterol. When I arrived here, neither the nurse or the medical team checked my cholesterol levels or provided me with medication or provided me a special diet.” “I have chronic anxiety. When I was in federal prison, I received medication for my anxiety. I would also see the psychologist who prescribed me medication for my anxiety.”
NYG Decl., ECF No. 2-24, ¶ 18	“When I was in Krome in Miami I saw psychologists every two weeks, or once a week. And when I was at El Paso Service Processing Center, I was seeing the psychologist every week or ten days. When I saw the psychologists more regularly, I felt better.”

CCD Decl., ECF No. 2-26, ¶¶ 15, 19, 23, 27; <i>id.</i> p.6 ¶ 6* *Paragraph numbers restarted after paragraph 32; subsequent paragraphs in this declaration cited by reference to the page number first and then the paragraph number in that page.	“I am being treated much worse here at Camp East Montana than I was treated at any of the state prisons where I served time. In those state prisons, I had better conditions, rights, and privileges, and better medical care, medication, and mental health care.” “This facility has more rules that restrict us, more than I was when I was in state prison.” “Unlike my time in state prison, there’s nothing to do here.” “We have to put our hands up and we are searched worse than in state prison, because in state prison we were just patted down quickly. But here, the guards touch us inappropriately.” “Camp East Montana is the worst experience I have ever had of being detained even compared to my time in the SHU in state prison because there are so many restrictions, rules, dust and sand in the unit, the unit is dirty, the terrible quality of the food which makes me feel sick and lack of commissary, the sexual assault I experience, the windowless tarp cell, the terrible yard, horrible medical care and mental health care, lack of access to a lawyer, absence of programming, and poor hygiene conditions. I was in state prison for about 19 years and the conditions here are worse.”
ZOR Decl., ECF No. 2-30, ¶¶ 8, 14	“My experience in the many months I have been detained at Camp East Montana has been horrible. It is worse than county jail and worse than the other immigration detention center I was detained at before coming to Camp East Montana.” “Camp East Montana is not like the other ICE detention center I was at before.”
SNM Decl., ECF No. 2-20, ¶ 6	“Conditions at Camp East Montana are much worse than they were when I was in jail and make me feel like I’m being punished again, more harshly this time.”
Grievance System	
Rodriguez Flores Decl., ECF No. 2-6, ¶ 34	“On the tablet, we are allowed to only send two messages to ICE or the facility staff per week. We can only send two grievances a week. While we can file handwritten grievances, we usually never hear back from ICE or the facility about these in a timely manner.”

SNM Decl., ECF No. 2-22, ¶ 7	“When I arrived, no one explained to me the process for filling a sick call to get medical attention. I learned how to submit a sick call request by asking the guards shortly after arriving at Echo unit. Similarly, when I arrived no one explained the grievance process to me. I learned about how [sic] submit a grievance when I had an issue with another detainee threatening me and I asked the guard about how I could complain.”
CCD Decl., ECF No. 2-26, ¶ 30	“On or about May 14, 2026, I submitted a written PREA grievance to that officer who encouraged me to file, who gave it to a supervisor. A female supervisor later spoke with me, and I explained that I had already reported the incident to Officer Blanco. About an hour later, I met with Garda official Michael Short and described what happened. I also told him there was video footage and that other officers witnessed the incident. During the interview, Michael Short repeatedly stated that other detainees had previously ‘lied’ about sexual assault allegations, although he eventually said he ‘believed’ me. He told me he ‘might report it to ICE,’ but since then I have not received any updates or follow-up. No staff person has come to check on me and see how I am doing. I also attempted multiple times to call the ICE sexual abuse reporting hotline number posted inside the facility, using the tablet, but no one answered.”
ZOR Decl., ECF No. 2-30, ¶ 48	“I had to put in many grievances to ICE to get them to approve new veneers for my cracked teeth. ICE kept telling me to ask medical. Medical kept telling me I had to ask ICE. I think I put in about 3 grievances to ICE asking them to fix my teeth. Eventually, after maybe 3 months of asking, the dentist finally installed the veneers.”
Majok Decl. ¶ 19	“Because of the mistreatment I faced at Camp East Montana, I submitted four grievance letters to the facility. I submitted one of the grievance letters after I told the nurse that I felt like I was going to harm myself, and she told me to do it. I never received any response from any of the grievance letters, and no one ever came to talk to me about them.”
Romero-Paredes Decl. ¶ 17	“I have submitted approximately 14 requests to ICE about the status of my case by submitting grievances on the tablet and have not received any responses except for a message saying that a team is working on my case. I have also submitted requests about the status of my passport, personal property, and glasses that I believe were taken from the area under my bunk.”
Aguilar Decl. ¶ 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.... 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.”

Monroy Decl. ¶¶ 20, 25	“I reported this [attack by another detainee] 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.” “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.”
------------------------	--

<u>INADEQUATE HEALTH CARE</u>	
Untimely and Incomplete Medical Screening	
Rodriguez Flores Decl., ECF No. 2-6, ¶ 7	“About four days after I got to Camp East Montana, I received a medical screening from medical staff.”
LLH Decl., ECF No. 2-32, ¶¶ 8, 11, 15, 21	“During my intake, I did not receive a medical intake exam. The guards only gave us the uniforms and then sent me to my unit. I was not screened for tuberculosis, COVID-19, or measles. They did not ask me if I was sick, felt sick, was on any medications, had a rash, had been throwing up, or had a fever, or anything like that.” “I was not given a medical evaluation [the second time at intake] either.” “[The third] time [at intake] I was given a medical evaluation. The evaluation was brief: a nurse measured my weight, height, blood pressure, temperature, and asked for my medical needs. I shared that I had an infection in one of my teeth, chronic sore throat, and a urinary tract infection. The nurse told me that I needed to submit a sick call request when I made it to my unit. That was it.” “[The fourth] time [at intake] I was given a quick medical evaluation. I did not receive a mental health evaluation. The medical evaluation was brief: a nurse measured my weight, height, blood pressure, temperature, and asked for my medical needs. I shared that I had lost my tooth (it fell out when I was in Arizona), I had a chronic sore throat, and I had a urinary tract infection. That night I was administered a lab test for my UTI. But, to this date, I have not received any updates about that test.”
Monroy Decl. ¶¶ 8-10, 38	“I did not receive a medical exam during my intake. I eventually received a basic exam approximately a month after I first entered CEM.” “I was not asked about my mental health during my intake.” “I was not asked about disabilities or any need for accommodation during intake.” “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.”

Fernandez-Gastelum Decl., ECF No. 2-14, ¶ 6	“During the intake process, no one asked me about whether I have any chronic conditions when I arrived at Camp East Montana. In addition, no mental health screening was conducted.”
Ly Decl., ECF No. 2-9, ¶¶ 12, 13	“The medical check process was in a different area than the intake room where I first slept on the floor. The medical check process began after I had already been clustered with other people. The medical process lasted a long time – almost 18 hours.” “During the medical check, ... I was not asked if I felt sick at the time.”
PKP Decl., ECF No. 2-23, ¶ 9	“About two days after being in the intake room, I was given a quick medical evaluation which included measuring my blood pressure, weight, height, and temperature.... I told the nurse that I have severe stomach issues because of my previous surgery and that I need a special diet, like the one that I was receiving at federal prison. I did not see that the nurse wrote this down. The nurse told me that I would not be given a special diet here because the facility does not provide any.”
UEG Decl., ECF No. 2-18, ¶ 4	“I saw a medical person very early in the morning the next day [after arriving at the facility at 8:00 pm the previous day], around 6:00am or so.... It didn’t even feel like a medical exam. All that they did was take my blood pressure and write down the numbers. Then they asked if I had any issues with my teeth. That was all that happened during that exam.”
SNM Decl., ECF No. 2-22, ¶ 18	“When I first arrived to Camp East Montana at Echo unit, no one asked immediately me [sic] about any medical conditions, symptoms, or medication needs, and I wasn’t seen by medical staff. It was not until about a week after I arrived that medical staff checked my weight, height, blood pressure, and temperature, and gave me a TB test.”
NYG Decl., ECF No. 2-24, ¶ 9	“... I was also provided with a quick medical evaluation by a nurse that consisted of measuring my height, weight, and blood pressure.”
Gonzalez Ramirez Decl. ¶ 10	“I told them [during intake] about my prostate problem, that I am prescribed two pills a day to control my pain from prostate, and that if I don’t get my medication, I can’t control my prostate which causes me serious pain and mobility issues. During the evaluation, I was not prescribed any medication, given an eye exam, or given a hearing exam.”
Rodriguez Sanchez Decl. ¶¶ 3-4	“The officers told us that we were not going to get our medication until they processed us, which took approximately three days.... When I saw the doctor, I asked if I could take the medicine I brought with me, but they said I was not allowed to take my medication. They offered Tylenol, which did not help me with my chronic back pain and PTSD.”

	“It took about two days for me to get my medications that I had already brought with me from Torrance Detention Center. During my medical screening, the medical staff asked if I had a chronic medical condition, took my vitals, my weight, my temperature, and my height.... I told medical staff during the screening that I was prescribed medications and asked them for them. The staff at Camp East Montana did not give me the prescribed medications that I had from Torrance and they told me that I needed to wait to see the specialist to get the medications and any medication that I brought from Torrance was going to my property and I wouldn’t be able to access them.”
Bounvongxay Decl., ECF No. 2-12, ¶¶ 7-8, 10	“I did not receive insulin on the evening I was held in the intake room. In the early morning on February 12th we were put in lines in the intake room to wait for medical screening. This was around 3 a.m., so I was feeling the negative effects of not receiving my insulin in the evening. While I was waiting, I asked one of the security guards if I could go talk to one of the officers doing screening because I had diabetes and needed insulin urgently. I was told that I had to wait my turn. I asked again and they told me no again. Ultimately, I explained that I needed medication to the other detainees in front of me in line, and they let me move forward to see the medical staff earlier.” “When I got in to the screening area I told the medical staff that I had diabetes and that I had brought my medications from home. I told them that the medications were in my personal property. I then showed the staff the medications I had that my primary care physician had prescribed to me. The staff told me that my need for insulin was an emergency, and that the officers shouldn’t have stopped me from skipping the line.” “I told the officers at intake and in medical about all three of my medications [to manage my diabetes], and I showed them all three of those medications. I was told that the facility didn’t have Jardiance or Victoza, so they would be ordered, but I never received either of those medications and they wouldn’t let me take the medications I had brought from home.”
Do Decl., ECF No. 2-17, ¶ 4	“When I arrived at Camp East Montana, it took about 15 hours before I got through the intake process. A group of us all waited at the intake station overnight.... The health check was really quick.”
Rivero-Gonzalez Decl. ¶¶ 7, 19	“On the fourth day, I received a medical evaluation.”

	“The medical provider told me that they did not have any of my list of medications and medical records from Alligator Alcatraz.”
CCD Decl., ECF No. 2-26, p. 5 ¶ 2* *Paragraph numbers restarted after paragraph 32; subsequent paragraphs in this declaration cited by reference to the page number first and then the paragraph number in that page.	“When I arrived, I told the medical team about my suicidal ideation. The nurses here told me that they cannot do anything about it. When I arrived, I saw that the facility had my medications from Adelanto and I saw these during intake. I asked the nurse if I could access these medications. The nurse said no because they were not approved yet.”
JLE Decl., ECF No. 2-31, ¶ 7	“I was given a quick medical evaluation that consisted of staff asking me if I had any medical conditions.... I told them that I have Type II diabetes, and I require insulin shots once per week. The nurse told me that they could not provide me with the same insulin that I was receiving outside because it would cost too much.”
Rodriguez Flores Second Suppl. Decl. ¶ 10	“During my intake medical screening, after sleeping on the floor, staff took my blood pressure, temperature, and weight. I asked for a knee brace or knee sleeve to help support my knee. The nurse told me that the facility did not have the money to provide one. All I was given was a pain medication that helped me a little.”
Mbabid Decl., ECF No. 2-8, ¶ 9	“When I arrived at Camp East Montana in El Paso, I told the guards there that I have TB, that I am supposed to take medication daily, and that I am not supposed to miss any dose. The guards told me that there was nothing that they could do until I was processed.”
Majok Decl. ¶¶ 6-7	“When I first arrived at Camp East Montana, I was put in the processing area for about seven days.... For those approximately seven days, the facility did not give me my medication for diabetes, high blood pressure, and depression.” “I told them what medications I had been on, and the staff told me they would get my medication right away, but they didn’t.”
Claudina de Paula Decl. ¶ 11	“Finally, on or about October 2, 2025, after five days in that intake room, I was taken to see a medical provider. The provider took my blood pressure and temperature and asked if I took any medication. She told me that my blood pressure was high. I thought it might be because I had not been sleeping or eating well for the past five days. I asked her if they would do any tests for Covid or tuberculosis. She said no. I asked this because while I was in the intake room I heard

