

EXHIBIT 1



December 8, 2028

Todd Lyons
Immigration and Customs Enforcement
500 12th St. SW
Washington, DC 20536

Joel D. Garcia
Field Office Director, El Paso
Immigration and Customs Enforcement
999 S. Oregon St.
El Paso, TX 79901

Commanding General, Major General Curtis Taylor
Garrison Commander, Col. Michael V. Soyka
U.S. Army, Fort Bliss
HQ, US Army Garrison, Fort Bliss
ATTN: AMIM-BLG-ZA
1741 Marshall Road
Fort Bliss, Texas 79916

CC: U.S. Senate Armed Forces Committee; U.S. Senate Committee on Homeland Security; U.S. Senate Committee on the Judiciary; U.S. House Committee on Oversight and Government Reform; U.S. House Committee on Armed Services; Department of Homeland Security Office of Inspector General; DHS Office of Civil Rights and Civil Liberties

VIA EMAIL AND CERTIFIED MAIL

Re: Coercive Third Country Deportations and Abusive Conditions of Confinement in Immigration Detention at Fort Bliss, TX (Camp East Montana)

Dear Officers:

We write to raise concerns regarding reports of significant abuse against detained immigrants held at the Camp East Montana immigration detention facility at Fort Bliss in El Paso, Texas ("Ft. Bliss"). These reports, based on interviews with over 45 detained immigrants held at the facility, reveal alarming conditions of confinement and repeated instances of coercion, physical force, and threats against immigrants facing third-country deportations, in violation of agency policies and standards, as well as statutory and constitutional protections.

The Ft. Bliss immigration detention facility is a massive tent camp erected only months ago, located in the middle of the desert on a military base that formerly served as a Japanese



internment camp site during World War II.¹ The facility, which began detaining people on an active construction site, currently holds over 2,700 men and women.² Detained immigrants are held for weeks at a time with no access to the outdoors in cramped, squalid soft-sided tents with 72 people per unit, where toilets and showers flood eating areas with raw sewage. Government oversight reports have already identified significant violations of detention standards at the facility: in September 2025, the *Washington Post* reported that ICE's own inspectors found that conditions at Ft. Bliss violated at least 60 federal standards within its first 50 days of operation. These violations included failure to provide basic medical care, inadequate portions of food, failure to ensure that contractors' use of force policy aligned with ICE's policy, and lack of access to counsel.³

Since the filing of the report, these conditions have only worsened. As immigrants detained at Ft. Bliss report, officers have beaten detainees and used threats of violence, criminal charges, and imprisonment in attempts to coerce people held at Ft. Bliss to leave the United States and cross the border into Mexico, even if they are not subject to a removal order to Mexico. Abusive and dangerous conditions of confinement persist at the facility months after the issuance of ICE's internal inspection report.

Detained immigrants report that officers have handcuffed and rounded up large groups of non-Mexican detainees at Ft. Bliss, loaded them onto vans, and transported them over an hour away to the U.S.-Mexico border at Santa Teresa, New Mexico. Once at the border, masked officers have instructed detainees to cross the border by "jumping" into Mexico. In some instances, these masked officers have beaten detainees who have refused to cross into Mexico or threatened them with criminal charges and long-term imprisonment. These actions by federal officers are clear violations of statutory, regulatory, and due process protections, including mandatory protections that require meaningful notice and an opportunity to contest a third-country removal on the basis of fear. These actions violate even the Department of Homeland Security's ("DHS") protocol for third-country removals,⁴ the legality of which is being challenged in federal court.⁵ Even the agency's minimal protocol requires officers to provide written notice of a third country removal and, in the absence of a determination that the third country has reliable diplomatic assurances that removed individuals will not be persecuted or tortured, to refer individuals who state a fear of removal to a third country to U.S. Citizenship and Immigration Services ("USCIS") for an

¹ Kimmy Yam, *Japanese American Groups Blast Use of Fort Bliss, Former Internment Camp Site, as ICE Detention Center*, NBC News, Aug. 20, 2025, <https://www.nbcnews.com/news/asian-america/fort-bliss-japanese-americans-internment-camp-immigrant-detention-rcna226044>.

² Immigration and Customs Enforcement, FY 2026 ICE Statistics, <https://www.ice.gov/detain/detention-management> (last updated Nov. 20, 2025).

³ Douglas MacMillan, Samuel Oakford, N. Kirkpatrick, and Aaron Schaffer, *60 Violations in 50 Days: Inside ICE's Giant Tent Facility at Ft. Bliss*, Wash. Post, Sept. 16, 2025, <https://www.washingtonpost.com/business/2025/09/16/ice-detention-center-immigration-violations/>.

⁴ A "third country" is a country not previously designated for removal by either an Immigration Judge or DHS in underlying removal proceedings. See Northwest Immigrant Rights Project, Nat'l Immigration Litigation Alliance, and Human Rights First, *Third Country Deportations and D.V.D. v. DHS* (June 27, 2025), <https://immigrationlitigation.org/wp-content/uploads/2025/06/25.05.27-DVD-Practice-Alert.pdf> [<https://perma.cc/2QYP-F2F2>].

⁵ *D.V.D. v. U.S. Dep't of Homeland Sec.*, 778 F. Supp. 3d 355 (D. Mass. 2025).



eligibility screening for protection from removal.⁶ There is no indication that the United States has received credible diplomatic assurances from Mexico as relevant to this guidance.

In addition, detainee reports reveal shocking conditions of confinement at Ft. Bliss, including multiple incidents of use of force by officers against detainees that involve abusive sexual contact, several of which have required hospitalization. Detained immigrants further report lack of adequate food and the provision of spoiled food, leading to hunger and significant weight loss; inadequate medical care; failure to provide basic hygiene supplies, including soap; squalid conditions, including sewage entering meal areas, and lack of cleaning supplies; prolonged detention in hold rooms; lack of outdoor recreation; and unreasonable barriers to access to counsel.

In light of these abuses, we urge the end to detention of immigrants at Ft. Bliss. We further urge an immediate halt to third-country removals of detained people from Ft. Bliss and a thorough investigation into the circumstances of these removals.

A. Government Officers Use Physical Abuse and Coercive Threats of Prosecution to Deport Non-Mexican Immigrants Held at Fort Bliss to Mexico.

In the past few months, DHS has escalated its efforts to deport people who have final orders of removal but who cannot be removed to their countries of origin, including those who won withholding or Convention Against Torture (CAT) relief, to third countries—typically a country that is not the person’s nation of origin and to which they have no ties. The government must provide meaningful notice and an opportunity to contest removal on the basis of a fear prior to removal to a third country.⁷ DHS’s policy falls woefully short of providing those protections. However, even under ICE’s own guidance, absent credible diplomatic assurances from the receiving country, officers must serve a written Notice of Removal that identifies the intended third country of removal and provide at least six hours for the individual to consult with an attorney. If an individual states a fear of removal to a third country, the officers must refer the case to USCIS for a screening for eligibility for protection from removal.⁸

ICE officers at Ft. Bliss, however, flagrantly violate statutory, regulatory, and due process protections as well as the agency’s own policy—engaging in shockingly abusive measures—in deporting non-Mexican immigrants detained at Ft. Bliss to Mexico. As multiple detainees have reported, including in the sworn affidavits provided here, ICE officers have routinely approached non-Mexican individuals held at Ft. Bliss, and, in most cases, informed them orally that they will be deported to Mexico. When detainees state that they fear being removed to Mexico and decline third country deportation, officers have subjected them to physical abuse, and threats of criminal prosecution and lengthy imprisonment.

⁶ Todd Lyons, *Third Country Removals Following the Supreme Court’s Order in Department of Homeland Security v. DVD*, No. 24A1153 (U.S. June 23, 2025), Jul. 9, 2025, <https://immigrationlitigation.org/wp-content/uploads/2025/07/190-1-July-9-Guidance.pdf> [<https://perma.cc/SBP9-SZUN>].

⁷ *Trump v. J.G.G.*, 604 U.S. 670, 673 (2025) (explaining that “[i]t is well established that the Fifth Amendment entitles [noncitizens] to due process of law in the context of removal proceedings” and requiring notice and an opportunity to be heard before removal to a third country); *Johnson v. Guzman Chavez*, 594 U.S. 523, 557 (2021); 8 C.F.R. § 1208.18(c)(1).

⁸ *Id.*; ICE, Detention and Removal Operations Policy and Procedure Manual, https://www.ice.gov/doclib/foia/dro_policy_memos/09684drofieldpolicymanual.pdf.



For example, in September 2025, officers at Ft. Bliss beat “Isaac,”⁹ a detained immigrant from Cuba, after he told officials he did not want to be deported to Mexico. Isaac was ordered removed by an Immigration Judge to Cuba, but did not want to be deported to Mexico.¹⁰ As Isaac describes, “[t]he guards came into my housing unit and told me I was going to be deported. When I asked them where, they told me I will be taken to Mexico.” After he refused, the officers left, but soon returned with many more guards, who took Isaac out of his cell. As he testified in a sworn declaration, “the guards hit my head” and “slammed it against the wall approximately ten times,” “squeezed and twisted my ankles,” and “grabbed and crushed my testicles between their fingers, which was very painful and humiliating.” As a result of the beating, Isaac “had severe pain behind my ears,” and could not touch the left side of his head without pain for approximately a month. Isaac was then taken to a “punishment room,” where ICE agents “told me to cooperate,” and that “no matter what I am going to be taken to Mexico.” Agents then handcuffed Isaac and approximately 20 other people, placed them on a bus, and drove them over an hour to the border. At the border, the detained immigrants were met by approximately 15 masked agents who informed them that they could get off the bus and cross into Mexico. One officer informed the immigrants that “if we don’t want to go to Mexico, then we would either be sent to a jail cell in El Salvador or Africa.”¹¹

Isaac still refused to be deported to Mexico and was returned to Ft. Bliss. However, in October 2025, three ICE representatives again came to his unit and attempted to have him sign a document providing consent to deport him to Mexico. Isaac refused, but he continues to fear that officers will one day “take us on a bus,” “put bags over our heads,” and “drop us in the middle of the desert to fend for ourselves.”¹²

“Benjamin,” an immigrant from Cuba who has a final order of removal to Cuba from an Immigration Judge,¹³ similarly attests that officers twice attempted to remove him to Mexico from Ft. Bliss, even though he fears deportation to that country. As Benjamin reports, over the course of a week, guards attempted to threaten him into signing a document agreeing to be deported to Mexico. The guards told him that if he did not, that they would handcuff him, put a bag over his head, and send him to Mexico. Benjamin refused to sign the document, stating that he was scared to go to Mexico, because he had heard that migrants are often kidnapped, robbed, or killed there. A week later, two officers informed him that a judge had submitted an order to deport him to Mexico. Benjamin asked for a copy of the order, but the officers told him that they could not show him the document. Officers then cuffed his hands and feet, chained them to a restraint around his waist, and transported him and several other detainees via bus to the border. At the border, seven masked officers without identification badges who “looked like military men” attempted to intimidate Benjamin and five other detainees who had refused deportation by crossing into Mexico. Benjamin and the others continued to refuse, and were eventually transported back to Ft. Bliss. However, upon their return, officers continued to threaten him, in what Benjamin describes as “mental torture.” A few weeks later, officers again told Benjamin that if he did not agree to be

⁹ All detainees are proceeding under pseudonym in light of the threat of retaliation by ICE.

¹⁰ EOIR, <https://acis.eoir.justice.gov/en/caseInformation> (last checked Dec. 2. 2025).

¹¹ Exhibit A, Declaration of “Isaac,” ¶¶ 18-25, Nov. 2025.

¹² *Id.* ¶ 25.

¹³ EOIR, <https://acis.eoir.justice.gov/en/caseInformation> (last checked Dec. 2. 2025).



deported to Mexico, that they would send him to a prison in Arizona for several months, and he would then be sent to Mexico.¹⁴

“Abel,” an immigrant from Cuba, also attested that officers twice attempted to remove him to Mexico from Ft. Bliss even after he told guards that he refused to be sent to Mexico. Abel was ordered removed to Cuba by an Immigration Judge, but did not want to be deported to Mexico, because he feared for his safety there.¹⁵ Abel tried to refuse to board the bus the first time, but an officer “grabbed [him] and slammed [him] down,” ultimately forcing him onto the bus with approximately thirteen other people. Abel’s injuries caused back pain that lasted weeks. When the bus stopped at the border, Abel and the others were met by officers wearing “black masks on their faces with only a hole for their eyes.” Abel began to yell that this was a “kidnapping” and that he did not want to be taken to Mexico. Guards placed metal cuffs over the plastic cuffs already on Abel causing his “wrists [to] hurt where the layered cuffs were.” Abel was eventually returned to Ft. Bliss, but guards again attempted to take him to Mexico several months later. They told him that if he refused to board the bus, they would send him to jail and then to Africa.¹⁶

Other detained immigrants at Ft. Bliss provide similar reports of their own experiences. “Francisco,” a detained immigrant from Guatemala who was granted withholding of removal,¹⁷ reports that ICE officers took him and approximately 45 other detainees at Ft. Bliss to the U.S.-Mexico border for deportation. Officers cuffed his hands and feet and loaded him and other detainees onto a bus. At the border, masked officers instructed the immigrants to “jump over the wall,” because that would be the only way that they would be “free.”¹⁸

“Eduardo,” an immigrant from Cuba, described similar attempts by masked officers to coerce detainees at Ft. Bliss to “jump” across the border to Mexico, after officers transported a truckload of detainees to the border. Eduardo was ordered removed to Cuba by an Immigration Judge, but did not want to be deported to Mexico.¹⁹ As Eduardo states, officers “told me they were going to charge me with federal crimes and I would never get out of this detention if I did not jump. The masked people sometimes beat on people to get them to jump the wall even if they don’t want to. I have seen other people get beaten up and forced to jump. But I did not jump. I do not want to be deported to Mexico.”²⁰

These coercive and abusive attempts at third-country removal violate agency guidance and the statutory and constitutional rights of detained immigrants. We urge an immediate halt to third-country removals of detained people from Ft. Bliss, including to Mexico; a thorough investigation into the circumstances of these removals; and specific investigation into the transportation of third-country nationals from Ft. Bliss to the U.S.-Mexico border, including the actions described herein.

¹⁴ Exhibit B, Declaration of “Benjamin,” ¶¶ 5-8, Nov. 2025.

¹⁵ EOIR, <https://acis.eoir.justice.gov/en/caseInformation> (last checked Dec. 2. 2025).

¹⁶ Exhibit C, Declaration of “Abel,” ¶¶ 7-16, Nov. 2025.

¹⁷ EOIR, <https://acis.eoir.justice.gov/en/caseInformation> (last checked Dec. 2. 2025).

¹⁸ Interview with “Francisco,” Nov. 2025.

¹⁹ EOIR, <https://acis.eoir.justice.gov/en/caseInformation> (last checked Dec. 2. 2025).

²⁰ Exhibit D, Declaration of “Eduardo,” ¶¶ 20-21, Nov. 2025.



New Mexico Texas



B. Immigrants Detained at Ft. Bliss Face Widespread Abuse and Deprivation.

1. Officers at Ft. Bliss Subject Detainees to Egregious Use of Force, Including Abusive Sexual Contact.

Officers at Ft. Bliss have engaged in a widespread and unreasonable pattern and practice of excessive force against detained people, including the use of abusive sexual contact by officers when utilizing force. People detained at Ft. Bliss report that officers have crushed detainees' testicles with their fingers, slammed detained people to the ground, stomped on detained people and punched their faces, and beaten detained people even after they are cuffed and restrained. These instances go far beyond *de minimis* use of force, are objectively unreasonable, and violate common standards of decency. See *Hudson v. McMillian*, 503 U.S. 1, 9-10 (1992); *Kingsley v. Hendrickson*, 576 U.S. 389, 397 (2015). Indeed, ICE's own detention standards clearly instruct that "[o]fficers shall use only the force necessary to gain control of the detainee," and prohibit officers from "[s]triking a detainee for failing to obey an order." U.S. Immigration and Customs Enf't, National Detention Standards 2025 § 2.8 ("NDS 2025"). Moreover, officers are prohibited from sexual contact with detainees, including "[i]ntentional touching of the genitalia . . . that is unrelated to official duties." *Id.* § 2.11.

Officers at Ft. Bliss beat "Samuel," a detained teenager, so severely that he sustained injuries across his body, lost consciousness, and had to be taken to a hospital in an ambulance. Officers piled on to him, body slammed him, and began to beat him after he switched off an overhead light in a housing unit. The officers positioned their bodies to block the view of the security camera in the unit. Samuel's right front tooth broke from the force of being slammed to the ground, and as Samuel attests, one officer "grabbed my testicles and firmly crushed them," while another "forced his fingers deep into my ears." Samuel also recalls that officers "pulled my fingers back very painfully, almost to the point that it felt like my fingers might break," after cuffing him, and punched the area around his mouth. Even then, with Samuel already cuffed, officers continued punching Samuel around his mouth. When the beating finally stopped, an officer held Samuel against the wall. While Samuel was feeling "dizzy" and was "fighting to remain conscious," an officer laughed at Samuel for having a chipped tooth after being slammed to the ground and told Samuel he was "like a little girl."²¹ Samuel's injuries were so severe that he lost consciousness in the medical tent. When he regained consciousness, he was in an ambulance on the way to the hospital. A month and half after the beating, damage to Samuel's left ear is so severe that he now has trouble hearing, and he continue to feel pain in his testicles.²² Although all medical care in detention must be provided at no cost to detainees, NDS 2025 § 4.3(II)(A)(2), Samuel received a medical bill charging him for his emergency visit to the hospital on the night that officers beat him.²³

²¹ Exhibit E, Declaration of "Samuel," ¶¶ 13-16, Nov. 2025; Exhibit Q, Suppl. Declaration of "Samuel," ¶ 6, Dec. 2025.

²² *Id.* ¶¶ 13-16.

²³ Exhibit Q, Suppl. Declaration of "Samuel," ¶ 7, Dec. 2025.



The practice of crushing detainees' testicles during use of force incidents at Ft. Bliss is not isolated. "Isaac," like Samuel, also reports that officers grabbed and crushed his testicles between their fingers as they beat him while attempting to force him into Mexico.²⁴

Detained individuals have also reported guards using force against them for simply requesting basic necessities, such as prescribed medication. After "Eduardo" requested his prescription medications, including for high blood pressure, guards beat him on his ribs, abdomen, and back of his head. He recalls that "guards started stomping on me until I lost consciousness." After the beating, Eduardo was then taken to the hospital, and upon his return to Ft. Bliss, was held in an isolated "punishment cell," in conditions of solitary confinement, for about five days. Eduardo continued requesting his medications after he was released from the punishment cell. In another incident, guards threw him to the ground where his clothes were "torn off" his body and he was left "bruised and bloody." He was again taken to the hospital for the injuries he sustained. Weeks later, guards beat Eduardo for a third time when he requested his medications. They pinned him down on the floor, cuffed him, and hit him in the ribs. He described feeling "humiliated" and like "an animal" for being beaten simply for requesting his medications. He noted that he has witnessed other detained people experience violence and harsh treatment by officers when they ask for basic necessities, including medicine and food. For example, officers have pepper sprayed detained people for making these requests.²⁵

Conditions at the facility have grown so dire, and officers have become so unresponsive to requests for basic necessities such as food and medicine, that detained people have resorted to hunger strikes to draw attention to the conditions at the facility. However, officers have responded with excessive, physical force against detained people engaged in hunger strikes. For example, Noah attests that officers beat him during a hunger strike in his unit. Approximately thirty to forty officers arrived and "started cuffing us and threw us against the floor." Although Noah did not resist, he recalled that "guards put their knees behind my neck and pressed down on my neck," leading to severe pain for days following the incident. Noah also witnessed a guard punch another detained person in the face, causing him to bleed profusely. Noah has become despondent, noting that "when we ask for things, even basic things like medicine, the guards treat us so harshly."²⁶

Officers also beat "German" for protesting inedible food provided to detained people at Ft. Bliss even after they had already cuffed him. Officers double cuffed German and two others by placing metal cuffs over their plastic cuffs and then "slammed [them] against the wall," causing injury to the side of German's head. His wrists and ankles were also hurt from the cuffs, which officers kept on him for hours even after he was placed in an isolated cell.²⁷

Other detained individuals describe officers using force to exacerbate preexisting, visible injuries. "Camilo" witnessed officers stepping on the ankle of a detained man with a preexisting ankle injury. The man was sitting at a shared table and was unable to stand up when guards tried to move the table. Officers then "beat him, stepped on his ankle, and made the injury worse."²⁸ "Isaac," saw a detained person with blood seemingly coagulating in his arm to the point that "it

²⁴ Exhibit A, Declaration of "Isaac," ¶¶ 18-25, Nov. 2025.

²⁵ Exhibit D, Declaration of "Eduardo," ¶¶ 14-19, Nov. 2025.

²⁶ See Exhibit F, Declaration of "Noah," ¶ 8-13, Nov. 2025.

²⁷ See Exhibit G, Declaration of "German," ¶ 13, Nov. 2025.

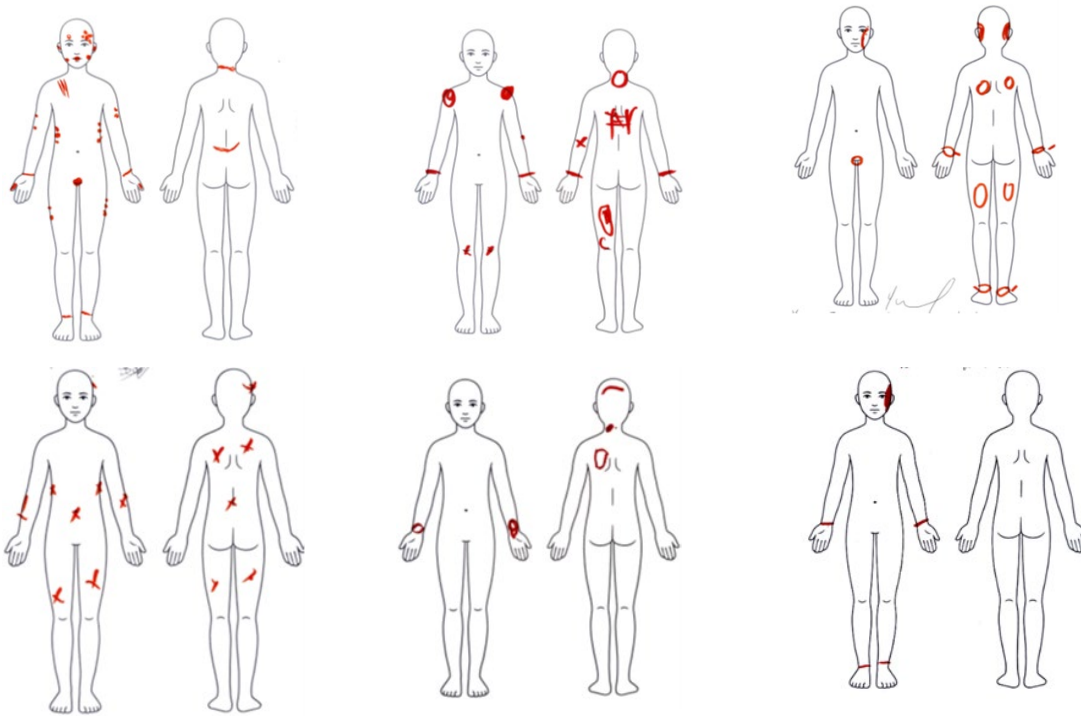
²⁸ See Exhibit H, Declaration of "Camilo," ¶ 17, Nov. 2025.



looked like his arm was going to pop.” The person later reported to Isaac that the officers beat his swollen arm after he told them he was feeling too unwell to participate in forced recreation.²⁹

The drawings below were created by detained immigrants who marked the areas on their bodies where they had been injured by guards at Ft. Bliss.

Diagram 1: Marking of Use-of-Force Injuries Against Immigrants Detained at Ft. Bliss



Injuries (from top left to bottom right) as marked by “Samuel,” “Noah,” “Isaac,” “Eduardo,” “Abel,” and “German.”

2. Detainees at Ft. Bliss Are Deprived of Sufficient Food, and Food Provided Is Spoiled and Inedible, Leading to Hunger, Illness, and Significant Weight Loss.

Detainees at Ft. Bliss almost uniformly describe deprivation of sufficient food. Detainees describe meager portion sizes of meals that are “the size of [a] fist,” and report that people have gone hungry, because officers do not provide sufficient food for distribution on housing units. In some cases, detainees have eaten only two meals due to insufficient food.³⁰ Detainees report significant weight loss at Ft. Bliss because of insufficient food. “Jaime” reports that he lost almost ten pounds in less than two months.³¹ “Hernan” and “Nelson,” also report that they have lost weight because of insufficient food.³² When food is provided, it is often frozen food that is

²⁹ See Exhibit A, Declaration of “Isaac,” ¶ 13, Nov. 2025.

³⁰ Exhibit I, Declaration of “Gershon,” ¶¶ 14-15, Nov. 2025; Exhibit P, Declaration of “Hernan,” ¶ 13, Dec. 2025.

³¹ Interview with “Jaime,” Nov. 2025.

³² Exhibit P, Declaration of “Hernan,” ¶ 14-15, Dec. 2025; Interview with “Nelson,” Oct. 2025.



supposed to be defrosted, but is spoiled and inedible.³³ As a result, detainees become ill from the food. Almost every detainee we talked to described widespread diarrhea and vomiting due to the food.³⁴

The food provided to detainees at Ft. Bliss falls below ICE Detention Standards and constitutional requirements. ICE Detention Standards require that all facilities “provide detainees with nutritious, attractively presented meals, prepared and served in a sanitary and hygienic food service operation.” NDS 2025 § 4.1. Detainees “shall be served three meals every day, at least two of which shall be hot meals.” *Id.* Food must be “fit for consumption and appropriately presented.” *Id.*; see also *Adams v. Mathis*, 458 F. Supp. 302, 308 (N.D. Ala. 1978), *aff’d* 614 F.2d 42 (5th Cir. 1980); *Ramos v. Lamm*, 639 F.2d 559, 570-71 (10th Cir. 1980) (Food must be “prepared and served under conditions which do not present an immediate danger to the health and well being of the [detainees] who consume it.”). Moreover, the lack of sufficient food and the provision of spoiled and rotten food is well known to the agency. Indeed, U.S. Representative Veronica Escobar recently informed Secretary Noem that “drinking water at the facility continues to taste foul, the food quality for detainees has not improved, and some detainees are skipping meals altogether due to a lack of dietary accommodations.”³⁵

3. Detainees at Ft. Bliss are Subject to Dangerous Medical Neglect and Lack of Mental Health Care.

In recent months, internal ICE oversight reports and Congressional letters have outlined widespread and systematic issues with the provision of medical and mental health care to detainees held at Ft. Bliss.³⁶ Despite these warnings, detainees at Ft. Bliss continue to face dangerous conditions of medical neglect, including denial of necessary medication and dangerously inconsistent medication administration schedules, and severely delayed or complete lack of response to requests for medical, dental, and mental health care. These conditions violate Constitutional requirements for the provision of adequate medical and mental health care to people in government custody, *Brown v. Plata*, 563 U.S. 493, 511 (2011); *Estelle v. Gamble*, 429 U.S. 97, 104 (1976), and fall far below requirements outlined by ICE detention standards.

Denial of Necessary Medication and Dangerously Inconsistent Medical Administration Schedules. People detained at Ft. Bliss report repeated and chronic issues with the facility’s failure to provide prescription medication and to ensure consistent delivery of medication, which presents particular danger to patients, such as diabetics, who rely on predictable

³³ Exhibit J, Declaration of “Maria,” ¶ 9, Nov. 2025; Exhibit D, Declaration of “Eduardo,” ¶ 12, Nov. 2025; Exhibit P, Declaration of “Hernan,” ¶¶ 14-15, Nov. 2025.

³⁴ See, e.g. Exhibit D, Declaration of “Eduardo,” ¶ 12, Nov. 2025; Exhibit E, Declaration of “Samuel,” ¶ 9, Nov. 2025; Exhibit J, Declaration of “Maria,” ¶ 9, Nov. 2025.

³⁵ Letter from Rep. Veronica Escobar to DHS Secretary Kristi Noem, Nov. 7, 2015, *available at* https://escobar.house.gov/uploadedfiles/10.27.25follow_up_letter_to_dhs_on_camp_east_montana.pdf.

