

Christine Brito, Esq. (CA Bar. No.316536)
Law Office of Christine Brito
3419 E. Chapman Ave. #355
Orange, CA 92869
(714)912-5026
Christineb@britoesq.com
Attorney for Petitioner
Gamaliel Rodriguez Pastrana

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Gamaliel Rodriguez Pastrana,
Plaintiff,

v.

FERETI SEMAIA, Warden of the
Adelanto Detention Center; EARNESTO
SANTACRUZ, Current or Acting Field
Office Director, Los Angeles Field Office,
U.S. Immigration and Customs
Enforcement; TODD M. LYONS, Acting
Director of U.S. Immigration and Customs
Enforcement; MARKWAYNE MULLIN,
Secretary of the U.S. Department Of
Homeland Security; and TODD
BLANCHE, Attorney General of the
United States, in their official capacities

Defendants

No. 2:26-cv-03880-CAS-DTB

PETITIONER'S COUNSEL'S VERIFIED
DECLARATION IN SUPPORT OF HABEAS
COMPLAINT AND TEMPORARY
RESTRAINING ORDER

PETITIONER'S COUNSEL'S VERIFIED DECLARATION IN SUPPORT OF HABEAS COMPLAINT AND TEMPORARY RESTRAINING ORDER

I, Christine Brito, declare that all these statements are made of my personal knowledge, which I believe are true, and if I am called to testify as a witness, I could testify under oath in a competent manner.

1. I have had limited conversations with detainee, GAMALIEL RODRIGUEZ PASTRANA since 04/20/2026, the day he was admitted to Victor Valley Global Medical Center.
2. This declaration is being submitted based upon my attorney-client relationship with Mr. Rodriguez. The herein confidential conversations are being shared with the federal court for the limited purpose of shedding light on his first-hand experiences of sub-par medical care and negligence while detained. Due to Mr. Rodriguez's confinement, and difficulty obtaining appointments at Adelanto Detention Center for him to sign his declaration, this declaration is being submitted on his behalf.
3. On or about April 20, 2026, Mr. Rodriguez could not be located by the staff at the Adelanto-Desert View Detention Facility. I was initially communicated that he was not detained, and/or that he was not at that facility, because was not appearing on their daily rosters. As discussed in the prior pleadings, Mr. Rodriguez has been completely shut out from the ICE detainee locator system since April 9, 2026. His detention status or location cannot be publicly verified by his own family, or herein lawyer.
4. It was confirmed on or about April 22, 2026, that Mr. Rodriguez was hospitalized at the Victor Valley Global Medical Center and remained under ICE custody. After speaking Directly to Mr. Rodriguez after nearly a week after being admitted to the hospital, Mr. Rodriguez let me know that he was waiting for authorization for knee surgery and being administered Norco, a drug for the severe pain he was experiencing.
5. Mr. Rodriguez informed me that he was suffering from medical neglect while hospitalized at Victor Valley Global Medical Center. [REDACTED]
[REDACTED] Mr. Rodriguez was unable to physically walk or get in/out of his hospital bed on his own. Mr. Rodriguez has also communicated to me that whenever he was scheduled to take pain medication, the hospital staff were usually 2 hours late in providing the medication, leaving him to bear intolerable pain than medically necessary.
6. Mr. Rodriguez's attending physicians at the government-contracted medical facility, Victor Valley Global Medical Center approved the medically necessary knee surgery for his diagnosis of "Strain/Tear of middle Meniscus to right knee" two separate times, but it was cancelled twice for undetermined reasons.

1 7. See medical notes:

- 2 ■ 04/23/2026 – “Current Status: Per bedside RN, patient will be
3 transferred to a higher level of care for knee surgery. Case
4 management is working on transfer to Arrowhead Regional hospital.
5 Medications: Lovenox 40 mg SQ once daily, Norco 5/325 mg by mouth
6 (for moderate pain)”
- 7 ■ 04/23/2026 – “Per bedside RN, patient will be transferred to a high
8 level of care hospital to get right knee surgery. New plan is for case
9 management to process paper work for transfer acceptance at
10 Arrowhead Regional Medical Center.”
- 11 ■ 04/26/2026 - “At this time transfer has been stopped due to the
12 procedure being an outpatient surgery. Nurse is unsure if Arrowhead
13 has stopped the transfer. Only pain control at this time. Dr. Patel at
14 bedside 7:30 pm discussing with the patient possibility of discharge
15 back to facility with a leg brace.”

16 8. The sudden cancellation of Mr. Rodriguez’s knee surgery forced Mr. Rodriguez to be
17 returned to the Desert View Detention Facility in a wheelchair with minimal pain
18 medication prescriptions on or about April 28, 2026. Mr. Rodriguez never received the
19 medical treatment he needed and continues to need. There are no scheduled follow-ups
20 with any specialists despite the attending physicians recommending that as part of Mr.
21 Rodriguez’s care plan.

22 9. Mr. Rodriguez continues to suffer from severe inflammation to his knee and has made
23 additional requests to be sent back to the hospital to his deportation officer. His recent
24 medical requests for help have gone ignored.

25 10. Mr. Rodriguez’s medical records were provided to him in-person after herein counsel
26 requested authorizations to obtain copies. Upon receipt, Mr. Rodriguez was warned by
27 Desert View Detention Center Deportation Officers that he was prevented from seeking
28 medical records again in 30 days.

11. Herein counsel has reviewed all 194 pages of the medical records that cover until May 5,
2026, and has consent from Mr. Rodriguez to share them with the federal court for the
purposes of corroboration.

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Gamaliel Rodriguez Pastrana, and submit this verification on his behalf. I have discussed with the Petitioner the events described in the declaration. I hereby verify that the factual statements made in the foregoing Declaration are true and correct to the best of my knowledge.

Executed on May 7th, 2026, in Orange, CA.



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EXHIBITS

Exhibit I

**Petitioner's Medical Records Released by GEO GROUP,
including hospitalization at Victor Valley Medical Center
(April 2026-May 2026)**