	from guards and other detainees that there was an outbreak of Covid and tuberculosis at Camp East Montana. This was the first time I saw a medical provider since I arrived at Camp East Montana.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶ 20	“When I first arrived at Camp East Montana, I also asked the nurse to test me for HIV and other STDs.... The nurse drew blood and she told me she sent it to a lab to get tested. I repeatedly asked the medical staff for the results of that test, but they were not provided to me. Up until the day I left Camp East Montana, the medical staff told me they did not have the results to those tests.”
Vilay Decl., ECF No. 2-21, ¶ 11	“We brought him back to our house, and he told us that he had not received any medical care while he was in ICE detention. Don told us that when he arrived at Camp East Montana, nurses made him take his shirt off and confirmed he had a defibrillator and a port, but that they didn’t do anything and just chatted amongst themselves. He said that he never received any insulin or other medication, including his heart medication, while at Camp East Montana, and he didn’t receive chemotherapy.”
Baccam Decl., ECF No. 2-11, ¶¶ 11-12	“Throughout the whole night [after being in the intake room for 24 hours already], we were given short medical screenings. I got mine in the early hours of the morning, I would estimate it was around 4 am.” “During the screening, I told the nurse that my front tooth had been broken when ICE arrested me and was painful. The nurse told me that it wasn’t of concern unless it really hurts, in which case they’d give me Tylenol. I asked for some Tylenol for my tooth, but never got any.”
Inadequate Tuberculosis Screening and Protocols	
Mbabid Decl., ECF No. 2-8, ¶¶ 9, 11-12	“When I arrived at Camp East Montana in El Paso, I told the guards there that I have TB, that I am supposed to take medication daily, and that I am not supposed to miss any dose. The guards told me that there was nothing that they could do until I was processed.” “I told them again that I had TB and needed my medication. They still would not give me access to my medication.” “It took the entire day for staff at Camp East Montana to finish processing us. I kept telling any staff person around me that I wanted to see a nurse and that I had TB and needed my medication. Around 7 pm that evening on October 28, 2025, I finally saw healthcare staff. I told him that I

	had TB, and this was the first time that it seemed like somebody knew what TB was and took it seriously.”
Baccam Decl., ECF No. 2-11, ¶ 40	“Staff seemed very disorganized. They gave me a TB test (a shot beneath my skin) and told me they’d come back and check on any reaction after three days. But they didn’t check on it then. I asked a guard why, and he told me staff had come that morning to check people’s reactions, but staff thought I had left the facility. I’m not sure why that would be; I was in the housing unit the whole time and they always scan our wristbands during count. Staff told me I wasn’t cleared because they did not see the TB test. They later made me get a chest x-Ray but the next day they called me in again and said they wanted to give me a chest x-Ray. I told them I had already gotten one the day before, so I refused to take it again. About an hour later, staff told me they found the first chest x-Ray.”
Rivero-Gonzalez Decl. ¶ 23	“I also explained [to the nurse] that they had not followed up on my TB skin test. That nurse called a supervisor. Then about two or three days later, I was taken to the medical unit.... At the medical unit, I was given the x-ray TB test.”
Claudina de Paula Decl. ¶ 11	“Finally, on or about October 2, 2025, after five days in that intake room, I was taken to see a medical provider.... I asked her if they would do any tests for Covid or tuberculosis. She said no.”
ZOR Decl., ECF No. 2-30, ¶ 12	“I never received a screening for tuberculosis during this medical intake process.”
LLH Decl., ECF No. 2-32, ¶¶ 8, 50	“I was not screened for tuberculosis....” “On or around March 2026, I was given a TB test which staff told me came out positive. Then the staff did an x-ray test. Staff told me it was to find out if I had TB. To this date, staff never came and told me what the results were.”
UEG Decl., ECF No. 2-18, ¶ 5.	“I have not received a TB test since I’ve been at Camp East Montana. I know what the TB test looks like because I’ve had it done at other immigration detention facilities that I’ve been in. Nobody has given me a TB test since I got here and I didn’t see anyone else get a TB test during the intake process.”
SNM Decl., ECF No. 2-22, ¶ 37	“I also received a skin-test TB exam on or about January 11, 2026. The medical staff did not examine my body to check if I had a positive test result. Instead, I saw my arm and noticed that I had a skin rash and indication that I had a positive TB result. So, I asked to see the medic for this. About a week later, I later received an X-Ray chest examination for TB, which I was told came out ‘negative.’ The medical staff told me that they wanted to give me another X-ray because they couldn’t find my X-ray results, but they never did.”

HOK Decl., ECF No. 2-25, ¶ 10	“The nurse also asked if I had any allergies and they gave me a TB skin test. They said I needed a TB skin test to get the medical care I needed. The nurse never checked my TB results three days later. A month later they called me to do another TB skin test because the medical team had lost track of me already had done the TB skin test the first time. I asked for an X-ray test, but the medical staff said ‘no’ and that if I refused the second TB skin test, they would ask the guards to isolate me in a cell on my own for a month. So, I did not have a choice but to do another TB skin test. The test came out positive, but that’s because I got my TB vaccines in my home country. The second nurse said that the medical team should have just conducted an X-ray and explained that they should’ve never done the second TB test and that that nurse shouldn’t have intimidated me to do the second test.”
Do Decl., ECF No. 2-17, ¶ 24	“In or around March, there was a measles outbreak. I wasn’t in the pod that got quarantined but they came around to my pod to give us all a tuberculosis skin test. That was the first time I had the tuberculosis test since being detained.”
Lack of Continuity of Care Upon Arrival	
NYG Decl., ECF No. 2-24, ¶ 9	“During that screening, I told them that I needed medicine for my prostate. The nurse prescribed me medication, but I did not receive it until about two weeks later.”
PKP Decl., ECF No. 2-23, ¶¶ 9, 29, 31	“I told the nurse that I have severe stomach issues because of my previous surgery and that I need a special diet, like the one that I was receiving at federal prison. I did not see that the nurse wrote this down. The nurse told me that I would not be given a special diet here because the facility does not provide any.” “When I arrived here at Camp East Montana, I had my knee brace that I was issued in federal prison. A guard saw it and threw it away in the trash during intake.” “When I was in federal prison, I was receiving medication and a special diet to manage my high cholesterol. When I arrived here, neither the nurse or the medical team checked my cholesterol levels or provided me with medication or provided me a special diet.”
CCD Decl., ECF No. 2-26, ¶¶ 2, 13	“When I arrived, I saw that the facility had my medications from Adelanto and I saw these during intake. I asked the nurse if I could access these medications. The nurse said no because they were not approved yet.” “I was given a quick medical evaluation that consisted of measuring my blood pressure, weight, height, and asking me about the medications I was taking. I told them that I was taking 5-6

	medications for my mental health conditions. I take medication for Schizophrenia, depression, anxiety, PTSD, high cholesterol, and high blood pressure. The nurse said that they would give me the medications, but I did not receive them.”
Bounvongxay Decl., ECF No. 2-12, ¶¶ 7-8, 10	“I did not receive insulin on the evening I was held in the intake room. In the early morning on February 12th we were put in lines in the intake room to wait for medical screening. This was around 3 a.m., so I was feeling the negative effects of not receiving my insulin in the evening. While I was waiting, I asked one of the security guards if I could go talk to one of the officers doing screening because I had diabetes and needed insulin urgently. I was told that I had to wait my turn. I asked again and they told me no again. Ultimately, I explained that I needed medication to the other detainees in front of me in line, and they let me move forward to see the medical staff earlier.” “When I got in to the screening area I told the medical staff that I had diabetes and that I had brought my medications from home. I told them that the medications were in my personal property. I then showed the staff the medications I had that my primary care physician had prescribed to me. The staff told me that my need for insulin was an emergency, and that the officers shouldn’t have stopped me from skipping the line.” “I told the officers at intake and in medical about all three of my medications [to manage my diabetes], and I showed them all three of those medications. I was told that the facility didn’t have Jardiance or Victoza, so they would be ordered, but I never received either of those medications and they wouldn’t let me take the medications I had brought from home.”
Fernandez-Gastelum Decl., ECF No. 2-14, ¶ 8	“I believe over a week passed before I received my medication [for HIV]. However, when the pills ran out, I learned that my prescription had not been refilled. I once again went approximately over one week without receiving my medication.”
Rodriguez Sanchez Decl. ¶¶ 3-4	“The officers told us that we were not going to get our medication until they processed us, which took approximately three days.... When I saw the doctor, I asked if I could take the medicine I brought with me, but they said I was not allowed to take my medication. They offered Tylenol, which did not help me with my chronic back pain and PTSD.” “It took about two days for me to get my medications that I had already brought with me from Torrance Detention Center. During my medical screening, the medical staff asked if I had a chronic medical condition, took my vitals, my weight, my temperature, and my height.... I told

	medical staff during the screening that I was prescribed medications and asked them for them. The staff at Camp East Montana did not give me the prescribed medications that I had from Torrance and they told me that I needed to wait to see the specialist to get the medications and any medication that I brought from Torrance was going to my property and I wouldn't be able to access them."
Romero-Paredes Decl. ¶ 6	"Since I have been detained at Fort Bliss, I have faced many problems with medical and dental care. I suffer from high blood pressure, allergies, and ongoing pain due to a cavity. The facility should know that I have this condition because I have told guards and medical personnel, filled out paper forms, and submitted over approximately 16 requests for medication or care on the tablets. I also arrived from my prior facility with medicine.... I did not receive any high blood pressure medication between approximately September 19, 2026, and approximately September 23, 2026."
Nelson Decl. ¶ 5	"In high school, I was told by a doctor that I have anxiety, depression, chronic insomnia, hypertension, and asthma. I told all this to the person who did my medical screening. However, they did not give me any medication, and I was not told whether I would receive the medication I was already taking. Approximately 1 month passed before I received any medication."
Gonzalez Ramirez Decl. ¶¶ 10, 35	"I told them [during intake] about my prostate problem, that I am prescribed two pills a day to control my pain from prostate, and that if I don't get my medication, I can't control my prostate which causes me serious pain and mobility issues. During the evaluation, I was not prescribed any medication...." "I also have prostate issues. I had these issues before arriving here. When I arrived here, I asked for medication for my prostate. It took over 30 days in order for me to get my medication for my prostate. During that time, my prostate was inflamed and swollen, including my testicles. I was in severe pain for about 30 days."
Vilay Decl., ECF No. 2-21, ¶¶ 3, 6, 11	"Don had a lot of complex and serious medical conditions. He was diagnosed with anaplastic ALK-negative large cell lymphoma in 2024 and undergoing regular care and monitoring, including chemotherapy. He was an insulin-dependent diabetic." "When I learned that he was in ICE custody, ... I immediately contacted his oncologist and asked for a letter explaining how sick he was and that he urgently needed care. Don was supposed to start a new round of chemotherapy the day we learned he had been taken."

	“[Don] said that he never received any insulin or other medication, including his heart medication, while at Camp East Montana, and he didn’t receive chemotherapy.”
Rossa Chanchamire Decl. ¶ 5	“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. ”
Majok Decl. ¶¶ 6, 7	“When I first arrived at Camp East Montana, I was put in the processing area for about seven days.... For those approximately seven days, the facility did not give me my medication for diabetes, high blood pressure, and depression.” “I told them what medications I had been on, and the staff told me they would get my medication right away, but they didn’t.”
Baccam Decl., ECF No. 2-11, ¶ 12	“During the screening, I told the nurse that my front tooth had been broken when ICE arrested me and was painful. The nurse told me that it wasn’t of concern unless it really hurts, in which case they’d give me Tylenol. I asked for some Tylenol for my tooth, but never got any.”
JLE Decl., ECF No. 2-31, ¶ 7	“[At intake] I told them that I have Type II diabetes, and I require insulin shots once per week. The nurse told me that they could not provide me with the same insulin that I was receiving outside because it would cost too much.”
Rivero-Gonzalez Decl. ¶¶ 19, 28	“The medical provider told me that they did not have any of my list of medications and medical records from Alligator Alcatraz.” “I also needed medication for my claustrophobia but only received it about eight days after I arrived at Camp East Montana. When I didn’t receive my medication, I felt like I was suffocating and dying at the facility. And, when that happened, I felt more anxious.... When I was at Alligator Alcatraz, I was receiving medication to treat my claustrophobia, but I never received the same medication at Camp East Montana.”
Lack of Privacy for Healthcare Encounters	
Baccam Decl., ECF No. 2-11, ¶¶ 11, 39	“They took us to a big open space in the same tent as the intake room we slept in. When medical staff asked me questions for the medical screening, other people could see and hear. We were sitting right next to each other. When we went up to the nurse, we sat at a table. But everyone else was sitting on a bench behind us waiting for their turn and could hear what was being said. There wasn’t anything to give people privacy.”