³⁶ Douglas MacMillan et al., *60 Violations in 50 Days: Inside ICE’s Giant Tent Facility at Ft. Bliss*, Wash. Post, Sept. 16, 2025, (noting that “ICE inspectors also said contractors failed to follow mandatory procedures for medical care”); Letter from Rep. Escobar (noting that “[p]eople have shared concerns regarding Camp East Montana’s potentially inadequate medical care: only the most ill detainees are referred to the medical unit and there are inconsistencies as to how soon after arriving detainees are able to undergo initial medical screenings. Detainees have also shared that access to necessary medications has been inconsistent, with some people receiving their medication while others have not.”).



medication schedules. For example, “Josefina,” has diabetes and requires pills and insulin to manage her condition. However, the facility administers insulin at irregular intervals, causing her blood sugar to spike and then drop too low. Josefina is usually woken up at 4:00 a.m. for her first dose of insulin, which disrupts her sleep. She rarely receives her second dose of insulin and the accompanying pill.³⁷ “Frank” was pre-diabetic before arriving at Ft. Bliss, but his condition has deteriorated while in detention. He has been prescribed medications for his blood sugar and blood pressure; however, he reports serious delays in the distribution of his medication. At the time of his interview, he had gone fifteen days without either of his prescribed pills and had not received any insulin at all, as prescribed.³⁸

“Isaac” has hypertension and had a stroke approximately a year ago. He told officers about his condition shortly after arriving; however, approximately a month passed after he arrived at Ft. Bliss before he received his prescribed medication, during which time his vision blurred, a clear indication of dangerously high blood pressure. Even now, his medication is administered on an incorrect schedule.³⁹

Other detained people report that they have not received their required medications with any consistency. “Eduardo” has anxiety and hypertension, but does not consistently receive the medication he requires. He described “receiv[ing] it one day and then not for four days.” He is supposed to take his medications early in the day, but one of them is not administered to him until approximately 3:00 p.m., and the other is usually provided to him by officers between midnight and 3:00 a.m., causing a rise in blood pressure and anxiety.⁴⁰ “Gershon” has Post-Traumatic Stress Disorder, depression, and anxiety, which he treats with prescription medication. However, he has counted at least ten instances where he has not received his medication.⁴¹ “Noah” requires daily medication for allergies; however, at the time of his interview he had not received his required medication for five days.⁴²

Ft. Bliss’s failure to provide prescribed medication and to ensure a reliable medication management system constitutes deliberate indifference in violation of the Constitution. *See, e.g., Gil v. Reed*, 381 F.3d 649, 661 (7th Cir. 2004); *Hill v. Marshall*, 962 F.2d 1209, 1213-14 (6th Cir. 1992); *Lewis v. Cain*, 701 F. Supp. 3d 361, 391 (M.D. La. 2023), *appeal dismissed sub nom. Parker v. Hooper*, 128 F.4th 691 (5th Cir. 2025). ICE Detention Standards require that “[m]edication will be distributed according to the specific instructions and procedures established by the health care provider.” NDS 2025 § 4.3.

Severely Delayed or Lack of Response to Requests for Medical, Dental, and Mental Health Care. Detainee requests for medical attention are largely ignored even after multiple requests.⁴³ “Maria” noted that “[i]f you report that you want to go to the doctor, the guards tell you to sign a list of people, but they won’t attend to you on that list for approximately 1-2 weeks after

³⁷ Interview with “Josefina,” Oct. 2025.

³⁸ Exhibit K, Declaration of “Frank,” ¶ 7, Nov. 2025.

³⁹ Exhibit A, Declaration of “Isaac,” ¶ 10, Nov. 2025.

⁴⁰ Exhibit D, Declaration of “Eduardo,” ¶¶ 7-8, Nov. 2025.

⁴¹ Exhibit I, Declaration of “Gershon,” ¶¶ 9-12, Dec. 2025.

⁴² Exhibit F, Declaration of “Noah,” ¶¶ 4-5, Nov. 2025.

⁴³ Exhibit D, Declaration of “Eduardo,” ¶ 8, Nov. 2025; *see also* Exhibit L, Declaration of “David,” ¶ 7, Nov. 2025 (requested medication for gastritis every day since arrival, but only received it about a month and a half after arriving).



you put your name on it.”⁴⁴ “Samuel” reported filing about ten requests for care about molar pain, migraines, stomach issues, depression, and anxiety before he was finally seen by medical staff weeks later. However, the medical staff merely gave him a Tylenol and sent him away.⁴⁵ “Vincente” suffered from extreme headaches for days in a row and repeatedly submitted requests for medical help that were denied after officers told him that the medical area was full. Officers informed Vincente that “they will not call the doctor unless someone collapses.” Vincente also reported that on multiple occasions another young man with heart problems has requested medical assistance before fainting, but has only received attention after actually collapsing.⁴⁶ Maria similarly observed that “[t]he guards seem to have to see you lying on the floor” before providing medical attention and that she has “seen people lying on the floor before receiving treatment.”⁴⁷ “Frank” has requested care by writing medical requests and handing them to the guards and attempting to use the tablets to submit medical requests as his health conditions worsened, but his written and electronic requests have gone unanswered.⁴⁸

Officers do not consistently provide detained people with medical attention even after they faint and experience visible bodily trauma. “German” described an elderly man in his unit with high blood pressure who repeatedly requested medical attention that he did not receive. His condition deteriorated to the point where “he fainted, fell down on the floor, and it looked like he broke his nose.” Although the elderly man bled profusely, officers did not respond, despite other detainees’ attempts to obtain medical attention. As German witnessed, when officers finally came out to hand out meals, “they ignored the man who was still on the ground in a puddle of his own blood.” Officers left the man’s meal on his bed.⁴⁹

Detained people also report significant issues with receiving dental care at Ft. Bliss. “Elizabeth” developed a gum infection while in detention and was prescribed an antibiotic to take every eight hours. However, officers have not followed medical instructions, and she is “lucky” if she receives the prescribed antibiotics every other day. When Elizabeth does not receive her antibiotics on time, her gums swell and become very painful, and she has headaches.⁵⁰

Denial and delay of medical care by detention officials constitutes deliberate indifference in violation of the Constitution. *Estelle*, 429 U.S. at 104; *Brown v. Hughes*, 894 F.2d 1533, 1538 (11th Cir. 1990). ICE Detention Standards require that the facility provides “medically necessary and appropriate medical, dental and mental health care and pharmaceutical services at no cost to the detainee,” “timely responses to medical complaints,” and that facility procedures “ensure that all request slips are received and triaged by the medical staff within 24 hours of receipt of the request.” NDS 2025 §§ 4.3(II)(A), (II)(I). The Standards also require that “Emergency dental treatment shall be provided for immediate relief of pain, trauma, and acute oral infection.” *Id.* § 4.3(II)(H)(1). However, immigrants detained at Ft. Bliss report significant delays in receiving responses to requests for medical, dental, and mental health attention, including the provision of

⁴⁴ Exhibit J, Declaration of “Maria,” ¶ 10, Nov. 2025.

⁴⁵ Exhibit E, Declaration of “Samuel,” ¶ 7, Nov. 2025.

⁴⁶ Exhibit O, Declaration of “Vincente,” ¶ 10, Nov. 2025.

⁴⁷ Exhibit J, Declaration of “Maria,” ¶ 10, Nov. 2025.

⁴⁸ Exhibit K, Declaration of “Frank,” ¶¶ 7-11, Nov. 2025.

⁴⁹ Exhibit G, Declaration of “German,” ¶ 9, Nov. 2025.

⁵⁰ Exhibit M, Declaration of “Elizabeth,” ¶ 8, Nov. 2025.



prescription medication, or report that they have received no response at all, even after repeated requests for care.

4. Ft. Bliss Fails to Provide Basic Hygiene Supplies, Clean Clothing, and Cleaning Materials, Leaving Detainees in Squalid Conditions.

Detainees at Ft. Bliss almost uniformly reported squalid conditions, and officers' failure to provide them with basic hygiene materials such as soap, clean clothing, or cleaning supplies. These conditions fall well below constitutional requirements and agency standards.

Lack of Basic Hygiene Supplies, Including Soap. Detainees widely report denial of basic hygiene supplies at the facility. "Frank" noted that he lacked soap and that detainees were "only given very small bottles of shampoo that we have to use to wash our body, hair, and sometimes our clothing."⁵¹ "German" reported that "[e]ven when shampoo is handed out, we are given only 15-20 one-time use packets for all of the approximately 72 people in the unit."⁵²

The facility's widespread and repeated failure to provide detainees with personal hygiene supplies at Ft. Bliss falls below constitutional and agency standards. ICE's detention standards require that all detainees must be provided with "one bar of bath soap, or equivalent." NDS 2025 § 4.4(II)(F). Moreover, detention standards require that the facility "replenish personal hygiene items at no cost to the detainee on an as needed basis." *Id.* See also *Chandler v. Baird*, 926 F.2d 1057, 1063-65 (11th Cir. 1991) (allegation of confinement without toilet paper, soap, and toothpaste supported an Eighth Amendment claim); *Carver v. Knox Cty*, 753 F. Supp. 1370, 1389 (E.D. Tenn. 1989) (failure to regularly provide toilet paper and soap, among other things "constitutes a denial of personal hygiene and sanitary living conditions" violative of the Eighth Amendment).

Lack of Clean Clothing. Several detainees reported lengthy delays in the provision of clean clothing. "Maria" did not receive clean clothing for 15 days after she arrived at Ft. Bliss, leaving her to wear the same clothes.⁵³ "Michael" reported that he had been in the same clothes for one month, as his clothing was taken away for laundry several weeks before, and not returned. He never received new clothes, despite filing three complaints about the issue, which received no response.⁵⁴ "Ulises" reported that he was informed that laundry is supposed to take place once per week, but the facility will go two to three weeks without being able to do laundry.⁵⁵ ICE Detention Standards require that all facilities provide detainees with clean clothing. "Socks and undergarments will be exchanged daily, outer garments at least twice weekly and sheets, towels, and pillowcases at least weekly." NDS 2025 § 4.4(II)(E). See also *Benjamin v. Fraser*, 161 F. Supp. 2d 151, 178 (S.D.N.Y. 2001) (noting that detainees are constitutionally entitled to clean clothing).

Squalid Tents and Lack of Cleaning Supplies. Conditions in Ft. Bliss's tent units are squalid and fetid, without the provision of sufficient cleaning materials.

⁵¹ Exhibit K, Declaration of "Frank," ¶ 10, Nov. 2025.

⁵² Exhibit G, Declaration of "German," ¶ 9, Nov. 2025.

⁵³ Exhibit J, Declaration of "Maria," ¶ 7, Nov. 2025.

⁵⁴ Interview with "Michael," Oct. 2025.

⁵⁵ Interview with "Ulises," Oct. 2025.



Detained people at Ft. Bliss are held in tent units with bunk beds for 72 people positioned closely together and a bathroom area with toilets and showers, shared by everyone in the unit.⁵⁶ Detainees note that the toilets are particularly unsanitary, with urine and fecal matter lining the bowls and the surrounding walls.⁵⁷ The area stinks of urine and feces.⁵⁸ In some units, individuals are given only one roll of toilet paper per day for all 72 people.⁵⁹ Often, across housing units, the excrement blackens the water from the bathroom area, which pools with the water that collects from the shower area, and floods into the area where meals are served each day. Detainees across six different housing units uniformly described water contaminated with sewage flooding the housing unit, including areas where detainees must eat.⁶⁰ “David” reported that “the shower drains do not work and constantly cause flooding” with water that is “filled with urine and fecal matter.” Detained people have made officers aware of this issue, but officers have not addressed it. While there is a barrier between the bathroom and dining area, it does not successfully block the water from spilling beyond the bathroom into the meals area.⁶¹ The flooring under the shower is made from non-waterproof wooden pallets that emit an “awful smell.”⁶²

Despite these filthy conditions, and even in the absence of cleaning staff, officers still fail to provide detained people with cleaning products. Detained people must often resort to wiping up the puddles of dirty water with their clothes, such as their underwear and socks, because they are not provided with towels or any other supplies to mop up the dirty water.⁶³ The fact that they are not provided any sort of cleaning solutions to clean the leakage of contaminated water into their dormitory increases the risk of disease outbreaks. Furthermore, the haphazard and ongoing construction of the detention center has caused sanitation issues. The vents “spit out dust,” which can be seen spilling onto the ground.⁶⁴

These conditions fall below constitutional and agency requirements. ICE Detention Standards require that “[f]acility cleanliness and sanitation shall be maintained. All surfaces, fixtures, and equipment shall be kept clean and in good repair. Suitable and sufficient cleaning equipment and supplies shall be available throughout the facility.” NDS 2025 § 1.1(II)(I)(2). “A sanitary environment is a basic human need that a penal institution must provide for all inmates.” *Toussaint v. McCarthy*, 597 F. Supp. 1388, 1411 (N.D. Cal. 1984); *Gates v. Cook*, 376 F.3d 323, 338 (5th Cir. 2004); *Ramos v. Lamm*, 639 F.2d 559, 569-70 (10th Cir. 1980) (finding constitutional violation where facility had “lack of routine maintenance and cleaning programs” and inadequate cleaning supplies).

⁵⁶ Exhibit O, Declaration of “Vincente,” ¶ 6, Nov. 2025.

⁵⁷ Exhibit D, Declaration of “Eduardo,” ¶ 6, Nov. 2025; Exhibit A, Declaration of “Isaac,” ¶ 8, Nov. 2025 (“The bathrooms were disgusting. The toilets were like the ones on airplanes that rely on air pressure. There was urine everywhere, including on the rims of the toilets and the floor. There was also fecal matter on the walls and rims of the toilets.”).

⁵⁸ Exhibit H, Declaration of “Camilo,” ¶ 12, Nov. 2025.

⁵⁹ Exhibit M, Declaration of “Elizabeth,” ¶ 7, Nov. 2025;

⁶⁰ Exhibit A, Declaration of “Isaac,” ¶ 8, Nov. 2025; Exhibit D, Declaration of “Eduardo,” ¶ 6, Nov. 2025; Exhibit G, Declaration of “German,” ¶ 5, Nov. 2025; Exhibit J, Declaration of “Maria” ¶ 4, Nov. 2025; Exhibit L, Declaration of “David,” ¶ 5, Nov. 2025; Exhibit N, Declaration of “Xavier,” ¶¶ 6-8, Nov. 2025; Exhibit P, Declaration of “Hernan” ¶ 7, Nov. 2025.

⁶¹ Exhibit L, Declaration of “David,” ¶ 5, Nov. 2025..

⁶² Exhibit A, Declaration of “Isaac,” ¶ 8, Nov. 2025.

⁶³ Exhibit D, Declaration of “Eduardo,” ¶ 6, Nov. 2025; Exhibit A, Declaration of “Isaac,” ¶ 8, Nov. 2025.

⁶⁴ Exhibit D, Declaration of “Eduardo,” ¶ 6, Nov. 2025; Exhibit X, Declaration of “Camilo,” ¶ 5 Nov. 2025.



5. Immigrants Are Held for Prolonged Periods in Frigid, Overcrowded Hold Rooms, Without Food.

Detainees at Ft. Bliss further report extended detention in the facility's "hold room" at intake, where they are held in frigid temperatures, without adequate food, for extended periods of time. These conditions violate ICE's detention standards and constitutional protections, as hold rooms are intended to be used only for a short period of time at intake. As ICE's National Detention Standards provide, "[a] detainee may not be held in a hold room for more than 12 hours," "[o]fficers shall provide a meal to any adult in the hold room for more than six hours," "[d]etainees shall be provided with basic personal hygiene items, e.g., potable water, disposable cups..." and "[s]taff shall ensure that sanitation and temperatures in hold rooms are maintained at acceptable levels." NDS 2025 § 2.5(II)(B), (II)(D)(3). Hold room conditions like those reported at Ft. Bliss can violate those standards and detainees' constitutional rights. *See Mercado v. Noem*, No. 25-CV-6568 (LAK), --- F. Supp. 3d ---, 2025 WL 2658779, at *29–30 (S.D.N.Y. Sept. 17, 2025) (noting unreasonable risk of harm from prolonged, abusive hold room conditions).

Several detainees reported unacceptably prolonged stays in a hold room. "Xavier" was kept in a hold room for three days.⁶⁵ "Quentin," and 42 others who arrived at the facility with him, were also detained in the hold room for two days.⁶⁶ Several more detainees reported that they were held overnight or for several days.

The frigid, overcrowded conditions in the hold rooms further violate detainees' rights. Several detainees described the hold room as a small room with no beds. One detainee estimated that the room would only have capacity for about 20 people. Detainees consistently reported that the hold room was overcrowded, indicating it was filled with anywhere from 20 to 100 people.⁶⁷ "Xavier" reported that the hold room was kept so cold that it exacerbated the pain caused by his suspected kidney stones, and other detainees consistently echoed the concern about the temperature of the room.⁶⁸

The extended detention in Ft. Bliss's hold room also forces those kept overnight or even for multiple nights to attempt to sleep there. Detainees who were held overnight consistently reported that there were no mattresses or beds made available, and they were forced to sleep on the hard floor during their time in the hold room. "Francisco" reported that the lights were always on during the entire three-day period he was held there.⁶⁹ The cold and overcrowding only make the conditions during overnight stays worse. "Noah" reported that detainees received only an aluminum blanket to protect them from the cold, and "David" reported sleeping on the floor while held in a single room with about 100 other detainees overnight.⁷⁰

Detainees also reported being cuffed for long periods during the intake process. "Quentin" reported that he was held with both his arms and legs cuffed for about 18 hours during the intake

⁶⁵ Exhibit N, Declaration of "Xavier," ¶ 5, Nov. 2025.

⁶⁶ Interview with "Quentin," Oct. 2025.

⁶⁷ *See* Exhibit L, Declaration of "David," ¶ 6, Nov. 2025.

⁶⁸ *See* Exhibit N, Declaration of "Xavier," ¶ 5, Nov. 2025.

⁶⁹ Interview with "Francisco," Oct. 2025.

⁷⁰ Exhibit F, Declaration of "Noah," ¶ 3, Nov. 2025; Exhibit L, Declaration of "David," ¶ 6, Nov. 2025.



process at Ft. Bliss.⁷¹ Before even making it to the hold room, multiple detainees reported being held in the bus that took them to Ft. Bliss while handcuffed. One detainee reported that they were left on the bus waiting for processing for eight hours without air conditioning in the middle of the Texas summer. They remained hand cuffed the whole time.⁷²

Finally, detainees held in the holding rooms are not provided sufficient food, a problem that is further exacerbated by their extended detention. Xavier reported receiving only bread and water for the three days he was in the hold room.⁷³ “Isaac” was held in the room from a Friday to a Sunday, but he was provided food only once during his entire stay: a small bag containing only a sandwich and some fruit.⁷⁴ “Quentin,” who was held for two days, reported that he received no food or water during that time; all he had to eat were the two small sandwiches that he was given during his 10 hours of travel before his arrival at Ft. Bliss.⁷⁵ “David,” who was also held overnight, received no food at all. He reported that the only source of water in the room, a water fountain, made people sick when they drank from it, so he avoided it and went without water as well for most of his time in the hold room.⁷⁶

6. Detainees at Ft. Bliss Are Held in Tents for Weeks, Without Opportunity for Natural Light or Outdoor Recreation.

Detainees at Ft. Bliss uniformly report that they are denied access to recreation and are held in squalid, cramped tents for up to weeks at a time. Not a single interviewee reported receiving daily recreation as required by the ICE National Detention Standards, and most reported going weeks or even months without seeing the sky. Although Ft. Bliss has an outdoor recreation area, it is not used consistently or according to ICE and facility policy. Several detained people noted that the facility has a posted schedule requiring nearly daily access to outdoor recreation but reported that this policy was not followed.⁷⁷ One detained person reported never receiving any outdoor recreation since arriving at Ft. Bliss. She had not seen the sun in over three months, and she was given access to indoor recreation only once. It took place in a room called “a library” that held no books.⁷⁸

Even those who experienced outdoor recreation reported receiving it infrequently, for short periods, and in covered areas. “Benjamin” described the officers only allowing outdoor recreation approximately every seventeen days for only about twenty minutes each time.⁷⁹ Multiple interviewees reported that it had been approximately a month since they had seen the sun.⁸⁰ Even when detainees are allowed recreation, the area provided is wholly inadequate. The outdoor

⁷¹ Interview with “Quentin,” Oct. 2025.

⁷² Interview with “Ulises,” Oct. 2025.

⁷³ Exhibit N, Declaration of “Xavier,” ¶ 5, Nov. 2025.

⁷⁴ Exhibit A, Declaration of “Isaac,” ¶ 9, Nov. 2025.

⁷⁵ Interview with “Quentin,” Oct. 2025.

⁷⁶ Exhibit L, Declaration of “David,” ¶ 6, Nov. 2025.

⁷⁷ Exhibit G, Declaration of “German,” ¶ 8, Nov. 2025; Exhibit X, Declaration of “Camilo,” ¶ 9, Nov. 2025.

⁷⁸ Exhibit M, Declaration of “Elizabeth,” ¶ 11, Nov. 2025.

⁷⁹ Exhibit B, Declaration of “Benjamin,” ¶ 10, Nov. 2025.

⁸⁰ Exhibit B, Declaration of “Benjamin,” ¶ 10, Nov. 2025; Exhibit G, Declaration of “German,” ¶ 8, Nov. 2025.



recreation area is essentially an enclosed box. The area is “sometimes very cold” and detained people “do not have long sleeves or warm clothing.”⁸¹

On the rare occasions when recreation is offered, it occurs irregularly and often at night.⁸² “Isaac” explained that there is “no consistent schedule for going outside.”⁸³ Detained people described having to beg the guards for access to outdoor recreation.⁸⁴ Officers will sometimes instruct detained people to go outside at 9:00 p.m. or 11:00 p.m. at night when it is cold.⁸⁵ Some detained people only see the sky when guards walk them from their tent to another tent for attorney visits.⁸⁶ The lack of fresh air and sunlight has had adverse psychological impacts. “Vincente” explained the “lack of fresh air and sunlight” was causing him and others to become stressed and anxious.⁸⁷ Another detained person said the inability to see the sun, even during outdoor recreation, makes him feel trapped and like he cannot breathe.⁸⁸

As the Supreme Court has held, exercise is a basic human need that must be provided under the Constitution. *Wilson v. Seiter*, 501 U.S. 294, 304 (1991). ICE’s National Detention Standards further require that “[i]f outdoor recreation is available at the facility, it shall be offered at a reasonable time of day. Weather permitting, each detainee shall have access for at least one hour per day, five days per week; or, six or more hours per week, at least four days per week.” NDS 2025 § 5.2.

For those held in isolated housing, or Special Management Units, ICE’s National Detention Standards require that “[d]etainees in the SMU shall be offered at least one hour of recreation per day, scheduled at a reasonable time, at least five days per week.” NDS 2025 § 2.9. Despite this, “Samuel” attested that when he was placed in the SMU, he was not allowed to see the sky for the entire period of about eight days when he was held in complete isolation in a cold, small room.⁸⁹ He had already gone two weeks without seeing the sky prior to his placement in the SMU.⁹⁰

7. Officers Deny Detainees Reasonable Access to Counsel and Legal Resources at Ft. Bliss.

Ft. Bliss systematically denies people in its custody reasonable access to counsel, in violation of ICE’s own detention standards and in ways that raise grave constitutional concerns. Across the facility, detainees are deprived of a functional law library, blocked from making confidential and reliable legal calls, and subjected to unreasonable limits on legal visitation.

ICE’s own standards require facilities to “permit detainees access to a law library, and provide legal materials, facilities, equipment, printing and copying privileges, and the opportunity to prepare legal documents.” NDS 2025 § 6.3. The standards further mandate that facilities “devise

⁸¹ Exhibit B, Declaration of “Benjamin,” ¶ 10, Nov. 2025; Exhibit A, Declaration of “Isaac,” ¶ 14, Nov. 2025.

⁸² Exhibit D, Declaration of “Eduardo,” ¶ 10, Nov. 2025.

⁸³ Exhibit A, Declaration of “Isaac,” ¶ 14, Nov. 2025.

⁸⁴ Exhibit G, Declaration of “German,” ¶ 8, Nov. 2025; Exhibit O, Declaration of “Vincente,” ¶ 13, Nov. 2025.

⁸⁵ *Id.*

⁸⁶ Exhibit D, Declaration of “Eduardo,” ¶ 10, Nov. 2025; Exhibit B, Declaration of “Benjamin,” ¶ 10, Nov. 2025.

⁸⁷ Exhibit O, Declaration of “Vincente,” ¶ 13, Nov. 2025; see also Exhibit A, Declaration of “Isaac,” ¶ 14, Nov. 2025 (“The lack of time outdoors hurts the functioning of our internal cycles and how we feel mentally.”).

⁸⁸ Interview with Yoel, Nov. 2025.

⁸⁹ Exhibit E, Declaration of “Samuel,” ¶¶ 17-18, Nov. 2025.

⁹⁰ *Id.* ¶ 18.



a flexible schedule to permit all detainees, regardless of housing or classification, to use the law library on a regular basis,” guaranteeing each person a minimum of five hours of access per week during reasonable hours. *Id.* Detainees must not be forced to sacrifice their already minimal recreation time to use the library, and requests for additional time, especially when facing court deadlines, must be accommodated whenever possible. *Id.*; see also *Bounds v. Smith*, 430 U.S. 817, 828 (1977).

Ft. Bliss is in full violation of this standard. Detainees uniformly report that no functional law library exists.⁹¹ Moreover, they have no access to printing or copying equipment to prepare legal documents or applications for relief. Detainees have access to tablets, but they contain no legal research tools, and the internet required to make use of tablets is frequently down.⁹² In theory, detainees can use the tablets to contact legal service providers. However, detainees are often unable to afford the cost of making calls because they must have available funds on their account to dial out. Moreover, there are usually only approximately six tablets available for the 72 detainees in each tent.⁹³ The failure to provide even the most basic legal resources denies detainees their right to access counsel and critically undermines their ability to defend themselves in immigration court proceedings.

Similarly, telephone access to attorneys at Fort Bliss is restricted, in direct violation of ICE’s own standards. ICE standards require that facilities provide “a sufficient number of telephones” that allow detainees to make legal calls privately and without being overheard. NDS 2025 § 5.4. Instead, detainees must place legal calls from shared tablets inside their tent using a PIN assigned during processing. “Quentin” reported that these tablets are in open areas, surrounded by guards and other detainees, making any legal call inherently non-confidential. Compounding this violation, detainees are often denied access to legal calls altogether because they do not have working PINs. “Vincente” reported that he, along with many others in his unit, never received a working PIN at processing. His request for a replacement went unanswered for over a month, leaving him completely unable to call an attorney during this time.⁹⁴

Attorneys also face unreasonable barriers to meeting with detainees. ICE’s detention standards require facilities to allow legal visitation seven days a week, including holidays, with at least eight hours of visitation on regular business days and four hours on weekends and holidays. NDS 2025 § 5.5. Despite this clear requirement, some members of the undersigned organizations have been turned away by guards during business-day visitation hours listed on the ERO website. Additionally, legal service providers offering pro bono representation report wait times of up to four hours to see clients, only to be told that detainees are “unavailable” due to count or lunch. In addition, facility officers have informed legal service providers that detained people often refuse

⁹¹ Exhibit J, Declaration of “Maria,” ¶ 12, Nov. 2025; Exhibit N, Declaration of “Xavier,” ¶ 11, Nov. 2025; Exhibit H, Declaration of “Camilo,” ¶ 13, Nov. 2025; Exhibit D, Declaration of “Eduardo,” ¶ 13, Nov. 2025; Exhibit G, Declaration of “German,” ¶ 12, Nov. 2025; Exhibit A, Declaration of “Isaac,” ¶ 17, Nov. 2025; Exhibit B, Declaration of “Benjamin,” ¶ 12, Nov. 2025; Exhibit E, Declaration of “Samuel,” ¶ 11, Nov. 2025; Exhibit M, Declaration of “Elizabeth,” ¶ 11, Nov. 2025 (“Elizabeth” noted that a small physical “library” recently opened, but it contains no books or ability to look for information about her case. She was only taken there one time for as a type of “recreation.”).

⁹² Exhibit H, Declaration of “Camilo,” ¶ 13, Nov. 2025; Exhibit L, Declaration of “David,” ¶ 13, Nov. 2025, Exhibit E, Declaration of “Samuel,” ¶ 12, Nov. 2025.

⁹³ Exhibit H, Declaration of “Camilo,” ¶ 13, Nov. 2025; Exhibit L, Declaration of “David,” ¶ 13, Nov. 2025, Exhibit E, Declaration of “Samuel,” ¶ 12, Nov. 2025.

