

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOE NEGUSE, in his official capacity as a
Member of the U.S. House of Representatives,
et al.,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT *et al.*,

Defendants.

Case No. 25-cv-2463-JMC

DECLARATION OF REPRESENTATIVE RAUL RUIZ

I, Raul Ruiz, declare as follows:

1. I am a Member of the U.S. House of Representatives, representing California's 25th congressional district. I have been a Member of Congress since 2013. I am also a medical doctor with a Master's degree in Public Health from the Harvard School of Public Health.

2. I have personal knowledge of the facts and information in this declaration, which I respectfully provide to explain how the unlawful new oversight visit policy of the Department of Homeland Security (DHS) and Immigration and Customs Enforcement (ICE) prevents me from performing my oversight duties as a member of Congress and significantly harms my ability to serve my constituents.

DHS and ICE Oversight Activities

3. Since being elected to the House of Representatives, I have been periodically engaged in oversight of DHS and ICE.

4. In the course of conducting oversight of DHS, I visited the ICE Los Angeles Field Office in June 2014 to meet with then-Assistant Field Director Bob Naranjo. That visit was coordinated in advance, and I received a tour of the office as part of it.

5. I have also conducted periodic oversight visits at Customs and Border Protection (CBP) facilities. In December 2018, I joined Representative Joaquin Castro and members of the Congressional Hispanic Caucus in visits to border patrol facilities in Lordsburg, New Mexico where two children—Jakelin Caal and Felipe Gomez—died while in CBP custody. That visit was coordinated in advance and its purpose was to inspect the facility and determine what conditions may have contributed to their premature deaths. During this visit, we received a tour of the entire facility and spoke with migrants held in custody, CBP agents, and onsite medical professionals. In January 2023, I travelled to the U.S.-Mexico border to meet with CBP at the Calexico West Land Port of Entry and tour nearby facilities. This visit was coordinated in advance, and I received tours of both the Calexico West Land Port of Entry and the CBP headquarters in Imperial, California. I also met with Imperial County and Calexico City officials to assess their communities' needs.

6. During the first Trump administration, my staff was in regular, active communication with CBP officials and assisted with coordinating with local nonprofits to provide asylum seekers with support.

7. My oversight of detention facilities has been particularly focused on ensuring that detained individuals receive adequate medical care. In July 2019, I introduced the Humanitarian Standards for Individuals in Customs and Border Protection Custody Act, which calls on CBP to conduct health assessments and emergency medical care, provide humane living accommodations, and ensure access to adequate water and nutrition. This bill came after my December 2018 visit with the Congressional Hispanic Caucus to border facilities in New Mexico where two Guatemalan children were detained before their deaths and drew on my background in international humanitarian

disaster aid as a practicing physician. More recently, I have become concerned with the uptick in ICE raids in my district causing heightened fear and disruption to community businesses.

Defendants' Unlawful Obstruction of July 11, 2025, Oversight Visit

8. On July 7, 2025, my office reached out to the ICE Office of Congressional Relations (OCR) formally requesting a site visit to the Adelanto Processing Center on July 11, 2025, from 8:00 a.m. to 10:00 a.m. PT. I also requested to meet with several detainees apprehended in my district. I notified OCR that other Members of Congress and their staff may possibly join my visit and asked if there was any additional information needed to make the visit happen. That email is attached as Exhibit A.

9. On July 10, 2025, my office received an email from OCR Acting Assistant Director Sean M. Hackbarth who told us he understood I planned to visit Adelanto the next day, but that his office had not yet received a request. AAD Hackbarth quoted DHS's new seven-day notice policy as it appears on the website. My staff replied that my office had submitted our visit request earlier that week and attached the correspondence. They reminded AAD Hackbarth that the seven-day notice policy was not in compliance with the law as written and stated that I would be there the next day as planned to conduct lawful oversight and ensure the residents of my district picked up in ICE raids were being treated well in confinement. AAD Hackbarth replied that his office had not seen our request to visit Adelanto. He reiterated DHS's adherence to the seven-day policy, citing DHS Assistant Secretary Tricia McLaughlin's statement as evidence. He assured my office that ICE continues to comply with Section 527 of Public Law 118-47, but that entry to detention facilities "may be delayed due to exigent circumstances" such as security considerations or the time required to vet site visit requests to ensure they are for a legitimate purpose. That correspondence is attached as Exhibit B.

