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9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11 LIGAYA RONDUEN, et al., on behalf of
12 themselves and all others similarly
13 situated,

14 Plaintiffs,

15 v.

16 THE GEO GROUP, INC., a Florida
17 corporation, and SPARTAN CHEMICAL
18 COMPANY, INC., an Ohio corporation,

19 Defendants.

Case No.: 23-cv-00481-JGB-ACCV

**DECLARATION OF JAVIER
HERNANDEZ IN SUPPORT OF
MOTION TO INTERVENE FOR
LIMITED PURPOSE OF
UNSEALING COURT RECORDS**

Date: December 7, 2026

Time: 9:00 a.m.

Courtroom: 1 (Riverside)

Judge: Hon. Jesus G. Bernal

DECLARATION OF JAVIER HERNANDEZ

I, Javier Hernandez, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the following is true and correct:

1. I am the Executive Director of the Inland Coalition for Immigrant Justice (“ICIJ”). I have served in my current position as Executive Director since March of 2015.

2. ICIJ engages in policy advocacy, community organizing and education, and community responses to U.S. Immigration and Customs Enforcement (“ICE”) and border patrol operations. Because of our focus on immigrant justice and the Inland Empire region, we have a special interest in exposing what goes on inside Adelanto ICE Processing Center (“Adelanto”) and the many negative impacts it has on our community.

3. ICIJ originated in 2008, when Roman Catholic Auxiliary Bishop Rutilio del Riego convened immigrant leaders in the Inland Empire Region. His call was to unify leaders in the region to begin organizing collectively with a common message of justice for immigrants. These meetings lead to the creation of the Justice for Immigrants Coalition of Inland Southern California. Near the end of 2015, we began a process to assess our progress, to identify key opportunities and threats, and to evaluate our capacity needs through a process of strategic planning. We also adopted a new name—Inland Coalition for Immigrant Justice—to better reflect our regional and unique identity.

4. We have continued to grow in strength and depth. We have evolved into a dynamic, diverse, and prominent coalition—an engine for justice and change in

1 the Inland Region and California. Currently, over 35 grassroots, community, faith-
2 based, legal service, and workers' rights organizations are part of the Coalition.

3 5. We have been involved in multiple pieces of legislation at the local and
4 state level that aim to hold for-profit immigration detention facilities accountable
5 and prohibit cities and counties from entering into contracts that expand facilities.
6 Our efforts included the passing of legislation to phase out all private operation of
7 detention and correction facilities in the state, but the bill's implementation was
8 later enjoined.

9 6. We are part of the Shut Down Adelanto Coalition ("SDA"), a collective
10 we helped form in 2019 of over twenty organizations working to achieve the just
11 closure of Adelanto. One of the values of SDA is that impacted community
12 members should guide and be at the forefront of localized fights, meaning their
13 concerns should be at the center of decisions reached by the coalition. We amplify
14 the voices of people who have been directly impacted by GEO Group and ICE.
15 We have held rallies where directly impacted individuals can themselves speak of
16 their experiences and have published reports detailing conditions inside Adelanto.
17 We do this to make sure that the people most harmed by GEO's abuses do not
18 have to suffer in silence.

19 7. In 2020, SDA began to expose a list of environmental hazards that have
20 long existed in the facility, such as the misuse of HDQ Neutral, contaminated
21 water, and horrible air quality coming from other toxic sites in close proximity to
22 the detention center. In May of 2020, we submitted a complaint to the Department
23 of Homeland Security Office of Civil Rights and Civil Liberties after receiving
24 reports from people detained in Adelanto that harmful and irresponsible use of

1 HDQ Neutral was causing major physical ailments. Our advocacy led to
2 congressional members, including Rep. Norma Torres, Rep. Judy Chu, and Rep.
3 Mark Takano, speaking out to demand that ICE address the reports from
4 immigrants who were affected by the pesticide. SDA and ICIJ continue to be
5 involved in the fight for accountability from GEO for their inhumane misuse of
6 HDQ Neutral.

7 8. At the onset of the COVID-19 pandemic, SDA demanded the release of
8 everyone inside Adelanto because of GEO and ICE's harmful practices. We held
9 car caravan protests outside the facility, gathered signatures on petitions, and
10 organized rallies where stories relayed from inside were shared. Besides the use of
11 HDQ Neutral, GEO and ICE endangered people inside Adelanto through
12 overcrowding and lockdowns. They did not enforce the measures recommended
13 by the Center for Disease Control and provided almost no personal protective
14 equipment. When a court ordered people be released because of the dangers inside
15 Adelanto, SDA and ICIJ helped facilitate reentry into the community.

16 9. Due to ongoing litigation, public pressure, and the continued advocacy
17 and organizing of SDA and ICIJ, on November 30, 2023, news broke that
18 Adelanto would be closing. Ultimately, the closing of the facility was reversed in
19 late 2024 when ICE extended the facility's operational agreement.

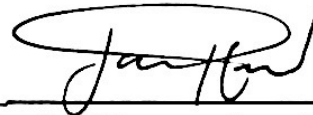
20 10. We continue to advocate for people detained in Adelanto. In May of
21 2026, detainees staged a hunger strike to draw attention to inhumane conditions in
22 the facility. Strikers faced retaliation for exercising their right to protest including
23 withheld meals, solitary confinement, and threats of tear gas and other acts of
24 violence from Adelanto staff. We amplified the strikers' actions, voices, and

1 requests by creating a toolkit for community members to support the detainees’
2 fight.

3 11. We, as longtime advocates for immigrants and against for-profit
4 immigration detention, seek to utilize our right to access the records in this case.
5 We intend to use these records and the stories of Plaintiffs to continue calling for
6 justice and divestment.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Executed on August 12, 2026 in San Bernadino, California.

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11 **Javier Hernandez, Executive Director**
12 **Inland Coalition for Immigrant Justice**