

EXHIBIT 7

DECLARATION OF JUAN GABRIEL AGUIRRE ALVAREZ

I, Juan Gabriel Aguirre Alvarez, make the following declaration based on my personal knowledge:

1. My name is Juan Gabriel Aguirre Alvarez and I am competent to make this declaration.
2. I was detained at Broadview from the morning of Thursday, October 9, 2025 until Sunday, October 12, 2025.
3. I was arrested by federal agents on the morning of Thursday, October 9, 2025, while I was working at a client's house. I was surprised because I have been in the United States for over 20 years, and I have no criminal record. When the agents approached me, I asked them if they had a warrant. They told me, "We don't need a fucking warrant," or words to that effect. They handcuffed me then put me in a car. I was driven to a parking lot in the back of a store. Agents moved me from the car to a van. We sat in the parking lot for about 30 minutes, then I was driven in the van to Broadview.
4. When I arrived at Broadview, agents took me inside, then put my belongings, including my belt, shoes, phone, and wallet into a plastic Ziploc bag.
5. ICE officers placed me in a crowded room with hundreds of other people. The room was filthy and there were bottles and sandwich wrappers all over the floor.
6. There was one shower at Broadview, but it was not working. I could not shower. I did not have access to soap, hand sanitizer, toothpaste, or a toothbrush. No one received a change of clothes. Many people were detained in their work clothes, and the room smelled very badly of sweat and body odor. The room was hot, which made the smell even worse. When people asked the officers to turn the AC up because it was very hot in the room, the officers ignored the requests.

7. There were two toilets in the room. One toilet was out in the open, and the other toilet was by a wall that was about two to three feet tall. However, it was not tall enough to provide privacy. People were also laying down very close to the toilets, so when I went to the bathroom, I had to watch where I was stepping.

8. There were no beds or mattresses. It was so crowded that there was not enough room for everyone to lay down. If you got to sleep on the floor, you were lucky. We had to take turns laying down on the floor. Sometimes, I asked people if I could have a turn laying down on the floor. Even when I could lay down, the floor was very hard and cold and made it difficult to sleep. The officers kept the lights on all throughout the night. Officers kept opening the holding room door and calling people's names all night long, so it was very loud. These conditions, combined with the terrible smell made it so I could only sleep, at most, around two hours a night.

9. I was not processed for over 24 hours after arriving at Broadview. They processed me around 2:00 or 3:00 pm in the afternoon on October 10, 2025. They brought me out of the room, into an open area. I sat down at a desk with an officer, who asked me when I got to the United States, asked me to provide my personal information, and asked about my family.

10. The officer who was processing me asked me if I wanted voluntary departure. I told him I was not going to sign anything because I needed to talk to a lawyer. I told him I was going to go to court and fight my case for my kids and family. I did not sign anything.

11. After I was processed on Friday, the officers moved me to a small room. At first, there were only a few other people in there. But it quickly filled up, and there were over 50 people in the small space. It became even more crowded than the other room. It was so crowded that when the officers tried to open the door to the room, they could not open it because people had no choice but to try sleep on the floor right in front of the door because it was so crowded.

12. This small room had only one toilet in the corner, out in the open. There was no privacy at all. Everyone could see others using the toilet.

13. I saw some a man get sick and vomit in and around the toilet. The man received no medical care. No officers came to clean up the vomit. It smelled terrible, and people tried to use toilet paper to clean up the vomit.

14. At around 10:00 or 11:00 pm on October 11, a man who was in the small room defecated in his pants. Another man in the room was wearing shorts and pajama pants, so he gave the other man his shorts. The man's soiled pants were placed in the garbage, and it smelled horrible. No one came to clean it up or take it away, so it smelled terrible the entire night. I was not able to sleep at all this night.

15. While I was at Broadview, officers gave me one half of a Subway sandwich at around 8:00 am, then another one half of a sandwich around 2:00 to 3:00 pm. Sometimes, we also got one half of a sandwich at night, around 7:00 to 8:00 pm. On October 11, 2025, the agents only gave us half a sandwich two times: once around 8:00 am and once around 8:00 pm. I did not receive any other food. It was not anywhere near enough food, and I was very hungry. Other people asked officers for more food, but they were refused.

16. Officers only gave me one bottle of water with each sandwich. The officers did not give us any more water, so we had to save our water to try to make it last. I was very thirsty because I did not get enough water.

17. I saw a man who was bleeding from his face. The officers placed him in the holding room while he was bleeding and did not give him any medical treatment.

18. I also saw several people who had swollen and bruised hands and arms. They told me the injuries occurred while they were being arrested. Only some of them received slings for

their arms. They were not taken to the hospital and did not receive treatment for their injuries. Another man who was detained attempted to help some of them because ICE would not help them.

19. On the night of October 11, or early in the morning on October 12, I looked out of the small window of the room I was in and saw people running around in the processing area. I saw an older woman who was passed out and unresponsive. The officers started running around. It took about 10 to 15 minutes for the fire department to come into the building and help her. It was very scary to watch.

20. There was no way to make a confidential phone call at Broadview. There was a phone I was able to use in the first room I was in, but you had to pay for the phone call, and the line was not confidential. There were also people all around me. While I was being processed, the officer allowed me to make one call to my wife using the landline on his desk. However, the officer was right in front of me, so I could not talk privately on the phone.

21. It seemed like the officers at Broadview did not know which individuals were in which rooms. Sometimes, they went around to each holding room calling out a person's name because they don't know where people are. Some people were there for multiple days before getting processed, while some people were processed on the same day. It seemed very disorganized.

22. I was transferred out of Broadview on the morning of Sunday, October 12, 2025 and was brought to Clay County Jail in Brazil, Indiana, where I am currently detained.

23. I was lucky to only be at Broadview from Thursday to Sunday. I talked to people who had arrived before me, on Monday or Tuesday, and they were still there when I was transferred out.

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

Executed on October 20, 2025 at Clay County Sheriff's Immigration Detention.

Juan G. Aguirre

Juan G. Aguirre Alvarez
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