

1 John Doe Pro Per  
2 Jane Doe Pro Per  
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10  
11 UNITED STATES DISTRICT COURT  
12  
13 CENTRAL DISTRICT OF CALIFORNIA  
14

15 John Doe and Jane Doe,  
16 Petitioners/Plaintiffs,

17 v.

18 U.S. Immigration and Customs  
19 Enforcement (ICE);  
20 Department of Homeland Security  
21 (DHS);  
22 Kristi Noem, Secretary of DHS;  
23 Field Office Director, Enforcement and  
24 Removal Operations (ERO), Los Angeles,  
25 in their official capacities; and  
26 John Doe ICE Officers 1-500, in their  
27 individual capacities,  
28

Respondents/Defendants.

CASE NO: 2:25CV11962-MWC-ASx

Title: DECLARATION OF JANE DOE,  
DECLARATION OF JOHN DOE

Date:

Time:

Dept:

(OR SOONEST AVAILABLE DATE)

1 **DECLARATION OF JANE DOE IN SUPPORT OF PETITION FOR WRIT OF**  
2 **MANDAMUS, BIVENS ACTION FOR DAMAGES, AND EX PARTE**  
3 **APPLICATION FOR TEMPORARY RESTRAINING ORDER**

4 I, JANE DOE, declare under penalty of perjury as follows:  
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- 6
- 7 1. I am a petitioner/plaintiff in this action, the spouse of John Doe, and a resident of  
8 California. I am disabled under the ADA, having undergone 37 surgeries, and I rely  
9 on John Doe as my primary IHSS caregiver. I make this declaration based on my  
10 personal knowledge, and if called as a witness, I could testify competently to the  
11 matters stated herein.  
12
  - 13 2. In the time that John was in the ICE facility, I worked as a contract officer for U.S.  
14 Immigration and Customs Enforcement (ICE) in various capacities, including  
15 oversight of detainees and limited enforcement operations. During this time, I had  
16 direct access to internal procedures, detainee records, and interactions between  
17 ICE officers and individuals under supervision or in custody.  
18
  - 19 3. I have personal knowledge of the abuses inflicted on my spouse, John Doe, by  
20 ICE officers and contractors. While in ICE custody prior to his 2011 CAT  
21 withholding grant, John Doe was subjected to repeated punishment for standing  
22 up to forced medical injections and unnecessary procedures, including repeated  
23 TB tests, X-rays, and other treatments that were not medically justified but were  
24 performed to generate excessive billing for private contractors. When he refused  
25 these forced medical interventions, he was punished through isolation in solitary  
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1 confinement for extended periods, denial of privileges, and when not fed or  
2 refusing to eat refusing to report the starvation to superiors—resulting in  
3 dangerous starvation conditions. I personally reported to ICE supervisors that  
4 John Doe was not being treated humanely, but no corrective action was taken  
5 and the supervisors failed to report these issues to their superiors, further  
6 violating his Fifth and Eighth Amendment rights, as well as ADA requirements for  
7 reasonable accommodations.  
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- 10 4. I also witnessed ICE contract officers physically abusing John Doe, including  
11 twisting his wrists while handcuffing him, slamming him around, and using  
12 excessive force during handling, which caused him unnecessary pain and injury.  
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- 14
- 15 5. Additionally, I witnessed and have knowledge of a widespread tobacco sales  
16 scam within ICE facilities, where contractors and guards illicitly sold tobacco  
17 products to detainees in violation of federal laws, including 18 U.S.C. § 234  
18 (prohibiting contraband in federal prisons) and internal ICE policies. This scam  
19 exposed detainees, including John Doe, to harmful substances, leading to his  
20 development of respiratory issues that exacerbate his disabilities. The scam was  
21 profit-driven, with proceeds benefiting private entities colluding with ICE staff.  
22 Staff members turned off smoke detectors or set them to low sensitivity to  
23 facilitate this, getting inmates addicted to cigarettes and selling cheap roll-your-  
24 own cigarettes at excessive markups through the commissary. This led to  
25 “nicotine wars” where inmates fought over access, creating a dangerous  
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environment. There was also a related commissary markup scam where items were overpriced to generate extra profits.