	“The [medical] tent is small and just an open space. When you’re sitting to wait your turn, you can hear everything the nurse and a patient are saying. So when I met with the nurse, other people, including other detainees, could see and hear me.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶ 23	“In the hallway, the doctor told me, in Spanish, that he looked at my medical history and asked if I knew I was HIV positive. He looked shocked and worried. I was in shock too. I wanted to die in that moment.... [T]his was the first time I was learning about it after approximately 5 months of asking for my test results and without receiving any treatment.... The entire time we were out in the hallway. People were walking by, coming in and out of the pod. I broke down crying. I was in shock. I didn’t want to speak to anyone. I laid down and spent the whole night crying.”
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 49, 51	“On or around April 8, 2026, a nurse saw me in the hallway for my knee.... I was not taken to the clinic for medical care. Instead, I was evaluated by a nurse in the hallway in front of others with no privacy.” “I was taken to the nurse in the hallway and there were other people and guards around me. Other people were walking around. When I was seen by the nurse, other people could see and hear me. The appointment was not private or confidential.”
Ly Decl., ECF No. 2-9, ¶ 13	“This medical intake was not private. Nothing is private there because it is like a cubicle with the top section open, and other detainees were sitting near me and waiting their turn. They could hear everything I told the medical staff during the screening.”
Rivero-Gonzalez Decl. ¶ 19	“The medical evaluation was conducted in the hallway where other staff and detainees could see and hear.”
Nelson Decl. ¶ 36	“Sometime in late December 2025, a guard called my name and took me and another group of men to the end of the hallway, about 30 meters from our pod. There was a folding chair and a folding table out in the hallway. There was a man sitting there with a computer. The guards lined us up to speak to that man. When it was my turn, the man asked what was wrong with me.... While I was explaining my symptoms and medical history, there was a line of four other detainees behind me. They could hear everything. There were also guards and other people walking through the hallway.”
ZOR Decl., ECF No. 2-30, ¶ 11	“This medical intake happens in a room with staff, guards, and other detainees around you. There was no privacy; there were people right next to me who could overhear everything I was saying. I shared with the medical staff doing the intake that I have depression symptoms, but I did not feel comfortable sharing a lot of details because people around me could hear what I was

	saying and there is a lot of stigma associated with mental illness and depression, especially for men.”
LLH Decl., ECF No. 2-32, ¶¶ 12, 52	“The hallway was public and there were other guards, nurses, and detainees in the hallway being evaluated by the nurses. We were close to each other. We were seen five people at a time. All five had to wait in the hallway while we each evaluated by the nurse, so we could see and hear what people were talking with the nurse about.” “I made a sick call and I was taken to the hallway to be examined by a nurse. There were other people in the hallway that I could see them and hear what they were saying to the nurses, even without trying to listen. I believe that they could also hear what I was telling the nurse.”
SNM Decl., ECF No. 2-20, ¶ 31	“The medical appointments are still occurring in the hallway where other detainees and guards can listen and see the medical appointment. The medical appointments are in front of 3-5 other detainees who made a sick call. The medical staff set up a few tables to evaluate us. Anything that we say in front of the nurse, we have to say it in front of the other detainees and guards.... [T]he main medical appointment is not private. The hallway area is dirty because of all the sand/dirt in the hallway, and our bodies are examined in front of others in an area that is dirty.”
NYG Decl., ECF No. 2-24, ¶¶ 17, 24, 26	“The nurse usually takes me outside the housing unit in the hallway to ask me personal questions about my trauma in front of other people who could hear in the hallways, like guards and the other detainees who walked by. I didn’t feel comfortable with that at all. It’s really hard to talk about the mental problems I am having, and I don’t want other people to know. That information should be private. I didn’t say everything I wanted to say because it was not a safe or confidential place to talk.” “On or about April 23, 2026, I was taken outside the unit to the hallway, around midway. There was no privacy during the appointment because there were other guards and detainees around the hallway, who could see me and hear what the nurse and I were saying.” “On or about April 27, 2026, a psychiatrist came to see me. The guards took me out to the hallway to see the psychiatrist. There were about five or six guards around me during the appointment, and they could overhear everything I was telling the psychiatrist. There were also other detainees in the hallway who I believe could overhear what I was saying. I told the psychiatrist that I needed to be seen in a private setting for confidential reasons. The psychiatrist did not acknowledge my request. Instead, the psychologist asked me personal questions about

	my mental health. While I did not feel safe or comfortable speaking to the psychologist in the hallway, I felt that I had to because this was my only time that I had seen a psychologist after repeatedly asking to speak to someone.”
Do Decl., ECF No. 2-17, ¶ 4	“There were two tables at the front of the room where the staff were doing a health check and a mental health check. I could hear and see everything that happened at that table because it was all in the same room and there was no barrier.”
UEG Decl., ECF No. 2-18, ¶ 4	“The [medical] exam was in the same waiting room that we were all in together and so I could see and hear everyone else’s medical exams and they could see and hear mine.”
Healthcare Encounters Late at Night or Early Morning	
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 48, 50	“On or around April 6, 2026, I submitted a sick call request, and the guards woke me up for the appointment at around 3 am. But I refused because I was sleeping and tired. The guards have woken up several people in my pod in the middle of the night for doctor’s appointments. I don’t know why they do that.... You have to choose between trying to get a good night’s rest and getting medical help.” “I feel discouraged to make a sick call request because I know that they will take me out of my bed in the middle of night, like at 3 AM, to just sit me down in the waiting room and give me a quick cursory examination with no meaningful care. I know that others in my unit feel similar because we talk about this all the time.”
Senevilay Decl., ECF No. 2-10, ¶ 16	“I put in another sick call request. I was taken to see another nurse at around 3:30 am. I don’t know why they can’t do medical appointments during the daytime, but that nurse was better.”
Rivero-Gonzalez Decl. ¶ 29	“I can be in that small cell in my wheelchair for hours when I am taken to medical. For example, the guards may take me at midnight to medical and I am there until about 6 or 7 am in the morning.”
Claudina de Paula Decl. ¶ 20	“On or about April 21, 2026, at approximately 4 am, I was woken up and taken to the medical unit to get medication for my psoriasis. I was then taken back to my pod where I tried to sleep and rest.”
ZOR Suppl. Decl. ¶ 7	“I rarely submit a sick call request if I feel sick. That’s because when I do, the guards usually wake me up in the middle of the night to go to the doctor. It is really difficult to sleep at Camp East Montana, so being woken up in the middle of the night is very distressing.”
Gonzalez Ramirez Decl. ¶ 37	“Sometimes I am taken to the medical unit in the middle of the night while I am sleeping. For example, on or about June 7, 2026, the guards took me to the medical unit at around midnight, I had to wait in a room for about an hour, then I was seen by the medical provider, and then I was

	returned to the unit at around 3 AM. I am tired of going to the doctor, so I miss my medication often since they don't do the refills on time. Even if you go, if they prescribe the medication, you won't actually get it for 3-4 days."
JLE Decl., ECF No. 2-31, ¶ 26	"On or about May 23, 2026, I made another sick call request so that the nurse could explain my blood test results. I was taken to my appointment at about 1:00 a.m. and I returned to my unit at around 3:00 a.m."
Do Decl., ECF No. 2-17, ¶ 21	"It's hard to get medical attention here and when they do come it's often very late at night. For example, I put in a sick call on or around May 17, 2026, because I had a sore throat, cough, and runny nose. They came to take me to the clinic at midnight that night.... It's really frustrating when they wake me up because they know that I have trouble sleeping and am on sleep medications but they still come late at night."
RES Decl., ECF No. 2-20, ¶ 33	"Renewing my prescription is really problematic. On or around March 31, 2026, for example, guards took me out around 2 AM to go to a different part of the camp to get a refill of my prescription, with about four other detainees. We were there until 6 am waiting for our medication."
SNM Decl., ECF No. 2-20, ¶ 30	"I have had two medical appointments after submitting a sick call slip where the guards woke me up late at night, like at 11 p.m. or 2 a.m., to go to the waiting room next to other sick people sitting and waiting for hours. After I was seen by the medical staff, I was returned to our unit around 4 a.m. or 5 a.m. After these appointments, I was taken to the yard in the early morning.... It makes me not want to ask for medical help because it's really hard to sleep already, and I don't want to have to wait for hours in the middle of the night to be seen. One time I refused to go to a medical appointment because I was woken up at 3 a.m. and I was tired. The guards wrote this off as a willing refusal. I wanted to get medical help, but I just didn't want to go at 3 a.m. and spend the whole night waiting."
Baccam Decl., ECF No. 2-11, ¶ 11	"Throughout the whole night, we were given short medical screenings. I got mine in the early hours of the morning, I would estimate it was around 4 am."
Inadequate Sick Call Process	
Moreno Rodriguez Decl., ECF No. 2-15, ¶¶ 17-20, 24	"On or about March 22, 2026, in the afternoon, I felt very nauseous and felt a sharp pain on the left side of my abdomen, near my pelvis. On a scale of 1 to 10, my pain was about 6. I take medication for an ulcer on the left side of my abdomen. At that time, I believed the pain was due to the ulcer. That night, I submitted a sick call request to see the facility's doctor. I told the guards in the pod that I was feeling sick. I was not taken to the doctor that night. I continued to

	feel this pain for two or three nights in a row. I remember submitting multiple sick call requests to see the doctor.” “On the second or third night, I was feeling sicker. My pain increased to about 9 out of 10.... I told the guard in the pod right away that I had vomited blood. He told me I had to wait to see the doctor. I then threw up about 4 or 5 more times. It was extremely painful. I could not sleep at all that night.” “In the morning, during the guard shift, I showed one of the incoming supervising officers the cup with blood in it.... The supervising officer seemed alarmed and ordered another guard to take me to the infirmary.” “I was at the infirmary for approximately 40 minutes. The medical provider took my vitals and checked my blood pressure, then she told me I was going to the hospital.” “No medical staff in Camp East Montana has told me what happened, why I vomited blood, and if I was diagnosed with anything in particular.”
LLH Decl., ECF No. 2-32, ¶ 9	“I was sick for about 15 days with fever. I pleaded to the guards that I wanted to see the doctor. The guard told me that I had fill out a sick call request. I asked for a face mask but the guards said that they did not have any, so I was not given one. I filed out about five sick call requests, but I was never seen by a doctor or other medical staff. I did not receive any medicine. When I was finally seen by medical staff about two weeks later, I was only given Tylenol, but they didn’t do an evaluation or anything. By that time, I was already feeling better.”
Cristobal Decl., ¶¶ 12, 17	“[My dad] told me his stomach was hurting a lot and felt like it would explode. I asked him if he was offered any medication for this, and he said no. I asked him why the guards at Camp East Montana didn’t give him medication or take him to the doctor.” “[My dad] told me that he complained to staff at Camp East Montana about his pain but that they only gave him Tylenol. I had a hard time hearing my dad on that call. His voice was faint, and his words were slurred.”
Rodriguez Flores Decl., ECF No. 2-6, ¶¶ 46-47, 51-52	“On or around mid-February 2026, I was finally prescribed a nasal spray and allergy medicine after reporting my symptoms, but this did not fix the problem. I still have the same problem of inflamed and stuffed nostrils and I still have difficulty breathing.”

	“I have submitted multiple sick call requests about the problems I am having with congestion and breathing but because the medical staff just told me all they can prescribe is allergy medication....” “The nurse told me, in Spanish, that they could not do anything to help me [sic] breathing or knee issues and that I had to wait until I was out of the facility to see a doctor. The nurse just gave me joint and muscle cream in a very small container that was for a single use and one dose of Tylenol. The nurse did not even examine my nose after I explained that I had breathing issues.” “I could not sustain myself with my left knee and I could not walk. On or about May 20, 2026, I received four Tylenols twice a day (in the morning and at night). On May 21, 2026, I received the same. I asked the nurse if they could do an X-ray, but the nurse said that they could not.”
Rodriguez Flores Second Suppl. Decl. ¶ 11	“Because of my knee pain, I have difficulty walking around the facility and participating in physical activity in the recreation yard. My knee continues to hurt when I put pressure on it. I have repeatedly asked the medical staff (a nurse) at Camp East Montana for a knee brace or sleeve since I’ve been back, but I have always gotten the same response that they cannot afford one. Since I arrived back at Camp East Montana, I’ve seen the nurse twice. I told them that the pain medication was not helping me anymore. Each time I’ve seen the nurse, I have asked for a knee brace, and I get the same response that they cannot afford to provide one.”
Senevilay Decl., ECF No. 2-10, ¶¶ 11-12	“The next night, I woke up with a very swollen ankle and throbbing pain. The pain was constant. I filled out a sick call request at around 5:30 am and wrote that I have gout, was in pain, and need medicine ASAP....” “Although I was in extreme pain, I wasn’t seen by a nurse until a day and half later. During the time between when I submitted the sick call request and when I was finally seen by a nurse, I kept telling staff in the housing unit that I was in a lot of pain.”
Majok Decl. ¶ 10	“On the days when the facility didn’t give me my medication, I put my name on the sick call list and told the guards that I didn’t feel well. The officer would write my name down. Then, they’d take me to the processing area where the hold rooms are and put me in a room for hours to wait for medication that never came. This happened around four or five times.”