10. On July 11, 2025, Representative Norma Torres and I traveled to the Adelanto Processing Center in Adelanto, California, to conduct an oversight visit. We were accompanied by

members of our staffs. Members of the public, including the press and representatives of immigrant advocacy organizations who were aware of our visit, also attended. Visiting the facility was necessary to obtain real-time, reliable information regarding the conditions of confinement.

11. We arrived at the field office around 8:20 a.m. PT and were met at the fence by a guard who greeted us. I introduced myself and Representative Torres and explained that we were there to conduct a tour of the facility pursuant to our statutory authority. I then asked him to allow us entry and to speak to an ICE agent about the conditions of the immigrants inside the facility. While I spoke to the guard, an individual whom I believe to be an employee of the GEO Group (the private prison company that contracts with ICE to manage the Adelanto facility) met us at the gate and told Representative Torres and me that it was his understanding that we had already been given notice that we were not approved for a visit that day. Representative Torres explained she had made prior arrangements and provided ICE with notice the previous week.

12. The individual then handed Representative Torres and me a piece of paper with contact information for DHS printed on it. In response, I told him that this was an illegal action because we were entitled by law to conduct oversight visits without providing prior notice. He said he had nothing else to say and turned to walk back to the facility. As he turned to leave, I reiterated that while we were not required by law to provide notice, we had complied with the policy in place at the time of scheduling requesting that Members provide at least 72 hours' notice prior to visiting ICE facilities and that ICE had then changed their policy to require seven days' notice after the fact. I stated that these notice requirements were both obstructions and violations of the law. We asked to speak to an ICE agent and the individual said that he would let the agents know before he walked back into the facility. No one from the facility came out to speak with us.

13. We then spoke to the press about what we had heard about the conditions in the Adelanto Processing Center and what we hoped to accomplish with our visit. Representative Torres

read from the slip of paper, which directed us to communicate with OCR to schedule a visit. We reminded the press we had been in communication with OCR but were nonetheless denied entry in a blatant violation of the law.

14. We left without being able to conduct oversight of the facility. We continue to lack information regarding the conditions of detention at the Adelanto Processing Center.

15. Following our attempted oversight visit, Representative Torres and I sent a letter to Department of Homeland Security Secretary Kristi Noem condemning DHS for unlawfully obstructing and delaying Members of Congress seeking to conduct oversight visits to immigration detention facilities. We also expressed our deep concern with DHS's inconsistent and ever-changing visitation guidance and OCR's failure to timely or substantively respond to our visit requests or questions seeking clarification about DHS policies. Our demand for written assurances that DHS would immediately cease all unlawful restrictions and fully comply with Section 527(a) by July 18, 2025, has gone unmet.¹ We issued a press release regarding the same shortly thereafter.²

The Significant, Irreparable Harm from Defendants' Unlawful Obstruction

16. Federal law requires DHS to allow any member of Congress to visit any DHS facility use to detain or otherwise house individuals for the purpose of conducting oversight without providing advance notice. It is critical for us to understand how appropriated funds are being used in real time on the ground in immigration detention. This close oversight informs each of us on how to

¹ Letter from Representatives Raul Ruiz and Norma Torres to Department of Homeland Security Secretary Kristi Noem (July 15, 2025). Representative Darren Soto and I also sent a letter to Secretary Noem the day prior, expressing our grave concerns with DHS's recent actions including sweeping raids by masked ICE agents, the exercise of excessive force in June against peaceful protestors in Southern California, and the handcuffing of Senator Alex Padilla after he attempted to ask a question at a press conference held by Secretary Noem. *See* Letter from Representatives Raul Ruiz and Darren Soto to Department of Homeland Security Secretary Kristi Noem (July 14, 2025).