6. These abuses were part of a broader pattern of misconduct I observed during my tenure, including the fabrication of reasons to extend supervision or detention for financial gain, intimidation of individuals and their representatives, and disregard for judicial protections like CAT withholding. For instance, ICE officers routinely threatened detainees with violence to ensure compliance. Although I did not personally witness a specific incident involving an OC/CS (pepper spray/tear gas) grenade thrown into a detainee's cell, this was a common story shared among staff and detainees to scare inmates into compliance. The incident had occurred on a day I was not present, but I did see the aftermath: damage to the cell walls where paint had peeled off, requiring renovations. Such tactics demonstrate the dangerous and violent environment at ICE facilities, making in-person check-ins a genuine threat to safety. These facilities have become torture chambers of innocent people for profit.

7. Furthermore, I have knowledge that ICE officers attempted to physically harm and even possibly kill John Doe for standing up against these abuses and refusing to comply with unjust demands. These attempts included orchestrated setups during detention and supervision that endangered his life, motivated by retaliation. I also observed what seemed to me as obvious under-the-table dealings with outsiders, such as private contractors and external entities, involving enrichment

1 schemes, financial funnels, and off-the-books arrangements to manipulate cases  
2 for profit. The primary kickback scam I was aware of was the transportation  
3 scheme where detainees were repeatedly shuttled back and forth between  
4 facilities or hearing locations, often unnecessarily, to reset immigration hearings,  
5 extend detention times, and inflate billing for secure transportation services  
6 provided by colluding private companies. This not only wasted public funds but  
7 also caused unnecessary suffering and health risks to those involved, including  
8 John Doe. I also witnessed staff members colluding with outsiders and inmates to  
9 move drugs and cell phones around the facilities.  
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- 11  
12 8. It would not take a rocket scientist to conduct a forensic analysis of the amount of  
13 tobacco sold and how much an inmate could realistically smoke during a one-  
14 hour outside break, which would reveal the scale of the scam. Similarly, it does  
15 not take a rocket scientist to test the smoke detectors at the facility or to interview  
16 previous staff, contract workers, or inmates and accurately document their  
17 complaints about similar issues. Several of these individuals have already come  
18 forward and are ready to speak against these injustices.  
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22 9. Both my spouse, John Doe, and I are eyewitnesses to the fact that ICE is  
23 continuing to fail to provide reasonable ADA accommodations for John's  
24 disabilities during supervision. Despite knowledge of his ADA-protected status  
25 and our family's vulnerabilities, ICE insists on in-person check-ins without  
26 alternatives such as telephone or virtual reporting. This denial of accommodations  
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1 forces John to appear at dangerous ICE facilities, putting both our lives in danger  
2 due to the violent environment, risk of retaliation, and disruption to my critical  
3 caregiving needs.  
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6 10. ICE is a dangerous place where people get hurt, people get killed, and people get  
7 forced injections for profit, whether they are innocent or not. It is not an  
8 appropriate place for John Doe, given his protected status and vulnerabilities.  
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10 11. I even recall being asked by a supervising officer if I would partake in the sale of  
11 narcotics. When I refused, I was let go silently without explanation.  
12

13  
14 12. Multiple complaints have been made to the Department of Homeland Security  
15 Office of Inspector General regarding these issues. Multiple investigators have  
16 come through the facilities, but nothing meaningful has been done, and the  
17 results of the investigations remain unknown.  
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19  
20 13. In John Doe's case, the ongoing supervision post-2011 has no legal basis and  
21 continues this pattern, directly harming our family by disrupting his caregiving  
22 duties and endangering my health. The facts stated herein support the claims for  
23 Bivens damages against individual ICE officers for constitutional violations, ADA  
24 relief, and the request for a TRO to halt further enforcement actions.  
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1 I declare under penalty of perjury under the laws of the United States that the foregoing  
2 is true and correct.

3  
4 Executed on December 17, 2025, at Sacramento, California.

5 Jane Doe Pro Per: JD  
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8 **DECLARATION OF JOHN DOE IN SUPPORT OF PETITION FOR WRIT OF**  
9 **MANDAMUS, BIVENS ACTION FOR DAMAGES, AND EX PARTE APPLICATION**  
10 **FOR TEMPORARY RESTRAINING ORDER**

11 I, JOHN DOE, declare under penalty of perjury as follows:

- 12  
13 1. I am a petitioner/plaintiff in this action, the spouse of Jane Doe, and a resident of  
14 California. I am disabled under the ADA and work as an IHSS nurse providing  
15 primary care to my spouse and other disabled family members. I make this  
16 declaration based on my personal knowledge, and if called as a witness, I could  
17 testify competently to the matters stated herein.  
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19  
20 2. While in ICE custody prior to my 2011 CAT withholding grant, I was subjected to  
21 forced medical injections multiple times with needles and repeated x-rays,  
22 including unnecessary procedures that were not medically justified but were  
23 performed solely so ICE could bill insurance multiple times for profit. When I  
24 refused these forced interventions, I was punished through isolation in solitary  
25 confinement for extended periods, denial of privileges, and deliberate withholding  
26 of food—resulting in starvation conditions. ICE officers and staff failed to report  
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1 these starvation incidents to their superiors, despite my complaints and visible  
2 deterioration. Not to mention that religious accommodations and foods are  
3 virtually nonexistent to begin with. It was nearly impossible to even get reading  
4 material.

