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Immigration Detention Expansion in Trump's Second Term

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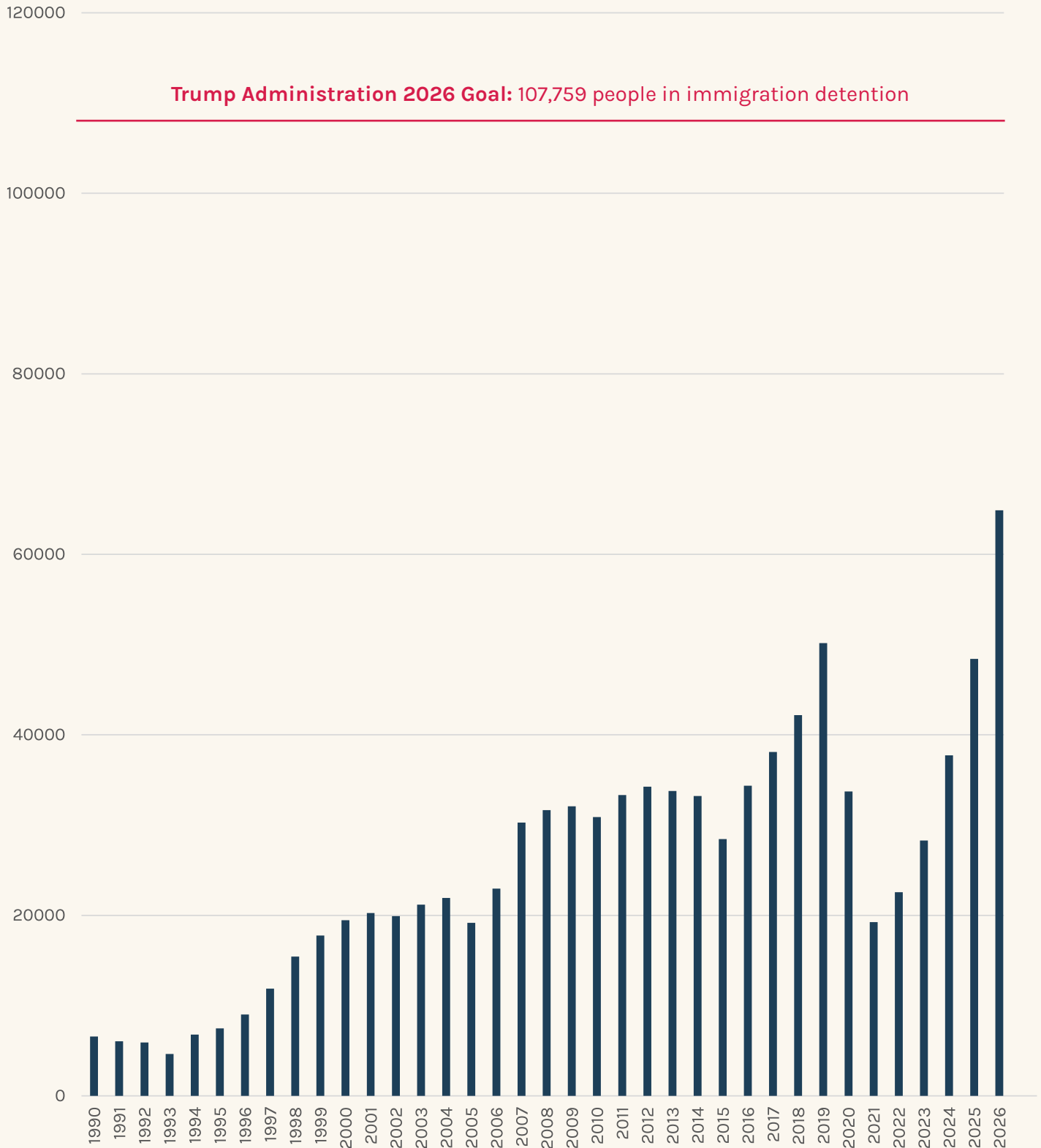