⁹⁴ Interview with “Quentin,” Nov. 2025; Exhibit O, Declaration of “Vincente,” ¶¶ 17-18, Nov. 2025.



legal visits because they are not provided with food, water, or bathrooms while waiting for an attorney visit and that if they miss a meal or medication distribution while waiting for a visit those meals or medications would not be made up. In at least one instance, a detained person was not notified by officers that an attorney had scheduled a legal visit with him, but the attorney was told he had refused the visit.⁹⁵

Facility protocols for attorney visitation change frequently, leading to new restrictions that do not accord with detention standards. At times, officers have instructed legal providers that they are limited to ten daily visits per organization. Officers have also informed legal providers that they are limited to only one pre-representational meeting of one hour with a prospective client, and that attorneys must file a Form G-28 for any subsequent meeting. These restrictions not only restrain providers' ability to consult and meet with potential clients, they are also flatly inconsistent with ICE's own rules. Indeed, ICE detention standards explicitly provide that neither attorneys nor legal assistants are required to file a G-28 to visit a detainee for consultation purposes, and it authorizes no numerical limits on pre-representation visits. NDS § 5.5. By imposing these barriers, Fort Bliss arbitrarily restricts attorneys' and legal service providers' ability to assess cases, meet with clients, and establish representation.

Taken together, the lack of legal resources, the absence of confidential phone access for attorney calls, and the improper limits on legal visitation at Fort Bliss show a systemic failure to comply with agency standards, as well as legal and constitutional requirements. Indeed, the Fifth Circuit has long recognized that the First Amendment protects the legal communications of people in detention. *Brewer v. Wilkinson*, 3 F.3d 816, 825-26 (5th Cir. 1993). Courts have likewise held that "conflicting and nearly-impossible-to-follow instructions on the availability of legal visiting hours," alongside other barriers, can have the "cumulative effect of denying [individuals in detention] constitutionally sufficient access to legal assistance" in violation of the Fifth Amendment's Due Process Clause. *Innovation Law Lab v. Nielsen*, 342 F. Supp. 3d 1067, 1080-81 (D. Or. 2018). Similarly, in *Torres*, the court found that a combination of restrictions on immigrant detainees' telephone access, difficulties in accessing legal mail, and interferences with in-person meetings was "tantamount to the denial of counsel." *Torres v. DHS*, 411 F. Supp. 3d 1036, 1060 (C.D. Cal. 2019).

C. Recommendations

In light of these abuses, ICE and the Department of Defense should end the detention of immigrants at Ft. Bliss. We further urge an immediate halt to third-country removals of detained people from Ft. Bliss and a thorough investigation into the circumstances of these removals.

We appreciate your prompt attention to these very serious matters, and the opportunity to meet and discuss these issues. For more information, please contact Eunice Cho at echo@aclu.org; Savannah Kumar at skumar@aclutx.org; Angélica César at cesara@hrw.org; and Charlotte Weiss at cweiss@texascivilrightsproject.org.

⁹⁵ Exhibit D, Declaration of "Eduardo," ¶ 23, Nov. 2025.



Sincerely,

American Civil Liberties Union
American Civil Liberties Union of New Mexico
American Civil Liberties Union of Texas
Estrella del Paso
Human Rights Watch
Las Americas Immigrant Advocacy Center
New Mexico Immigrant Law Center
Texas Civil Rights Project

EXHIBIT 2



New Mexico Texas



TEXAS
CIVIL RIGHTS
PROJECT

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EXHIBIT A

"Isaac"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 43 years old and from Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 17, 2025.
4. Before I was detained by ICE, I lived in [REDACTED] Florida. I was a subcontractor and made deliveries for Costco and Lowes. I lived with the mother of my daughter and with my daughter. My daughter is five years old. When I lived with her, I enjoyed going to the park and the beach with her. We would watch TV together. I enjoyed doing everything with her.
5. At East Montana, I am held in the D-5 unit currently. I have been in the D-5 unit for approximately six days, since approximately Thursday, November 6, 2025. There are about 35 to 40 people in the D-5 unit. I used to be in the B-3 unit, but I was moved to D-5 unit because I am currently sick with the flu. I have been told that I will be moved back to B-3 when I recover.
6. The D-5 unit is supposed to be for people who are sick and need medications. However, there are people who have been in the D-5 unit for several days who haven't gotten their medications. There are also people in D-5 who are not sick. There are about eight people who seem healthy. I worry that those healthy people might get sick by staying around sick people in D-5. No one comes to clean the unit and it is in a similar dirty condition as B-3.
7. It has been approximately two weeks since I have seen the sky. While being in D-5 we have only been taken out to recreation once and it was for about an hour. Recreation takes place in an enclosed and covered area.
8. There were about 76 or 80 people in the B-3 housing units. The bathrooms were disgusting. The toilets were like the ones on airplanes that rely on air pressure. There was urine everywhere, including on the rims of the toilets and the floor. There was also fecal matter on the walls and the rims of the toilets. The dirty water from the bathroom would get into the dining area. The water was sometimes blackened from the things in the bathroom and that blackened water is carried to the dining area. The flooring for the

bathroom is made of wooden pallets and it emits an awful smell like there is fungus or mold growing. The puddle of dirty water was there every day. There is a barrier between the bathroom and dining area, but it does not block the water. We would often have to wipe the puddles with our clothes because we do not have towels or other supplies to mop up the dirty water.

9. When I was first transferred to East Montana, I arrived by bus with about 40 or 45 people. The bus was full. My legs and hands were cuffed with metal cuffed. We were put in a room with benches. I was there in the room with the benches for over 24 hours. There were no beds and I slept on the floor. It was very, very cold. There were about 20 to 30 people at a time inside that same room. I arrived on or around a Friday and I was held there until around Sunday, which is when I was finally taken to my tent. For the entirety of that time, I was given just one bag with a small sandwich and some fruit to eat.
10. Since I have been detained at Camp East Montana, I have struggled with high blood pressure. I have had high blood pressure since approximately 2021. In approximately 2023, I had a stroke. I was taking a medication called something like Lisinopril before I was detained. The facility should know I have high blood pressure because I told them about it soon after I arrived here. I did not receive medication for high blood pressure for approximately a month after I arrived here. I don't think I received any medication for high blood pressure until approximately September 20, 2025. During that time, my vision would blur and I would get a lot of headaches. I could tell my blood pressure was jumping way too high. Even after they started giving me the medication, Lisinopril, it has not been given to me on the correct schedule. It is supposed to be taken in the morning, but they often give it to me in the afternoon or evening. Right now at this very moment I also feel like I have very high blood pressure and I have not received blood pressure medication. I also have a headache.
11. About two weeks ago, a doctor prescribed me new medication that I believe is called something like diuretic, but they have still not given it to me.
12. I have been to the medical tent, including approximately last Wednesday. I go there because they take me to measure my blood pressure. Every time I go, I see them shredding a lot of paper. I don't know what the documents are, but I see them shredding documents.
13. Other people have also had problems with medical care. I saw one person whose blood was coagulating in his arm and it looked like his arm was going to pop. That person was telling the guards that he was not feeling okay. He told me the guards beat his swollen arm while he was in that condition. In fact, the guards told him that he had two choices, he could either go outside for recreation or go to the SHU. However, he didn't want to go to recreation because he was feeling unwell. In response, he told me that the guards grabbed him by the neck and choked him and the guards hit him in the eyes on his face.

14. This place seems designed to wear you out. There is no consistent schedule for going outside. I have gone multiple weeks at times without going outside. Sometimes, officers will tell us to go outside at 9 p.m or 11 p.m. when is cold outside. The lack of time outdoors hurts the functioning of our internal cycles and how we feel mentally.
15. The schedule for meals is also inconsistent. There are times when we don't get meals for the entire day. We will sometimes just get a random bag at 11 p.m. that is filled with minimal food, like a sandwich and two mandarins. We were also once given rotten juice to drink for a week. There are many people with special dietary needs and it does not seem like they are getting what they need. In the B-3 unit, there are approximately two diabetics, some people who are lactose intolerant, a vegetarian, approximately two who are on low sodium diets for blood pressure reasons, approximately two who require bland diets, and approximately two who are on kosher and halal diets.
16. There is a shortage of hygiene products here. We do not have enough shampoo or soap. There is very little toothpaste and people have to argue over who gets it. No one ever comes to clean the area. We ask for cleaning products to see if we can clean for ourselves, but we are not given the products we need to keep the space clean. These conditions have been so difficult. However, the guards do not respond to our written requests, or our requests when we ask in person. They only seem to respond if we protest.
17. I do not know of any library at this facility or any way to access legal resources. There is also no educational or religious programming that I know of or have had access to.
18. On a day approximately September 15-17, 2025, the guards used force against me because they tried to take me to Mexico and I told them I don't want to be taken there. The guards came into my housing unit and told me I was going to be deported. When I asked them where, they told me I will be taken to Mexico. I told them "no," at which point those guards left. However, they came back with about 30 other guards. Outside in the hallway, the guards started beating on me.
19. The guards hit my head. They slammed it against the wall approximately ten times. Also They squeezed and twisted my ankles. The guards also grabbed and crushed my testicles between their fingers, which was very painful and humiliating. I felt like I was being sexually assaulted. After the guards slammed my head against the wall, I had severe pain behind my ears. I couldn't even touch the left side of my head for about a month because of the pain. The guards seemed to be trying to not leave visible marks on me. Other detained people tried to help me when I was beaten, but one of them was so severely beaten that he ended up in a wheelchair himself.
20. Then they took me to a separate room. It seemed like a punishment room. ICE agents then went into that room and told me to cooperate. They told me I have to be well

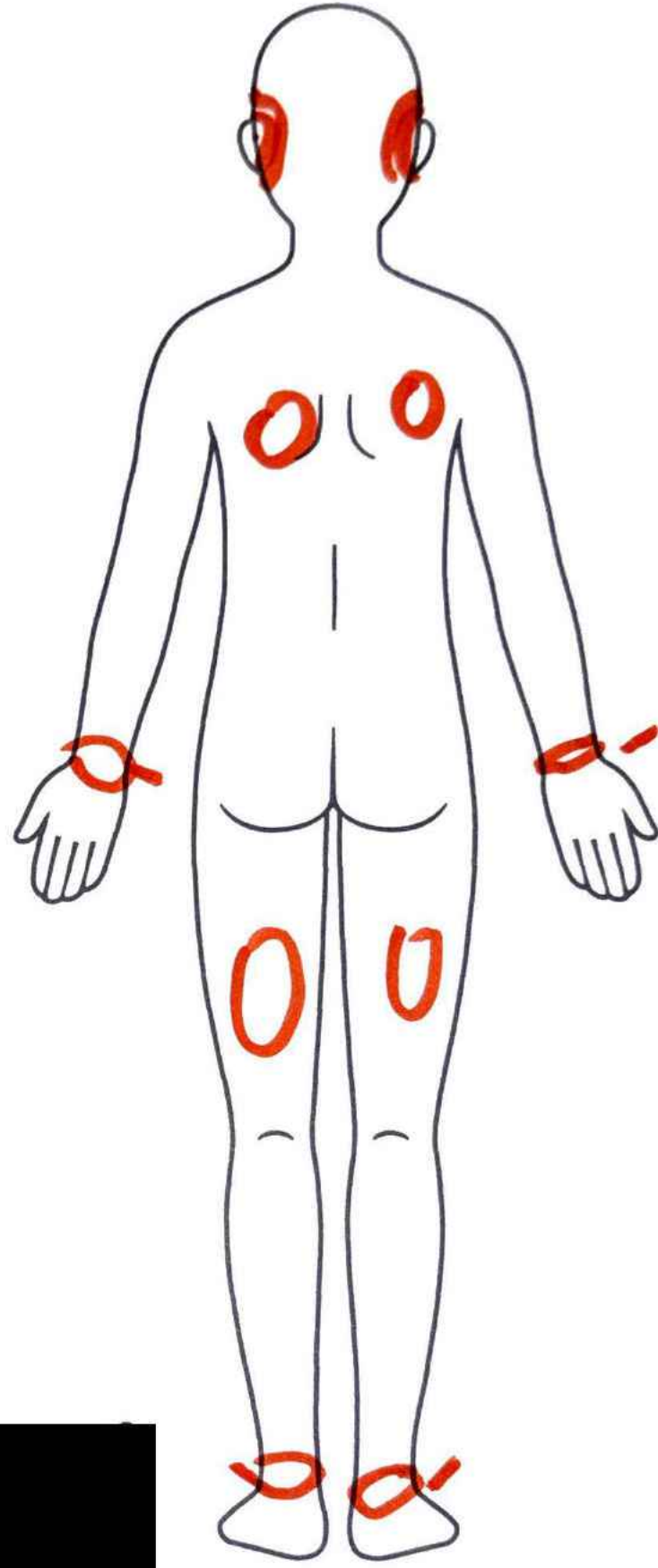
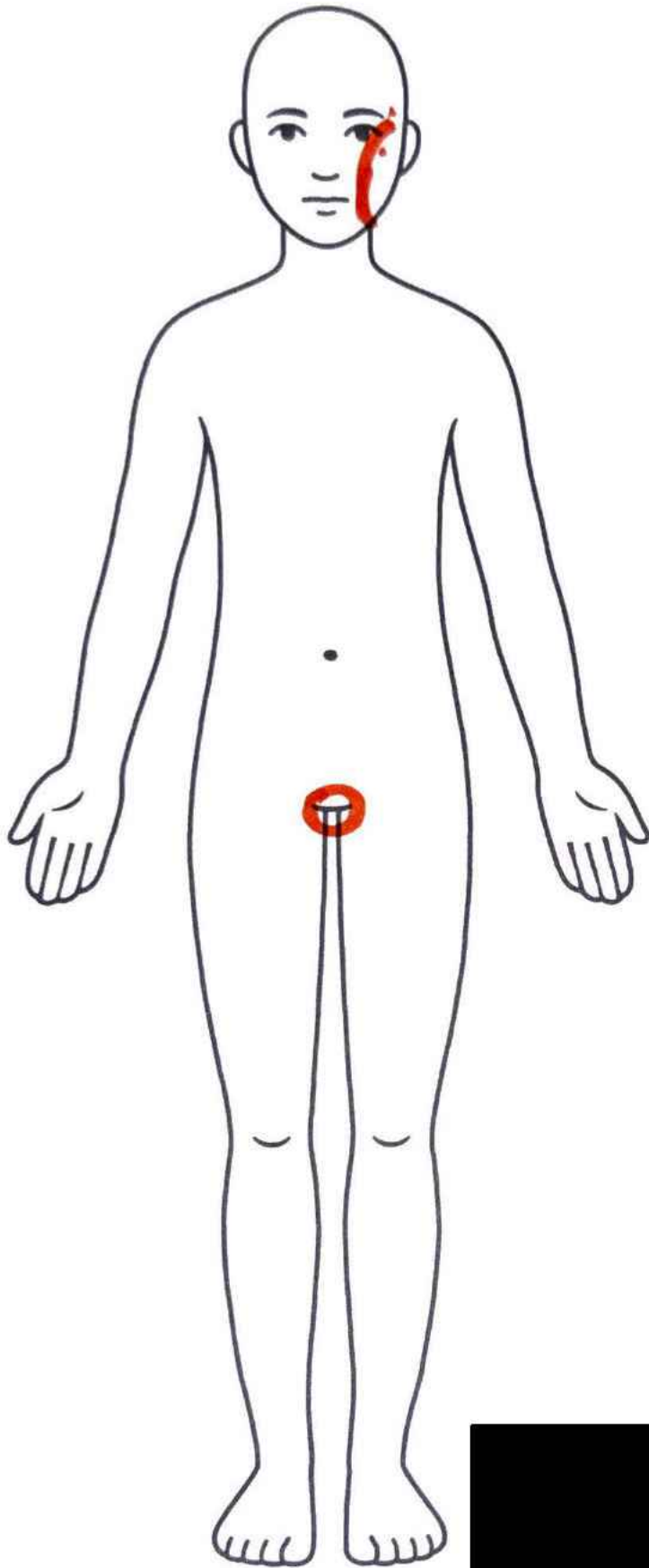
behaved and to change clothing. They told me no matter what I am going to be taken to Mexico.

21. From there they took me with about 20 people on a bus to what they said was Mexico. We were all cuffed with plastic cuffs. The cuffs were very tight and they hurt.
22. When we arrived to what I understand to be the Mexican side, there were about 15 to 20 masked people. Only their eyes were visible. One of the masked people came onto the bus and announced to us that people who want to get off the bus could get off the bus and people who want to stay could stay. A guard told us that our countries don't accept us, so Mexico is a good option and that if we don't want to go to Mexico then we would either be sent to a jail cell in El Salvador or to Africa. They tried to pressure us to go to Mexico by threatening us in these ways.
23. Then, after I refused to go to Mexico, they brought me back on the bus. Just two people came back on the bus with me: a Nicaraguan man, and another Cuban man. The rest went to Mexico.
24. Again on or around October 22, 2025, around three ICE representatives came into my unit told me that since I am Cuban and Cuba will not accept me, they will deport me to Mexico. They tried to get me to sign papers that require fingerprints. These papers would give them consent to send me to Mexico. I told them not to bother and that I will never sign them. They put me back in my unit after that.
25. I am scared of being taken to Mexico again. My fear is that one day they will take us on a bus and they will put bags over our heads and they will drop us in the middle of the desert to fend for ourselves.
26. I am attaching a true and correct copy of a picture to this declaration with red markings that I made myself on November 12, 2025. The red markings indicate the places where I was hurt by guards on approximately September 15-17, 2025 when they attempted to take me to Mexico.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the th of NOVEMBER, 2025 in El Paso, Texas.

Signature: _____



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On [REDACTED] I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED] detention, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true,

[REDACTED] also gave me verbal consent to sign on his/her behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:
NAME:

[REDACTED]

Date:

[REDACTED]

2025

EXHIBIT B

"Benjamin"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 49 years old and from Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 16, 2025.
4. Before I was detained by ICE, I lived in Orlando, Florida. I have been living in the U.S. for 32 years. I worked as a hibachi chef for approximately 14 or 15 years. Before that, I worked in construction as frame carpenter. I have one son who is approximately fifteen years old. He is a U.S. citizen.
5. Approximately one week after I arrived at this facility, over the course of a week, guards called me out approximately four times to intimidate me into signing something like a voluntary deportation document. They threatened me by saying I have a bad record and the only solution is to go to Mexico. They said they would handcuff us, put bags over our heads and send us to Mexico. I refused to sign the papers. Approximately all four of the times I was pulled out, the officers told me that if I don't agree to go to Mexico, they will send me to Sudan in Africa, or to El Salvador, or to Guantanamo Bay. I told them I am not a Mexican citizen. I told them my whole family lives here. I am scared to go to Mexico because I am not from there. I also believe that there is kidnapping near the border area and that people could get robbed or killed there.
6. Approximately two weeks after I arrived at this facility, two border patrol officers who were women called me out and told me that a judge had submitted an order for me to be deported to Mexico. When I asked for the document of the order, they told me that they can't show me the document. Regardless, they put us on a bus to take us to the border. Six of us said we don't want to be sent to Mexico and twelve people seemed to say they would go to Mexico. They put the six of us who didn't want to go to Mexico at the back of the bus, but the driver said he still had to take us to Mexico to show the government that they had tried to take us there. My wrists and feet were cuffed and chained to the front of my body with a restraint on my waist.
7. When we got to the border crossing, there was one bus on the U.S. side and one bus on the Mexico side. I was on the bus on the U.S. side. The bus on the Mexican side is for those who go to Mexico to go farther in. The twelve people at the front of the bus got off.

I have not seen them again. Approximately seven masked men who looked like military men, but without badge numbers showed up. They got onto the bus that I was still on. When they couldn't succeed in intimidating me and the others who were still on the bus, they left. I was later brought back to the unit where they continued threatening me about taking me to another country. These threats feel like mental torture.

8. Approximately a week ago, guards told me that Cuba will never accept me, but Mexico will accept me. They told me if I don't sign the document, they would send me to a prison in the heart of Arizona and that I'd have four months in prison and then they would send me to Mexico anyway.
9. I have been here for approximately three months and I have been sick approximately four times already. Approximately a week ago, I got the flu. I had a fever for approximately four days. I couldn't even get out of bed. I was not eating. I could not handle it anymore, so I started knocking on the door and they took me out. Then they moved me from D-1 to D-5. There were about eight people in D-5. Six people in D-5 had the flu and two had COVID. I know this because they gave us tests and told us what we have. They mixed the eight of us together even though we have different sicknesses. It took me two days before they gave me any medication, which was what I believe to be an antiviral.
10. The officers only take us outside approximately every 17 days for only approximately 20 minutes. The outdoor area in an enclosed space, it's like an enclosed box. It is sometimes very cold out there and we do not have long sleeves or warm clothing. We are not able to see the sun from there. It has been approximately a month since I've seen the sun, besides when I saw it just now when I was walking to this attorney visit.
11. There is a lot of dust in the housing areas we are in. From the dust, I wake up each day with a sore throat, phlegm, sinus pains, and I have suffered from bloody noses. This place is still under construction.
12. There is no law library here.
13. They don't seem to have enough food or medication or other basic resources for us here, but I hear they still want to bring more people to be detained here.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the th of November, 2025 in El Paso, Texas.

Signature: 

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish.

On November 11, 2025, I personally spoke with [REDACTED] and

read the foregoing declaration to him, translated into Spanish faithfully and

accurately. [REDACTED] affirmed that s/he understood my translation and that the

information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:

NAME:

[REDACTED]

Date: 11/1/2025

EXHIBIT C

"Abel"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I, [REDACTED] make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] am 51 years old and from Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 17, 2025.
4. Before I was detained by ICE, I lived in Miami, where I lived for about 30 years. I came to this country in 1994. For work in Miami, I was a car tow truck driver. I had been doing that for approximately 20 years. Most of my family is here in the United States. My mother is here and I have two grandchildren.
5. At Fort Bliss, I am held in the D-1 unit right now. The conditions are bad and they are treating all of us like animals. They have us sleeping on very thin mattresses where we are practically sleeping on just the metal frame.
6. About two weeks after I arrived at Ft. Bliss, guards called me out to sign documents and add my fingerprints to them. They told me that I would have 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 took us to the front office and locked us in a room. I did not leave the room because I understood that the guards would put me on a bus and take me to Mexico.
7. When I refused to leave the room, a guard grabbed me and slammed me down and it hurt me so much that I had pain on my back for approximately two weeks. The guard beat me just because I was refusing to be cuffed and taken to Mexico. The guards also beat several other people. The guards threw me against the floor and approximately 4-5 guards came down on me until they cuffed me. This caused pain to the back of my head.
8. I am attaching a true and correct copy of an image of the body depicting the injuries I suffered on the day the guards tried to take me to Mexico this first time. I marked on the outline of the body with red marker to show where I was hurt by the guards. I completed this drawing on or around November 12, 2025.
9. Then, the guards took me on a bus with approximately thirteen people to a part of the border called St. Terasa, which is here in 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

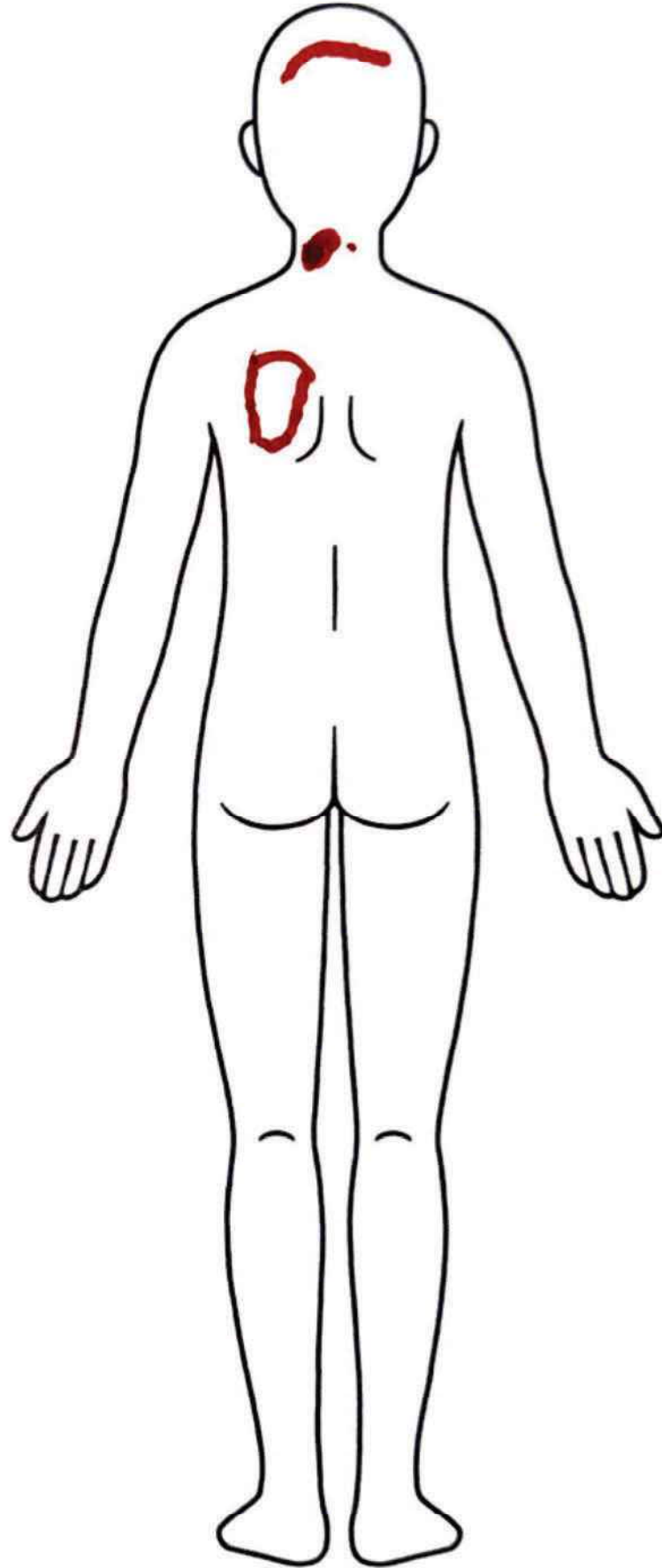
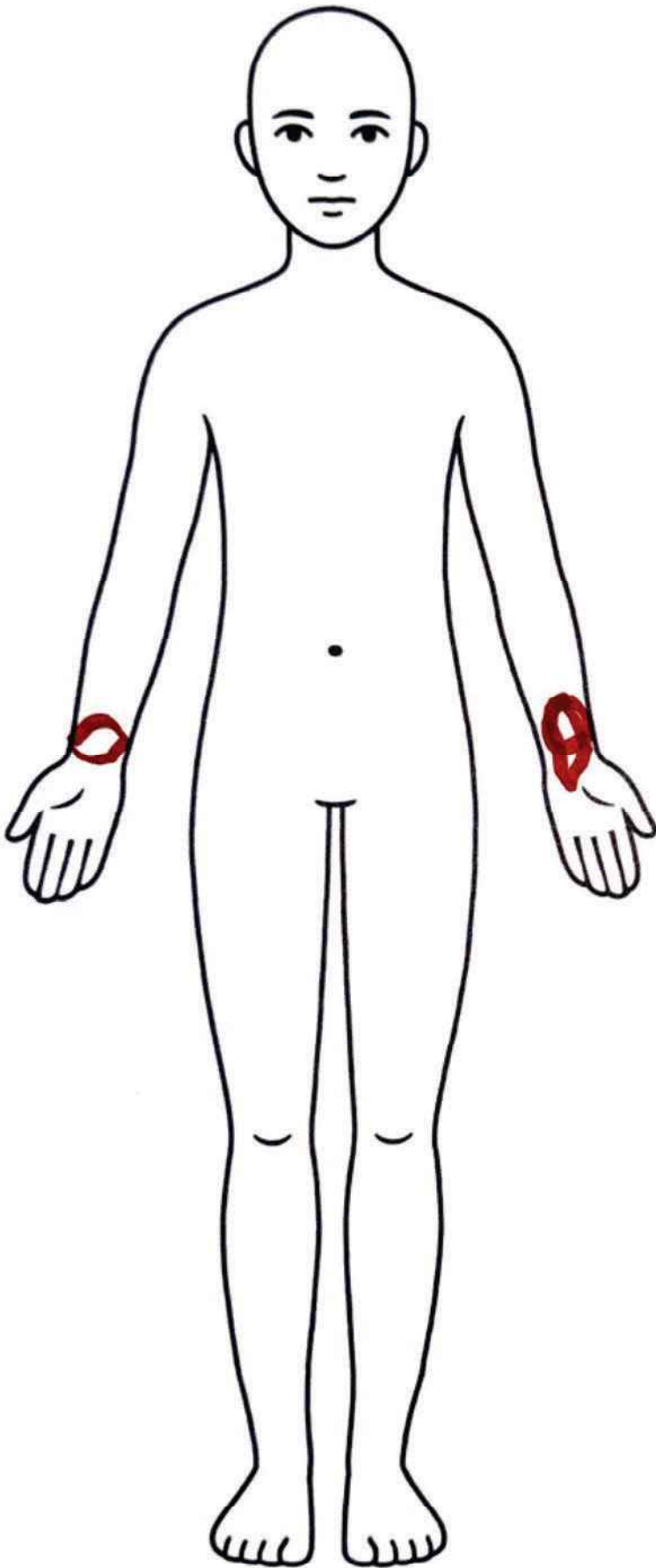
lot of pain because they had slammed me against the floor. The bus ride took approximately 40 minutes, but approximately an hour and a half or so on the way back because of traffic.