² Press Release, Representative Raul Ruiz and Representative Norma Torres, *Representatives Ruiz and Torres Condemn DHS for Blocking Congressional Oversight of Detention Centers* (July 17, 2025), <https://ruiz.house.gov/media-center/press-releases/representatives-ruiz-and-torres-condemn-dhs-blocking-congressional>.

best serve our constituents—especially those of us who represent districts where DHS facilities are located or nearby.

17. I intend to visit the Adelanto Processing Center again, with and without notice, for purposes of conducting oversight. The ability to visit without notice is critically important to obtaining accurate information about detention conditions. I am concerned that if notice were required, ICE might temporarily make changes to any incriminating or substandard conditions that would then obfuscate the picture of the true conditions at Adelanto.

18. Oversight is essential to my ability to adequately serve my constituents impacted by ICE raids and detention. As a physician trained in humanitarian aid, I am concerned with the access those in custody at Adelanto have to health care, especially those individuals with chronic illnesses. It is critical that these individuals have regular access to their medication and based on reports I have received, there is currently cause for concern about the medical care being provided at this facility. I have received reports that meals can often be delayed until 10 or 11 p.m., resulting in diabetic individuals potentially becoming hypoglycemic due to not being able to eat at normal intervals while taking their medication. Oversight is vital to inform whether additional legislation is needed to ensure those in ICE custody have their basic needs taken care of—including medical needs—on a reliable basis.

19. ICE is not currently required to document during intake where individuals will be held or whether they will be moved at some point. This practice disrupts familial, social, and legal support networks, the maintenance of which is critical for those detained by ICE. My ability to conduct oversight is also crucial to crafting legislation that would require ICE to be transparent and to keep individuals in custody within their own communities.

20. Defendants' refusal to permit me to conduct oversight at detention facilities without seven days' notice, and at field offices under any circumstances, hinders my ability to perform my

duties as a Member of Congress. It is important that I have access to real-time information about the quality of medical care detainees are receiving and where they are being held, as this may vary greatly from day to day. An advanced notice requirement would render some of the critical information I need likely out of date by the time I am permitted access. If I receive a report from a constituent that a family member is being detained at Adelanto and that person is not receiving their medication as prescribed, I need to be able to conduct oversight that day. Any delay—especially seven days’ delay—hinders my ability to conduct necessary oversight. Further, an advance notice requirement affords ICE personnel the opportunity to modify practices they learn are resulting in complaints in an attempt to conceal neglect or abuse.

21. Without adequate oversight, I am less able to serve my constituents, to ensure that DHS and ICE are acting consistent with the law, and to craft relevant legislation and appropriations—including limits on such appropriations—going forward.

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

Executed this 6 day of August 2025 in Palm Desert, CA
Riverside County
Raul Ruiz
RAUL RUIZ

RUIZ EXHIBIT A

From: [REDACTED]
To: [CongressToICE](#)
Cc: [REDACTED]
Subject: ICE Visit Request - Adelanto 07/11/25
Date: Monday, July 7, 2025 5:27:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
Importance: High

Dear ICE,

I am reaching out from the Office of Congressman Raul Ruiz, M.D. **We are formally requesting a site visit to the Adelanto ICE Processing Center on Friday, July 7, 2025, 8:00am-10:00am.** We are being mindful of the new policy. The congressman would also like to meet with a few detainees that where apprehend from CA-25 (Cities: Beaumont, Banning, Hemet, San Jacinto, Desert Hot Springs, Cathedral City, Thousand Palms, Indio, Coachella, Mecca, Thermal, Oasis, North Shore, and Imperial County). There are potential other congressmembers/staffers that will be joining, and I would be happy to provide their names. Please let me know what we need to provide to make this happen. Happy to get on the phone asap.

Look forward to hearing from you or being forwarded to the appropriate personnel.

Much Appreciated,

[REDACTED]
Deputy District Director | Congressman Raul Ruiz, M.D. (CA-25)



RUIZ EXHIBIT B

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Adelanto ICE Processing Center Visit Request
Date: Thursday, July 10, 2025 6:15:00 PM
Attachments: [image001.png](#)
[ICE Visit Request - Adelanto 071125.msg](#)

Hi All,

See attached email request sent Monday within the original 72 hours' notice.