Executive Summary

When President Trump took office in January 2025, there were roughly 40,000 people being held in immigration detention. Through the end of December, that number had risen by almost 75 percent, with more than 68,000 people held in immigration detention across the United States¹ and the system reportedly capable of holding 70,000 people on any given day²—the highest level in history. Yet this is just the start for the Trump administration, which according to leaked plans originally hoped to have nearly 108,000 immigration detention beds online by January 2026. And while the administration has not met this ambitious goal, the rapid and ongoing expansion of immigration detention has wrought enormous changes on immigration enforcement, trapping hundreds of thousands of noncitizens in an increasingly opaque world of remote jails and private prisons, where U.S. Immigration Customs Enforcement (ICE) can exert ever-greater pressure on the people it is jailing to give up, accept deportation, and forego any chance to remain in the United States.

A system of detention, which did not fully take off until the mid-1990s, is now on track to rival the entire federal criminal prison system by the end of President Trump's second term in office. This expansion is fueled by an unprecedented increase in funding provided by Congress in President Trump's One Big Beautiful Bill Act. Combined with ICE's annual appropriations, ICE has nearly \$15 billion per year to use on immigration detention through the end of fiscal year 2029.

FIGURE 1:
AVERAGE DAILY POPULATION IN IMMIGRATION DETENTION, FISCAL YEARS 1990-2026, COMPARED TO TRUMP ADMIN'S 2026 GOAL³



Source: Data for FY 1990 through FY 2018 via Emily Kassie, "Detained: How the United States created the largest immigrant detention system in the world," *The Marshall Project*, September 24, 2018, <https://www.themarshallproject.org/2019/09/24/detained>; Data for FY 2019 through FY 2026 via U.S. Immigration and Customs Enforcement, Detention Statistics, <https://www.ice.gov/detain/detention-management>

This report aims to document the historic expansion of detention under the Trump administration. It details not only the policy changes which have led to ICE detention reaching the highest level on record, but also their impact on the individuals who have found themselves locked into it. The growth in immigration detention, and the spectacle which has accompanied the construction and use of new facilities—coupled with the near-elimination of any transparency into the operation and use of those facilities—is the backbone of President Trump's mass deportation efforts.

The changes that have occurred in detention go beyond basic questions of infrastructure and development of the capacity to detain. As immigration enforcement has become the top priority of federal law enforcement, major shifts have occurred in the profile of *who* is arrested, and therefore *who* is detained, to begin with.

Surges of federal law enforcement officers taken from agencies as varied as the FBI and the IRS have fanned out across the nation to carry out “at-large” arrests in American communities, **which increased by 600 percent in Trump's first nine months in office.** Targeted enforcement operations have been supplemented by more indiscriminate worksite raids, “roving patrols,” and “collateral arrests;” and immigrants dutifully attending court hearings and check-ins have been re-detained without warning. **The result of these changes in arrest practice has been a 2,450 percent increase in the number of people with no criminal record held in ICE detention on any given day.**

With the administration sending more people to detention centers, fewer people are being permitted to leave them while they fight their cases. On January 20, President Trump ordered that ICE maximize its use of detention. Within weeks, ICE stopped issuing discretionary releases, requiring immigrants held in detention centers to petition immigration judges for release on bond. **From January through November 29, discretionary releases from detention fell by 87 percent.** And by late summer 2025, the Trump administration took further steps to deprive people of the opportunity for release. This set controversial new legal precedents barring immigration judges from releasing huge swathes of immigrants on bond—keeping them locked in mandatory detention.

As this report reveals, rather than focusing on serious public safety threats and flight risks, the Trump administration is primarily using detention to pressure people into giving up their chance to remain in the United States. **As of November 2025, for every one person released from ICE detention pending a hearing or after being granted relief, 14.3 people were deported directly from ICE custody, up from a ratio of 1.6 in December 2024.**

Without releases, the population of people held in ICE detention has expanded rapidly. Through November, the number of people held in ICE detention on any given day rose by nearly 75 percent from January. The administration plans to further increase the system by over 150 percent from January and has already initiated contracts to add new facilities to the system. By the end of November 2025, ICE was using 104 more facilities for immigration detention than at the start of the year, a 91 percent increase.