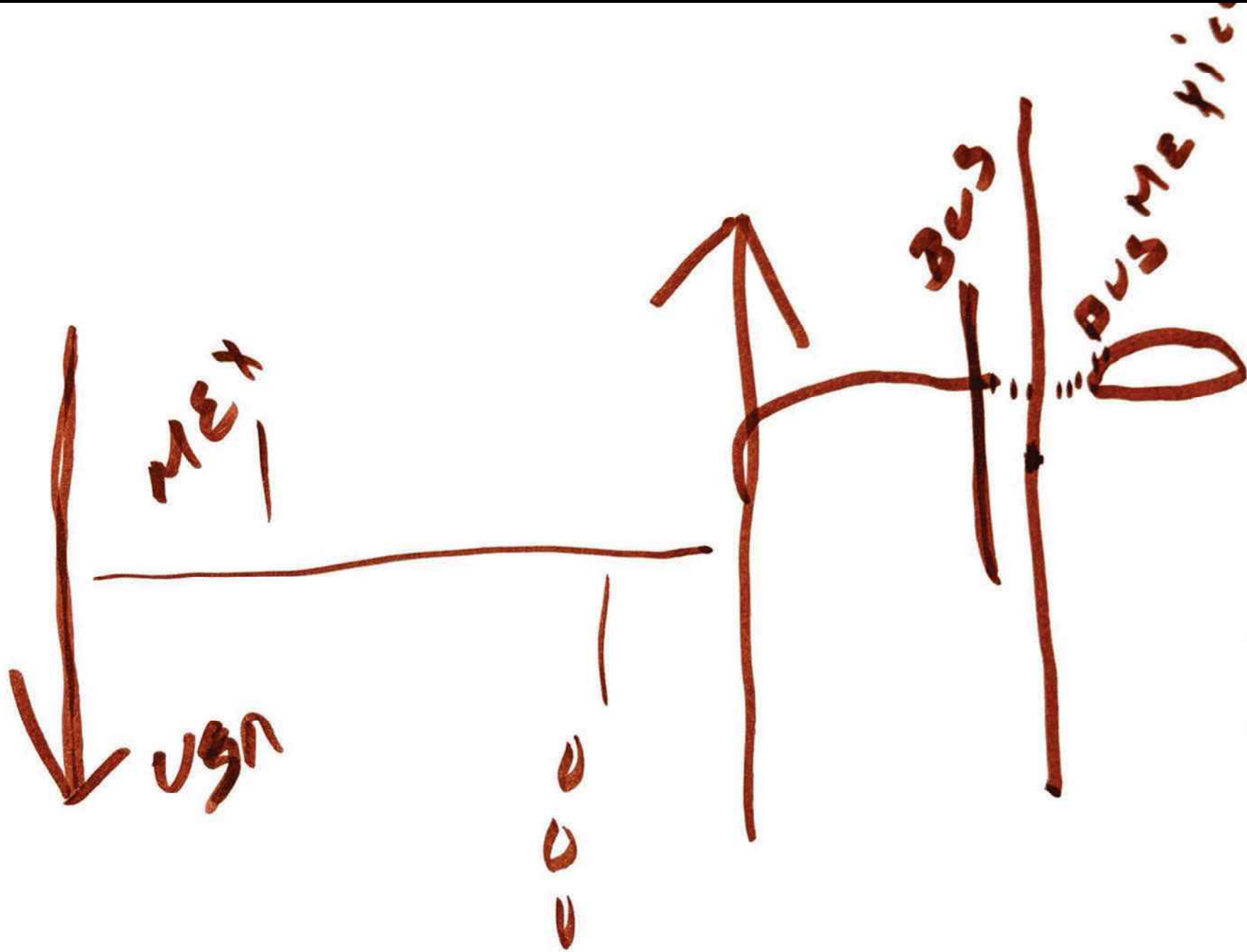
10. When we arrived at what I understand to be St. Tereasa, the guards took off our metal cuffs and put plastic cuffs on us. The area was on what appeared to be a large hill and it seemed high enough that my ears started to clog like when on an airplane. There were other people there who were wearing black masks on their faces with only a hole for their eyes. They told us to walk toward the Mexican bus. There was a bus to Mexico on one side and the bus back to the U.S. on the other. I started feeling very anxious at this point and I started yelling and screaming at the immigration guard in Mexico that this is a kidnapping and I don't want to be taken. The guard from Mexico then said that they don't want anyone who was going to be forced to go to Mexico. If I hadn't started kicking and screaming at that moment, I believe I might have been taken to Mexico. I was doing everything I possibly could to not be taken to Mexico.
11. I am attaching a true and correct copy of a drawing of my memory of the scene at St. Tereasa. It depicts the two busses: one going toward Mexico and the other going toward the U.S. I completed this drawing on or around November 12, 2025.
12. Out of the thirteen people who came with me on the bus, only four people returned with me. They left the plastic cuffs on my wrists, but they also put metal cuffs over them and tightened them even more than on the way to the border. My wrists hurt where the layered cuffs were.
13. I was so scared during that entire experience. Around the area where they brought us is where I believe trafficking of people happens.
14. Last week, the guards tried to take me to Mexico again. An ICE guard stood outside and called us. The guards came with materials for our fingerprints and signatures to consent to go to Mexico. I said "no" and that I was not going to sign. I told the guards that I was afraid for my life to be sent to Mexico and that I didn't want to be in a country of narcotraffickers. The guards told me they would deport me to a third-party country and would press charges against me. I told them I want to stay here. That time, I did not get on the bus. They continued to tell me that they would send me to jail and to a third country, like Africa, but I continued to tell them "no," and they put me back in my housing unit.
15. The experience of the guards trying to trick us to sign 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.
16. I am scared of retaliation for speaking about my experience here, but I believe the whole world should know what is happening here at Camp East Montana in El Paso and what has happened to me.

Everything in this declaration is true and correct to the best of my knowledge and recollection.
This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED] rd of December, 2025 in El Paso, Texas.

Signature: [REDACTED] _____





U.S. DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

Alien Name: _____

Alien Number (A #): _____

Date: _____

2025

NOTICE OF REMOVAL

This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) intends to remove you to Mexico.

CERTIFICATE OF SERVICE

I certify that, on today's date, the contents of this notice were read to _____ in the Spanish language, and I served the alien a copy of this notice in person.

Signature of Alien

Title and Signature of ICE Official

Date of Service

Time of Service

Name or Number of Interpreter (if applicable)

EXHIBIT D

"Eduardo"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am approximately 35 years old and my country of origin is Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 17, 2025. However, I was taken to the Otero County Processing Center for about two weeks after that date and then brought back here to Camp East Montana. However, the official bracelet that I wear still says my entry date at this facility was August 17, 2025. Things seem to have gotten increasingly worse here since that date and it keeps getting worse.
4. Before I was detained by ICE, I lived in Miami, Florida. I had lived there for approximately 10 years. I worked as an electrician. I have two companies. I lived with my wife. I have three children, all of whom were born in the United States and are U.S. citizens. I have a baby girl who is just about five months old. I also have two sons. One is about three years old and the other is about thirteen years old.
5. At Camp East Montana, I am held in Unit D-3. There are about 72-76 beds in the tent I am held in. Most of those beds are now filled, but it didn't start out that way.
6. The unit I am in is not clean and we are not usually given cleaning products to clean with. Everything feels dirty. We live in tents and the vents spit out dust and you can see it spill down onto the ground. The toilets are filled with urine and fecal matter. The walls and the floor around the toilets have fecal matter on them. Water from that area and from the shower area collects and that same dirty water leaks over to the area where we have meals. The flooring under the shower is made out of what seems to be a wooden pallet structure rather than something water-proof. There also don't seem to be any measures to prevent a fire from spreading here. For example, I don't see a fire extinguisher or any place for water to be sprayed if there is smoke.
7. Since I have been detained at Fort Bliss, I have faced many problems with medical care. I suffer from anxiety and blood pressure issues. The facility should know that I have this condition because I shared this information with officials when I arrived at this facility and I believe it is documented. I require a medication that sounds like Hydroxicin or Hydrozine for anxiety. I also require a medication that sounds like Enalapril for my blood pressure issues. I receive these medications inconsistently. I'll receive it one day and then not for four days and so on. The one I'm supposed to take in the morning, they

sometimes give it to me at 3pm. Hydorxicin is something I'm supposed to get earlier in the day but they give it to me between midnight and 3am. When I don't get medications on time, I feel bad. My blood pressure rises. I can't sleep because of the anxiety.

8. I don't receive timely medical attention here. For example, I have been having diarrhea since about October 24, 2025. I was supposed to receive medication for it, but I was told I couldn't receive it. I'm also concerned because sometimes they will give us different medications than what we are prescribed. We are supposed to fill out a document to request treatment, but our requests are largely ignored. When they do give us medical attention, it will often be five or six days later, and even then it seems to be just be one time or temporarily and then never again.
9. I did see medical staff at what appeared to be a general hospital after I was beaten by officials at this facility on about October 14, 2025. The hospital was about ten minutes away. I was transported to the hospital in an ambulance. I believe I received x rays and body scans. Though my hands feet were cuffed the entire time and a belt held me down, I felt I was treated properly there at the off-site hospital. Both sides of my ribs and my spinal column still hurt from that beating.
10. Since I have been detained at Fort Bliss, I have rarely had outside recreation. Now they only take us out at night in tents that have no opening on the ceiling. I have only seen the sky when I have come out to talk to you about this declaration. I last saw the sky on October 24, 2025. I saw it again today when I came here to complete this declaration.
11. It is difficult to stay clean and maintain hygiene while detained here at Camp East Montana. We do not receive enough hygiene products. Our clothes become dirty without a routine for washing them. We have no way to clip our nails. We must chew on our nails to shorten them.
12. The food here is so bad I hardly want to talk about it. It seems to just be getting worse and worse with time. Just seeing it might make a person vomit. I would not even feed the food we are given to the dog at my house. The food is frozen. When it defrosts, it becomes very liquidy. The food makes me feel sick almost every day. My stomach hurts. I often have diarrhea and sometimes vomit. Others in my unit also seem to be suffering with diarrhea and vomiting from the food.
13. I don't believe there is a law library at this facility. I do not know of any programs, such as religious or educational programs, that people can participate in here.
14. On or about October 14, 2025, I was beaten by guards here at Ft, Bliss. I was asking for the two medications I need, but the guards were not giving it to me. When I tried to get their attention, about six or seven guards started beating on me. They beat me on my ribs and my abdomen and the back of my head. There is still a large mark on my abdomen from it. I was cuffed and the guards started stomping on me until I lost consciousness. I

believe I was taken to the hospital then. After bringing me back, they took me to SHU, which is a punishment cell. I was left in SHU from about Tuesday, October 14, 2025 to about Sunday, October 19, 2025. I was in there for days without the medicine I had been asking for. When I was released on Sunday, I kept asking for my medication. The guards said "no," and when I kept asking them for it, about ten to twelve guards beat me again while I was cuffed. They threw me to the ground and my clothes were torn off me. I was left bruised and bloody. I was in such bad shape that I was taken to the hospital in an ambulance. I was at the hospital for several hours. I believe they scanned my body while I was there. I still have bruises on my arms, legs, and back, and abdomen. It still hurts.

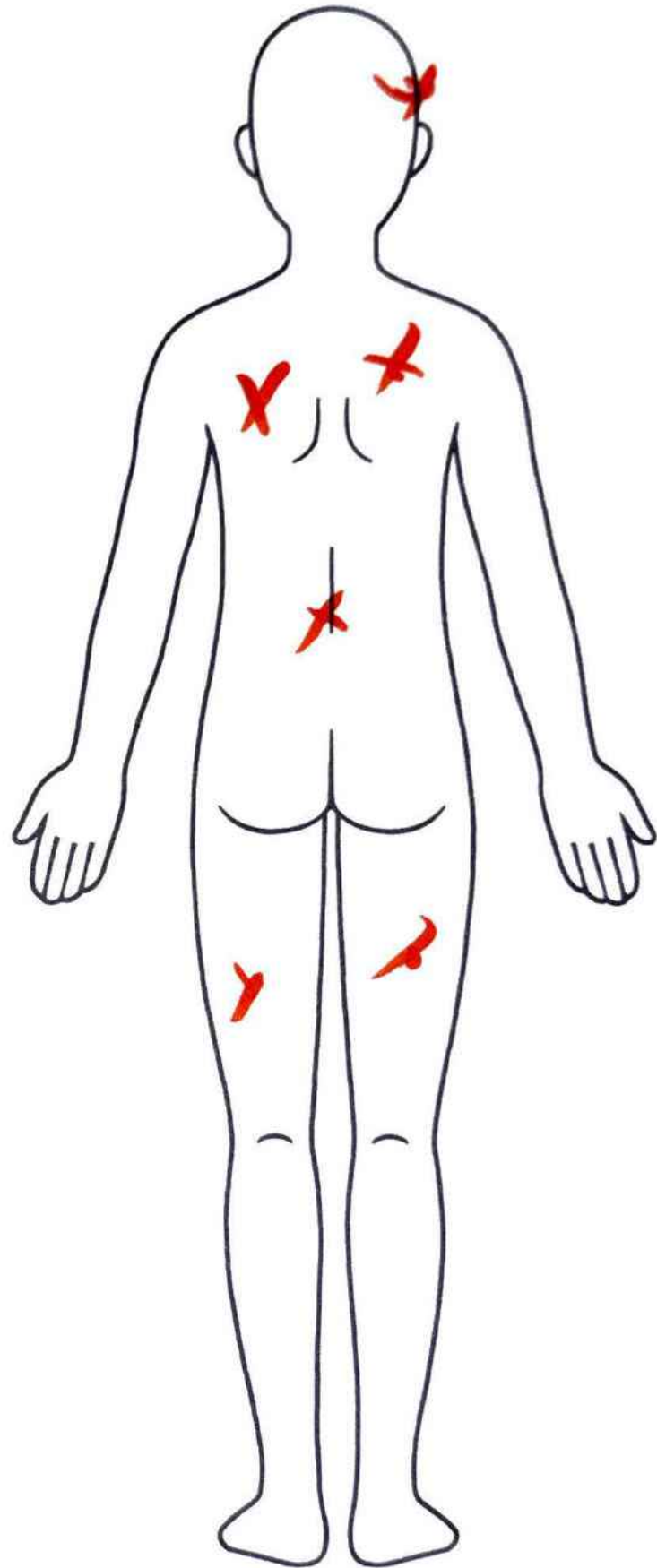
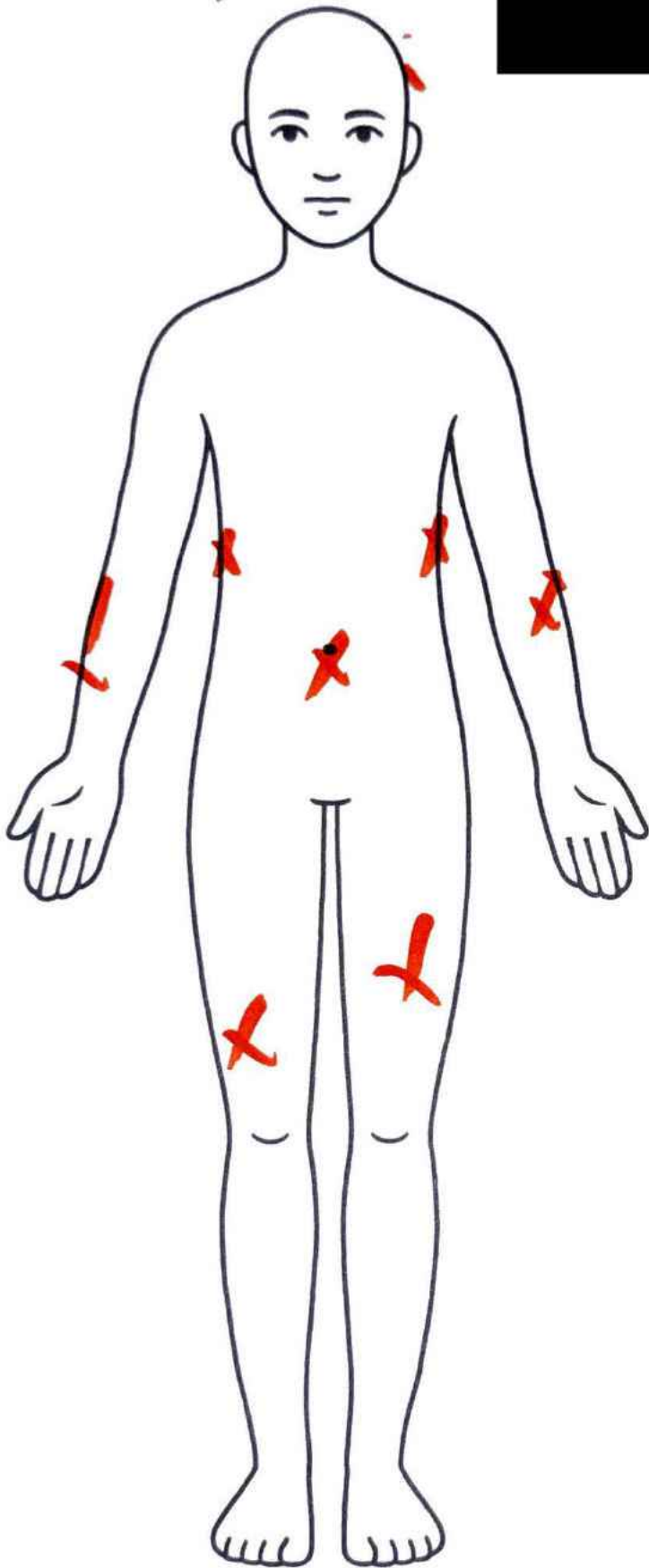
15. After I was beaten for the first time, I was held in solitary confinement from approximately Tuesday, October 14 to Sunday, October 19, 2025. There was a bunk bed in there, but no other furniture. It was about half the size of the attorney visitation room, which fits just three chairs around a small table. They never seemed to shut the lights off in SHU. If I had to use the bathroom, I had to ask the guards. I was not able to shower the whole time I was in there because I was never let out to shower. I had no communication with anyone the entire time I was in there, since I did not have access to a tablet or any other way to communicate. Supposedly there is supposed to be a panel to evaluate the circumstances of our confinement in SHU, but I had no access to it. I had no opportunity to challenge my confinement in SHU. There is also always the risk of retaliation here for trying to ask for our rights to be respected.
16. I am attaching a true and correct image to this declaration depicting the injuries I received from this first beating by the guards
17. On or around November 3, 2025, I again was requesting my medications, which I was not receiving as I should have. There was a medication cart that was coming around, but they did not come to me. I felt awful and felt that I needed the medications. When I asked for the medications, a group of guards came and started beating me. Two of them held me. They pinned me down on the floor. They cuffed me and started hitting me in the ribs. I felt humiliated that I would get beat like that just for requesting my medication. Lately, I've been scared to ask for anything because I'll just get beaten. I feel ostracized, like I am an animal. After they beat me, they again put me in SHU for about four or five days, around the 7th of November.
18. I am another two true and correct image to this declaration depicting the injuries I received from this second beating by the guards.
19. I'm not the only one who has experienced violence and harsh treatment by the guards here. I have witnessed other violence and harsh treatment by the guards toward others. When other detained people ask for things like medicine or food, they have gotten pepper sprayed. When people complain about the conditions here, they get sent to SHU.

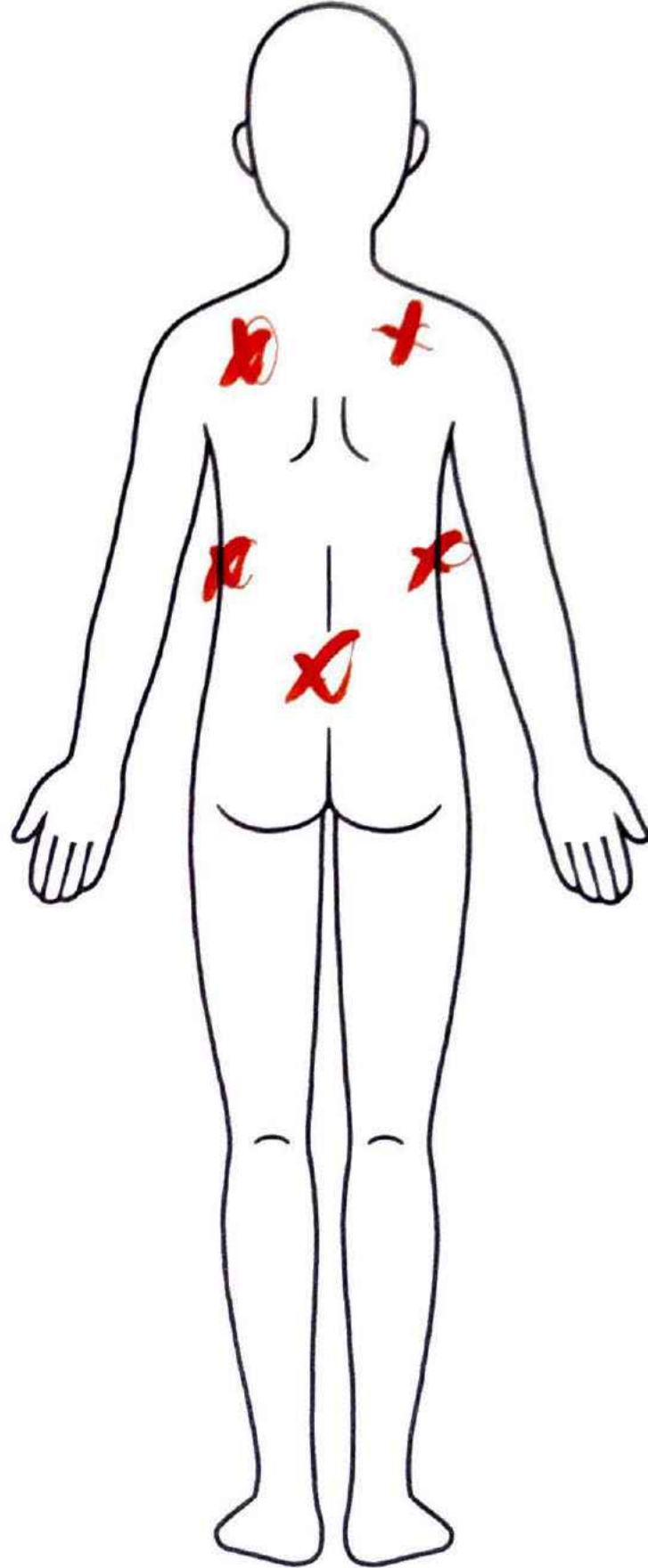
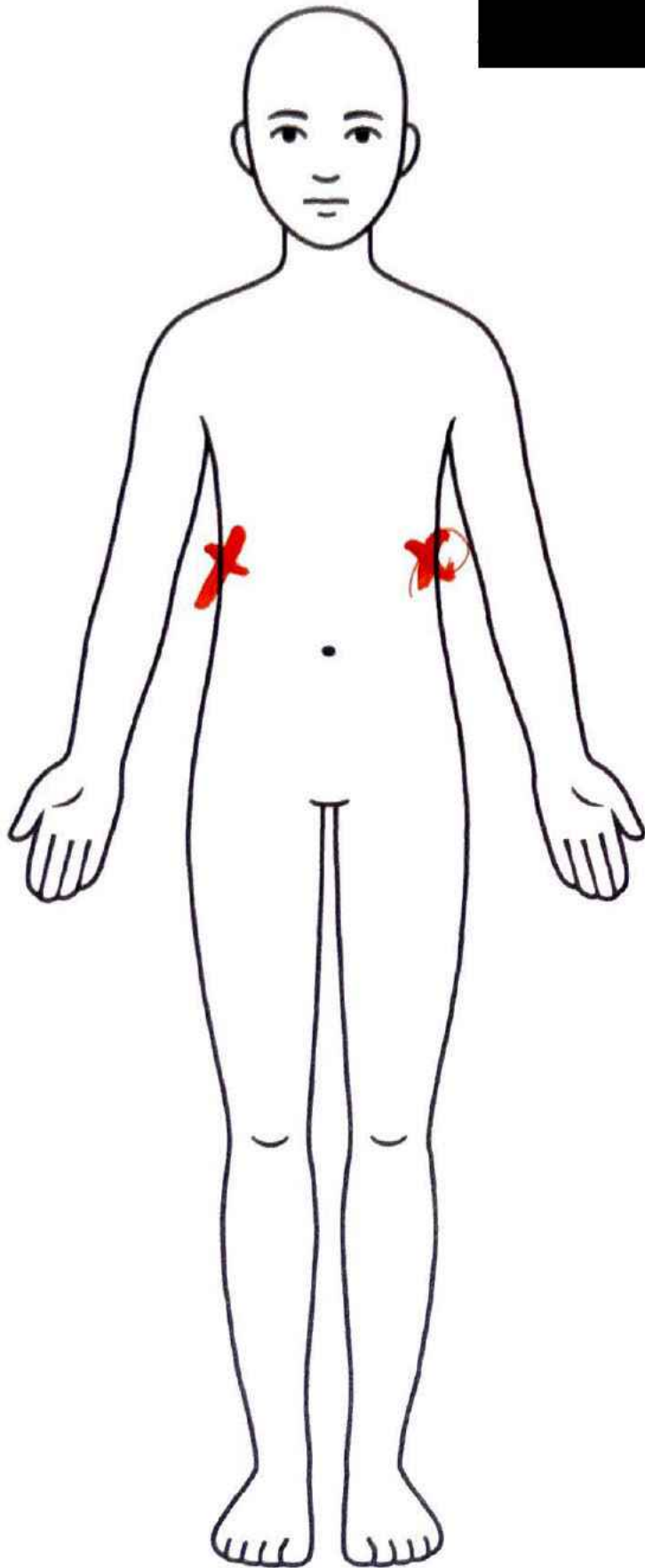
20. On at least two occasions, sometime in around September 2025 and around October 23, 2025, people working at this facility tried to remove me to Mexico. The guards told me "We're going to show you your family," but I never saw my family or had a chance to call them. Instead, they tried to remove me from the United States to Mexico. I am Cuban, and do not want to be sent to Mexico. I am scared to go to Mexico. I have never been there. I would fear for my life there.
21. On both occasions, which were around midday on both days, they put me and several other detainees in a truck to a place called St. Teresa. It takes about two hours from the detention center to get to St. Teresa. The first time, in September, there were about 24 to 25 people in the truck with me. On around October 23, 2025, there were about twelve other people with me in the truck: 10 Cubans and 2 Nicaraguans. The guards cuffed our wrists and ankles while we were in the truck. The people who put us on the truck and transported us worked at the detention center, but there were also masked people there when we got near the border wall. I don't think these masked people were from the detention center. They wore black masks with just one large eye hole. There was also one ICE representative. That person did not have his face masked.
22. When the guards took us out of the truck, they replaced the metal cuffs with plastic ones and then told us to jump over into Mexico. They told me they were going to charge me with federal crimes and I would never get out of this detention center if I did not jump. The masked people sometimes beat on people to get them to jump the wall even if they don't want to. I have seen other people get beaten up and forced to jump. But I did not jump. I do not want to be deported to Mexico. A lot of people, however, did end up jumping.
23. Yesterday, an attorney had a legal visit scheduled with me. I know this because she told me she scheduled a legal visit with me. No one told me I had a legal visit scheduled or that an attorney was here to visit with me. I was not asked to go out to a legal visit. I would ^{not} want to turn down a legal visit.
24. Whenever I am allowed to leave this place, I will be leaving it with a great deal of trauma from my experience here.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED] th of November, 2025 in El Paso, Texas.

Signature: [REDACTED]





ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On November [REDACTED] 2025,

I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately.

[REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED]

Date: 11- [REDACTED] -2025

NAME: [REDACTED]

EXHIBIT E

"Samuel"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 19 years old and from Venezuela. [REDACTED] is a pseudonym I am using for this declaration.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 20, 2025.
4. Before I was detained by ICE, I lived in Chicago, Illinois with my mom and my two younger siblings. I was studying and working there. Sadly, my mom died approximately four months ago from cancer. My father had abandoned me.
5. At Fort Bliss, I am held in the Bravo 2 unit. There are about 71 or 72 beds here. I was in unit Charlie 9 before. In my unit, Bravo 2 there are bunk beds throughout the room with five tables in the middle area where we eat. I spend approximately 24 hours a day in the dormitory each day.
6. Since I have been detained at Fort Bliss, I have rarely had outside recreation.
7. Since I have been detained at Fort Bliss, I have faced many problems with medical and dental care. I did not have an intake exam when I arrived here. I have had issues with my molars, such as my gums bleeding, and there is no dentist here. I have made about ten complaints about molar pain, migraines, stomach issues, depression, and anxiety. The doctor I saw on or about October 12, 2025, which was after I made those complaints, gave me a Tylenol and sent me away. I received nothing else. That appointment was not private.
8. It is difficult to stay clean and maintain hygiene while detained at Camp East Montana. We do not have soap to wash our hands or bodies.
9. The food is horrible and causes me to have diarrhea, gas, and acid reflux. For that reason, I usually just eat one meal a day.
10. Other people have problems with the food here. I know five to eight people who have had diarrhea, gas, and stomach aches because of the food.
11. There is no law library here that I know about.

12. We have electronic tablets here, however there is one tablet for every four people that we can use for limited times during the day. It's not clear how to access things like legal information on it, if there is a way to access it on the electronic tablets at all.
13. On or around October 17, 2025, I turned off a light on the way to the yard. That is what triggered an altercation with an officer who spoke Spanish. The officer started insulting me, and I sat down on the floor. After that, he called the second officer who came and they had an exchange in English that I did not understand. Then both of them tried to cuff me. I didn't know why they were trying to cuff me. Then the rest of the officers started piling onto me and using their bodies to block the security camera. Blocking the camera with their bodies is a tactic I have seen them do before with other detained people. Then, the officers body-slammed me and started to beat me. My front right tooth broke from the force of being slammed to the ground. Then, even more officers came. One of the officers grabbed my testicles and firmly crushed them. An officer forced his fingers deep into my ears. Since then, I have had a lot of trouble hearing out of my left ear. I can't hear as well now. After cuffing me, the officers pulled my fingers back very painfully, almost to the point that it felt like my fingers might break. The officers continued beating me. An officer then started punching into the side and front of my mouth at which point I bit down on it. I was in so much pain and I still have marks from the incident on my body.
14. I am attaching a true and correct copy of a drawing on which I marked using red marker to show the places where I believe the guards hurt me on or around October 17, 2025 as described in part in the previous paragraph. I made the markings on November 13, 2025. The drawing shows my injuries and areas of pain from the incident, which include: scratch marks from guards scratching me near my collarbone, bruising on the left side of my neck from the beating, pain in my fingers from guards pulling them back, pain near my legs and ribs from the guards kneeling and punching me. Pain around my testicles from the guards crushing them.
15. After a while, the officers stopped beating me. Then an officer held me up against the wall. I was dizzy and fighting to remain conscious. An officer started laughing at me quite a bit and making fun of the fact that I had chipped my tooth when I had been slammed to the ground. The guard told me I was like a little girl. Then, I believe three guards took me to the medical tent. My consciousness faded in the medical tent. When I regained consciousness, I was in an ambulance on the way to the hospital.
16. At the hospital, the medical staff gave me an IV drip and checked for broken bones. They told me that the guards had told them that the reason I was in the hospital is because I had gotten in a fight with other detained people. The medical staff gave me some sort of muscle relaxant. At that point, I had bruising on my back, chest, legs, and other injuries. My face was swollen and I had pain in my jaw. I couldn't really chew for a

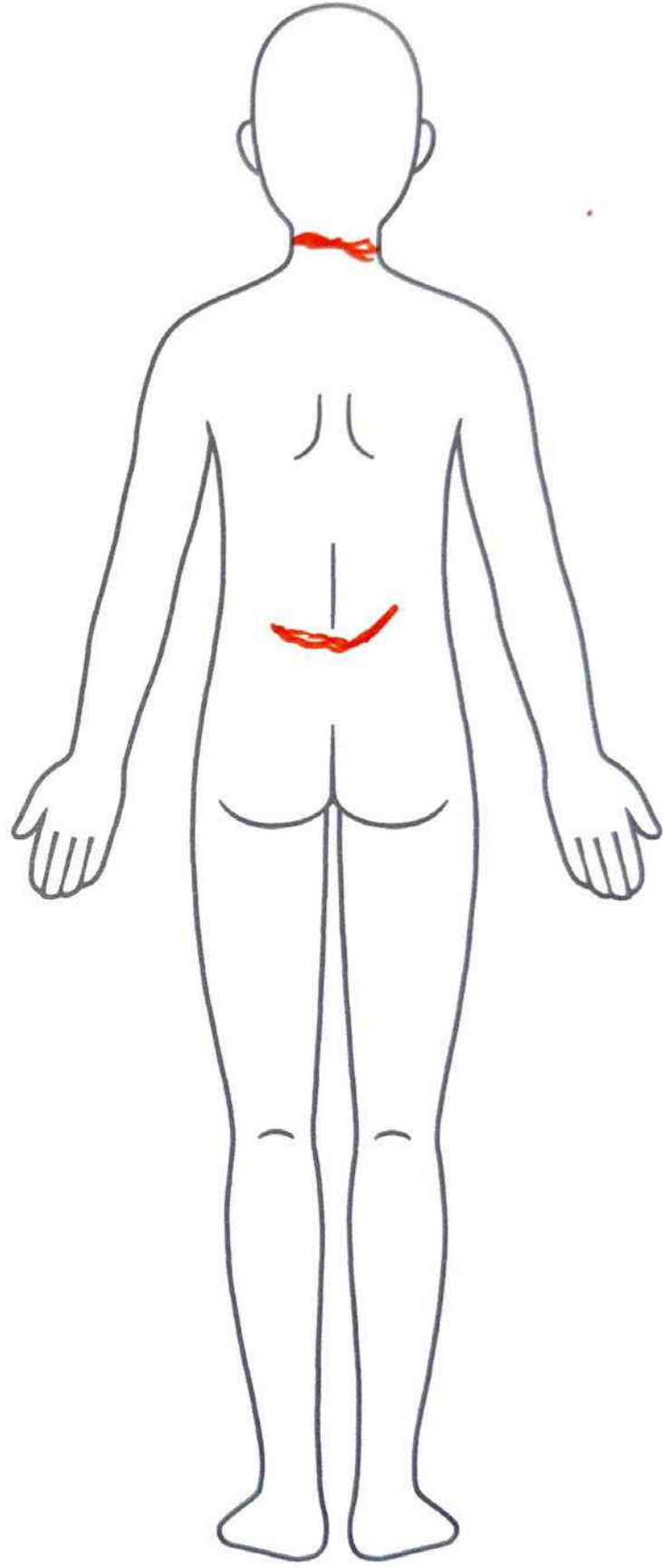
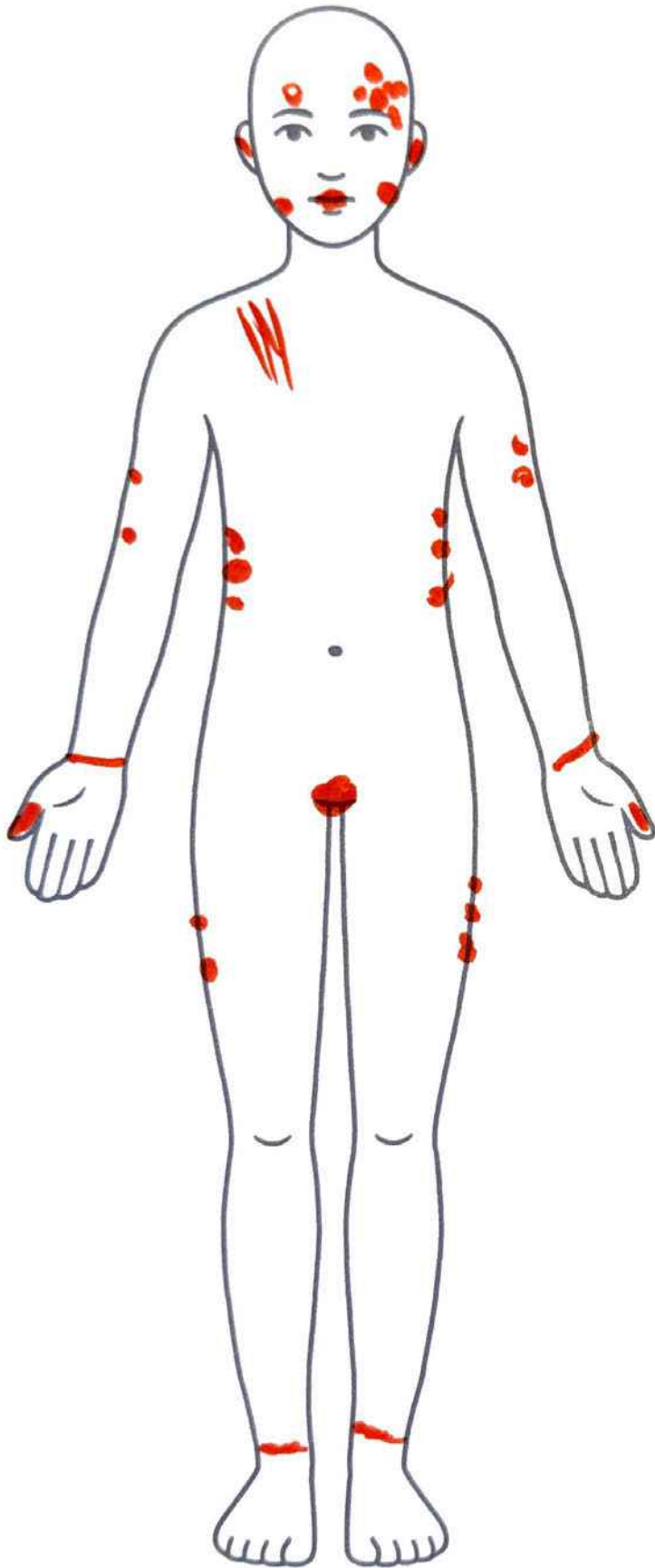
while. I also suffered ear damage and reddening around my ear. I was at the hospital from about 6:30 pm to 2 am.

17. After bringing me back from the hospital, the officers put me directly in SHU, also known as "the hole," or solitary confinement. It is also called a "center for discipline". I was kept there in isolation for about eight days without contact with anyone, even my lawyers, who I learned later were requesting calls with me. SHU is a small room with a bed and a toilet. It was intolerably cold. I had a hard time sleeping because of how cold it was. The blanket itched me rather than providing me with comfort. It needled and stung me when I put it around myself. The fabric would let out a lot of dust and some sort of residue because of the material it was constructed with. The toilet in SHU was already dirty when I got there. The water pressure would fluctuate. Sometimes the toilet bowl contents wouldn't go down and other times they would. There were times when the feces remained in the bowl and would not flush and I had to wait for the guards to come repair it.
18. I didn't see the sky for the entire time I was in SHU. For the two weeks prior to going in there I hadn't seen the sky at all and then I also didn't see the sky for the whole time I was in there. I felt really sad about that. I felt like going outside could help my stress and anxiety. The guards would let me shower, but it would be at strange hours like 1AM or 2AM.
19. I experienced migraines and a feeling of deafness in my left ear while I was in SHU and suffered from serious depression and anxiety. I am still feeling these things now. For example, I can only hear a little bit out of my left ear now.
20. I'm currently in SHU again. I've been in here since on or around November 6, 2025. The guards tell me I can appeal being in SHU, but they do not tell me how I can appeal it. I was supposed to be there for five days, but on or around the fifth day a guard came to tell me that I was going to be left in the SHU for eleven more days. They told me this was to learn my lesson.
21. I feel overwhelmed and desperate here. I've never been locked up like this and my feelings of sadness got worse with my mom passing away. I'm just trying to carry myself through this situation.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED] ^{NOVEMBER}th of _____, 2025 in El Paso, Texas.

Signature: [REDACTED] _____



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish.
On November [REDACTED] 2025, I personally spoke with [REDACTED] and
read the foregoing declaration to him, translated into Spanish faithfully and
accurately. [REDACTED] affirmed that s/he understood my translation and that the
information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true
and correct.

Signed
NAME

[REDACTED]

Date: 11 [REDACTED] 2025

EXHIBIT F

"Noah"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

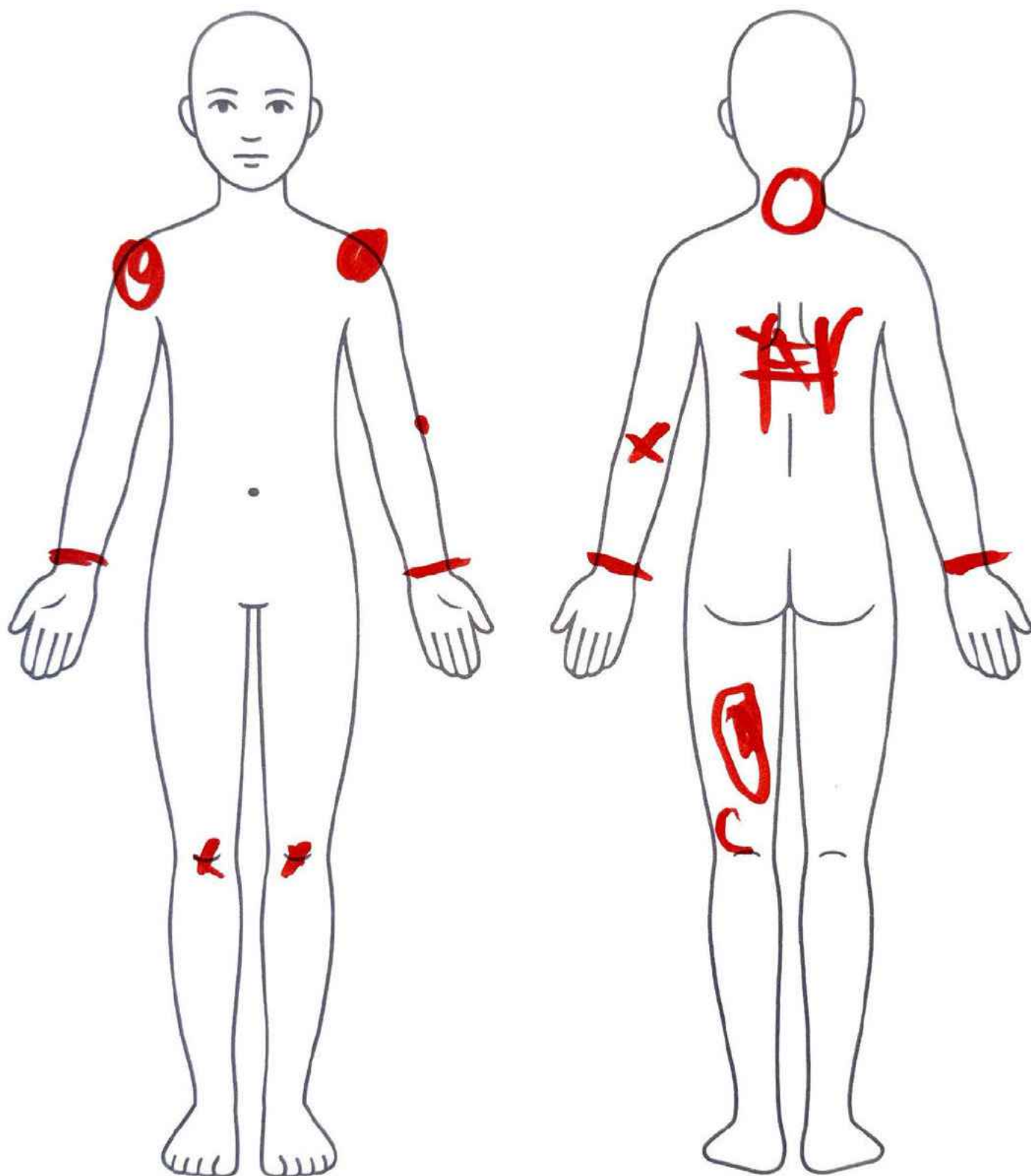
1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 32 years old and from Venezuela.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about October 5, 2025 and then I was processed on October 7, 2025, which is the date it says on my bracelet. I arrived here on or about a Tuesday morning. We were put in a cold room for 2 days with about 40 of us in it. We had to sleep on the floor with a sheet that looks like an aluminum paper. They only gave us small sandwich bags with very little food. I came here with my documents, including my ICE papers, but they will not give them to me or tell me where they are. It feels important to me to have my ICE papers because those are the only documents I have that identify me. I have tried to talk to supervisors and captains about my papers, but I still have not received them. I have asked them multiple times and whenever I ask, they just tell me my things are elsewhere.
4. I am now in the Charlie-8 unit. The conditions are always dirty there. It is dusty. Some people have had COVID and then they will quarantine us. I have very bad allergies here. I am always sniffing, my eyes run, and there are secretions from my ears. My chest hurts and I can't breathe through my nose.
5. Ever since I got here, I have been asking for medicine for my allergies. I continue to be suffering from allergies. I am supposed to receive allergy medication every day. However, today is Thursday and I have not received allergy medication since Sunday. My throat has been hurting and I have had chest pain.
6. The treatment here is cruel and they the guards treat us poorly. They don't value our rights here. I tried to talk to the guards, but they don't pay attention.
7. Approximately two weeks ago, as a result of the conditions here, in particular not having the opportunity to meet with ICE representatives, we decided to hunger strike to try to get our rights met. It was important for me to meet with ICE representatives for two reasons. First, I want to know about my possessions and second because I have already seen a judge and I have an order of deportation, so I do not understand why I am still here. The hunger strike lasted about 5 days to the point that some people became weak.

8. During my hunger strike, there was a time when I was asking for medication to treat my allergies. Some of the other people I am detained with were screaming out for help. There were three or four guards there at first. One of the guards called others and approximately 30 or 40 guards came. Those guards started cuffing us and threw us against the floor. My arms and legs hurt when I was thrown to the ground while cuffed with my hands behind my back. Even though I was not resisting, I got very hurt by the guards. Guards put their knees behind my neck and pressed down on my neck.
9. Attached is a true and correct copy of a drawing where I added red marks with a marker to show the places on my body where I was hurt by the guards approximately two weeks ago. I drew this on November 13, 2025.
10. During that same incident, I saw a guard beat and punch someone I am detained with in the face. That person was bleeding profusely from his face. Guards took that person away and after that I never saw him again.
11. Right after that, they started grabbing us one by one and started taking us away. There were about ten of us who they took away and put in separate rooms. These rooms were called "the hole" or solitary confinement. We were each alone in the hole. While in the hole, I was just lying down, staring at the ceiling, wondering when I would get out. I was still on hunger strike then. I did not know when I was going to be let out and I did not know of any process to review my placement in the hole. I was in there for one day.
12. The first few days after the incident where I was pushed to the ground, my arms, my legs, and the back of my neck hurt. I still have at least one mark on my left elbow area from the injuries I received from being pushed onto the ground.
13. I don't cry easily, but I cried after the incident because I felt so powerless in that situation. We are not dogs here, but we are treated like dogs. When we ask for things, even basic things like medicine, the guards treat us so harshly.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the 13th of November, 2025 in El Paso, Texas.

Signature: _____



Hace 35 Días los guardias nos agredieron

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On November [REDACTED] 2025, I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:

NAME:

Date:

11/ [REDACTED] / 2025

EXHIBIT G

"German"

DECLARATION OF [REDACTED]

1. [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] am 33 years old and from Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 5, 2025.
4. Before I was detained by ICE, I was in Kentucky staying with my father for approximately a month, even though I was based in Miami, Florida. For work, I drove vans for an internet cabling business.
5. At Fort Bliss, I am held in Unit D-1. It is a tent with approximately 72 beds. Most of the beds are occupied. The tent I am in is dirty. We try to request cleaning products to clean it ourselves, but we are denied cleaning products. The showers leak all the way into the area where we eat. There is supposed to be a small barrier between the showers and other parts of the tent, but water leaks from under it into the area where we eat. The floor pallets in the shower emit a horrendous smell because water seeps through them and that same water goes into the eating area. Since we are not given anything to mop up the dirty water, we have to use our own underwear and socks to wipe up the water. We also sometimes use towels from formerly detained people who were moved or deported to mop up the water.
6. People here don't seem to be getting the medical care they need. For example, there was a man in my unit who seemed to be in his sixties. He had high blood pressure and often complained that he was not feeling well. He kept asking for medical attention, which he did not receive. His condition got so bad that he fainted, fell face down on the floor, and it looked like he broke his nose. He was bleeding profusely because of the fall and broken nose. When we tried to get the guards' attention, they did not come. When the guards finally came to give out our meal, they ignored the man who was still on the ground in a puddle of his own blood. They left the man's meal on his bed.
7. In terms of mental health, there seem to be a lot of people here struggling with anxiety and depression. I heard someone from Unit Alpha 8 was suffering from anxiety and depression and deeply missing his mother. He did not want to be deported to Mexico and killed. He would bang on the door loudly and repeatedly. I do not know if his cries were

answered. I lost contact with him because our vest colors are different and a new policy here seems to require separating us by vest colors.

8. Since I have been detained at Fort Bliss, I have rarely had outside recreation. I have not seen the sun for approximately one month. Officials have only been taking us out at night. Usually over fifteen days pass before we are taken outside at all. We have a calendar that says that we are supposed to be taken outside routinely, but the guards do not pay attention to it. We have to beg to be able to go outside.
9. It is difficult to stay clean and maintain hygiene while detained at Ft. Bliss. Right now, no one seems to have any hygiene products like toothpaste, soap, or shampoo. Even when shampoo is handed out, we are given only 15-20 one-time use packets for all of the approximately 72 people in the unit. This leads to people fighting for access to basic necessities. In addition, we are told to put the clothing in the laundry area, but people rarely come to do our laundry, so we have to re-wear the clothes we put in the laundry area. Often, when the guards pick up the laundry, they don't bring it back, so people do not have clean clothes to wear.
10. There is not enough food for everyone and the meal times are irregular. The food is very bad. It is some sort of unpleasant stew that does not seem to be in edible condition. We sometimes throw the food away because of this. When we try to complain about how bad the food is, there is usually no response.
11. There is one electronic tablet per four to five people here, which we all use for phone calls. It seems to only work in the morning. I have a child in Cuba and it costs a dollar per minute to be able to talk with him and try to maintain a connection with him. The tablets haven't had connection for approximately this whole week, so they are unusable. Even when the tablets have worked previously, signal on the tablet seems to stop working after noon.
12. I do not know of any law library here or any other way for us to access books or other legal materials.
13. I was placed in solitary confinement for approximately one day approximately a month ago when I was still in unit Alpha-8. I was placed there for protesting the inhumane conditions at this facility, such as the inedible food. Two other people and I were cuffed with metal cuffs placed over the plastic ones. We were slammed against the wall, and put into SHU. The side of my head was injured from being slammed against the wall. I had to bang on the cell asking for my painful cuffs to be taken off, which they finally were after two to three hours in SHU. My wrists and ankles got hurt from the cuffs.
14. There was no bed or furniture in solitary confinement. There was only the hard floor and a toilet. You have to advocate for yourself to even get an aluminum blanket. It felt freezing in there and I was very cold, sleeping on the floor. The air was pumping directly

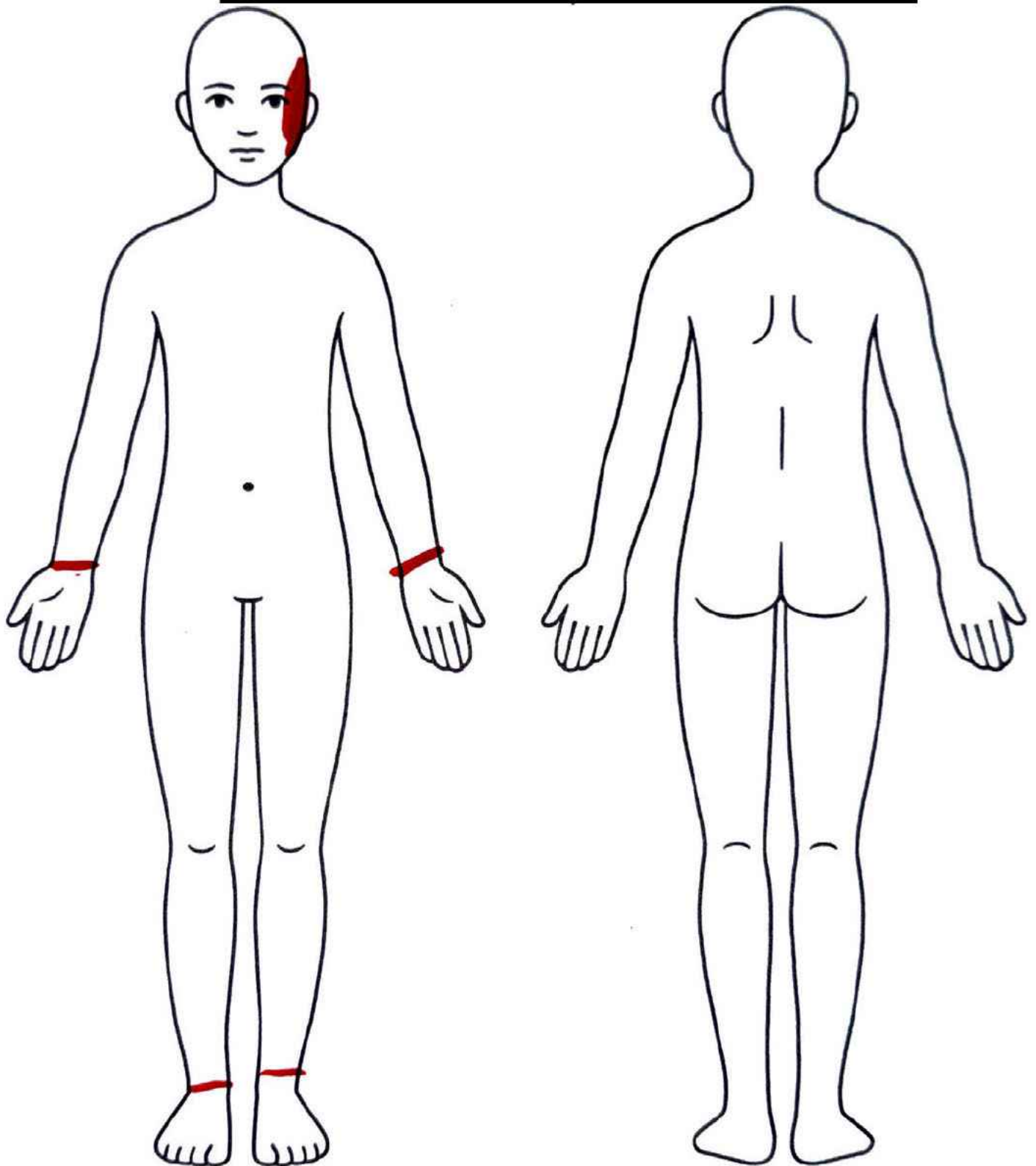
and aggressively in the area. It was a very small area with just enough space for one person. In SHU, I was given three small sandwiches three times a day without a schedule.

15. Officials here have tried to take me to Mexico twice. The first time was about a month ago when I was in unit Alpha-8 and the second time was about a week later when I was still in unit Alpha-8. They called for me in my unit and gave me my belongings. They asked me to sign papers that I think were voluntary deportation papers. I told them I don't want to sign those. They asked me if I want to go to Mexico. I told them I do not want to. They told me they were going to put me on a bus to Mexico and if I didn't get off the bus at the border that all I would do is stay here. They said once I got on the bus to the border, a second bus would take me to Mexico. I refused to go anywhere, so they did not put me on the bus. The second time, officials put me in a small room without giving me my belongings and asked me to sign papers that I think were voluntary deportation papers. The people who signed the papers were segregated to one side and those who did not sign were segregated to another. I wasn't taken to the border because I did not sign the forms.
16. I have never been in a situation like the one at Camp East Montana and I never expected to be in one. The conditions are so horrible here that everyone thought this place would be shut down, but it hasn't happened yet. I am worried and stressed all the time here. I am hopeful that I will not be here forever.
17. Attached is a true and correct copy of a picture I drew on of the injuries I sustained when I was placed in SHU. I added the red markings to the image of the body to indicate where I was hurt.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the 11th of November, 2025 in El Paso, Texas.

Signature:



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On 11- [REDACTED] -2025,

I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately.

[REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:

[REDACTED]

Date:

11- [REDACTED] -2025

NAME:

[REDACTED]

EXHIBIT H

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 32 years old, and my country of origin is Colombia. My date of birth is [REDACTED]. I am married, my wife lives in the Dallas, Texas, we have a two-year-old daughter who was born in the United States. While living in Dallas, I worked as a butcher.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 15, 2025.
4. At Camp East Montana, I am held in Unit Charlie. There are about 72 beds in the tent I am held in. Most of those beds are now filled.
5. The unit is not clean and we are usually not given cleaning supplies. Dust comes in through holes in the vents, many people develop allergies or cough. In my two months in Unit Charlie, the unit has been cleaned twice and the cleaning only consisted of sweeping the area. I, along with other people in my unit, have to ask for brooms and mops so we can clean. In my previous unit, Unit Alpha, there were flies and other insects. It was disgusting and the personnel did not clean the tent. It was always dusty.
6. **Food.** We receive very little food and it is generally bad, I do not think it is fit for human consumption. We get three meals per day, but the portions are kid-sized and not enough for adults. Many people throw away their food because it is undercooked, frozen or dry. The food has no salt, even for people without dietary restrictions. When I first arrived, we received snacks between meals, such as cookies, crackers, or juice. The snack program was recently cut. We no longer receive anything between meals which forces us to go hungry between the very small meals we receive.
7. **Medical Care.** I injured my knee and requested medical attention. I was taken to the doctor. They took x-rays and gave me pain medication. I used to receive daily pain medication for my injury, but I have not received it for about five days. My knee still aches and I worry the injury will get worse.
8. My entire unit was placed in isolation for fifteen days because two people had COVID-19. Those two people were removed from the unit. The rest of us were not allowed

recreation or visits. We were not tested for COVID. Some people had symptoms. I had a sore throat but did not receive treatment. The guards did not wear masks or take precautions, they also did not provide others with masks to prevent the spread of COVID.

9. **Recreation.** I rarely have recreation time. There is a schedule, but the guards do not ever follow it. We are supposed to have recreation five times per week for one hour. In reality, we go outside two or three times per week. The time varies depending on the guards. Recreation in Unit Charlie takes place in a small covered area. We cannot see the sun. When I was in Unit Alpha, there was a small outdoor area shared with Unit Bravo. I received recreation twice per week there.
10. **Hygiene and Cleanliness.** It is difficult to stay clean while detained here. We do not receive enough hygiene products. We receive small bottles of shampoo and toothpaste daily. For the past fifteen days we have not received any toothpaste. We used to receive disposable toothbrushes but were recently told to keep the toothbrushes because they stopped handing them out.
11. **Laundry** is unreliable and clothes are often lost. There are two laundry days; one is for uniforms and one is for bedding. Bedding laundry is mandatory. The staff often mixes items or returns them to the wrong people which makes people think twice before sending their items off to be washed.
12. The toilets do not have disinfectant and they always smell like urine and feces. They are always dirty. There is dust everywhere. There are five showers, but two are out of service because they leak into the entire unit.
13. **Library and Activities.** I do not believe there is a law library here. I do not know of any religious, educational, or other programs that people can participate in.
14. **Legal Access.** There is no clear way to contact an attorney and I cannot use video calls to contact my family. I use the tablet to call my family, but the wait is extremely long because we have to share very few tablets among 72 people. Sometimes I wait up to two hours to make a call. Calls cost about one dollar for fifteen minutes.
15. The tablets have information about the facility. You can pay to watch movies or listen to music. I believe movies cost about two or three dollars. There is a television in the unit. We can change the channel. The guards control the lights. The lights turn on at six in the morning and turn off around ten at night. There is a list of pro bono providers and consulates.
16. **Treatment by Guards.** The guards are not usually violent, but their supervisors are. I have witnessed beatings on multiple occasions. Three days ago, there was a fight in the

unit. A guard stepped in and de-escalated the situation. In most cases if a fight breaks out, guards do nothing and wait for supervisors to arrive. When supervisors arrive, they beat anyone they can get their hands on, even if they are not involved.

17. For example, in Unit Alpha there was a Colombian man in his thirties who had an injured ankle. He was sitting on a shared table. He had trouble standing when the guards tried to move the table. They beat him, stepped on his ankle, and made the injury worse. They placed him in isolation and later took him to a hospital.
18. About one month ago, fifteen people refused to eat because the turkey was undercooked. The guards pressured everyone to eat and the people refused. The captain threatened to call the anti-disturbance forces to beat them.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the th of Nov, 2025 in El Paso, Texas.

Signature:

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/ [REDACTED] 25, I personally spoke with [REDACTED] read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:

NAME:

[REDACTED]

Date:

11/ [REDACTED] 2025

EXHIBIT I

"Gershon"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 24 years old and from Mali.
3. I was previously detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I was detained there from on or about September 6, 2025 until on or about November 15, 2025.
4. Before I was detained, I lived in New York with my U.S. citizen fiancée. I was taking exams to obtain my General Educational Development (GED) certificate. In March 2025, I received my work permit and began working as an Uber driver.
5. On June 27, 2025, I was arrested while leaving the immigration court in New York after attending my Master Calendar hearing. I asked the officers why they were arresting me and they responded that I came to the U.S. illegally, and the new administration wants immigrants out of this country.
6. After I was arrested, I was detained at Manhattan Federal Plaza for two days. Then, I was detained at the Delaney Hall Detention Facility in New Jersey for about two months and a detention center in Louisiana for one night.
7. On or about September 6, 2025, officers put chains on my legs and hands and put me on a plane to Fort Bliss.
8. At Fort Bliss, I was deprived of adequate medical care, sufficient food, and basic hygiene items.
9. I suffer from Post-Traumatic Stress Disorder, Depression, and Anxiety because I was enslaved in my home country for being a member of a lower ethnic class.
10. For treatment, I take Lexapro as an antidepressant, Hydroxyzine to help me sleep, Propranolol for anxiety, and Prazosin for nightmares.
11. More than ten times, Fort Bliss did not give me my medication at all. If they did bring me my medication, they often brought it late. When I asked the nurse why this happened, she responded that the officers hadn't told her I needed my medicine.
12. When the facility didn't bring me my medication or brought it late, my Depression and nightmares got worse. When I was deprived of my medicine, I either could not fall asleep or I slept all day.
13. I requested medical appointments with a psychologist to inform them of these issues. I requested to speak with a psychologist five times. Only after my sixth request, a psychologist met with me. I told the psychologist that the facility wasn't giving me my medicine and if they did, was giving

it to me late. The psychologist said there was nothing she could do.

14. The food they gave us was about the size of your fist. The food often ran out because the guards wouldn't control the food. For example, they would allow people to get seconds before everyone had received a single serving.
15. When the food ran out, I would have to wait four or five hours for the next meal. This meant that I would only eat two meals a day. There were four times when I only ate two meals a day.
16. I was jumped by four detainees because of disputes over the food. The guards did not bring special diet foods that day for the detainees with dietary restrictions. One of the detainees said that no one could eat until the special diet food was brought. I stayed in line and the detainee told me to shut up. I told him the same and in response, he and three other detainees jumped me. They punched me on the mouth and back, and they kicked my legs. My lips became swollen and started to bleed.
17. The whole time the detainees jumped me, the guards watched and did nothing.
18. There is no soap in Fort Bliss. Sometimes, the guards did not provide us toothbrushes or shampoo. The longest I had to go without a toothbrush was four days. The longest I had to go without shampoo was five days.
19. We were supposed to be taken outside five times a week for one hour a day but the guards never followed this schedule.
20. Once I went without seeing the sun for two weeks. Sometimes, we wouldn't be taken outside for ten days.
21. The tablets at Fort Bliss were the only way we could call our families, but there were technological issues with the tablets every day. Sometimes, I would try calling my family for one or two hours but I would only be able to speak with them for fifteen minutes because of connection issues. When I did reach them, they often could not hear me.
22. We told the guards about this issue one to two times a week. The guards said that they would fix it but they never did.
23. I sometimes felt suicidal at Fort Bliss because of the bad conditions: because I had to fight to get enough food, because the tablet wasn't working and I couldn't speak with my family. I started feeling down and down and down. I had thoughts of ending my life but I never acted on it.
24. My detention has felt traumatizing to me. I thought I was doing the best thing by going to immigration court. Instead, they arrested me and sent me here.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in English, a language in which I am fluent.

Executed on the [REDACTED] nd of December 2025 in El Paso, Texas.

Signature: _____

[REDACTED]

EXHIBIT J

"Maria"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct. I make this declaration based on my own personal knowledge.

1. My name is [REDACTED] is a pseudonym I am using for this declaration. I am 28 years old and from Honduras.
2. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 30, 2025.
3. Before I was detained, I was living in Houston with my partner. I worked in a salon there. I liked working there; my boss there treated me like I was her own daughter.
4. At Fort Bliss, I was held in the C-5 unit. In my unit, there were approximately 66 people. The bathrooms were nasty. There was no toilet brush to clean with. There were stains and residue from excrement and urine all over the inside of the toilet bowl. We only received supplies for the bathroom once about every 15 days or once a month. The sinks where we wash our hands were also dirty. The water flooded out from the shower area. It flooded until it reached the entrance of the tent. The flooding got to the area where we were supposed to eat. There was a little wall near the bathroom area, but the water still passed under that wall.
5. I'm having a tough time here. As a trans woman, I am not respected. The detained individuals and guards treat me like a joke. I am housed with men even though I identify as a woman. The guards tell me my only other option would be protective custody. They tell me I should think twice before opting for protective custody because I wouldn't be allowed to shower, I'd get a smaller portion of food, and there would be no bed so I'd have to sleep on the floor. Just thinking about those conditions made me feel depressed. I don't like having to live with men, but the description of protective custody here scared me.
6. When I was transferred to Fort Bliss, I arrived on a plane from Florida. There seemed to be approximately 100 people on the plane. At first, they were going to put me with the women, but then they ended up putting me with the men. I was in the processing area with the women for approximately 25 minutes before being moved to the area with men. At that time, I told the people at intake that I take a medication called something like Mirtazapine for depression. It took them about a week and a half for them to give me the medication. When I don't receive my medication, I want to cry on a daily basis. I also lose my appetite and have pain in my back.
7. When I first got to the unit, the guards did not give me clothing. For the first fifteen days, I had to wear the clothes I came in from Miami. It was disgusting to have to keep wearing

those clothes for so long. After that, they only gave me one shirt, two pairs of pants, and one tank top.

8. As much as I tell the guards here that I am trans and my name is A.P., they keep calling me by my legal name.
9. The food is awful at Ft. Bliss. It is freezer food that looks very ugly and comes out spoiled. I have gotten sick from the food with diarrhea and stomach aches.
10. If you report that you want to go to the doctor, the guards tell you to sign a list of people, but they won't attend to you on that list for approximately 1-2 weeks after you put your name on it. The guards seem to have to see you lying on the floor before giving you the attention they need. I have seen people lying on the floor before receiving treatment.
11. I do not know how to request confidential visits with my attorney. I've seen my attorneys on screens, but I do not know if the area I am in when I meet with them is confidential.
12. There is no law library here. There are also no educational programs or anything like that for me to participate in.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/25, I personally spoke with [REDACTED] and read the foregoing declaration to her, translated into Spanish faithfully and accurately. [REDACTED] affirmed that she understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED]'s detention and the virtual nature of this visit, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, [REDACTED] also gave me verbal consent to sign on her behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED] Date: 11/25/2025

NAME: [REDACTED]

EXHIBIT K

"Frank"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 52 years old, however, my bracelet says I am 50. I am from Mexico.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 27, 2025.
4. Before I was detained by ICE, I lived in Florida for 24 years with my wife. I worked in construction during my time in Florida.
5. At Fort Bliss, I am held in Unit C-11.
6. I am held in a unit with approximately 72 people. People sleep in bunk beds. We share a bathroom, and the bathroom is inside the unit. The unit is very dirty. The bathrooms are never cleaned by staff, and we are not given regular access to cleaning supplies. I have had to request brooms or supplies and clean the bathrooms with other detainees. We do not have soap so we clean our unit using water.
7. **Medical and Dental Care.** Since I have been detained at Fort Bliss, I have experienced serious problems with medical care. I was pre-diabetic before arriving, but I am now a diabetic. The facility is aware of my condition and of my prescriptions because I informed them at processing and have made repeated requests to see a doctor and get medication during my time here. I have been able to see a nurse at Ft. Bliss who prescribed me two medications: one for my blood sugar (500mg) and another for my blood pressure (20mg). However, there are serious delays in the distribution of my medication. For instance, upon arriving there was a one month delay in the provision of my medication. As a result, I had to rely on my leftover medication from my detention at

Krome. I am currently going 15 days without either of my prescribed pills and have not received insulin at all. As a result of this lack of medication, I have experienced high blood pressure and a lack of sleep.

8. I have requested medical care multiple times by submitting written medical request forms and handing them to guards, who are supposed to forward them. However, these requests are either not escalated or are ignored by supervisors.
9. **Food.** I would not feed the food they give us here to my dogs. It is so disgusting that people cannot eat it because they become ill. Some people even throw it away. I am a diabetic and I am supposed to receive meals that account for my medical condition. There have been days where I do not eat until 10pm because my meal is delayed.
10. **Hygiene.** It is nearly impossible to keep clean at Fort Bliss. I do not have soap and we are only given very small bottles of shampoo that we have to use to wash our body, hair and sometimes our clothing. Laundry is always delayed, sometimes it gets delayed for 1 or two weeks. They take our uniforms and do not return them. When delays happen, we submit written requests but receive no information about who the messages go to. We make our requests in blue ink and they are returned to us with red pen markings. However, the issue is never resolved.
11. **Tablets.** The tablets I use to call my family do not work. Calls often drop, especially when the internet service is bad. I have also tried to use the tables to submit medical requests, particularly as my health condition has worsened. During my time here, I have submitted ten medical requests to ICE using the tablet. These requests also go unanswered. This is especially harmful because people become desperate and depressed when they cannot communicate with their loved ones. We also have a TV in our unit, but they are currently not working. People become desperate because there is nothing to do with our time.

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

This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED] of November, 2025 in El Paso, Texas.

Signature:

[Redacted Signature]

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On 11/15/25, I personally spoke with [REDACTED] [REDACTED] read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED]

Date: 11/15/25

NAME: [REDACTED]

EXHIBIT L

"David"

DECLARATION OF [REDACTED]

A# [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 35 years old and from [REDACTED], Mexico.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 19, 2025.
4. Before I was detained by ICE, I lived in Immokalee, Florida with my U.S. resident wife and two U.S. citizen children. I worked in construction during my time in Florida.
5. At Fort Bliss, I am held in the C-4. In my unit, there are about 72 people. It is dirty and hardly gets cleaned. The bathrooms are especially dirty. The shower drains do not work and constantly cause flooding. The flood water is dirty, filled with urine and fecal matter. The guards are aware of this, and we have repeatedly requested that they fix the flooding problem. No one has attempted to fix the issue. As a result, I have had to ask for cleaning supplies to try keep our unit clean. However, they only let me borrow a broom and a mop. They don't provide soap or cleaning supplies. This makes it difficult to keep our unit clean.
6. **Intake Process.** When I was transferred to Fort Bliss, I arrived by plane. I was placed in a small room, it was overcrowded. There were about 100 people in a room with a capacity for about 20 people. We were kept there overnight and had to sleep on the floor. During this time, we were not given food and only had access to one water fountain. However, I quickly realized that the water was making people sick and stopped consuming it.
7. **Medical care.** Since I have been detained at Fort Bliss, I have faced many problems with medical care. I suffer from gastritis. The facility should know that I have this condition because I informed them during my intake, have submitted medical care requests, and have told the guard about this. While detained here, I have had health complications. I require medication for my gastritis. However, I barely received this medication two weeks ago despite requesting it every day since my arrival. As a result, I am very concerned about my health and have become stressed.
8. **Dental care.** I suffer from teeth and gum sensitivity, at previous detention centers, I was taken to see the dentist and given special toothpaste for my sensitivity. At Ft. Bliss, I have

not been taken to see the dentist despite submitting requests. As a result, I have experienced increased sensitivity and tooth pain.

9. Other people have also had problems with medical care. For example, a man in my unit had a foot infection. The infection developed into an open wound and he has experienced bleeding and extreme swelling. The man has submitted requests for medical care but has not received attention or medication for his infection. His condition is worsening.
10. **Recreation.** Since I have been detained at Fort Bliss, I have rarely had outside recreation. We are supposed to be taken outside at least five times per week, but I have only had recreation 2 times per week at most. Our recreation area is very small.
11. **Hygiene and Cleanliness.** It is difficult to stay clean and maintain hygiene while detained at Ft. Bliss. We receive very little shampoo which we use to wash our hair, bodies and even our underwear. We do not get soap at all. I have also experienced issues with laundry, items get lost and it is difficult to get them back. As a result, I try to hand wash my own clothing in the bathroom sink using the little shampoo that we have available.
12. **Food and Water.** There are many issues with the food here. The food we receive is not fit for human consumption. The food is bland, undercooked, and the portions are very small. In my case, the food has worsened my gastritis symptoms.
13. **Communication Issues.** I have access to tablets in my unit, but they hardly work. The internet connection is often down. I have experienced issues contacting my family, for example, the calls sometimes do not go through, and they often drop. I also have not been able to contact the Mexican Consulate, despite having attempted multiple times.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED]th of November, 2025 in El Paso, Texas.

Signature: [REDACTED] [REDACTED] [REDACTED] _____

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/1/25, I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED]'s detention, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, [REDACTED] also gave me verbal consent to sign on his/her behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:
NAME:

[REDACTED]

Date:

11/1/2025

EXHIBIT M

"Elizabeth"

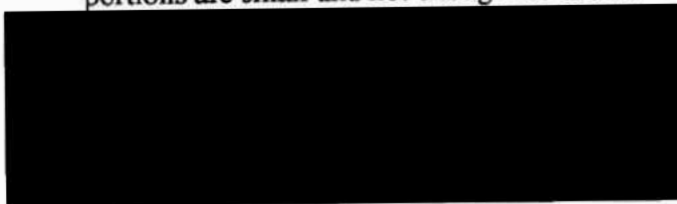
DECLARATION

I hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I am 44 years old and my country of origin is Cuba.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since September 6, 2025. I was first taken into custody on August 6, 2025.
4. Before I was detained by ICE, I lived in Tampa, Florida. I had lived there for 5 years, had a valid work permit and a pending asylum application. I worked multiple jobs in housekeeping, construction and clothing manufacturing.
5. At Camp East Montana, I am held in Unit 5. There are about 72 beds in the tent I am held in. Most of those beds are filled. The conditions in my unit are terrible.
6. The unit I am in is very dirty. No one in the facility cleans it. Dust comes in through holes in the ceiling vents, and everything is dusty and dirty. We are not given cleaning supplies. We constantly have to ask for brooms, mops, and other basic items. We clean the unit ourselves. Sometimes the guards offer us leftovers or chips in exchange for our cleaning.
7. The toilets are especially dirty. We are not given enough toilet paper. We receive one roll per day for 72 people. When it runs out, we are told to wait until the next day for more. People become desperate. Guards sometimes ration toilet paper by handing out single sheets.
8. **Dental Care.** Since being detained at Fort Bliss, I have had many dental and medical problems. I developed a gum infection while in detention. I believe it is due to the poor quality of the food and the lack of dental care supplies like toothbrushes and toothpaste. The facility knows about my condition because I asked to see a dentist as soon as my gums started hurting. The guards took me to a nurse and told me there is no dentist here. The nurse prescribed antibiotics that I am supposed to take every eight hours. The guards do not follow these instructions. My medication is often delayed. If I am lucky, I receive it every other day. Sometimes it comes at noon and other times late at night. I have experienced complications as a result of these delays. When I do not receive the antibiotics on time, my gums swell and become very painful. I also get headaches.
9. **Medical Care.** I did not have any medical conditions before being detained. While here, I contracted COVID-19 on November 11, 2025 and was placed in an isolation unit. I was moved from this unit on November 18, 2025. A nurse gave me pink and white tablets. I

was placed in isolation with other people who had COVID. There were no real barriers or precautions to stop the virus from spreading to others. The guards did not clean the isolation area.

10. **Mental Health Care.** I have had problems accessing mental health care while detained at Fort Bliss. I have anxiety. A psychologist diagnosed me and I have seen them twice. I have been prescribed sleeping pills, which I receive at night, although they are sometimes delayed. The pills help me sleep, but they are not real treatment for my anxiety.
11. **Recreation.** I have not had any outside recreation since arriving at Fort Bliss. I have not seen the sun in more than three months. The only recreation time I have had was on Sunday, November 16, 2025. I was taken to an indoor common area that the guards called a library. There were no books. There were computers, but they had no internet access. I cannot look for information about my case and there is no law library. I do not know of any religious or educational programs available to people here.
12. **Sanitation and Hygiene.** It is difficult to stay clean at Camp East Montana. We do not receive enough hygiene products. Our clothes get dirty and there is no reliable laundry routine. The guards have a laundry schedule, but they do not follow it. We receive a very small 32-milliliter bottle of shampoo almost every day. There is no soap, so we must use the shampoo for our hair and our bodies. This is especially hard for women with long hair. If we need pads, we must request them from the guards. We must request almost everything from them.
13. **Food.** The food is terrible. The staff does not consider people's dietary needs. I get stomach irritation when they serve spicy foods because I am not used to eating them. The portions are small and not enough for adults.



ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/12/25 I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed
NAME

[REDACTED]

Date:

11/12/25

EXHIBIT N

"Xavier"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 32 years old and from Venezuela.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility for about two months. Before I was detained by ICE, I lived in Dallas, Texas.
4. When I was in Dallas, I worked washing cars, gardening yards, and selling food. With this money I made, I supported my two children in Dallas and took care of them.
5. I arrived at Fort Bliss by airplane and then bus. They left us cuffed on the bus for about five hours upon arrival. They didn't allow us to go to the bathroom during that time. Then, they put me in a small room with about 32 other people. The room was cold, which caused pain on the side of my body because I have what I believe are kidney stones. We were left in that cold room for approximately three days and they only gave us bread and water during that time.
6. At Fort Bliss, I am held in the C-3 unit. In my unit, there are 72 beds. The unit is very dirty. The bathrooms are often broken. We have to beg for cleaning supplies so we can clean the unit ourselves. The guards won't proactively bring us things to clean with. There is a lot of dust that comes into the tent and makes us feel sick. The showers and the bathrooms all overflow with water.
7. The overflowing from the bathrooms happened as recently as yesterday. We had to bang on the doors to beg the guards to do something to address it. I feel frustrated that we have to resort to things like banging on doors just to get basic issues like this addressed.
8. This place does not seem designed for humans to be here. Inside the housing tent where I am held, there are drops of water that come from the ceiling. This causes puddles in our housing tent and the areas outside. All day and all night there are construction noises here. These noises make it hard to sleep. We can hear the beep, beep, beeping noise all the time. It does not stop. We also hear jackhammers banging and other construction noises constantly.
9. We are not regularly given hygiene products like soap or taken outside to the yard. This feels like a violation of my rights as a human.

10. There is no commissary here for us to purchase additional items that we are lacking.
11. There is no library here even though the facility manual says that we have the right to use a library to conduct research for our legal cases for 15 hours each week.
12. The food we are provided with devastates me because it is so bad.
13. Shortly after I arrived at Fort Bliss, I let medical staff know that I have kidney stones. I had these for about six months prior to getting here. I was supposed to have a medical appointment for them, but I missed that appointment because I was transferred here.
14. When it comes to medical treatment, there is a delay between when we ask for medical attention and when we receive it. It can take 3-4 days before we receive any type of response after we put our name on a list indicating we need medical attention, even if we need medical help urgently.
15. Around three weeks ago, I went on a hunger strike. I stopped eating mainly because I was not getting a court date nor any information about my case. I felt overwhelmed and tormented without a court date. I also felt sad about the lack of humanity I felt when I would ask for help or information and no one would give me a single response.
16. Another reason why I stopped eating is because I needed pain medication for the pain caused by my kidney stones. The only peaceful option I felt like I had left to try to get my basic needs met was to stop eating. I started feeling like the only way they were going to take me to the hospital is if I found myself in a life or death situation.
17. I became very skinny while on my hunger strike.
18. Approximately every week, between one to three people usually go on hunger strike because they want status updates on their cases and to know what is happening to them and how long they will be trapped here without any information.
19. About one and half months ago, I had to use the electronic tablet in my unit to contact my boyfriend outside of detention and ask them to try to call 911 because I was experiencing such extreme pain on the side of my body in my kidney area. If I had to put the pain on a scale from 1-10, it was a 10. It was sharp and felt swollen and enflamed. I believe that as a response, an emergency team arrived and the captain here came to pick me up and take me outside so I could receive some medical attention.
20. Even now, after everything, I have pain from the kidney stones. I signed the list to get medical attention two days ago and again yesterday. I have not heard anything back. I feel like I have to keep living the pain over and over.
21. We have to beg to receive recreation time here. It seems like the only way we can request the things we are entitled to, such as recreation time, is by banging on the doors. There

doesn't seem to be another mechanism to talk to anyone from ICE about the issues we are experiencing and about getting our basic needs and rights met here.

22. The guards here do not treat me with respect. They abuse their authority and state that we have to do what they tell us to do. They do this through threatening that they will not allow us to fulfill our rights or privileges. For example, they do not take us to the barbershop.
23. When the guards ignore our basic needs, I try to tell them that I know we are immigrants, but that does not make us less human. I feel so overwhelmed and traumatized by the whole situation of being here. Being here feels like torture. I feel like this experience is finishing me emotionally and physically. I don't feel like I can survive for another month at this place. They treat us like animals.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED], certify that I am fluent in both English and Spanish. On 11/11/25, I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that he understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED]'s detention and the virtual nature of this visit, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, [REDACTED] also gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED] Date: 11/11/2025

NAME: [REDACTED]

EXHIBIT O

"Vincente"

DECLARATION OF [REDACTED]

I, [REDACTED], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED]. I am 25 years old and from Mexico.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about 09/08/2025.
4. Before I was detained by ICE, I lived in Alabama for 2 years I worked in construction during my time in Alabama.
5. At Fort Bliss, I am held in Unit C-11
6. At Fort Bliss, I am held in a unit with approximately 72 people. The unit consists of rows of bunk beds closely positioned next to each other. The bathroom is inside the unit and is shared by everyone in the dorm. The unit is not kept clean. The bathrooms are never cleaned by staff, and we are not given regular access to cleaning supplies. Detainees must request brooms or supplies and clean the bathrooms ourselves. Since we do not have soap, we clean our unit using water.
7. **Intake Process.** When I arrived at Fort Bliss, I was processed and placed into the dorm. I did not receive meaningful information about how to request medical care, legal access, or mental health services. I was not given a working PIN for the phones for about one month. During this time, I was unable to contact my family or an attorney. I repeatedly asked for assistance, and only after I spoke directly with a supervisor did I receive a functioning PIN.
8. **Medical and Dental Care.** Since I have been detained at Fort Bliss, I have experienced serious problems with medical care. I have repeatedly suffered from extreme headaches for several days in a row, and I have repeatedly submitted requests for medical help. The guards tell me that the medical area is full, and I am never taken. I used to receive medication for sleep and ointment for back pain every night, but a nurse recently informed me that the facility no longer provides these items because the center claims it has no budget.
9. I have requested medical care multiple times by submitting written medical request forms and handing them to guards, who are supposed to forward them. However, these requests are either not escalated or are ignored by supervisors. When medical attention is given to anyone, it is often delayed until the person's condition worsens. The guards have told me that they will not call the doctor unless someone collapses.
10. **Other Detainees' Medical Issues.** I have witnessed numerous medical emergencies go unaddressed. A man with heart problems told guards he felt very sick. The guard reported it to supervisors, but no help arrived until the next day. Another young man has fainted

multiple times. He asks for medical assistance before fainting, but he is only treated after he collapses. He requires a special diet but often does not receive it, causing him to go days without appropriate meals.

11. Two men with diabetes are not receiving proper diabetic meals or medication. I personally informed a guard that they had not received their diet trays that day. They had gone nearly the entire day without sufficient food and only received sandwiches around midnight.
12. **Mental Health Care.** At Ft. Bliss, I have mental health needs and previously saw a psychologist twice a week with the help of a guard who arranged my visits. That guard is no longer here. Since then, I have requested mental health visits again for several weeks but have not been taken back. It has been approximately 15-20 days since my last session. My mental health has worsened due to lack of care.
13. **Recreation.** Since arriving at Fort Bliss, I have had very limited access to outdoor recreation. I once went more than two weeks without being able to go outside or see the sun. The only way detainees receive recreation is by collectively shouting to get the officers' attention. The recreation yard is a small area with limited space and minimal equipment, we have a soccer ball. Lack of fresh air and sunlight is affecting me, I become stressed and anxious, as do many others.
14. **Hygiene and Cleanliness.** Maintaining hygiene is extremely difficult. There has been no soap available for over a month. Cleaning supplies are rarely provided. The dorm was cleaned for the first time in more than a month only two weeks ago. Laundry is supposed to be done two to three times a week, but it often happens only once every 15 days, and clothing frequently goes missing. The blankets I was given are insufficient for the cold weather, and I have seen many people develop rashes from the rough blankets provided.
15. **Food and Water.** Meals have been reduced over time. I used to receive a plate, juice, and a tortilla with every meal, as well as cookies. These items have been discontinued. The current meals leave me and many other people hungry between mealtimes. People who require special diets, including those with diabetes, are often not given them for days at a time. I often save my apples and share them with them to help them manage any complications as a result of the inadequate diet they are given.
16. **Library/Activities.** There are no religious services, educational programming, or meaningful activities. There is no law library available to us and I have not been able to access information about my case.
17. **Legal Access.** It is extremely difficult to access legal help. There is no posted information on how to contact attorneys. Phone calls require payment, and many detainees, including myself when I first arrived, go weeks without a working PIN. Tablets frequently malfunction or drop calls. Messages sent to ICE through the tablets have gone unanswered for more than a month. Many detainees have been here for over a month without being assigned a court date.
18. Confidential communication with attorneys is not guaranteed. Calls drop frequently, and there is no clear system for requesting private attorney calls or visits. Moreover, the phone numbers that I was given to contact the Mexican Consulate do not work. Every time I try to dial out the call drops or does not go through. This is especially urgent for me because I have been trying to reach them to facilitate my voluntary departure, which I signed on August 2, 2025.