From: [REDACTED]
Sent: Thursday, July 10, 2025 3:02 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Adelanto ICE Processing Center Visit Request

Hi [REDACTED] -- I'll keep any eye out.

All detention facility visit request come through our office and I have not seen one yet for Rep Ruiz to visit Adelanto.

The Department is now requiring seven calendar days advance notice for visits to DHS detention facilities. Here's the DHS statement attributable to Assistant Secretary Tricia McLaughlin:

"As ICE law enforcement have seen a surge in assaults, disruptions and obstructions to enforcement, including by politicians themselves, any requests to tour processing centers and field offices must be approved by the Secretary of Homeland Security. These requests must be part of legitimate congressional oversight activities.

As for visits to detention facilities, requests should be made with sufficient time to prevent interference with the President's Article II authority to oversee executive department functions—a week is sufficient to ensure no intrusion on the President's constitutional authority. To protect the President's Article II authority, any request to shorten that time must be approved by the Secretary."

As Department guidance regarding visits to DHS facilities is updated, it will be posted to [ice.gov](https://ice.dhs.gov).

ICE continues to comply with Sec. 527 but entry into detention facilities may be delayed due to exigent circumstances (including personnel and facility security considerations during protests) or time required to vet requests to ensure they for legitimate purposes (i.e., oversight, etc.). ICE will continue to take all actions required to faithfully execute Executive Order 14159, [Protecting The American People Against Invasion](#); we defer additional questions regarding visits to DHS facilities, including questions regarding statement by Secretary Noem, to the Department.

Let me know whether you have questions or need additional information.

V/R,
[REDACTED]

From: [REDACTED]
Sent: Thursday, July 10, 2025 5:39 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Adelanto ICE Processing Center Visit Request

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

Hi [REDACTED]

Thanks for reaching out, but I think you are misinformed. We actually submitted the request earlier this week. Adding in [REDACTED] who can share the email and the response we received.

Also, as I'm sure you know, your 7-day policy is not in compliance with the law as written and either was the 72 hr policy for that matter. The statute specifically states that staffers must give 24 hours of notice before any visit, which under standard statutory construction rules, implies that Members do not have to give any notice (which is also the position of the House General Counsel's Office). Sufficed to say, my boss will be there tomorrow. Ultimately, it will be up to your folks to decide whether they want to operate in compliance with the law or blatantly flout lawful Congressional oversight.

Dubiously legal shenanigans by DHS aside, my boss would really like to check up the residents of his district who were picked up in the ICE raids and make sure

they are being treated well in confinement. To the extent to which you can facilitate that tomorrow, it would be appreciated. Thanks!

Best,

[REDACTED]

[REDACTED]

Chief of Staff
Congressman Raul Ruiz, M.D. (CA-25)

[REDACTED]



From: [REDACTED]
Sent: Thursday, July 10, 2025 5:27 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Adelanto ICE Processing Center Visit Request

Good afternoon, all –

I understand Rep Ruiz is considering visiting the Adelanto ICE Processing Center tomorrow, but we have not yet received a request.

Please note the Department requires requests be made a minimum of seven (7) calendar days in advance to schedule visits to DHS detention facilities. Any requests to shorten that time must be approved by the DHS Secretary.

Visit requests should be submitted during normal business hours to OCR at CongressToICE@ice.dhs.gov. Visit requests are not considered actionable until OCR acknowledges receipt of the request to the requestor. Requests received after hours or on weekends/holidays will be confirmed on the next business day. OCR will work with the appropriate ICE Field Office to coordinate the visit request and will confirm details as soon as practicable.

Visit requests should include the date of the proposed visit, the visit location, the duration of the visit, and the names and titles of all participants. Only Members and congressional staff scheduled and confirmed for the visit will be allowed to participate.

If you have questions or need additional information, please let me know.

V/R,

[REDACTED]

[REDACTED]

Acting Assistant Director
Office of Congressional Relations | U.S. Immigration and Customs Enforcement

[REDACTED]