

# Exhibit 1

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

Edicson David QUINTERO CHACON,

*Petitioner,*

v.

Terrence DICKERSON, Warden, Stewart Detention  
Center, *et al.*,

*Respondents.*

Civil Action No. 4:25-cv-50-CDL-AGH

**DECLARATION OF JUANITA GOEBERTUS, DIRECTOR, AMERICAS DIVISION,  
HUMAN RIGHTS WATCH**

I, Juanita Goebertus, declare the following under 28 U.S.C. § 1746, and state that under penalty of perjury the following is true and correct to the best of my knowledge and belief:

1. I am the Director of the Americas Division of Human Rights Watch and have worked with the organization since 2022. I hold BAs in Law and Political Science from the Universidad de los Andes (Colombia) and an LLM from Harvard Law School. I oversee Human Rights Watch's work on El Salvador and have traveled to the country several times, most recently in 2024. I provide this declaration based on my personal knowledge and experience.
2. Beginning on March 15, 2025, the United States government has transported noncitizens—including more than 240 Venezuelan nationals—to the Center for Terrorism Confinement, the Centro de Confinamiento del Terrorismo (CECOT) in Tecoluca, El Salvador.
3. Human Rights Watch has documented the removal of the Petitioner in this action, Edicson

David Quintero Chacón, who is among the Venezuelans detained at CECOT. This is consistent with CBS News reporting<sup>1</sup> and with information we have collected through interviews with family members of Venezuelans who have been transferred to CECOT and subjected to enforced disappearances and arbitrary detention.<sup>2</sup>

4. CECOT opened in January 2023. CECOT was first announced for a capacity of 20,000 detainees. The Salvadoran government later doubled its reported capacity to 40,000. As Human Rights Watch explained to the United Nations Human Rights Committee in July 2024, the population size raises concerns that prison authorities are not able to provide individualized treatment to detainees, thereby contravening the United Nations Standard Minimum Rules for the Treatment of Prisoners.
5. People held in CECOT, as well as in other prisons in El Salvador, are denied communication with their relatives and lawyers, and only appear before courts in online hearings, often in groups of several hundred detainees at the same time. One Salvadoran attorney who is representing several detainees at CECOT told Human Rights Watch that he has not been allowed to meet or speak with his clients. Relatives of people apparently held at CECOT told Human Rights Watch that Salvadoran authorities have refused to provide them information on the whereabouts or fate of those detained.
6. I sent a letter to Salvadoran authorities on April 5, asking for information on the identity of people detained, their conditions of detention in CECOT, and the legal basis for their detentions. The government of El Salvador has not responded.
7. The Salvadoran government has described other detainees held in CECOT as “terrorists,”

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<sup>1</sup> Camilo Montoya-Galvez & Annabelle Hanflig, *Here are the names of the Venezuelans deported by the U.S. to El Salvador*, CBS News (Mar. 20, 2025), <https://www.cbsnews.com/news/venezuelans-deported-el-salvador-names/>.

<sup>2</sup> News Release, Human Rights Watch, *US/El Salvador: Venezuelan Deportees Forcibly Disappeared* (Apr. 11, 2025), <https://www.hrw.org/news/2025/04/11/us/el-salvador-venezuelan-deportees-forcibly-disappeared>

and has said that they “will never leave.” Human Rights Watch is not aware of any detainees who have been released from that prison. The government of El Salvador denies human rights groups access to its prisons and has only allowed journalists and social media influencers to visit CECOT under highly controlled circumstances. In videos produced during these visits, Salvadoran authorities are seen saying that prisoners only “leave the cell for 30 minutes a day” and that some are held in solitary confinement cells, which are completely dark.

8. While CECOT is likely to have more modern technology and infrastructure than other prisons in El Salvador, I understand, on the basis of interviews with journalists and others who have entered CECOT, that the mistreatment of detainees there is in large part similar to what Human Rights Watch has documented in other prisons in El Salvador, including Izalco, La Esperanza (Mariona) and Apanteos prisons. This includes cases of torture, ill-treatment, incommunicado detention, severe violations of due process and inhumane conditions, such as lack of access to adequate healthcare and food.
9. Prison conditions in El Salvador should be understood within the context of the country’s three-year-long state of emergency, which has suspended constitutional due process rights. Since the state of emergency was instituted in March 2022, security forces report detaining 85,000 people (the equivalent of 1.4% of the country’s population). Although the government has denied Human Rights Watch information on the number of detainees it holds and its prison capacity, Human Rights Watch estimates based on official data that there are 109,000 people held in prisons with an official capacity for 70,000. Since the state of emergency was instituted, over 350 people have died in El Salvador’s prisons according to Salvadoran human rights groups, including the organization Cristosal, which

jointly authored our December 7, 2022 report on El Salvador's prisons titled, "We Can Arrest Anyone We Want" (hereinafter "We Can Arrest Anyone"). Exh. A.