19. **Treatment by Guards.** Guards have been yelled at for submitting requests on our behalf. Some guards have told me privately that conditions at Fort Bliss are worse than at other detention centers where they have worked and that "things are not supposed to be like this." I have witnessed guards being reprimanded by their supervisors for attempting to assist detainees with basic needs.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the [REDACTED]th of November, 2025 in El Paso, Texas.

Signature:

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On 11/12/25, I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed:
NAME: [REDACTED]

Date: 11/12/25

EXHIBIT P

"Hernan"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 27 years old and from Guatemala.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about August 25, 2025.
4. Before I was detained, I lived in New York and worked in the service industry. I had a good life in New York and had the opportunity to meet many incredible people. I was able to help my family in Guatemala. Everyone comes here for a dream and I was pursuing that dream.
5. In August 2025, I was arrested. Then, I was brought to Manhattan Federal Plaza for two days and was transferred between several different facilities. After, I was handcuffed on my hands and feet and put on a bus for four hours to go to the New Jersey airport. During the four-hour bus ride, we did not have water and the bus was not air conditioned. We stayed in the plane for about eight hours before it took off. For 18 hours—from when we left the facility to when we arrived in El Paso—we were handcuffed.
6. I arrived to Camp East Montana on August 25, 2025. Each unit is one pod with bathrooms and a dormitory. There are fourteen pods per tent and there are five tents total at Camp East Montana. The guards have told me that they are building more tents.
7. The biggest problems here are the bathrooms leaking contaminated water into the dormitory, the lack of medical care, and the food.
8. Contaminated water has overflowed from the bathrooms to the dormitory. The overflowing water contained excrements and urine and we had to eat and live in that room with the contaminated water. Detained individuals in the "A" Tent told me that this happened in their tent and the rest of the tents too.
9. We don't have soap. We're only give one single-use shampoo packet to clean ourselves each day. Supposedly, this single-use packet is supposed to be enough to wash our whole body but it is insufficient.
10. There is no medical care for me or anyone here. About a month and a half ago, I twisted my ankle in the yard and I couldn't walk. I've been requesting medical care every day since then, but I still haven't received medical attention. I request medical care by putting my name on a sick list every day. My ankle is no longer bruised or swollen but it still hurts to walk. There is now a bulge on my ankle that was never there before. Sometimes when I walk, there's a popping sound, and I believe that's my tendon.
11. Many people here, including myself, have suffered from the flu and cough. They put their names on the sick list but they never receive medical attention. I have put my name on the sick list

because of the flu and cough twenty times but have never received medical care for this.

12. Many people here, including myself, have suffered diarrhea, vomiting, and stomach pains because of the food and don't receive medical attention. They put their names on the sick list but they never receive medical attention. I have put my name on the sick list every day because of stomach pains from the food but have never received medical care for this.
13. The food is a big problem here. The food isn't enough to fill you and it tastes horrible. We have to eat it regardless because we're hungry. We're always hungry here.
14. The food tastes terrible and makes us sick. The food is frozen. When they put it in the microwave, the food doesn't have any flavor regardless of whether it's beef, chicken, or vegetables. I have vomited five times after eating the food. Most of us here have vomited and had diarrhea from the food. I've lost weight because of the food. I know this because my clothes used to fit me and now they are loose.
15. Being in Camp East Montana makes me feel depressed, anxious, and stressed. I am afraid because I don't know what my future looks like here. I feel this all day every day not knowing how long I will be here. I don't know if I will be able to stay in the U.S. but the best situation would be staying in the U.S. I cry here a lot. I know I'm not the only one who cries in this facility because I've seen other detained individuals cry too.

Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the  rd of , 2025 in El Paso, Texas.

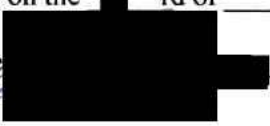
Signature 

EXHIBIT Q

"Samuel"

DECLARATION OF [REDACTED]

I, [REDACTED] hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. My name is [REDACTED] I am 19 years old and from Venezuela. [REDACTED] is a pseudonym I am using for this declaration.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas.
4. On or around October 17, 2025, officers beat me. For example, one officer grabbed and crushed my testicles and an officer forced his fingers deep into my ears.
5. As a result of the officers' use of force, I had to be taken in an ambulance to the hospital on the day of the incident.
6. Now, even though it has been about a month and a half since the incident, I am continuing to experience hearing loss in my left ear. In addition, when I go to the bathroom, I continue to feel pain in my testicles.
7. Approximately two weeks ago, I received a medical bill charging me \$1,140 related to the emergency visit to the hospital on the night of the incident when the guards beat me. I believe this cost is for the ambulance and the emergency services.
8. I don't have the money to pay for this bill. I fell unconscious because the guards beat me and now I am being charged for the medical treatment I required from the injuries caused by that beating.

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, [REDACTED] certify that I am fluent in both English and Spanish. On December [REDACTED] 2025 I personally spoke with [REDACTED] and read the foregoing declaration to him, translated into Spanish faithfully and accurately. [REDACTED] affirmed that s/he understood my translation and that the information in the above declaration is true and accurate.

Due to [REDACTED] detention and the virtual nature of the visit, it was not possible to obtain a written signature on the declaration. In addition to confirming the information on the above declaration is true, [REDACTED] also gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: [REDACTED]

Date: [REDACTED]

12/1/25

NAME: [REDACTED]

EXHIBIT 3

10/12/26, 10:33 AM

ACLU alleges beatings, sexual abuses happened at Camp East Montana on Fort Bliss

On the Border [FOLLOW](#) 14 Followers

ACLU alleges beatings, sexual abuses happened at Camp East Montana on Fort Bliss

By [KVIA ABC-7](#) [FOLLOW](#)

December 11, 2025 6:01 PM Published December 8, 2025 2:28 PM



Update: DHS has released the following statement in response to the ACLU's letter and allegations:

"This is fearmongering clickbait. As our brave ICE law enforcement is facing a more than 1150% increase in assaults against them, the ACLU is choosing to smear them with anonymous allegations. Here are the facts:



10/12/26, 10:33 AM

ACLU alleges beatings, sexual abuses happened at Camp East Montana on Fort Bliss



with proper meals, medical treatment, access to showers, and have opportunities to communicate with lawyers and their family members. It is a longstanding practice to provide comprehensive medical care from the moment an alien enters ICE custody. This is the best healthcare that many aliens have received in their entire lives. Meals are certified by dietitians. No lawbreakers in the history of human civilization have been treated better than illegal aliens in the United States. Get a grip.

These third country agreements, which ensure due process under the U.S. Constitution, are essential to the safety of our homeland and the American people. If you break our laws and come to our country illegally, you could end up in any number of third countries. President Trump and Secretary Noem are using every tool available to get criminal illegal aliens out of American communities and out of our country. Our message is clear: Criminals are not welcome in the United States. These third country agreements, which ensure due process under the U.S. Constitution, are essential to the safety of our homeland and the American people."

Assistant Secretary Tricia McLaughlin

FORT BLISS, Texas (KVIA) -- ACLU of Texas claims that beatings and sexual abuses have happened at Camp East Montana, the migrant tent camp located on Fort Bliss.

Advocates with ACLU of Texas, ACLU of New Mexico, Estrella del Paso, Human Rights Watch, Las Americas Immigrant Advocacy Center, New Mexico Immigrant Law Center, and Texas Civil Rights Project sent a letter to U.S. Immigration and Customs Enforcement (ICE) calling for an end to immigration detention at the camp.

The letter claims that migrants at Camp East Montana have been subjected to beatings, coercive threats, medical neglect, hunger, and denial of meaningful access to counsel.

"The letter comes just weeks after Rep. Veronica Escobar warned that people detained at Fort Bliss were given foul-tasting drinking water, rotten food, and inadequate healthcare," ACLU of Texas said in a news release Monday.

Join the Conversation

**Have your
say.**

10/12/26, 10:33 AM

ACLU alleges beatings, sexual abuses happened at Camp East Montana on Fort Bliss


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ACLU of Texas says its team has conducted months of interviews with more than 45 detained people, and has obtained 16 sworn declarations by migrants kept at Camp East Montana.

"Numerous detained people told lawyers that officers have engaged in a widespread and unreasonable pattern and practice of excessive force, including the use of abusive sexual contact by officers when utilizing force," ACLU of Texas stated.

ACLU of Texas detailed on teenaged detainee's experience, who claims he was beaten and lost consciousness. He claims his front tooth broke and that an officer grabbed his private parts. Another migrant claimed officers hit his head and crushed his private parts.

Camp East Montana was constructed on Fort Bliss and first [opened](#) in August 2025.



ABC-7 has reached out to ICE for comment on the letter and the allegations made by ACLU of Texas.

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KVIA ABC-7

EXHIBIT 4

May 22, 2026

Todd Lyons & David Venturella
Immigration and Customs Enforcement
500 12th St. SW
Washington, DC 20536

Joel D. García
Field Office Director, El Paso
Immigration and Customs Enforcement
999 S. Oregon St.
El Paso, TX 79901

Commanding General, Major General Curtis Taylor
Garrison Commander, Col. Michael V. Soyka
U.S. Army, Fort Bliss
HQ, US Army Garrison, Fort Bliss
ATTN: AMIM-BLG-ZA
1741 Marshall Road
Fort Bliss, Texas 79916

CC: U.S. Senate Armed Forces Committee; U.S. Senate Committee on Homeland Security; U.S. Senate Committee on the Judiciary; U.S. House Committee on Oversight and Government Reform; U.S. House Committee on Armed Services; Department of Homeland Security Office of Inspector General; DHS Office of Civil Rights and Civil Liberties

VIA EMAIL AND CERTIFIED MAIL

Re: Continued Concerns About Conditions of Confinement at Camp East Montana

Dear Officers,

We are writing to follow up on our December 8, 2025, letter documenting abusive conditions of confinement at the El Paso Camp East Montana detention camp at Ft. Bliss (“Camp East Montana”). Since the submission of the letter and accompanying declarations (attached as Appendices A and B), conditions at Camp East Montana have continued to deteriorate, raising serious alarm. These conditions appear to violate agency policies and standards, as well as statutory and constitutional protections. To date, we have received no substantive response to our correspondence. In the absence of such acknowledgment, we are compelled to conclude that our recommendations have been disregarded despite clear notice of these ongoing issues.

Since the submission of the December letter, at least two detained people have died at Camp East Montana, bringing the total number of deaths to at least three. The El Paso County Medical Examiner found that one of the detained people, Geraldo Lunas Campos, died by homicide at the facility.¹ As we documented in our December 2025 letter, there is a clear pattern of excessive uses of force by officials at Camp East Montana that have led to injuries and even deaths.

A U.S. Immigration and Customs Enforcement inspection of Camp East Montana between February 10-12, 2026, revealed 49 violations of detention standards or policies. These deficiencies were documented in a report (attached as Appendix C). Among other violations, the report documented serious delays in resolving grievances, including medical grievances. In fact, the report showed the facility's failure to follow its own policy of urgently responding to any grievance alleging any threat of a detainee's health, safety or wellbeing. In addition, the report noted violations of use of force and restraints-related policies, including failures to document detainees' examinations or treatment of injuries following uses of force and failing to document that medical services were even provided. Per the report, there were dozens of additional violations of standards or policies.

Despite reported changes in contractors at the facility, serious violations continue. People detained at Camp East Montana continue to suffer from the issues documented in our December 2025 letter.² Our prior letter describes severe mistreatment of detainees, including excessive use of force, abusive sexual contact, and prolonged detention in overcrowded, harsh conditions. Detained individuals face serious neglect, such as inadequate and spoiled food, lack of medical and mental health care, inconsistent medication access, and delayed responses to urgent health needs. Basic living standards are also unmet, with insufficient hygiene supplies, unclean environments, and confinement in tents or cold holding areas without proper light, recreation, or adequate nutrition. In addition, since our prior letter, individuals have reported harsh conditions of solitary confinement, ailments from inhaling dust that flows into the facility, serious difficulty obtaining their own medical records, and denial of access to grooming to maintain personal hygiene. The punitive conditions of confinement at Camp East Montana impose an atypical and significant hardship on detained individuals that undermines the purpose of civil detention.

Solitary Confinement

"Special Management Units" (SMUs), also known as solitary confinement or segregation cells, are used in a manner far more punitive than permitted under ICE standards. Those standards mandate that administrative or disciplinary segregation should "only be used when less restrictive

¹ Nicole Acevedo, *ICE detainee's death ruled a homicide by medical examiner*, NBC News (Jan. 21, 2026, 7:09 PM), <https://www.nbcnews.com/news/us-news/lunas-campos-ice-detainee-homicide-autopsy-rcna256566>.

² See Appendix A.

housing options have been considered and determined to be contrary to the best interests of the detainee and security or good order of the facility.”³ Our December 2025 letter provided clear notice of this abusive practice, yet we have received reports from detained individuals that confirm its continuation: the immediate placement of individuals in SMU upon hospital return for serious injuries caused by excessive uses of force by officials, extended isolation in SMUs without timely or rational justification, and punitive threats and placement into SMUs solely for requesting basic needs, like medical care or hygiene. Such actions by officials are not mere errors but a willful infliction of harm, demanding immediate cessation.

Hazardous Dust Exposure

People detained at Camp East Montana report struggling to breathe and experiencing serious respiratory symptoms from dust that pours into the tents they are forced to live in. They describe dust lining their beds, tables, and even food that they eat. El Paso frequently experiences severe dust events where strong winds from the Chihuahuan Desert lift fine soil particles that can reach hazardous levels and penetrate deep into the lungs.⁴ These dust exposures are linked to increased respiratory problems and may also carry fungal spores that pose additional breathing risks and other ailments.⁵ In fact, a study published on February 18, 2026, found a significant ascending trend in valley fever (coccidioidomycosis) cases in El Paso from 2013 to 2022, with incidence rates more than tripling and strong associations to El Paso’s meteorological factors like extreme heat, high wind gusts, and elevated airborne dust concentrations, particularly inhalable coarse particles like fungal spores.⁶ This type of exposure to harmful airborne particles puts the rights of detained people, who are confined in dust-filled tents with limited air circulation, at serious risk.⁷

Despite repeated complaints from detained individuals, officials at Camp East Montana knowingly subject people to high levels of hazardous dust infiltration without providing masks, air filtration, relocation, or medical monitoring for resulting respiratory distress. Officials are aware of the obvious health dangers from pervasive dust, linked to respiratory illness and fungal

³ A copy of the policy can be found here: <https://www.aclu.org/documents/foia-document-review-of-the-use-of-specialmanagement-units-for-ice-detainees>.

⁴ See Herrera-Molina, E.; Gill, T.E.; Ibarra-Mejia, G.; Jeon, S. Associations between Dust Exposure and Hospitalizations in El Paso, Texas, USA. *Atmosphere* 2021, 12, 1413. <https://doi.org/10.3390/atmos12111413>.

⁵ *Id.*

⁶ See Ibarra-Mejia, G., Khanjani, N., Dastoorpour, M., Herrera-Molina, E., Ardon-Dyer, K., Jeon, S., Gill, T. The ascending trend of valley fever in El Paso, Texas and its association with meteorological and dust factors. *International Journal of Biometeorology*, Feb. 18, 2026. <https://doi.org/10.1007/s00484-026-03159-8>.

⁷ *Helling v. McKinney*, 509 U.S. 25, 33 (1993) (holding that exposure to involuntary secondhand smoke in prison can give rise to an Eighth Amendment claim if it “poses an unreasonable risk of serious damage to [an inmate’s] future health.”); see also *American Textile Mfrs. Institute Inc. v. Donovan*, 452 U.S. 490, 494-496 (1981) (noting that exposure to cotton dust, an airborne particle, created a health hazard and that “there is an association between mortality and the extent of dust exposure.”)

infections in the El Paso region, yet consciously disregard them by withholding basic protective measures and refusing to provide reasonable safety. Such punitive persistence elevates substandard tent housing to willful infliction of harm, which demands immediate cessation and remedial action.

Medical Records

Individuals at Camp East Montana have an almost impossible time obtaining their medical records. However, the National Detention Standard 4.3 make clear that “[d]etainees and their representatives shall be allowed to request and receive medical records pursuant to facility policy, which shall be communicated to the detainee in the facility handbook.” Many detained people report that no facility handbook is provided to them, and that the process to request medical records remains opaque.

Further, representatives of the undersigned organizations have submitted four separate requests for medical records on behalf of at least 14 individuals who are or were detained at Camp East Montana at Fort Bliss. To date, we have not been provided any responsive records. Nor have officials or facility staff provided any clear, reliable, or lawful process for obtaining them. This complete failure to respond, despite repeated requests, is unacceptable and inconsistent with your legal obligations governing access to detainee medical information.

The continued refusal or failure to produce these records raises serious statutory and constitutional concerns. The withholding of medical records in the face of repeated, documented requests obstructs necessary medical oversight and advocacy, and reflects, at minimum, deliberate indifference to the health and safety of the individuals in your custody. We demand an immediate production of the requested records and a clear, functioning process for timely compliance going forward.

Non-Confidential Medical Visits

Obtaining medical care remains difficult at Camp East Montana. Even those detained persons who manage to receive a medical appointment report a lack of confidentiality in their visits, with visits taking place in group settings and in hallways without privacy. National Detention Standard 4.3 makes clear that “medical personnel...shall protect the privacy of detainees’ medical information to the maximum extent possible while permitting the exchange of health information required to fulfill program responsibilities and to provide for the well-being of detainees.” The public nature of medical visits at Camp East Montana erodes the confidentiality to which detained people are entitled regarding their health. These conditions reflect more than isolated lapses; they show a repeated disregard for the obvious need to protect medical privacy and the harm that follows when officials fail to do so.

Denial of Access to Grooming to Maintain Hygiene

Detained people report that following the recent transition in facility contractors, the barbershop has been open inconsistently. As a result, detained people are denied meaningful access to basic grooming services necessary to maintain personal hygiene. Individuals report lacking the facilities or resources to trim their nails, hair, or facial hair.

National Detention Standard 4.4 states that “[g]ood hygiene is essential to the well-being of detainees in the custody of ICE/ERO.” However, detained people report not having access to basic grooming and hygiene products. The deprivation of these basic grooming tools and services forces detainees to live in conditions that compromise hygiene, dignity, and health. Lack of nail care can lead to overgrowth, discomfort, and increased risk of infection; inability to maintain hair and facial hair can contribute to skin conditions, lice, or other hygiene-related issues, and psychological distress. These conditions fall below minimum standards of care and raise serious concerns under applicable detention standards and constitutional protections.

Lack of Confidentiality and Apparent Retaliation for Talking with Attorneys

At Camp East Montana, attorney-client calls take place in transparent boxes where officials can easily see inside. Similarly, in-person contact visits occur in visitation rooms with no individual ceiling. The visitation rooms are simply four walls erected within the larger tent. Sound easily carries throughout the larger tent, again threatening the confidentiality of the visits. Officials interrupt attorney-client calls and in-person visits by entering the box or visitation room and speaking directly to the attorney or detained person, threatening the confidential nature of the call.

National Detention Standard 5.5 makes clear that “[v]isits between legal service providers (or legal assistants) and an individual detainee are confidential and shall not be subject to auditory supervision.” In addition, “[f]acility staff shall not be present in the confidential area during the attorney-detainee meeting unless the attorney requests the presence of an officer.”

Detained people also have no access to free, confidential outgoing calls to their attorneys. Instead, the only way to make an outgoing call to an attorney seems to be through a monitored and recorded line on a tablet that also costs money to use.

Detained people have reported being suddenly disciplined for minor or fabricated infractions shortly after attorney calls, resulting in placement in SHU and denial of access to a tablet for outside communications. This pattern raises serious concerns, especially given the sensitive information detained people discuss on calls with their attorneys. This pattern creates a culture of intimidation and fear of retaliation simply for speaking with an attorney.

Camp East Montana’s legal access procedures fall far short of basic confidentiality requirements. The reported pattern of sudden discipline after attorney calls only heightens the concern that legal communication is being chilled and punished. These practices are unacceptable

and must be corrected immediately, because they interfere with legal representation, undermine confidentiality, and create an atmosphere of intimidation and retaliation that no civil detention facility may impose.

Prevent Further Human Suffering at Camp East Montana

In light of recent reports⁸ about the potential shuttering of “Alligator Alcatraz,” a makeshift inhumane compound that ran illegally, there is a risk that individuals detained at Alligator Alcatraz may be transferred into the unlawful conditions at Camp East Montana, as has happened in the past.⁹ It is critical that this not happen. Camp East Montana is already massively overstretched and unable to meet the basic needs of people detained there. Any level of population growth will lead to additional human suffering and rights violations.

The ongoing nature of the violations above, most of which were documented in our December 2025 letter, demonstrates that officials had actual notice of the unconstitutional conditions. Reports of spoiled food, untreated medical needs, prolonged exposure to extreme temperatures, and unsanitary living environments are not isolated or emergent issues; they are persistent and systematic deficiencies that pose an obvious and substantial risk to detainees’ health and safety.

Despite this notice, officials have failed to take reasonable corrective action, and in some instances have exacerbated the harm by permitting continued overcrowding, limiting access to hygiene and medical care, and imposing punitive conditions such as solitary confinement under already unsafe circumstances. These conditions are longstanding, pervasive, and well-documented. Official inaction to abate these conditions in the face of known risks following formal notice underscores that these violations are not the result of mere negligence, but rather a conscious disregard for detainees’ basic constitutional rights.

Given the ongoing failure to protect detainees’ basic health and safety, manifest in the dangerous conditions of confinement, including but not limited to punitive solitary confinement, untreated medical needs, squalid living conditions, pervasive dust exposure, and spoiled food, ICE and the Department of Defense must immediately cease all immigrant detention at Ft. Bliss and Camp East Montana.

These egregious, well-documented abuses demand urgent humanitarian intervention to prevent irreparable harm, including death. Every additional day of operation inflicts

⁸ *Trump officials discussing possible closure of Alligator Alcatraz*, USA TODAY (May 7, 2026, 7:54 PM), <https://www.usatoday.com/story/news/politics/2026/05/07/alligator-alcatraz-trump-tom-homan-florida-desantis/89983278007/>.

⁹ *Camp East Montana Receiving Detainees from Alligator Alcatraz*, KVIA (Aug. 28, 2025, 3:35 PM), <https://kvia.com/news/border/2025/08/28/camp-east-montana-receiving-detainees-from-alligator-alcatraz/>.

unconstitutional suffering on vulnerable individuals and exposes officials to escalating legal liability.

We appreciate your prompt attention to these very serious matters, and the opportunity to meet and discuss these issues. For more information, please contact Savannah Kumar at skumar@aclutx.org or Edgar Saldivar at esaldivar@aclutx.org.

Sincerely,

American Civil Liberties Union
American Civil Liberties Union of New Mexico
American Civil Liberties Union of Texas
Estrella del Paso
Human Rights Watch
Las Americas Immigrant Advocacy Center
Texas Civil Rights Project

EXHIBIT 5

Office of Partnership and Engagement

U.S. Department of Homeland Security
500 12th Street, SW
Washington, DC 20536



**U.S. Immigration
and Customs
Enforcement**

June 30, 2026

The American Civil Liberties Union
125 Broad Street, 18th Floor
New York, NY 10004

To Whom It May Concern:

Thank you for your May 22, 2026, letter to U.S. Immigration and Customs Enforcement (ICE). ICE Enforcement and Removal Operations (ERO) oversees all civil immigration detention of one of the most highly transient populations of any detention system in the world. As a result, ICE is committed to safe, secure, and humane environments for all of those in its custody. Please see the following responses to your letter's allegations.

ICE is responsible for the safety and well-being of all aliens in our custody, and segregation is a necessary and vital practice for ensuring a safe and secure environment. ICE does not use or place detained individuals into solitary confinement. However, ICE does use segregation, a distinct practice to ensure the welfare of detained individuals and staff. Unlike conditions generally associated with solitary confinement, detainees in segregation experience basic living conditions akin to those provided to the general population, including having regular access to supervisory, management, program, and health care staff; receiving the same meals and portion sizes; having access to recreation; being able to send and receive mail and correspondence as they would otherwise be able to do; having access to telephones; and having access to programs and services such as commissary, library, and religious guidance. ICE will continue to use segregation as a practice to both honor detainee requests to be placed into protective custody and to ensure the safe and secure operations of the detention facility. Furthermore, to provide detainees in the general population a safe and orderly living environment, facility authorities may utilize disciplinary segregation when a detainee's behavior does not comply with facility rules and regulations. However, disciplinary action will not be capricious or retaliatory, and staff are prohibited from retaliating against a detainee lodging a complaint or grievance, such as a request to speak with an attorney. Disciplinary segregation placement is temporary—maximum sanction is 30 days per incident, except in extraordinary circumstances—and is only authorized by order of the Institutional Disciplinary Panel, or its equivalent, after a hearing in which the detainee has been found to have committed a prohibited act and only when alternative dispositions would inadequately regulate the detainee's behavior.

Camp East Montana takes all health and safety concerns seriously. A thorough review of medical records indicates only one detainee has reported symptoms potentially related to dust exposure, and this individual was promptly evaluated and treated by the medical team. No grievances have been filed by detainees regarding dust exposure, respiratory distress, or related

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conditions. Additionally, all meals are delivered to the facility pre-packaged and served in sealed containers, minimizing any risk of dust contamination in food. The facility remains attentive to environmental conditions in the El Paso region, including dust events, and staff conduct routine inspections to ensure the safety and well-being of all detainees. Camp East Montana maintains a commitment to detainee health and safety, and any future complaints or medical issues related to dust exposure will be addressed promptly and in accordance with established procedures.

Each of ICE's detention facilities are governed by ICE's national detention standards. Specifically, National Detention Standards (NDS) 2025 governs detention operations at Camp East Montana. In accordance with NDS 2025, all detainees receive a National Detainee Handbook and a facility handbook specific to that facility. Camp East Montana also provides the handbook on the Talton tablets. There are no reports that detainees at Camp East Montana are not receiving handbooks upon arriving at the facility.

Your letter asks how a detainee should request their medical records at the facility. Per Camp East Montana's operations, if a detainee would like to obtain copies of their medical record, they must submit a written request. The detainee will be required to sign a release of health information form prior to receiving the medical records. A detainee and their representatives may also request medical records through the detainee's designated ICE officer, or the ICE Freedom of Information Act (FOIA) process as described in the facility's Detainee Handbook. Moreover, if your organizations wish to request the medical records of a specific detainee, please submit a FOIA request.¹

Your letter mentions detainees are not receiving health care. ICE is committed to providing safe delivery of appropriate health care to aliens in agency custody. ICE's national detention standards and other ICE policies require facilities to provide comprehensive medical and mental health care from the moment aliens arrive at a facility and throughout their time in ICE custody. Detainees have access to a continuum of health care services, including screening, prevention, health education, diagnosis, and treatment while in ICE custody. Generally, detention standards require facilities to conduct a medical intake screening – including medical, dental, and mental health – within 12 hours of arrival at a facility and a comprehensive health assessment within 14 days of arrival. Each facility is staffed by medical care professionals 24 hours a day, seven days a week, or facilities have a plan in place to provide 24-hour emergency medical and mental health care when no medical personnel are on duty, for direct patient access. While ICE does not directly provide or direct the medical care provided in non-ICE Health Service Corps staffed facilities, the agency oversees those facilities' compliance with national detention standards and coordination of offsite care through medical referrals, as needed, through the Field Medical Coordinator Program.