Baccam Decl., ECF No. 2-11, ¶¶ 17, 25	“We’d tell the guards we needed to see medical staff, but the guards would just tell us to put in a sick call request. But doing that didn’t get us seen, and it could take weeks just to get an aspirin.” “Camp East Montana really affected my health. I’ve never felt like this in my life: fatigue, body aches, weight loss, and coughing constantly. I’ve never been sick so much. I asked to see a nurse about three times for sick call because I was having trouble with the dust and sand, but the nurse just said I wasn’t on the list.”
Rodriguez Sanchez Decl. ¶¶ 31, 35	“They came to give me my medicine that evening. The next morning, I started peeing blood, so I called the guard. I asked to go to the medic because I was concerned about my health. The guard told me that I was not allowed to go to medical while in the hole. Then, I told him that if they did not take me, I might die.” “At Camp East Montana when I first arrived and asked for medical help, they told me that if I wasn’t actively dying, they would not give me medical care.”
RES Decl., ECF No. 2-20, ¶ 36	“The sand and dust here are really bad.... My throat gets really affected and starts aching and itching, and I start to sneeze. I’ve gone to medical staff about it here and explained what’s happening, but they just say, ‘No, you don’t have anything, here are two lozenges’ and tell me to drink water.”
Rivero-Gonzalez Decl. ¶¶ 23-24, 28	“I explained to the nurse that I had made several sick call requests, about 5 or 6, but that no one ever responded.... That nurse called a supervisor. Then about two or three days later, I was taken to the medical unit.... The psychiatrist said she would request my medications but could not guarantee that they would be provided to me, but she did not explain why. She said that she would see if the medical insurance would cover it. She explained that this was medical insurance that ICE provided. The psychiatrist said that if my medication was not approved, she would see if they could approve a similar medication.” “On or about June 25, 2026, [after about ten days at the facility] a nurse came to administer an anti-depressant (Seroquel), anxiety medication (Wellbutrin), sleeping medication (Trazodone). That was the first time I got those medications at Camp East Montana. I had been on those medications previously at Alligator Alcatraz. For my physical pain, I received Advil and another pain medication.”

	“I also needed medication for my claustrophobia but only received it about eight days after I arrived at Camp East Montana. When I didn’t receive my medication, I felt like I was suffocating and dying at the facility. And, when that happened, I felt more anxious.... When I was at Alligator Alcatraz, I was receiving medication to treat my claustrophobia, but I never received the same medication at Camp East Montana.”
Barreto Decl. ¶ 22	“... I fractured my foot in the yard playing soccer.... I was not able to walk or move around very well, I was still forced to walk until I went to the hospital. I was not given a wheel chair or crutches so it was very painful to walk and to move around the unit without the help of the wheelchair or crutches. I immediately submitted a sick call request on this day, but it took about four days after I submitted my medical request to take me to medical. It wasn’t until on or around July 2, 2026, that I went to the ICE medical center to check on my foot.”
Reina Decl. ¶¶ 14, 17, 25, 26, 34-35	“I have felt sick since I got to Camp East Montana. I have symptoms of allergies almost every day. I have a stuffy nose and sneeze a lot, my throat is dry. I feel tired and my head hurts. I have gone to the doctor at least twice to ask for treatment for allergies. The doctor gave me allergy pills for one week. I took the pills, but the symptoms came back after the effect wore off. At times, I have submitted sick calls when I feel sick. But it often takes 3 or 4 days to see the doctor. The symptoms are gone by the time they take me to the doctor.” “On or around March 8, 2026, while I was housed in Delta-5, I was feeling very sick. I had a fever and strong body aches. I am not sure if it was a cold, Covid, or something else. I had been feeling like that for about 5 days. I had submitted sick call requests, but I had not been taken to the doctor. My back was also hurting a lot.” “[The guard] said he would submit a request to take me to the doctor and if they didn’t take me that night, then he would take me the next night. I wanted the doctors to do an X-ray, my arm was very swollen and it hurt a lot. I was worried something was torn or broken. I was not taken to the doctor that night. A nurse came in later to give me 3 red pills again and pomade. I had a hard time sleeping that night because of the pain.” “The next day, around 9 pm, the same guard came to my room and asked me if I had been taken to the doctor. I told him no. He walked me out of the hole and took me to the doctor himself. In the medical unit, I asked the doctor for an X-ray, but she refused. She said my arm was just hurt and swollen, and the medication would help. The entire interaction lasted about 10 minutes.”

	“I never saw the doctor again to follow up on my arm injury. For approximately 15 days I received the same 3 red pills around 9 am, and then around 9 pm. I kept applying the cream the doctor gave me and massaged my arm. I think the pills are Tylenol. However, when staff stopped giving me the pills, my arm started hurting again. Four months have passed since the incident, and I am still in pain....” “Approximately 3 days after [in solitary], I was taken to the medical area to see a nurse or doctor. I asked her to order tests for my arm, and she said she would request X-rays. She again prescribed Tylenol and a pomade and sent me back to my pod. Approximately a month or more went by, and I was not taken to get X-rays or received any follow up about my arm. Sometime in June submitted another handwritten sick call request to discuss the pain in my arm again. Approximately 3 days later, I was called into the hallway to speak to some medical professionals. I told them about the pain in my arm and again told them I had requested to get tests. The medical professionals said they would request them. Approximately 2 or 3 days later, I was taken to a separate area in the camp where they performed the X-rays of my arm. Approximately a month and a half has gone by, and I still do not have the results from my X-rays, so I do not have a diagnosis or know if my arm was fractured.”
Reina Suppl. Decl. ¶ 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.”
CCD Decl., ECF No. 2-26, p. 5 ¶ 1* *Paragraph numbers restarted after paragraph 32; subsequent paragraphs in this declaration cited by reference to the page number first and then the paragraph number in that page.	“Since I’ve been here, I’ve made approximately, at least 12 sick call requests to get my correct medication.”

Camarillo-Gonzalez Decl., ECF No. 2-16, ¶¶ 19, 21, 22, 24, 26	“During my time at Camp East Montana, I submitted multiple sick call requests to get medical attention for my kidney stones. My pain was often as high as an 8 on a scale of 1 to 10, and sometimes it would be as extreme as a 10 out of 10. There were times I would even pee blood or felt a strong urge to urinate but could not pee at all. During the medical visits, I was prescribed ibuprofen or tylenol but nothing to treat the kidney stones.” “As time went on at Camp East Montana I started feeling very tired and often had symptoms similar to a cold. I visited the infirmary a few times to address this and they told me it was because of the dust in the units. I was not prescribed any medication. During one of those medical visits, I asked the nurse to do an HIV test again. Once again, the nurse drew my blood and told me they would send it to a lab for testing.” “On or around March 15, 2026, I submitted a sick call request to see a doctor because I was feeling pain due to the kidney stones. I was feeling pain and burning in my kidney area and I wanted treatment, not just ibuprofen. When I was taken to see the doctor, I told him that I had requested an HIV test for a second time and that I had not received the results from the first or second test back. Approximately 15 days had passed since the nurse drew my blood for the second time. The doctor told me he did not have the results and that test results take a long time. The doctor prescribed more ibuprofen for my kidney stones and sent me back to my pod.” “Six or seven days passed before I started receiving treatment for HIV[.] I was not taken to see the doctor after I was told about my diagnosis. No one explained the treatment or the diagnosis, the doctor only told me to take the pills. The medical staff at Camp East Montana did not perform any further tests to evaluate my condition or to determine my viral load, CD-4 or T-cell count.” “Sometime after approximately March 30, 2026, I submitted a sick call request because I was feeling sick. I felt tired and very congested. I also wanted to get more information about my HIV diagnosis and any secondary effects of the medication I was prescribed.... I was taken to the infirmary....”
Nelson Decl. ¶¶ 25-26, 34	“Receiving medical care and medication was an issue throughout all my time at Camp East Montana. It is nearly impossible to receive substantive treatment for medical issues, most of the time we were only given Tylenol or Ibuprofen.”

	“The day after I started feeling symptoms, I wrote my name down on the sick call list. I wrote my name down 24 times before I was taken to see a doctor. I numbered each of the requests. While I was waiting to see a doctor, I did not get any medication or help to alleviate my symptoms. When I asked, the guards told me they didn’t know why it was taking so long to see the doctor, and that they could not help me. I was finally taken to the clinic approximately a month and a half after I first requested to see a doctor.” “The guards told me to add my name to a sick call list. Approximately three days went by and I was not taken to see a doctor. I submitted 5 more requests, one daily. After 5 days, I had still not been taken to see a doctor. I then started numbering the requests, starting all the way from 1 again. I continued to submit one request per day. I reached 17 requests before I was seen by medical staff.”
Gonzalez Ramirez Decl. ¶ 28	“During my time here I have not received hearing aids or glasses, even though I have requested them multiple times through sick call requests and during medical appointments. I’ve just been told the same thing: that the facility will not provide these for me. That seems so unfair to me because without them I cannot see or hear well at all.”
ZOR Suppl. Decl. ¶¶ 9, 44, 46-49	“I also feel discouraged to submit sick calls because it takes 2 or 3 days after the request to see a doctor and, by then, my symptoms have already passed.... It usually takes multiple days to be taken to the doctor after a sick call, so there’s no point in even submitting one.” “I have had multiple medical issues during my time at Camp East Montana. Soon after I first arrived at the facility, I fell during recreation hour and hurt my right arm. My wrist swelled up, and I think I may have broken it. The guards would tell me that medical help would come, but it never did. I sent five or six requests for medical care after this. Each time I filled out the form to request care the guards told me they could not give me treatment because I had not filled out the form, even though I repeatedly filled it out.” “My nose kept bleeding a lot after I was sent back to the housing unit. It was very painful and I felt like I could not breathe very well. I could feel blood pooling inside my nose. I put in requests to see medical again because of the issues with my nose. I did this maybe 2 or 3 times after that initial visit following the beating. I was given a spray for my nose, but no one explained to me what it did. Again, I was never given x-rays or taken to the hospital or a

	specialist to see why my nose was so painful and bleeding. I was told to keep taking Tylenol. I would say I could not breathe well for about months following the injury, and I do not feel 100% back to normal.” “My mouth was also very painful and bleeding after the beating. I put in medical requests also to see the doctor about a painful blister inside my mouth that kept filling with blood over and over again. I think it put in maybe 4 requests for that issue. I went to see the doctor but I never got an answer about what was happening with my mouth injury. I was simply told to keep taking Tylenol.” “I had to put in many grievances to ICE to get them to approve new veneers for my cracked teeth. ICE kept telling me to ask medical. Medical kept telling me I had to ask ICE. I think I put in about 3 grievances to ICE asking them to fix my teeth. Eventually, after maybe 3 months of asking, the dentist finally installed the veneers.” “To see medical at Camp East Montana, you have to submit a medical request form on the tablets. They can sometimes take days to respond to those requests.”
Navdeep Decl., ECF No. 2-28, ¶ 38	“It takes a long time to get medical attention here. If you have or develop a serious condition, you’re out of luck.”
UEG Decl., ECF No. 2-18, ¶ 6.	“I had a fever myself when I first got this sickness. I tried to put in a request for medical care and it took two days until I got a response. Imagine someone having a fever and not getting care for two days, of course the symptoms change during that time. They didn’t provide any care when I needed it.”
SNM Decl., ECF No. 2-20, ¶¶ 28-29, 39	“I have put in a few requests for medical to, for example, keep receiving my HIV medication treatment, to get refills for my ibuprofen for shoulder pain, to get muscle rub for my shoulder pain, or to get medicine for my clogged nose because of the sand/dirt. Usually, the medical team takes a few days to respond to my sick call requests or sometimes they cannot give me the medication even if they have it, unless it is specifically for me.” “The medical staff take days to respond to my sick call requests. People are waiting for days in their units while they are sick. This happened when I was in Echo. I saw people who were sick in their beds waiting to go to the clinic.”