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7 3. ICE officers also physically abused me, including twisting my wrists while  
8 handcuffing me, slamming me around, and using excessive force during handling,  
9 which caused me unnecessary pain and injury.

- 10  
11 4. I was exposed to a widespread tobacco smoke through a sales scam within ICE  
12 facilities, where contractors and guards sold tobacco products illicitly, leading to  
13 my respiratory issues that persist today. Staff turned off smoke detectors or set  
14 them low to enable this, addicting inmates to cigarettes and selling cheap roll-  
15 your-own at excessive commissary markups, sparking “nicotine wars” and fights  
16 among inmates.

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19 5. I am aware of the transportation scam where detainees like me were shuttled  
20 back and forth unnecessarily to reset hearings and inflate billing. I was a victim of  
21 this scam as well at the cost of the US tax payer.

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23  
24 6. Attorney Marc Bozeman, a licensed Texas attorney (of The Bozeman Law Firm -  
25 litigation boutique) and officer of the court, represented me in immigration matters  
26 and personally witnessed similar ICE abuses against me and others. While  
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1 accommodating me to an ICE “check-in,” Mr. Bozeman was nearly attacked by  
2 an ICE agent involving physical intimidation and threats after asking about the  
3 legality of my supervision. Nearly 20 ICE officers surrounded us and balled their  
4 fists, raising their voices and behaving like savages. We were sitting down, hoping  
5 for a conversation and or answer. This incident demonstrates ICE’s ongoing  
6 propensity and cultural love for violence against witnesses, advocates, and those  
7 associated with protected individuals like myself. Mr. Bozeman is available as a  
8 fact witness to testify regarding these matters if required by the Court.  
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- 10  
11 7. Both my spouse, Jane Doe, and I are eyewitnesses to the fact that ICE is  
12 continuing to fail to provide reasonable ADA accommodations for my disabilities  
13 during supervision. Despite knowledge of my ADA-protected status and our  
14 family’s vulnerabilities, ICE insists on in-person check-ins without alternatives  
15 such as telephone or virtual reporting. This denial of accommodations forces me  
16 to appear at dangerous ICE facilities, putting both our lives in danger due to the  
17 violent environment, risk of retaliation, and disruption to Jane Doe’s critical  
18 caregiving needs. Jane is immunocompromised, and I have been instructed by  
19 my doctor not to go into places like that.  
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22  
23 8. ICE is a dangerous place where people get hurt, people get killed, and people get  
24 forced injections, whether they are innocent or not. It is not an appropriate place  
25 for me, given my protected status and vulnerabilities. Requiring in-person check-  
26 ins exposes me to the same risks of retaliation and harm. I am not the portable. I  
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1 am taking care of American citizens as a state employed nurse. I have passed the  
2 FBI background checks to be able to get my job working with the state. I'm  
3 eligible for state employee discount programs. Arresting me or causing me to get  
4 sick while checking in without ADA accommodations will hurt multiple American  
5 citizens that rely on me to take care of them.  
6

7 9. ICE, does not respect my safe at home protected status, or the confidentiality of  
8 my address under the site program. In fact ICE has contacted the embassy of the  
9 country I am being protected from on multiple occasions and handed me  
10 embassy paperwork telling me to contact them and get my papers in order. This  
11 is a direct violation of the CAT order. This has caused foreign agent to send me  
12 threats via various different platforms.  
13

14  
15 10. The ongoing supervision post-2011 has no legal basis and continues this pattern  
16 of abuse, directly harming my family by disrupting my caregiving duties and  
17 endangering health. There is no legal reason for a sudden change to a two moth  
18 "check-in" cycle or any "check-in" at all. The facts stated herein support the  
19 claims for Bivens damages against individual ICE officers for constitutional  
20 violations, ADA relief, and the request for a TRO to halt further enforcement  
21 actions.  
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1 I declare under penalty of perjury under the laws of the United States that the foregoing  
2 is true and correct.

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4 Executed on December 17, 2025, at Sacramento, California.

5 John Doe Pro Per: Doe J  
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