Your letter alleges detainees have no confidentiality with medical appointments. Per Camp East Montana operations, partitions are utilized at the clinic and during the medical intake process. Additionally, sick call patients are seen one at a time with partitions. Medical staff are trained in Health Insurance Portability and Accountability Act guidelines and there are privacy curtains at each medical exam room as well. Patients are informed of their rights to accessible

¹ <https://www.ice.gov/foia>

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healthcare and consent to treatment prior to any treatment performed, while keeping strict patient/provider confidentiality.

Your letter mentions detainees do not have access to grooming options to maintain proper hygiene. ICE detention standards address barbering areas and specifically state that “barber operations will be provided with all equipment and facilities necessary for maintaining sanitary procedures of hair care...” However, due to Camp East Montana’s current transition to a new contractor, barbershop, nail clipper, and facial hair services were temporarily disrupted and these services have now been restored.

ICE is committed to ensuring aliens have ample access to appropriate process and legal resources. During their immigration proceedings, detainees are afforded numerous procedural protections that ensure they are provided with notice and an opportunity to be heard. These protections include, but are not limited to, the right to be represented by an attorney; to contest any charges of removal; to present evidence; and to examine any evidence against them. This includes their right to access legal representation and their right to communicate with their country's consulate under the Vienna Convention on Consular Relations.

In reference to concerns regarding lack of confidentiality and apparent retaliation for attorney-client communications at Camp East Montana, attorney-client calls are conducted in designated rooms with transparent panels, known as Virtual Attorney Visitation booths, which allow for visual observation by security personnel for safety purposes only; there is no audio monitoring of these calls. In-person attorney visits occur in a visitation room that does not have individual ceilings; however, these rooms are equipped with sound suppression systems to ensure privacy during conversations. Detainees are provided with a free five-minute call to an attorney or family member upon intake, and they have access to a list of pro-bono legal service providers for free calls. Any indigent detainee may request a free, confidential phone call to their attorney at any time, either through the pod officer or via the Talton tablet system.

In reference to allegations detainees are disciplined for minor or fabricated infractions after attorney calls, resulting in placement in the Special Housing Unit or denial of tablet access, Camp East Montana has no record of any grievances or complaints filed alleging these incidents. ICE cannot further investigate these allegations without additional information, such as names and alien registration numbers. All segregation placements are fully documented, including officer statements and the reasoning for any placement. No ICE detainees are disciplined for speaking with their attorneys or denied tablet access.

As codified in ICE detention standards, all ICE detainees maintain the right to meet privately with their legal representative and their legal assistants seven days a week for a minimum of eight hours per day on regular business days, and a minimum of four hours per day on weekends and holidays. At Camp East Montana, attorneys can schedule confidential legal calls, video teleconference meetings, or visit detainees during specified hours, as posted on the facility page on ICE.gov.² Please note ICE detention facilities may temporarily restrict visiting when necessary to ensure the security and good order of the facility, employees, and detainees.

² Visit the ICE.gov facility page for the most up to date procedures and visiting hours, available at: <https://www.ice.gov/detain/detention-facilities/dod-detention-facility-fort-bliss>

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Camp East Montana maintains eight-in-person privacy rooms for detainees to meet with their legal representative in a confidential manner. These areas are subject to visual monitoring, but not auditory monitoring due to noise cancelling machines that hang from each in-person attorney room. Camp East Montana also provides eight confidential Virtual Attorney Visitation (VAV) booths where a legal representative may hold a remote legal visit either via video teleconference or by phone, and 36 no contact, open booths intended for family and friend visits. The VAV booths meet the confidentiality requirements by preventing auditory supervision and still allow facility officers to maintain visual supervision, consistent with ICE detention standards.

Out-going attorney calls made by a detainee with a tablet are unmonitored and unrecorded. For all attorneys who have created ERO eFile accounts and have listed their phone number(s) in their profile, ICE had Talton, the tablet provider, code the phone numbers as unmonitored and unrecorded. Detainees or legal representatives can always register the legal representative number as confidential directly with Talton using the request form. Please see the following link for more information: <https://www.ice.gov/doclib/detention/faq-taltonAttorney.pdf>. For video teleconferencing via GettingOut.com, attorneys can also register with Talton to have the video calls unrecorded and unmonitored. All detainees are also issued headsets to connect to the tablet.

Your letter alleges detainees have been subject to retaliation for placing attorney calls. Without specific case examples, ICE is unable to investigate or respond to this allegation. Your letter also alleges that officials interrupt attorney-client calls and in-person visits by entering VAV booths or in-person rooms and speaking directly to the attorney or detained person. It is consistent with ICE VAV contract language for officers to knock five minutes before the end of the allotted appointment time and then enter the booth at the end of the appointment time, to end the call and facilitate the next appointment. Without specific case examples, ICE is unable to investigate this allegation further.

Your letter mentions “there is a risk that individuals detained at Alligator Alcatraz may be transferred” to Camp East Montana. All alien transfers and transfer determinations are non-punitive and based on a thorough and systematic review of the most current information available in accordance with ICE Directive 11022.1: *Detainee Transfers*. Decisions to transfer are made by the Field Office Director, or his/her designee, based on complete and accurate case information and principles set forth in the Transfer Directive and other applicable ICE policies. Examples for alien transfers includes providing appropriate medical or mental health care to the alien; fulfilling an approved transfer request by the alien; protecting the safety and security of the alien, other aliens, or detention personnel; complying with a change of venue ordered by the Department of Justice Executive Office for Immigration Review; transferring to a more appropriate detention facility based on the alien’s individual circumstances and risk factors; terminating the use of a facility due to failure to meet ICE detention standards, lack of enough use of the facility by ICE, or emergent situations; or relieving or preventing facility overcrowding. When determining if a transfer is appropriate, ICE considers key factors prior to a transfer, including the detention center and the aliens’ health, safety, and welfare. While a detainee transfer is possible, this would be a normal part of ICE’s detention operations.

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The Office of Detention Oversight (ODO) within the ICE Office of Professional Responsibility conducted an inspection on February 12, 2026, with a final rating of acceptable/adequate. ERO received the ODO final report on March 31, 2026, and is waiting for the El Paso Field Office to provide a corrective action plan.

Your letter requests ICE close Camp East Montana. ICE constantly evaluates its detention needs and contract structures based on the ebb and flow of immigration patterns, the bona fide needs of the agency, and fiscal considerations. In addition, ICE is consistently reviewing its policies and procedures to ensure detention is used only when necessary. As for your request that ICE close Camp East Montana, this is currently not feasible as this facility is critical to ICE's ability to fulfill its critical national security and public safety mission. ICE's approach to contracting with private detention contractors and state and local governments maximizes flexibility in managing dynamic flows of detained noncitizens. Closing it as you request would significantly hamper ICE's ability to fulfill its immigration enforcement and public safety mission in the communities we help protect.

Thank you again for your letter and interest in this matter. Should you wish to discuss this matter further, please contact the ICE Office of Partnership and Engagement via email at ICEOPE@ICE.DHS.gov

Sincerely,

A handwritten signature in black ink, appearing to read 'ME' followed by a long horizontal stroke.

Megan Echtenkamp
Acting Assistant Director
Office of Partnership and Engagement
U.S. Immigration and Customs Enforcement



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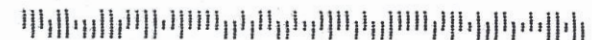


EXHIBIT 6

Democracy Dies in Darkness

wp EXCLUSIVE

60 violations in 50 days: Inside ICE's giant tent facility at Ft. Bliss

As the Trump administration rushes to open massive makeshift holding centers nationwide, ICE's own inspectors say the marquee Texas project is violating dozens of federal standards for immigrant detention.

September 16, 2025 More than **1 year ago**

By [Douglas MacMillan](#), [Samuel Oakford](#), [N. Kirkpatrick](#) and [Aaron Schaffer](#)

When the first immigrants arrived at their new detention quarters at a Texas military base this summer, they were marched onto an active construction site. Dust swirled and excavators hummed as contractors raced to build the tent encampment, where development had begun just two weeks earlier and would go on for months.

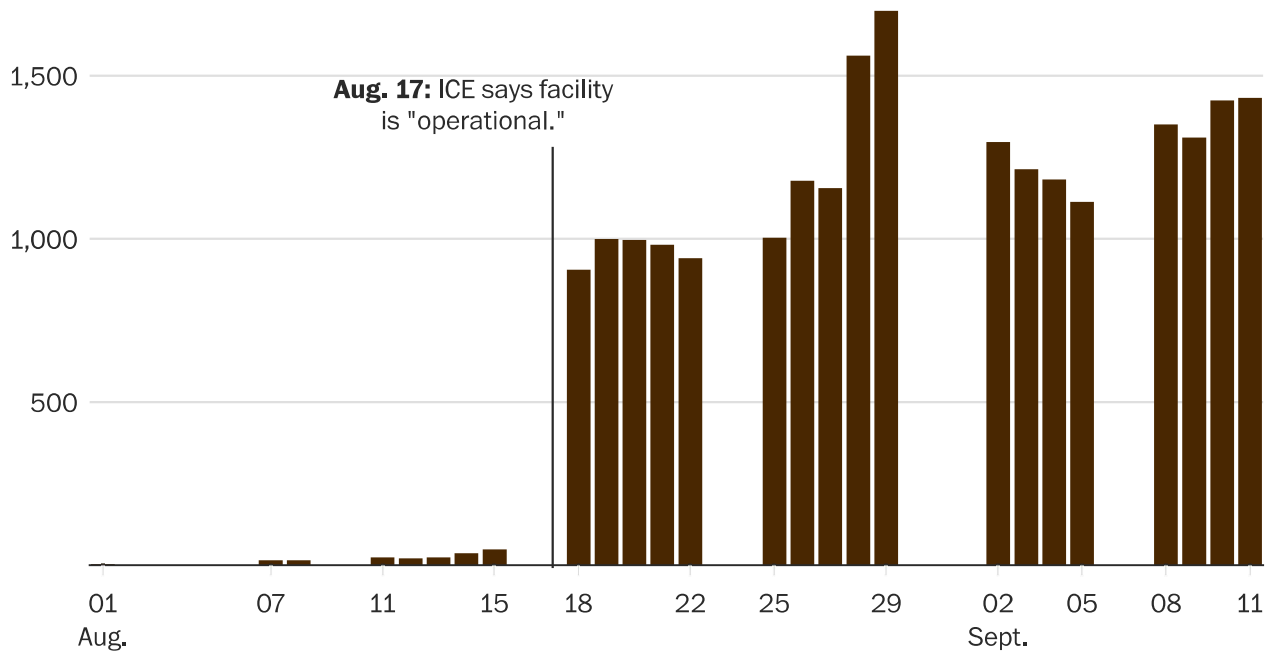
Locked up in the unfinished facility, migrants were subjected to conditions that violated at least 60 federal standards for immigrant detention, the detention oversight unit of U.S. Immigration and Customs Enforcement found earlier this month in a contractually required inspection.

The detention center at Fort Bliss, called Camp East Montana, failed to properly monitor and treat some detainees' medical conditions, lacked basic procedures for keeping guards and detainees safe and for weeks did not provide many of them a way to contact lawyers, learn about their cases or file complaints, according to a copy of the inspection report obtained by The Washington Post.

The ICE inspection report, which is not public and has not been previously reported, raises significant new concerns about the safety of workers and detainees at one of the Trump administration's marquee immigration projects. Expected to hold up to 2,700 migrants at a time this month and as many as 5,000 by the end of the year, Camp East Montana has been publicly described by officials as the prototype for a new breed of large-scale holding facilities that will help ICE achieve its goal of doubling the nation's detention capacity by the end of the year.

“There is no way that this facility should be operating with their current numbers, let alone expanding,” Michelle Brané, the former head of the federal Office of the Immigration Detention Ombudsman under President Joe Biden, said after reviewing a copy of the report provided by The Post. She called it among the most concerning detention center audits she had ever seen and said the violations “will directly affect safety in very serious ways.”

Daily detainee population at Camp East Montana



Note: Population data is counted only on weekdays except for holidays.

Source: Internal ICE documents

After receiving a list of questions about the report and interviews on conditions at the facility, ICE spokeswoman Leticia Zamarripa said the agency “had every intention to provide responses.” But after more than five days, ICE had not provided responses to any of The Post’s questions.

On Wednesday evening, a day after this article published online, the Department of Homeland Security posted a news release accusing The Post of “twisting inspector notes.”

“All detainees are provided with proper meals, medical treatment, and have opportunities to communicate with lawyers and their family members,” said the statement, attributed to Assistant Homeland Security Secretary Tricia McLaughlin. “... Meals are certified by dieticians. Ensuring the safety, security, and well-being of individuals in our custody is a top priority at ICE.”

Zamarripa declined a reporter’s request to tour Camp East Montana, saying she hoped to provide media tours “soon” but offering no other specifics.

Trump’s border czar, Tom Homan, has led the push to build more large-scale facilities, which he said “create more efficiencies” and allow ICE agents to “arrest more bad people on the street,” he told a group of reporters last month. He said concerns raised about conditions at the Alligator Alcatraz detention encampment in the Florida Everglades were “fake stories,” and said the facility was “just as good” as the temporary, makeshift facilities used by federal emergency responders in natural disasters.

There are few federal laws regarding conditions in immigrant detention centers. ICE sets the standards, and contractors agree to follow them. ICE can impose penalties, and facilities with too many violations can be closed.

Many of the deficiencies ICE found in its inspection of Camp East Montana in the first week of September appear to stem from the hasty construction and early opening of the makeshift facility. While the largest private prison firms say it can take up to three months just to hire and train enough staff members to open a new ICE facility in an existing building, contractors at Fort Bliss have turned an empty patch of desert into one of the nation’s largest ICE holding sites in less than two months. The site is still not complete.

“You can’t build things quickly and expect them to be good,” said Imelda Maynard, legal director at Estrella del Paso, an El Paso-based nonprofit legal services provider for migrants.

As of early September, ICE held nearly 59,000 detainees in 187 facilities. More than 1,400 were at Fort Bliss.



Source: Google Maps, Reuters

The Fort Bliss facility is the first of at least 10 temporary, tentlike encampments that the Trump administration plans to build at military bases and the sites of existing detention centers in the coming months, internal ICE documents show. ICE has said these “soft-sided” structures will provide temporary accommodations for migrants who are arrested and targeted for deportation.

Camp East Montana’s contract states that the facility is meant to hold people “for periods of approximately two weeks or less.” One former detainee, asylum seeker Ricardo Quintana Chavez, was held there 24 days before being voluntarily deported to Peru last week, according to internal ICE records. A nonprofit representing migrants said several others have been there for more than two weeks.

In an interview with The Post, Chavez, 57, said it was obvious to him that Camp East Montana was brand new and poorly managed. He said that he was fed cookies, candies and potato chips in lieu of meals, that he was allowed only infrequent outdoor recreation, and that problems with the building caused water to seep into his cell when people used the showers.

“You have to keep drying it,” he said via a recorded voice memo in Spanish.

This account of Camp East Montana’s first 50 days — from when the contract was awarded to the final day of the ICE inspection, on Sept. 5 — is based on internal ICE documents, the interview with Chavez, interviews with people who have visited the site and satellite photos showing its construction.

No telephones

The scramble to build the massive new detention facility in a remote stretch of desert northeast of El Paso was already underway on July 19, a day after the government announced it had awarded the contract, satellite photos show.

Acquisition Logistics LLC was selected to oversee the \$1.2 billion contract for the construction and operation of the facility. The small business is registered to the Virginia home of Ken Wagner, the company’s 77-year-old owner.

An archived version of Wagner’s website says he is a retired senior Naval flight officer who has led a variety of technical projects for the federal government, including developing a classified data communications system for an intelligence agency.

Acquisition Logistics did not respond to requests for comment, nor did any of the five subcontractors listed on contract documents.

Contact us with information about ICE detention

The Washington Post wants to hear from people who have information about Fort Bliss or other ICE detention sites. We will respect any wishes to share information confidentially.

If you are a current or former worker at one of these facilities, or have information about people who have been held there, contact Doug MacMillan at douglas.macmillan@washpost.com or 415-269-6352 on Signal.

ICE documented its first detainees at Fort Bliss on Aug. 1. They were given little opportunity to communicate with the outside world, inspectors later found, noting this would violate ICE rules requiring immigrant detainees be permitted to contact lawyers and family members.

For much of August, when relatives or others searched ICE's public-facing website for the names or identification numbers of people they now know were held there, the site did not show any facility name. Instead, it displayed an ICE phone number that was rarely answered by a human being, according to attorneys and advocates who tried calling many times.

Rather than telephones, the facility had a batch of tablet computers that detainees were told to use to make calls, according to ICE inspection documents. Several reported that the pin numbers they were given to access the tablets weren't working. The report said detainees were told it could take up to a week to fix the problem. It's unclear whether it continues.

For the first three weeks of August, when legal representatives and Rep. Veronica Escobar (D-Texas), who represents El Paso, tried to meet with detainees in person, they were turned away.

On Aug. 4, ICE officials declined a request from Escobar to tour the detention facility, saying in a follow-up email on Aug. 8 that the site was "still under construction and will not be operational until" Aug. 17. At the time of the email, internal ICE records obtained by The Post show the facility held 15 detainees.

Federal law permits members of Congress to enter "any facility operated by or for the Department of Homeland Security used to detain or otherwise house aliens." Escobar noted she was following the agency's own guidelines, which require seven days' notice for such visits. ICE confirmed her request met that requirement, but said it was not allowing visits until "construction is complete" and did not admit her until two weeks after her initial request.

Crystal Sandoval, a legal representative with Las Americas, an El Paso-based nonprofit, said she was also turned away, on Aug. 25, but allowed into the facility on Aug. 29. After passing through security, she was brought to a white tent on the west side of the fenced compound. Inside, six detainees were waiting in a pod outfitted with slots that she likened to money-changing windows.

"One of my biggest concerns was the privacy," she recalled.

The room was hot and noisy, and she had trouble hearing the men. More than 110 HVAC units were visible adjacent to detention tents, satellite images taken on Aug. 31 show.

Sandoval was told a "contact room," where legal representatives could speak directly with detainees one-on-one, wasn't yet complete.

Inspectors later found that detainees were in the dark about their cases because they didn't even know who their assigned deportation officer was, in violation of ICE standards, which say facilities must provide contact information and scheduled hours for ICE staff.

This is a serious problem but is not uncommon in ICE detention centers, Denise L. Gilman, co-director of the Immigration Clinic at the University of Texas School of Law, said in an interview.

“One of the very worst things about immigration detention is just not even understanding why you’re there, how long you’re going to be there, what you can do to further your case,” Gilman said. “Whether that’s to just ask to be sent back home or to claim asylum or to fight for your case in some other way.”

Chavez, a journalist who says he fled Peru after receiving death threats for his coverage, was living in Miami this summer when he was arrested for selling ceviche on the street without a permit. The misdemeanor landed him in jail before he was transferred to a series of ICE detention facilities and eventually brought to El Paso.

While being held at Camp East Montana for more than three weeks, Chavez says he was given no information about the status of his asylum case.

“You never, ever, ever speak with an ICE officer personally about your case,” he said. “They give us generic answers. And when you focus on one issue, they say, ‘I don’t know your case, I couldn’t tell you.’”

‘Visible frustrations and unruliness’

By Aug. 18, ICE had shipped more than 900 migrants to Camp East Montana from all over the country.

The migrants, mostly men but some women, had a variety of backgrounds and countries of origins, Escobar said. Many had been living and working in the United States for decades and had wives and children who are U.S. citizens, she said.

Detainees were brought to live in enormous white tents, each as long as two football fields. Inside, temporary walls divided the cavernous spaces into smaller pods, where up to 72 people ate, showered, slept in bunk beds and used the bathroom, documents and interviews show. Because the pods were open on top, with no ceilings of their own, the conversations, outbursts and cries of hundreds of people created a cacophony day and night.

ICE’s [website](#) states that immigrant detention is not meant as a form of punishment, but rather, only to ensure people show up for their court hearings and removal proceedings. And yet, ICE’s inspectors found some people at Fort Bliss were being held without many basic human necessities.

During the first few weeks, some toilets and sinks didn’t work, according to a memo written by an ICE employee in August and obtained by The Post.

In its statement Wednesday, DHS said that “temporary maintenance issues were resolved immediately.”

By September, inspectors found that only one of the four planned outdoor recreation areas had been completed, and it had to be shared among 1,200 detainees. ICE requires one hour of recreation time per day, five days a week. At Fort Bliss, each person was only allowed 40 minutes of recreation per session, and some detainees reported only getting three sessions in a two-week period.

“There’s just one yard for everyone, and it’s a tiny yard,” Chavez said. This added to detainees’ “visible frustrations and unruliness,” the ICE inspectors wrote.

Because of concerns that detainees were not being given enough food, the facility decided to increase “overall meal calories by 30%,” the ICE inspectors wrote, noting in early September that this plan had not been implemented and was still awaiting the approval of a dietitian. Inspectors also found that detainees needing a certain diet for a medical condition were being served a generic “medical meal” that did not necessarily address the needs of their specific conditions.

ICE inspectors also said contractors failed to follow mandatory procedures for medical care.

Some medical charts were never filled out and some intake screenings were never conducted, meaning, the inspectors wrote, that the medical team could not “identify emergent or past chronic medical conditions, mental illness issues such as suicidal/homicidal ideation or intent that could lead to detainee life-safety issue.”

One detainee had been given psychotropic medication but there was no record of that person ever consenting to it. Another had been placed on suicide watch but there was no record of anyone watching them.

The medical contractor at Camp East Montana, a Florida-based firm called Loyal Source, runs dozens of medical clinics for migrant facilities along the Southwest border. In 2022, a federal oversight agency blamed Loyal Source for “critical understaffing” of these facilities that jeopardized the health and safety of migrants in custody.

Loyal Source did not respond to requests for comment. In comments to congressional investigators published in a report this year, Loyal Source said it does not have a responsibility to fully staff all of the migrant facilities, because its contract only requires it to fill a certain percentage of positions. The company partly blamed the government’s lengthy background check process for its inability to quickly hire new staff members.

A ‘serious vulnerability’

In a press briefing outside the base last month, Sen. John Cornyn (R-Texas) said the facility would be part of an effort to deport immigrants with “criminal charges or convictions” who have exhausted all of their legal remedies.

“We’re not talking about gardeners, housekeepers or people like that,” Cornyn said.

The ICE inspection report says that Camp East Montana holds migrants “of all security levels,” and ICE’s own public data says the facility has admitted both criminal and noncriminal migrants. The facility classifies detainees based on risk level upon their arrival and has a system for keeping high- and low-risk populations separate from one another.

The report says the facility does not, however, have good policies and practices for keeping all of the site’s occupants secure from danger.

When federal inspectors arrived in September, they reported that Camp East Montana had 286 security personnel for more than 1,200 detainees. That’s only a portion of the 452 detention officers Acquisition Logistics told the government it would employ by the time the detainee population passed 1,000, contract records show.

Inspectors also found the facility had no approved security policy, which would include procedures for finding contraband that may pose a threat or controlling access to keys or equipment that could be used as weapons.

Armed guards stationed along the facility’s perimeter were given instructions about the care and handling of their weapons, but the instructions did not explain which situations would justify the use of lethal force, inspectors noted, calling this “a serious vulnerability.”

DHS said Wednesday that the contractor’s security team “is reviewing their Use of Force policy to align with ICE’s Use of Force policy.”

Daniel Gilbert and Dan Lamothe contributed to this report

What readers are saying

The comments express strong criticism of the conditions at the Camp East Montana detention facility, likening it to concentration camps and highlighting the inhumane treatment of detainees. Many commenters blame the Trump administration for these conditions, accusing it of... [Show more](#)

This summary is AI-generated. AI can make mistakes and this summary is not a replacement for reading the comments.

EXHIBIT 7

SECRETARY MARKWAYNE MULLIN

Homeland
Security

Search



U.S. Department of Homeland Security

DHS Debunks Washington Post's False Reporting about Camp East Montana at Fort Bliss

Release Date: September 17, 2025

WASHINGTON — The U.S. Department of Homeland Security (DHS) today set the record straight about the Washington Post's false and misleading report on the Camp East Montana detention facility at Fort Bliss in El Paso, Texas.

*"As our brave ICE law enforcement is facing a more than 1000% increase in assaults the Washington Post is choosing to smear them," said **Assistant Secretary Tricia McLaughlin**. "Here are the facts: any claim that there are "inhumane" conditions at ICE detention centers are categorically false. All detainees are provided with proper meals, medical treatment, and have opportunities to communicate with lawyers and their family members. It is a longstanding practice to provide comprehensive medical care from the moment an alien enters ICE custody. This is the best healthcare that many aliens have received in their entire lives. Meals are certified by dietitians. Ensuring the safety, security, and well-being of individuals in our custody is a top priority at ICE."*

The following are FALSE claims made in the Washington Post's article, as well as the facts:

FALSE CLAIM: "ICE's inspectors found some people at Fort Bliss were being held without many basic human necessities."

THE FACTS: Every detainee receives food, water, medical care, bedding and clean clothing. The Post twisted preliminary inspector notes into a smear campaign. The facility is climate-controlled and staffed to ensure safe and secure housing.

FALSE CLAIM: "During the first few weeks, some toilets and sinks didn't work."

THE FACTS: Temporary maintenance issues were resolved immediately. Detainees returned to functioning lavatory and hygiene facilities.

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10/12/26, 9:55 AM

DHS Debunks Washington Post's False Reporting about Camp East Montana at Fort Bliss | Homeland Security

FALSE CLAIM: *“By September... only one of the four planned outdoor recreation areas had been completed... some detainees reported only getting three sessions in a two-week period.”*

THE FACTS: Recreation is provided consistent with ICE standards.

FALSE CLAIM: *“Due to concerns that detainees were not being given enough food, the facility decided to increase ‘overall meal calories by 30%,’... inspectors noted this plan had not been implemented.”*

THE FACTS: The claim that ICE underfeeds detainees is false. They receive three meals a day. Certified dietitians evaluate meals and ensure they meet the appropriate standards.

FALSE CLAIM: *“Inspectors also said contractors failed to follow mandatory procedures for medical care... charts never filled out... screenings never conducted.”*

THE FACTS: Every detainee receives a medical intake screening and proper medical care. For many illegal aliens this is the best medical care they have received in their entire lives.

FALSE CLAIM: *“One detainee had been given psychotropic medication but there was no record of that person ever consenting to it. Another had been placed on suicide watch but there was no record of anyone watching them.”*

THE FACTS: ICE and its medical contractors follow federal medical guidelines. Oversight is constant, and serious cases are escalated immediately. This is fearmongering clickbait. All detainees have access to appropriate medical, dental, and mental health care, including emergency services. Health care staff have a valid professional licensure and/or certification for the jurisdiction in which they practice and will perform duties within the scope of their clinical license. Facility mental health providers, by virtue of their education, credentials, and experience, are permitted by law to evaluate and care for the mental health needs of patients in ICE custody. Medical treatment shall not be administered against the detainee's will. If the detainee refuses to consent to treatment, medical staff will explain the medical risks to the detainee of declining treatment and make reasonable efforts to convince the detainee to voluntarily accept treatment in a language or manner that the detainee understands.

A detainee may be placed in administrative segregation when the detainee's continued presence in the general population poses a threat to life, property, self, staff, or other detainees; for the secure and orderly operation of the facility; or for medical reasons. Staff shall observe and log observations on an irregular schedule; For cases that warrant increased observation, the staff shall observe detainees accordingly.

FALSE CLAIM: *“When federal inspectors arrived in September... Camp East Montana... only a portion of the 452 officers promised.”*

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10/12/26, 9:55 AM

DHS Debunks Washington Post's False Reporting about Camp East Montana at Fort Bliss | Homeland Security

THE FACTS: Staffing levels at new facilities scale with population. Camp East Montana's ratio of officers to detainees fully meets safety requirements. The Post misled readers by comparing phased staffing numbers without sufficient background context.

FALSE CLAIM: *"Armed guards stationed along the facility's perimeter... instructions did not explain which situations would justify the use of lethal force."*

THE FACTS: ICE officers follow clear and strict rules on use of force consistent with federal law. The Post's claim is irresponsible fear-baiting. The facility contract security staff is reviewing their Use of Force policy to align with ICE's Use of Force policy.

FALSE CLAIM: *"For the first three weeks of August... legal representatives and Rep. Veronica Escobar... were turned away."*

THE FACTS: Tours and legal visits are accommodated after construction is complete and security protocols are in place. This member showed up when they facility wasn't even open yet. ICE did not "hide" conditions — safety dictated phased access. Congressmembers are aware of ICE's 7-day visitation request requirement. There was absolutely no notice given to ICE despite policies that are in place in order to protect detainees and law enforcement.

FALSE CLAIM: *"Inspectors later found that detainees were in the dark about their cases... they didn't even know who their assigned deportation officer was."*

THE FACTS: Detainees are provided access to lawyers and have full due process—in fact the average illegal alien gets far more due process than most Americans.

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