	“I have not received proper care for my shoulder. In early March 2026, I finally received an x-ray for my shoulder, and I received my x-ray results on or about mid-March 2026. The x-rays only showed that my bones were not fractured or broken. The nurse only told me that there were no broken bones or fractures. That’s it. The nurse did not offer any other treatment plans or other evaluations.”
Ly Decl., ECF No. 2-9, ¶ 18	“I submitted a medical slip so I could be seen. A nurse gave me some hot rub [for my injured neck and shoulder] but no type of scan was ever done. I never saw an actual doctor while at Camp East Montana. There seemed to be only nurses there. The nurse asked me to take off my shirt to check my injury. She did not even touch my injured shoulder. She just saw it and that was it. There was a bump on my shoulder and I verbally asked them to do an x-ray to make sure things were okay but nothing was done about it. The nurse told me that they would take it further only if there was a bruise or a bone popped out. Since I did not have a bruise and no bone popped out, the nurse declined to do any x-rays. I received a shot of pain killers. For about 3 to 4 days, I was unable to lift my left arm above my shoulder.”
Cristobal Decl. ¶ 17	“On or around the second week of November 2025, my dad called and told me he had lost all his strength and could not walk anymore. He complained about chills and a sharp pain in his stomach. He said he was unable to close his hand. He told me that he complained to staff at Camp East Montana about his pain but that they only gave him Tylenol.”
Piñango Decl. ¶¶ 11-12	“There was a group of guards outside my cell. I told one of them that I was in pain and wanted to see a doctor. The guard said he would submit a request, but I was not taken to the doctor until approximately 5 hours later. When I was finally taken to see the doctor, the whole interaction lasted less than 10 minutes. She quickly examined my stomach. I told her that it hurt when she pressed it. She prescribed Tylenol and a pill for heartburn. I told her I did not have heartburn but she insisted that I take the pill. I was still in severe pain when I was taken back to my cell. I could not sleep at all that night. I spent the entire night crouched down on the edge of the bed.” “The next morning ... I was still in a lot of pain and asked to see the doctor again. The guard said he would submit a request, but I was never taken to the doctor. The intense pain eventually started subsiding on its own. I did not receive any more medication for the stomachache or medical follow-ups.”
JLE Decl., ECF No. 2-31, ¶ 24	“On or about May 18, 2026, a nurse took me to the medical unit and shared my blood test results which showed that I had very high potassium and she explained that this could indicate a heart problem. The nurse did not tell me anything further or prescribed me any medication.... [T]he

	nurse did not give me any medication or explain anything further. I only received another blood test.”
Vilay Decl., ECF No. 2-21, ¶ 11	“We brought him back to our house, and he told us that he had not received any medical care while he was in ICE detention. Don told us that when he arrived at Camp East Montana, nurses made him take his shirt off and confirmed he had a defibrillator and a port, but that they didn’t do anything and just chatted amongst themselves. He said that he never received any insulin or other medication, including his heart medication, while at Camp East Montana, and he didn’t receive chemotherapy.”
PKP Decl., ECF No. 2-23, ¶ 29	“I made a sick call request regarding my swollen knee. I was seen by a doctor and I was given Tylenol. In all, I made three sick calls. I have received three different medications, none of which have helped.... I feel that I need an orthopedic knee brace to help me walk. I have asked the nurse for a brace but they have told me that this is prohibited because I can make it into a weapon. But in federal prison, I had a knee brace with me which helped me walk around. When I arrived here at Camp East Montana, I had my knee brace that I was issued in federal prison. A guard saw it and threw it away in the trash during intake.”
HOK Decl., ECF No. 2-25, ¶ 9	“On or about January 12, 2026, I was given a quick medical evaluation because I requested it since I had trouble walking. In the first week, I completed about two sick calls a day so that they would examine my knee. I had a puncture on the skin of my right knee which prevented me from walking. I had lots of blood coming out of my knee. The nurse quickly applied some kind of cream on my knee, but did not clean my wounds, and gave me ibuprofen. Because the nurse did not clean my wounds, I still had dirt on my knee, and it became infected over the next three weeks which caused me severe pain and I could not walk. The nurse said that they were going to give me cream and supplies so that I could continue to clean the wounds on my knee, but they never did.”
Monroy Decl. ¶ 38	“I had to wait approximately two months after requesting to see 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.”
Pedro Juan Decl. ¶ 13	“Once, my belly felt very inflamed; it was big and hard. I had not had a bowel movement for approximately 10 days. I asked the guards to take me to the doctor but they didn’t.”
Inadequate Medication Administration	
Majok Decl. ¶¶ 8-10	“At Camp East Montana, I never consistently received my prescription medications for my diabetes, high blood pressure, and depression. There would be one day when I received all my

	medication and then about three to four days when I didn't receive any medication. This pattern repeated during my month at the facility." "When the nurses didn't bring me my medication, I'd ask the guard and nurse where my medicine is. They said that there's not enough medication because there are too many people here. They also said that my medication for diabetes, high blood pressure, and depression would come in two or three days, but that wasn't always true. Sometimes, they didn't have any of my medication or sometimes, they only had some of my medication." "On the days when the facility didn't give me my medication, I put my name on the sick call list and told the guards that I didn't feel well. The officer would write my name down. Then, they'd take me to the processing area where the hold rooms are and put me in a room for hours to wait for medication that never came. This happened around four or five times. When the facility didn't give me my medication, I felt so much pressure in my heart that it felt like there was a whole car on top of my body."
Fernandez-Gastelum Decl., ECF No. 2-14, ¶ 8	"I believe over a week passed before I received my [HIV] medication. However, when the pills ran out, I learned that my prescription had not been refilled. I once again went approximately over one week without receiving my medication. I felt worried when I was not receiving it. I depend on my daily dose of Biktarvy to keep my immune system functioning and working well."
Bounvongxay Decl., ECF No. 2-12, ¶¶ 9-10, 12-13	"Staff at CEM were aware of my diabetes because I reported it during intake and showed staff my medications. However, I did not get my medications regularly at CEM, and I did not get enough food." "I also took two other medications, Jardiance and Victoza, to manage my diabetes. I told the officers at intake and in medical about all three of my medications, and I showed them all three of those medications. I was told that the facility didn't have Jardiance or Victoza, so they would be ordered, but I never received either of those medications and they wouldn't let me take the medications I had brought from home. I was only given insulin once per day by the medical staff, and my daily doses were often late or missed all together." "When I was at CEM, I asked one of the guards in my unit to call down to medical most days around the time my insulin was due, because they did not usually call for me on time. When the

	guards called, medical would usually say that someone would come to get me, but some days no one ever came, or they came late.” “My insulin came an hour or two late several times during my two weeks at CEM. When that happened, I would start to feel weak and shaky and get extremely hungry. On about four occasions I did not get my insulin at all, and I had to completely skip a dose.”
Senevilay Decl., ECF No. 2-10, ¶¶ 14-16	“I tried to explain to the nurse what type of gout medication I took before being detained, but she didn’t seem to know what it was. She gave me a few pills and told me she’d order more pills for me.” “The next day, I didn’t receive any more medication. I was in extreme pain for about ten hours.” “She looked at my records and said that she didn’t know why the first nurse hadn’t ordered the medication for me. She gave me medication and since then I’ve been offered the medication daily.”
JLE Decl., ECF No. 2-31, ¶¶ 7, 23, 25-27	“I told them [at intake] that I have Type II diabetes, and I require insulin shots once per week. The nurse told me that they could not provide me with the same insulin that I was receiving outside because it would cost too much. My blood pressure was also very high and the nurse said that they would give me medication for my high blood pressure, but I have never received it. The only thing I’ve received has been cough drops.” “When I arrived, my blood pressure was consistently high for three days, according to a nurse who tested it. The nurse explained that they would provide me with medication, but I have not received this medication since I arrived.” “On or about May 21, 2026, I made a sick call request to see the medic again to find out my test results. But they did not have my results. I did not receive any medication for this high potassium or for my high blood pressure.” “... I made another sick call request so that the nurse could explain my blood test results. I was taken to my appointment at about 1:00 a.m. and I returned to my unit at around 3:00 a.m. The medical provider explained that they were going to check my blood sugar for a week and that the high potassium level would drop on its own with the food here at the facility. I did not

	receive medication. I explained that the first nurse who saw me on May 8th told me that I would receive medication for my diabetes and high blood pressure. The medical provider said that medication was not necessary and that my blood pressure and high potassium would drop on its own. On this appointment, I also asked about my insulin medication which I am supposed to receive once a week, but they said that they did not have it.” “On or about May 24, 2026, at around 6:30 PM, the nurse came to my unit to administer medications to others in the unit. During this time, I asked the nurse if she had my insulin medication and if they were going to check my sugar. The nurse said that they might have the insulin at the facility but that she did not have it on her at that moment and that she was going to ask. But I never heard back.”
Rodriguez Sanchez Decl. ¶¶ 8-9, 16, 36	“Both times I was at Camp East Montana, I believe we were supposed to receive our medications twice a day. The first round of medications was supposed to be administered to us at 8 AM, but they were often late and we would receive them closer to 10 or 11 AM. The night medication was supposed to arrive at 8 PM, but they were late administering them too, so we often would receive them around 9 or 10 PM.” “The second time I was at Camp East Montana, we sometimes would not get our night medications once the lights went off. This made it exceedingly difficult to manage my pain from my back injuries and fall asleep.” “I was prescribed antibiotics for my infection, but I only received them for a day and a half. After eight days of not receiving antibiotics, for some reason, the medical staff I saw during a doctors visit started prescribing me antibiotics again. Medication delays happened often at Camp East Montana; people’s sicknesses often worsened while they waited for their delayed medications.” “I used to take Pregabalin for my Fibromyalgia; and Naltrexone and Tramadol for pain from the torture that I experienced in the Venezuelan prison. I continue to experience severe pain and cannot sleep because the medication they gave me at Camp East Montana and the El Paso Processing Center does not work like the medications I used to have before being detained.”
Rivero-Gonzalez Decl. ¶¶ 24, 28	“On or about June 25, 2026 [after about ten days at the facility], a nurse came to administer an anti-depressant (Seroquel), anxiety medication (Wellbutrin), sleeping medication (Trazodone).

	That was the first time I got those medications at Camp East Montana. I had been on those medications previously at Alligator Alcatraz. For my physical pain, I received Advil and another pain medication.” “I also needed medication for my claustrophobia but only received it about eight days after I arrived at Camp East Montana. When I didn’t receive my medication, I felt like I was suffocating and dying at the facility. And, when that happened, I felt more anxious.... When I was at Alligator Alcatraz, I was receiving medication to treat my claustrophobia, but I never received the same medication at Camp East Montana.”
Claudina de Paula Decl. ¶ 36	“I started receiving the pills that the hospital prescribed approximately one or two days later. I was supposed to be taking that medication every 12 hours but the nurses would come in at different times throughout the morning and night. I never knew when I would get the medication. I was also prescribed an adhesive patch to place on my skin. I started receiving that approximately 3 days after it was prescribed.”
Romero-Paredes Decl. ¶¶ 6-7	“While detained here, I have had extremely high blood pressure because I require high blood pressure medication two times a day and have not received this medication consistently. I did not receive any high blood pressure medication between approximately September 19, 2026, and approximately September 23, 2026. When I was not receiving my blood pressure medication, I felt warm all over, pain in my head, felt like my heartrate was very high, and I felt very irritable. I could feel my heart and my head throbbing consistently. My blood pressure reached its peak on or around Monday, September 21, 2026, when I went to the healthcare area and saw that I had an approximately 200/177 reading at 11:30pm. Since around September 23, 2026, I have typically only received one high blood pressure pill a day. Based on my past experience, I believe I need two pills per day to keep my blood pressure under control. I did not receive any medication on or around September 25, 2026. On or around September 27, 2026, in the evening, a nurse measured my blood pressure, which read at approximately 177/135. It is my understanding that I will only receive one pill a day from here on out. This makes me very nervous because I know how dangerous high blood pressure is for me. I am worried that I could have a heart attack or a stroke without proper treatment for my high blood pressure.” “I have requested my high blood pressure medication and Zyrtec-D for my allergies. I have only received an allergy pill once on or around Monday, September 21, 2026.”