10. In July 2024, Human Rights Watch published a report on abuses committed against children during the state of emergency, titled "Your Child Does Not Exist Here." Exh. B. Over 3,300 children have been detained, many without any ties to gang activity or criminal organizations. Human Rights Watch documented 66 cases of children subjected to torture, ill-treatment and appalling conditions, including at times extreme overcrowding, unhygienic conditions, and inadequate access to food and medical care while in custody. In February 2025, the Legislative Assembly approved a law ordering the transfer of children detained for organized crime offenses to the country's adult prison system, exposing them to a heightened risk of abuse and violating international juvenile justice standards.
11. For "We Can Arrest Anyone," and in "Your Child Does Not Exist Here," Human Rights Watch interviewed more than 30 people released from El Salvador's prisons, including children, and dozens of people who have relatives in jail. These interviews were conducted in person in several states in El Salvador or by telephone and corroborated by additional research and media reports.
12. One of the people we spoke with was an 18-year-old construction worker who said that police beat prison newcomers with batons for an hour. He said that when he denied being a gang member, they sent him to a dark basement cell with 320 detainees, where prison guards and other detainees beat him every day. On one occasion, one guard beat him so severely that it broke a rib.
13. The construction worker said the cell he was imprisoned in was so crowded that detainees had to sleep on the floor or standing, a description often repeated by people who have

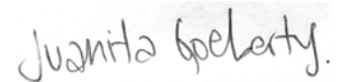
been imprisoned in El Salvador.

14. Another detainee we interviewed was held for two days in a police lock-up with capacity for 25 people, but he said that when he arrived, there were over 75 prisoners. He slept on the floor next to “the bathroom,” a hole in the ground that smelled “terrible.” He was sent in a group of other prisoners to Izalco prison on the third day, where they were ordered to take off their clothes. The group was forced to kneel on the ground naked looking downwards for four hours in front of the prison’s gate. Guards took the group to a room with five barrels full of water with ice, he said. Fifteen guards forced him and others to go into the barrels for around two hours in total, as they questioned them. The detainee was forced into a barrel “around 30 times,” and was kept there for about a minute each time. Guards forced his head under water so he could not breathe. “I felt I was drowning,” he said. Guards repeatedly insulted them, calling them “dogs” and “scum” and saying they would “pay for what [they] had done.”
15. A third detainee held in prison in June 2022 described being sent to what he described as a “punishment cell.” He said officers moved him and others there to “make room for other detainees.” The new cell was constantly dark, detainees had to sleep standing due to overcrowding, and there was no regular access to drinking water.
16. For “We Can Arrest Anyone,” Human Rights Watch and Cristosal gathered evidence of over 240 cases of people detained in prisons in El Salvador with underlying health conditions, including diabetes, recent history of stroke, and meningitis. Former detainees often describe filthy and disease-ridden prisons. Doctors who visited detention sites told us that tuberculosis, fungal infections, scabies, severe malnutrition and chronic digestive issues were common.

17. Out of the estimated 350 detainees who have died in the last three years in El Salvador's prisons, we documented 11 of these cases in detail in "We Can Arrest Anyone," based on interviews with victims' relatives, medical records, analysis by forensic experts, and other evidence.
18. In one case, a person who died in custody was buried in a mass grave, without the family's knowledge. This practice could amount to an enforced disappearance if authorities intentionally concealed the fate or whereabouts of the detainee.
19. In at least two other cases, officials appear to have failed to provide detainees the daily medication they required to manage underlying health conditions such as diabetes.
20. In at least four of the eleven cases, photographs of the bodies show bruises. Members of the Independent Forensic Expert Group (IFEG) of the International Rehabilitation Council for Torture Victims (IRCT), who reviewed the photos and other evidence in two of the cases, told Human Rights Watch and Cristosal that the deaths were "suspicious" given that the bodies "present multiple lesions that show trauma that could have been caused by torture or ill-treatment that might have contributed to their deaths while in custody."
21. In a separate Human Rights Watch report from February 2020, titled "Deported to Danger," Human Rights Watch investigated and reported on the conditions in Salvadoran prisons experienced by Salvadoran nationals deported by the United States. Exh. C. In interviews with deportees and their relatives or friends, we collected accounts of three male deportees from the United States who said they were beaten by police or soldiers during arrest, followed by beatings during their time in custody, which lasted between three days to over a year. During their time in prison, two of these individuals reported being kicked in the face and testicles. A third man described being kicked by guards in

his neck and abdomen, after which he sustained injuries requiring an operation for a ruptured pancreas and spleen, month-long hospitalization, and 60 days of post-release treatment.

Executed on this 16th day of April, 2025 in Villa de Leyva, Colombia.

A handwritten signature in black ink, reading "Juanita Goebertus", is positioned above a horizontal line.

JUANITA GOEBERTUS