Nelson Decl. ¶¶ 5, 30	“I was told by a doctor that I have anxiety, depression, chronic insomnia, hypertension, and asthma. I told all this to the person who did my medical screening. However, they did not give me any medication, and I was not told whether I would receive the medication I was already taking. Approximately 1 month passed before I received any medication.” “On or about October 2025, I submitted a sick call request because I realized my prescriptions for Bupropion, Mirtazapine, and Losartan were running out. I [sic] took the facility about a month to get refills for my hypertension and anxiety medication. I went approximately 18 days without taking my medication.”
ZOR Suppl. Decl. ¶¶ 10	“After a while, I received an ointment. However, I told the doctor it is not working because the irritation is not getting any better. She told me that was all they had. The irritation bothers me almost every day.”
Gonzalez Ramirez Decl. ¶¶ 35, 37	“I also have prostate issues. I had these issues before arriving here. When I arrived here, I asked for medication for my prostate. It took over 30 days in order for me to get my medication for my prostate. During that time, my prostate was inflamed and swollen, including my testicles. I was in severe pain for about 30 days.” “I also get medication to help me sleep and to help with my nausea and fainting. Every time we run out of the medication, we need to go back to the doctor to get it refilled; they don’t just refill the medications after they run out automatically. It has been very tiring having to go back to the doctor every time to try to get my medication.”
RES Decl., ECF No. 2-20, ¶ 34	“On or about May 4, 2026 my medication for high blood pressure was running out. I was waiting for the nurse to bring a refill but they wouldn’t so I submitted a sick call to get it refilled. The next day, a guard came to take me to the clinic. The nurse checked my blood pressure and it was extremely high, up to 200. The nurse gave me a medicine. My blood pressure then went down to 180. The nurse then gave me another medication. I was there for approximately 4 hours. I did not get my medication then. They only gave it to me the next day.”
SNM Decl., ECF No. 2-22, ¶ 19	“I am taking Biktarvy medication once a day. On or about March 7, 2026, the medical staff here took away the HIV medication I had in my possession, and they told me that they were going to administer it to me (previously, they gave me a multiple day supply, which I would take on my own). I’m not sure why that did that; I used to self-administer my medication every day right before breakfast. The medical staff told me that they would bring it at 8:00 AM every day going

	forward. But they don't always bring it on time and instead they bring it between 8:00 a.m. and 11:00 a.m.”
CCD Decl., ECF No. 2-26, ¶¶ 28; <i>id.</i> p. 5 ¶¶ 1*, 4* *Paragraph numbers restarted after paragraph 32; subsequent paragraphs in this declaration cited by reference to the page number first and then the paragraph number in that page.	“On or about May 13, 2026, at around 10:00 p.m., I went to the medical tent because I had not received the medication I had been waiting for, for about two weeks. Earlier that same day, I had gone to the medical tent, but medical staff also told me they did not have my medication.” “On or around May 13, 2026, I finally received my psychiatry medications. Since then, however, I've only gotten my medications correctly on two occasions administered by the nurses in my unit. That means that the other times the nurses have not administered my medications correctly in terms of the same type, dosage, delivery time, or medications that I am required to receive. On the days when I do not receive my correct medication, I cannot sleep well, I feel severe symptoms like persistent rumination, anxiety, depression, nightmares, and I have thoughts of suicide and self-harm. Since I've been here, I've made approximately, at least 12 sick call requests to get my correct medication.” “I also take medication for my back pain and for high cholesterol. When I arrived, I told the nurse that I need pain medication for my back and high cholesterol. It took about 8 days to give me some kind of pain medication. But I have not received my cholesterol medication.”
Rossa Chanchamire Decl. ¶¶ 5, 7	“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.... 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.” “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.”

Monroy Decl. ¶¶ 32, 40	“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.” “[After my tooth extraction] 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.”
Vilay Decl., ECF No. 2-21, ¶ 11	“We brought him back to our house, and he told us that he had not received any medical care while he was in ICE detention....He said that he never received any insulin or other medication, including his heart medication, while at Camp East Montana, and he didn’t receive chemotherapy.”
Inadequate Specialty Care	
Gonzalez Ramirez Decl. ¶¶ 23-24, 26-27	“On or about mid-April 2026, I was taken to see a specialist for my hearing issues.... They tested my hearing. The specialist told me that both sides of my hearing are damaged because of the loud noise levels at the facility.... No one here at Camp East Montana has told me what if anything the specialist said I should do or how to treat or accommodate my hearing issues.” “I am both near and farsighted.... [A]fter being at the facility for about 3 months, my vision started to become blurry, cloudy, teary, and strained because of the bright lights that are on from 5 AM until 10 PM. So, now, I do need my glasses and I cannot see well without them. The lighting here is harsh and I feel has damaged my eyesight. I have been waiting to see a specialist for my eyesight, but I have not been taken to a specialist.” “On or about June 2, 2026, I received an eye exam where the medical provider placed big Alphabet letters about 3 meters away. The first letters were so big and I could see those. But as soon as the letters became slightly smaller, I could not see them, and I told the medical provider about this. The medical provider just told me that I ‘passed’ the exam and that I did not have any vision issues and that I did not qualify to go see a specialist and that my vision issues are due to my old age. But I told the nurse that I cannot see in here and that I have difficulty looking

	around the unit because of the bright lights. But they ignored me. The medical provider said that they could cancel any pending appointment with a specialist because I did not need it.” “Since being here, I have had a pending appointment with an eye specialist to get eye drops for my eyes since they are very dry. I need eye drops, but I don’t get them. This makes my vision worse. But it has been months and I have not received these eye drops.”
Vilay Decl., ECF No. 2-21, ¶¶ 3, 11	“[Don] was diagnosed with anaplastic ALK-negative large cell lymphoma in 2024 and undergoing regular care and monitoring, including chemotherapy. He was an insulin-dependent diabetic. His heart was also weak and he had a defibrillator pacemaker since around 2011.” “[Don] said that he never received any insulin or other medication, including his heart medication, while at Camp East Montana, and he didn’t receive chemotherapy.”
NYG Decl., ECF No. 2-24, ¶ 10	“I told the medical staff at the emergency room in Spanish that I wanted to see a urologist. A guard from Camp East Montana was present in the room when this happened, and he was interpreting for me to the emergency room doctor during my medical appointment (I spoke Spanish and the ER doctor spoke English). When I asked the guard to translate on my behalf to tell the medical staff that I wanted to see a urologist, the guard interrupted me and told me ‘No’ and that Camp East Montana would not provide me with a urologist.”
Inadequate Chronic Care	
Senevilay Decl., ECF No. 2-10, ¶¶ 10-12	“I have had gout for years, and it flares up off and on depending on what I eat and drink. Turkey is the number one problem food for me; it makes my joints swell up and causes me pain. Before I was detained, I had medication I would take when I needed to help manage my condition, and I knew what foods to avoid.” “At Camp East Montana, you have to eat whatever they give you, or you will starve. Earlier this month, we were given turkey to eat multiple days in a row. The next night, I woke up with a very swollen ankle and throbbing pain. The pain was constant. I filled out a sick call request at around 5:30 am and wrote that I have gout, was in pain, and need medicine ASAP.” “Although I was in extreme pain, I wasn’t seen by a nurse until about a day and a half later.”
Majok Decl. ¶¶ 8, 12	“At Camp East Montana, I never consistently received my prescription for my diabetes, high blood pressure, and depression.”

	“At Camp East Montana, I never received dietary meals for my diabetes.”
PKP Decl., ECF No. 2-23, ¶ 31	“When I was in federal prison, I was receiving medication and a special diet to manage my high cholesterol. When I arrived here, neither the nurse or the medical team checked my cholesterol levels or provided me with medication or provided me a special diet.”
Bounvongxay Decl., ECF No. 2-12, ¶¶ 9-10, 12-13	“Staff at CEM were aware of my diabetes because I reported it during intake and showed staff my medications. However, I did not get my medications regularly at CEM, and I did not get enough food. When this happens, it makes my body feel wrong. I feel off balance, my body feels light, and my vision gets blurry. At CEM, my blood sugar was consistently spiking and falling.” “I also took two other medications, Jardiance and Victoza, to manage my diabetes. I told the officers at intake and in medical about all three of my medications, and I showed them all three of those medications. I was told that the facility didn’t have Jardiance or Victoza, so they would be ordered, but I never received either of those medications and they wouldn’t let me take the medications I had brought from home. I was only given insulin once per day by the medical staff, and my daily doses were often late or missed all together.” “When I was at CEM, I asked one of the guards in my unit to call down to medical most days around the time my insulin was due, because they did not usually call for me on time.” “My insulin came an hour or two late several times during my two weeks at CEM.”
JLE Decl., ECF No. 2-31, ¶¶ 7, 27	“I told them [at intake] that I have Type II diabetes, and I require insulin shots once per week. The nurse told me that they could not provide me with the same insulin that I was receiving outside because it would cost too much. My blood pressure was also very high and the nurse said that they would give me medication for my high blood pressure, but I have never received it. The only thing I’ve received has been cough drops.” “... I asked the nurse if she had my insulin medication and if they were going to check my sugar. The nurse said that they might have the insulin at the facility but that she did not have it on her at that moment and that she was going to ask. But I never heard back.”
Vilay Decl., ECF No. 2-21, ¶¶ 3, 11	“[Don] was an insulin-dependent diabetic. His heart was also weak and he had a defibrillator pacemaker since around 2011.”

	“[Don] said that he never received any insulin or other medication, including his heart medication, while at Camp East Montana....”
Romero-Paredes Decl. ¶ 6	“I suffer from high blood pressure, allergies, and ongoing pain due to a cavity. The facility should know that I have this condition because I have told guards and medical personnel, filled out paper forms, and submitted over approximately 16 requests for medication or care on the tablets.... While detained here, I have had extremely high blood pressure because I require high blood pressure medication two times a day and have not received this medication consistently. I did not receive any high blood pressure medication between approximately September 19, 2026, and approximately September 23, 2026. When I was not receiving my blood pressure medication, I felt warm all over, pain in my head, felt like my heartrate was very high, and I felt very irritable. I could feel my heart and my head throbbing consistently.... Since around September 23, 2026, I have typically only received one high blood pressure pill a day. Based on my past experience, I believe I need two pills per day to keep my blood pressure under control. I did not receive any medication on or around September 25, 2026. On or around September 27, 2026, in the evening, a nurse measured my blood pressure, which read at approximately 177/135. It is my understanding that I will only receive one pill a day from here on out.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶¶ 22, 24, 26	“When I was taken to see the doctor, I told him that I had requested an HIV test for a second time and that I had not received the results from the first or second test back. Approximately 15 days had passed since the nurse drew my blood for the second time. The doctor told me he did not have the results and that test results take a long time. The doctor prescribed more ibuprofen for my kidney stones and sent me back to my pod.” “Six or seven days passed before I started receiving treatment for HIV[.] I was not taken to see the doctor after I was told about my diagnosis. No one explained the treatment or the diagnosis, the doctor only told me to take the pills. The medical staff at Camp East Montana did not perform any further tests to evaluate my condition or to determine my viral load, CD-4 or T-cell count.” “Sometime after approximately March 30, 2026, I submitted a sick call request because I was feeling sick. I felt tired and very congested. I also wanted to get more information about my HIV diagnosis and any secondary effects of the medication I was prescribed.... I was taken to the infirmary....”

Inadequate Response to Urgent or Emergent Medical Situations	
Rodriguez Flores Decl., ECF No. 2-6, ¶ 50	“On or about April 22, 2026, during the 5:00 AM count, I had serious difficult [sic] breathing (I would just stop breathing suddenly). I would fall asleep and then wake up in a panic and I could not breathe. I asked the guard to please take my blood pressure or to the medic. I asked if I could go to the emergency room. But the guard said he could take me to the emergency room only if I were on the floor and really struggling to breathe or ‘dying.’ I asked the guard to bring me a sick call slip, but he did not. Later in the day, I was out in the yard, and I felt better but I feel this drop in blood pressure and breathing issues in the morning. I have never had these breathing issues before.”
Cristobal Decl. ¶¶ 14, 21-22, 27	“One day, on or around mid-October 2025, my dad did not call me. He called multiple times every day, so I was worried. Approximately the next day, he called and told me he was taken to an onsite clinic because he could not move or get up from his bed. I asked him why the guards didn’t take him to the hospital. He said that the staff at the clinic had told him it was only a fever and had given him Tylenol.” “On or around November 17, 2025, I received a call from a doctor at a hospital in El Paso, Texas.... He told me, ‘they waited until the last minute to take him to the hospital.’ I understood that he seemed to be referring to the staff at Camp East Montana.” “Later that day, the same doctor called me to say my dad was in grave condition. He told me my dad was in septic shock and his organs were infected.” “I was shocked and devastated to see my dad’s face. He had lost so much weight. It looked like he had blisters or dry blood in his mouth and nose. It was like he was drowning in his own blood.”
Angye Decl., ECF No. 2-27, ¶¶ 14-15	“Right after the kickback intake process, guards tried to take me to a segregation unit. However, I told them I needed to go to the hospital first. I had to insist that I be taken to the hospital by requesting it repeatedly. My hands were swelling a lot and my fingers were swollen and I still could not walk. The guards then called the captain who took me to the medical unit. The nurse tried to do first aid, but told me that they did not have the equipment needed to check on me. The nurse told me that I needed to go to the hospital, but that first they needed to get permission from ICE. Then, approximately three ICE officers came to the medical unit. The officers asked me what happened.... The nurse then told me I’d be taken to the hospital in about

	an hour. I was taken to another room to wait.... Officers then pushed me in the wheelchair until we arrived at the van. Officers then placed me in the van and I was transported to Las Palmas Del Sol hospital.” “At the hospital, a guard had to bring me a wheelchair again. Medical staff did a scan of my back and a scan of my left wrist. I believe these were x-ray scans. I was told by medical staff that my left wrist appeared to be fractured, but they told me it was hard to tell because of all the swelling. Medical staff told me I should come back to the hospital in a week or two to do the scans again when the swelling hopefully goes down. My fingers were swollen as well. Medical staff placed a brace on my hand and wrist. The brace is black and provides support to my wrist to prevent additional movement. I believe the scan of my back showed there was stress on my spine and that I had soft tissue injuries. They told me they do not do scans of noses, so they were not able to scan my nose, which was still in pain.”
Rodriguez Sanchez Decl. ¶¶ 28-29	“I could not move or walk, but the guards kept taunting me. Once I was evaluated at the clinic, I was told I needed to go to the hospital, about 30 minutes after my arrival. I was then forced to take a bus, not an ambulance or any other form of transportation. They handled me like an animal, throwing me on the bus with chains on my belly, feet, and hands. I was in the worst pain I had ever felt.” “Once we arrived at the hospital close to Camp East Montana, they took X-rays of my back. I requested to get X-rays of my back and ribs since I had been severely injured and still could not feel or control my legs. They did not do any additional X-rays or MRI scans. They gave me several shots for the pain, but they did not tell me what they were injecting me with. They also gave me several pills; the doctor told me it was Meloxicam and sent me back to Camp East Montana the same day. I was already taking Meloxicam for my spinal injuries prior to being detained, but when I returned to Camp East Montana, they did not increase my dosage.”
Rivero-Gonzalez Decl. ¶ 17	“When I was [in solitary], I started to cry out in pain, and I fell to the ground when I tried to use the toilet because there was no support for me. I was on the ground for about an hour, crying in pain. I had severe back, leg, knee, and body pains. That’s because when I spend a long time sitting down, in the wheelchair for example, I get serious leg cramps, and I get severe back pain. But I need help standing up and supporting myself. I did not get support standing up in the solitary unit.”

Barreto Decl. ¶¶ 22, 24	“On or around June 28, 2026, I fractured my foot in the yard playing soccer. I know it was fractured because the doctor told me that it was fractured. I was not able to walk or move around very well, I was still forced to walk until I went to the hospital. I was not given a wheelchair or crutches so it was very painful to walk and to move around the unit without the help of the wheelchair or crutches. I immediately submitted a sick call request on this day, but it took about four days after I submitted my medical request to take me to medical. It wasn’t until on or around July 2, 2026, that I went to the ICE medical center to check on my foot.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶ 18	“Approximately one or two weeks after I arrived at Camp East Montana, I had to use the electronic tablet in my unit to contact my friend outside of detention and ask them to try to call 911 because I was experiencing extreme pain on the side of my body, where my kidneys are, fever, dizziness. If I had to put the pain on a scale from 1-10, it was a 10. I nearly lost consciousness. The pain was sharp and the area felt swollen and inflamed. I told the guards about this but they told me I had to wait to see the doctor. My friend called 911 and I believe that as a response, an emergency medical team arrived to Camp East Montana. I was not seen by that team, however, and did not receive treatment that night. The next day, one of the captains at Camp East Montana came to my pod, called me out, and took me to the medical tent. Again, I was given Ibuprofen. The pain went away for a few days but came back. Even now, after everything, I still feel pain from the kidney stones.”
ZOR Decl., ECF No. 2-30, ¶ 45	“I also think I had a broken nose, but I was not given x-rays to confirm that. Instead, after the extraction, they sent me back to the housing unit with Tylenol. I think I may have also gotten antibiotics. I was not taken to the emergency room or to a specialist.”
Aguilar Decl. ¶ 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.”
Infectious Disease Controls and Quarantine Protocols	
Senevilay Decl., ECF No. 2-10, ¶¶ 22-26	“I was supposed to be deported on or around March 22, but was told that I was being placed in quarantine for measles instead.” “Staff didn’t tell us much about the outbreak. They just told us someone had measles. But we didn’t know what measles was. Staff didn’t explain what measles was to us, didn’t tell us how to

	protect ourselves, what to look out for. They just took us out of the housing unit and told us we needed to get shots.” “There were two quarantines, one for people in orange uniforms, and one for people in red uniforms. I have a red uniform. We were quarantined next to the pod with measles. The pods are just created through four walls in a larger tent, with no ceiling. So the air that is in one pod can get into the other.” “Right when our 21-day quarantine was supposed to end, on maybe Day 20, staff told us one of the guys in orange had a case, so we had to spend another 21 days in quarantine.” “A week after the second quarantine ended, someone came in with Covid, and we were quarantine for another six or so days.”
Mbabid Decl., ECF No. 2-8, ¶¶ 14-16	“I spent approximately two weeks in the medical tent at Camp East Montana. It was a tent with beds in it, and I was put in a room by myself. The room wasn’t sealed; the walls were tall didn’t quite go up to the ceiling (some air could pass through).” “While I was detained in the room in the medical tent, I could not contact my family or my attorney. I asked multiple times to talk to my family and to my attorney but the guards told me that I could not call anyone or receive a call from anyone while I was in the medical tent. There were no windows for me to see the world outside. I was just alone in there with a bed. I asked for a tablet and they told me that calls were not allowed in the medical tent.” “After about two weeks, sometime in early to mid-November, they did more testing and said that I wasn’t contagious for TB and so could be in the general public unit.”
Ly Decl., ECF No. 2-9, ¶¶ 14, 16, 17	“While I was at Camp East Montana the first time, I saw two rooms that were used to house people who had influenza or COVID. I know this because the door window had a paper sign that labeled each room ‘Influenza’ or ‘COVID.’ But the roof of these rooms were not sealed on the top. The top is open.” “I was never told by staff that there was a measles outbreak while I was at that facility. I found out that there was measles outbreak after I was transferred to EPSPC. I found out because when I arrived to EPSPC, the group I arrived with was quarantined.”

	“When I was at Camp East Montana, no staff told us about what measles and tuberculosis are, what the symptoms are, or how to protect ourselves. I didn’t understand why they kept giving me the TB reaction test or the x-Ray. Staff didn’t explain anything to us.”
Baccam Decl., ECF No. 2-11, ¶ 17	“The conditions at Camp East Montana were bad. People got sick constantly. You could hear people coughing all the time.”
Bounvongxay Decl., ECF No. 2-12, ¶ 21	“Any time I left the unit to get insulin or for yard I walked down a hall where I would pass several other units. One of these units was a COVID unit, which was labeled on the door. People were sent there for quarantine if they were sick. But all of the units in our tent were like cubicles- the walls did not go up to the ceiling. This included the COVID unit, which shared a wall with some of the regular housing units and the hallway. The walls were only about 10-11 feet high, while the roof was about double that height at its peak. So air could pass through from the COVID unit to the regular housing unit and the halls.”
Rodriguez Sanchez Decl. ¶ 38	“We were quarantined for about ten days in Mid-April in the D9 unit at Camp East Montana. Staff told us that someone in our unit had contracted COVID. The person in our room that had contracted COVID told us that he had COVID when he came to get his things. He wasn’t wearing a mask at the time; staff just let him back in to pack up stuff from his bed. The guards then took all of us except for the person who had the positive covid test who they sent to a room alone, to quarantine. During this time, we were never seen by the medical staff, and we also were not allowed to see the medical staff. When they gave us the medications, they would give us the pills by opening the door but we didn’t have direct contact with the medical staff. From talking to the people in my room, I think that there were six of us, including myself, who contracted COVID while in quarantine. I thought I had covid because I lost my sense of taste and felt very sick but this wasn’t confirmed since we were not able to see the doctor during this time.”
Reina Decl. ¶¶ 15-16	“When we got there, the guards said we were under quarantine because someone from our unit had ‘tested positive.’ The guards didn’t explain what that meant or which disease we had been exposed to. I was confused. We told the guards that if someone was sick then we should get tested or checked by a doctor.” “Later that night, at a time I do not recall, the guards told us that we were not actually in quarantine. They said we would stay in that unit for 4 or 5 days and then we would go back to Alpha-13. They didn’t explain why or what had happened.”

Romero-Paredes Decl. ¶ 11	“When I was transferred from D5 to E14 with the rest of the people in D5 on or around September 13, 2026, I discovered that almost everyone in the E unit was sick and had COVID-19 or tuberculosis. I was not sick, but it felt like a quarantine because so many of the people around me were sick. I worried about getting sick myself. People around me were coughing and seemed sick. I was not given a mask to protect myself from getting sick. No other detained person was given a mask, either.”
Nelson Decl. ¶¶ 28-29, 31-32	“Some time after that, a detainee in my pod tested positive for Covid. The guards took that man out of the pod and he never come back. I was housed at the Bravo-6 unit during that time. The guards told me he had tested positive for Covid and they were isolating him and putting us all under quarantine. The quarantine lasted for 20 days, almost 3 full weeks. During that time, we were not taken to the yard and people were not taken to their immigration hearings. I spoke to a lot of people that had been waiting for months for their hearing date and missed it. Throughout the entire quarantine, no one provided us with face masks, checked our temperatures, or administered any tests. We also didn’t have access to disinfectants, so we were not able to clean surfaces.” “After the quarantine was lifted, people were afraid of missing another court date and staying at Camp East Montana longer. So, if a detainee had a fever or felt sick, they often didn’t say anything.” “I did not write my name down to see a doctor. I was afraid the guards would put us on quarantine again. We already had such a hard time being able to do or go anywhere other than our pod, and being in quarantine just made it so much worse for us.” “In early March 2026, we learned that the facility was closed down to outside visits because of a disease outbreak. The guards told us the shutdown was due to tuberculosis but I also heard from the guards there were people with measles. On or about March 6, 2026, a guard came to my pod and woke me up around 1 am. He told me to get up because I had to go to get X-rays to test me for tuberculosis. I had not requested any X-rays or been told I needed them. I told the guard I didn’t want to go. He told me if I didn’t go, I would be put in isolation for 30 days. So, I agreed to go.”

Gonzalez Ramirez Decl. ¶¶ 11, 41	“When I was in the intake room, I got sick from a cold. Then, after leaving the intake area, I got the flu and Covid. About fifteen days after entering the facility, I got influenza and I was taken to quarantine with a few people. Then, about 30 days later, I got COVID-19.” “I have been in quarantine about three times, one for having the flu and the other for having COVID, and another for someone in my unit who had measles.”
ZOR Decl., ECF No. 2-30, ¶ 50	“I was in a quarantine housing unit with other people because we were told that we were exposed to measles. We were not given any blood tests during the quarantine, but we were given vaccines. During the quarantine the medical staff came in and would ask in the mornings and evenings whether we had any symptoms. We were not able to contact our attorneys while in quarantine.”
Navdeep Decl., ECF No. 2-28, ¶ 37	“Sometime in March, there was a measles outbreak here. I was in the Charlie Unit at the time. We were told there were approximately 70 people who had measles and that they were quarantined. There was no recreation during this time and we just had to stay in our housing unit. People in the hallways were walking around with PPE kits, but I was never given a mask and no one else in my housing unit was given a mask. People would come to disinfect the unit once a week during that time. No other precautions were taken. Approximately 7 days later, when the measles outbreak was still going on, there was also a Covid outbreak. Between measles and Covid, I was very scared.”
LLH Decl., ECF No. 2-32, ¶ 47	“When [outbreaks] happened, staff didn’t come and give us information or education about what those diseases are, what symptoms to look for, and how to protect ourselves. We weren’t given masks or any other personal protective equipment during that time either. Each time my unit would go out to yard, I would see signs posted on neighboring units in the hallway that had signs saying ‘COVID-19,’ or ‘Measles,’ or ‘Tuberculosis.’ Those quarantine units were next to my unit, and the air is circulated between the units because they are open on top.”
SNM Decl., ECF No. 2-20, ¶¶ 27, 35	“There was a measles outbreak at Camp East Montana when I was housed there. Staff told me like around early March 2026, that they could not give me the measles vaccine because they wanted to test my white blood cell count first.” “During that appointment, I asked again if I could receive the measles shot, but the medical staff told me ‘No’ because they were not giving it anymore. They told me they were only giving the measles vaccine a month ago, which is precisely when I initially requested the measles vaccine. To this date, I have not received my measles vaccine.”

Monroy Decl. ¶ 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.”
Rodriguez Flores Decl., ECF No. 2-6, ¶ 24	“Since the new company took over, on or about April 18, 2026, I have noticed that people who feel sick, even with some minor cold symptoms, are immediately taken to a quarantine unit which is a solitary unit which leaves us without any human interaction, phone calls are limited to 10 minutes long per day, or no programming. This is terrible because people are left there alone for days which negatively impacts our mental health.”
Failure to Provide Medical Records to Patients and Their Representatives	
Rodriguez Flores Decl., ECF No. 2-6, ¶ 35	“On or around March 24, 2026, I told ICE that I wanted a copy of my medical and legal records. But ICE responded that they could not give me these files. I filed [sic] out the forms via the tablet to request these records. I haven’t gotten any of the records I requested yet.”
Reina Suppl. Decl. ¶¶ 5-6	“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.” “I was not given a manual when I entered the facility, so I do not know how else to request my medical records.”
Cristobal Decl. ¶ 31	“Shortly after my dad died, I requested the medical records from the Hospital of Providence over the phone. Hospital staff said my dad had to personally sign and approve the release of his medical records. I could not understand how they could ask us for that if they knew my dad had already died. To this date, the facility has not provided me with my dad’s medical records.”
Camarillo-Gonzalez Decl., ECF No. 2-16, ¶¶ 26-27	“When I was taken to the infirmary, I asked for my medical records. The medical staff there told me I could not have it and that my lawyers had to request it. I told them I did not have a lawyer. They said I would have to request it ‘from outside.’” “On or around April 6, 2026, before I was transferred out of Camp East Montana, I told a captain that I wanted my medical records. He told me that I could not have them and that they would send them to the El Paso Processing Center. However, once I arrived at the El Paso Processing Center, I asked the medical staff for my records and the [sic] told me Camp East

	Montana did not send them. Up to this date, I have not received my medical records from Camp East Montana.”
Angye Decl., ECF No. 2-27, ¶¶ 38-39	“I requested copies of those medical records, but I have not yet received them. They told me they would mail them to Camp East Montana.” “I asked [the medical staff] for my medical records, including those from my scan at my last medical visit on or around May 15, 2026. She said there was nothing in the records even indicating I had additional scans on or around May 15, 2026. She said she was going to take me to the records room, but then she left the room and seemed to disappear.”
Monroy Decl. ¶ 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.”
Continuity of Care Upon Release or Transfer	
Mbabid Decl., ECF No. 2-8, ¶ 18	“[After being released the facility] didn’t give me any of my medication when they released me. When I was at Reception after being released, an ICE officer gave me some of my belongings. I asked where my documents and tuberculosis medication were. The ICE agent said once I’m released, there’s nothing they can do for my medications, and told me that to get my documents I’d have to ask USCIS. They also didn’t give me any of my medical records or tell me what, if anything, I was supposed to do to continue to treat my tuberculosis.”
Baccam Decl., ECF No. 2-11, ¶ 41	“When I got to El Paso Service Processing Center, the nurses told me and others that we had to get another chest x-Ray. I said that I didn’t want to do it again, because I’d already had one done at Camp East Montana. I asked why they couldn’t just look at the medical records from Camp East Montana. The nurse told me that Camp East Montana wouldn’t send the medical records over, so we had to do it again.”
Bounvongxay Decl., ECF No. 2-12, ¶ 14	“When I was transferred to EPSPC, a lady from the medical staff at EPSPC called me in for intake, and she said that my file was blank. She told me that staff at CEM sent over the actual medication they were giving me, but no information about my condition or medical history. She told me that EPSPC did not know what to give me because they had no medical history. Because CEM did not send over my medical history, EPSPC had to start from scratch by testing my blood to check on my medical condition, and they had to start over my medications from the lowest dosage, because they didn’t have any of my medical history or prescriptions.”

Angye Second Suppl. Decl. ¶ 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 did not send 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.... Not having these medications when I was transferred [from Camp East Montana] 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.”
Rossa Chanchamire Decl. ¶ 14	“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. 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. Because there was no evidence of any medical exam conducted at Camp East Montana, the Processing Center had to order new medical tests.”
Inadequate Mental Health Care	
Monroy Decl. ¶ 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.... 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.”
Majok Decl. ¶ 11	“I asked to speak with a psychiatrist several times at Camp East Montana because I felt like I was going to die and I didn’t feel safe at the facility. I felt suicidal. Approximately four times, the facility told me that they were going to take me to the psychiatrist, but then they would take me to ‘the hole’ where I’d wait for hours and then be returned to my regular housing unit

	without ever seeing anyone.... The fifth time I requested to speak with a psychiatrist, I told the nurse that I felt like I was going to harm myself and she told me to do it. When the nurse told me that, it made me feel like there was no hope. I stopped asking for help for my mental health after that.”
Rodriguez Sanchez Decl. ¶¶ 17, 30	“I received a psychological evaluation and told the staff that I needed psychological help during my intake process at Camp East Montana. I asked to get therapy once a week. The visit I had with the psychologist was only five minutes long, and it was not like the real therapy that I got with psychologists in Minnesota.” “Upon arriving back at Camp East Montana, I went straight to the mental health unit where they did an ‘evaluation’ on my mental health by asking me how I felt after coming back from the hospital. They knew what the guards had done and some of my prior history with PTSD, so I responded by telling them, ‘How do you think I feel like right now?’ The lady laughed at me, signing a paper that I think indicated that I was in good enough condition to go to solitary and handed it to the guard. She also high-fived the guard, as if she was celebrating sending me to solitary.”
Rivero-Gonzalez Decl. ¶¶ 20, 22, 26-27	“Then [in solitary], I was seen for a mental health screening. I shared that I needed medication for my post-traumatic stress disorder symptoms, depression, claustrophobia, suicidal thoughts and past attempts, anxiety, sleeping disorder, nightmares, and negative rumination. The staff person stopped the interview and said that we should stop because it was about 4:50 am. I told them that I was very depressed and I was not sleeping well for days, I had insomnia. I told them that them placing me in solitary confinement only worsened my depression where I was alone. The staff person said that they would come by later to my unit to complete the screening, but they never did. Then I was sent to the general population housing unit.” “The mental health screening was completed on or about June 22, 2026, so about a week after I arrived, by chance because I told the nurse, who was giving me Advil in the morning, that I had not been sleeping well, that I spent time alone in Echo-9 with 72 beds (just me and the guard), and that I needed my medication.” “With my mental health medication, I felt better, but I still struggled to sleep well. I still feel very depressed. I told the psychiatrist about this, and I got the same response that they were

	going to see if the medical insurance provided by ICE would approve different medications for my mental health.” “But the medication for my mental health was not working. Specifically, Wellbutrin was not working for me because I still felt very anxious. I still had nightmares almost on a nightly basis.”
Fernandez-Gastelum Decl., ECF No. 2-14, ¶ 13	“I have experienced many problems with mental health care while detained at Fort Bliss. I requested multiple times to have a mental health screening. I have been feeling awful here. There are many days when I don’t want to do anything at all. I experienced trauma before even arriving here that has caused me to experience challenges with my mental health and I now feel even more powerless being here.”
Navdeep Decl., ECF No. 2-28, ¶ 23	“Before I was put into SMU, they did a mental health evaluation of me. A woman asked me some questions and I answered that I did not want to hurt myself or anyone else. I explained I didn’t feel like talking after what I had just gone through. The woman said something like ‘you came here with nothing,’ as if she was trying to say my situation was better now.”
NYG Decl., ECF No. 2-24, ¶¶ 17, 18, 23, 30, 46	“The nurse usually takes me outside the housing unit in the hallway to ask me personal questions about my trauma in front of other people who could hear in the hallways, like guards and the other detainees who walked by. I didn’t feel comfortable with that at all. It’s really hard to talk about the mental problems I am having, and I don’t want other people to know. That information should be private. I didn’t say everything I wanted to say because it was not a safe or confidential place to talk.” “When I was in Krome in Miami I saw psychologists every two weeks, or once a week. And when I was at El Paso Service Processing Center, I was seeing the psychologist every week or ten days. When I saw the psychologists more regularly, I felt better.” “When I returned to Camp East Montana, I still felt incredibly depressed and anxious.... The psychologists has only offered to take me to the observation cell where they would strip me of my clothing, and I would there alone for days in solitary confinement. I told the psychologist that I did not want this because I had already experienced this when I was at Torrance Detention Center and it didn’t make me feel better, in fact it made me feel worse as I felt humiliated and degraded. I do not feel that staff at Camp East Montana have offered meaningful help.... All I wanted was to talk to a therapist about my experiences, as that has helped me in the past, outside

	of Camp East Montana. I don't want to be banished to a solitary cell alone. I do not deserve this kind of negative hurtful mistreatment happening to me." "I do not watch TV because I am depressed all of the time and do not have energy to do anything." "I experience chronic stress, anxiety, depression, persistent rumination, and nightmares. I have been detained by ICE for approximately a year, and my mental and physical health has worsened during this time. I feel like I am tortured and punished here."
CCD Decl., ECF No. 2-26, p.5 ¶¶ 1*-3*, 5* *Paragraph numbers restarted after paragraph 32; subsequent paragraphs in this declaration cited by reference to the page number first and then the paragraph number in that page.	"On the days when I do not receive my correct [psychiatric] medication, I cannot sleep well, I feel severe symptoms like persistent rumination, anxiety, depression, nightmares, and I have thoughts of suicide and self-harm." "When I arrived, I told the medical team about my suicide ideation. The nurses told me that they cannot do anything about it." "Since I've only seen the psychologist once and briefly, it was only to discuss my PREA complaint. During that visit, I asked about my medications and to see a psychologist consistently, but I have not seen a psychologist since then." "I have chronic anxiety. Since being here, I have felt the symptoms of chronic anxiety because there are no windows, I feel trapped here, and feel that I cannot get any fresh air. I also feel depressed because I am trapped here and I cannot even see my family."
ZOR Decl., ECF No. 2-30, ¶¶ 33, 51	"Because there is nothing to do in the housing units, people get really depressed and anxious." "... [I]t took about 1 month of waiting before I could get medication for a mental health condition after it was prescribed by the facility doctor."
ZOR Suppl. Decl. ¶ 19	"I struggle constantly with my mental health here, especially when dealing with the constant pat downs and searches, and the treatment from the guards. I feel desperate at times."
Ly Decl., ECF No. 2-9, ¶ 39	"Conditions at Camp East Montana have messed with me mentally and made me lose hope."
HOK Decl., ECF No. 2-25, ¶¶ 21, 31	"I feel trapped here and anxious." "I regularly feel anxious, frustrated, and sad about being here."

JLE Decl., ECF No. 2-31, ¶¶ 9, 13	“I feel desperate and anxious by not being [sic] to see daylight or the outside world has affected me emotionally.” “The lack of activities and constant confinement has made me feel anxious and hopeless.”
Aguilar Decl. ¶ 6	“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 ... 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.”
Rodriguez Flores Second Suppl. Decl. ¶ 16	“My mental health has worsened a lot. Each day feels eternal. This place is destroying my soul. I don’t know what I am going to do. I have given up. I feel trapped here. I am imprisoned here. I am a human being. I do not deserve to be treated in such a degrading and inhumane way. I am not a criminal. I just want to see my family and be free.”
Navdeep Decl., ECF No. 2-28, ¶¶ 22, 24	“I already felt sad and depressed before being put in SMU, and I felt even worse when in there.” “I was sad being completely alone. Being in there made me miss my family a lot.”
Moreno Rodriguez Decl., ECF No. 2-15, ¶ 27	“We were treated like animals at Camp East Montana. I felt desperate, depressed, and sometimes I wanted to give up.”
Gonzalez Ramirez Decl. ¶¶ 43, 45	“I have seen a psychologist two or three times, they ask me about suicidal ideologies, I tell them that I have a vigorous anger for my situation and am depressed. There are days where I wish they would find me dead instead of having to keep suffering with my pains of being here. At any time I could die from my age, but I could never act on my suicidal ideations.” “I also have bad anxiety, I feel like I want to die but of natural causes not from the injustices I have suffered here, I want it to be on my own terms. If I have to stay here for a longer time, I would rather die.”

Camarillo-Gonzalez Decl., ECF No. 2-16, ¶¶ 25, 29	“My physical and mental health seemed to clearly deteriorate during my time at Camp East Montana, first because of the kidney stones and then because of the HIV diagnosis. I felt depressed and very anxious.” “I felt so overwhelmed and traumatized by my entire experience at Camp East Montana. Being there felt like torture.”
--	--