TRUMP'S SECOND TERM AT A GLANCE

600%

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enforcement officers

2,450%

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discretionary releases
from detention January -
November 29, 2025

These new facilities range from small county jails offering a few beds to previously closed state prisons that can house over 2,000 people to newly-constructed tent facilities on military bases that can hold up to 5,000 people. This capacity has also been augmented by new state-run detention facilities, including the infamous “Alligator Alcatraz” facility, the first-ever state immigration detention facility that is not operating under contract with ICE.

As documented by three stories included in this report from people currently or recently held in ICE detention, conditions of confinement have grown significantly worse as detention has expanded. **Deaths in ICE detention in 2025 were the highest ever for a non-COVID year.** And for the rising number of people held in detention, the worsening conditions have led many to simply give up their cases—even if they had viable claims.

Today, detention is at the highest level in history. In July 2025, Congress authorized \$45 billion for ICE detention, to be spent through Fiscal Year 2029. This funding comes on top of the already record high \$4 billion appropriated for ICE detention in the Fiscal Year 2025 budget; an annual sum which is expected to increase in subsequent years. In the final section of this report, **we calculate that with this funding, ICE could potentially acquire enough detention beds to house 135,000 people at any given time, more than three times the entire capacity of the system at the time President Trump took office.** Private prison companies, as well as state and local governments, are set to cash in on these huge sources of funding.

With the Trump administration effectively eliminating three immigration oversight sub-agencies and prohibiting members of Congress from conducting lawful inspections, the detention system and the abuses endemic to it are more opaque than ever before. The problems with conditions in ICE detention are likely to grow only worse over the next four years. Families and adults disappear into detention in one state and reappear thousands of miles away—or in another country following a rapid deportation. While a flood of habeas corpus lawsuits has prevented some injustices, the majority of people do not have the resources or the ability to fight ICE’s choice to detain.



Introduction

In recent years, the majority of people arrested and sent to ICE detention have been either migrants apprehended at the border or noncitizens arrested in the country's interior following an interaction with the criminal legal system. At the border, U.S. Border Patrol agents determine whether a migrant taken into custody will be immediately repatriated without leaving U.S. Customs and Border Protection (CBP) custody, released on conditions, or transferred to ICE to be detained for further processing. Noncitizens arrested inside the United States are transferred to the custody of ICE for initial processing, after which ICE determines whether to release the person or detain them for further processing.

As a result, the people held in ICE detention come from a wide variety of different backgrounds. Some have lived in the United States for decades, even grown up here as children. Others have spent nearly their entire time in the country while in immigration custody.

This report documents the changes to the U.S. immigration detention system and provides a profile of three people caught up in this system in the first year of President Trump's return to office. One is a green card holder and father of two from Trinidad who came to the United States when he was four. Border Patrol detained him at the airport because of a crime he pled guilty to in 2023. Another is a woman detained after crossing the border in 2024. A judge determined she was eligible for humanitarian protection, yet she remains detained for reasons ICE has never told her. The third is a recipient of Deferred Action for Childhood Arrivals (DACA), who was detained by ICE despite valid DACA status following an interaction with the criminal legal system. Although each person arrived at detention from very different legal statuses, all three experienced the brunt of these rapid changes in detention conditions and enforcement practices in this first year of the Trump administration.

The U.S. system of immigration detention that President Trump inherited on January 20, 2025, was already plagued by endemic and inhumane conditions. Government watchdog reports and decades of litigation reveal consistent and long-standing failures of care in detention.⁴ This includes inadequate medical care, lack of access to counsel, poor physical conditions, overcrowding, and verbal and sometimes physical abuse by guards and officials.

For most of the 20th century, long-term immigration detention was the exception, not the rule. Prior to the 1980s, long-term immigration detention was primarily reserved for the screening and potential exclusion of immigrants arriving at the border and seeking admission. In 1981, after President Reagan took office, the United States opened its first modern immigration detention facility in Miami: the Krome Detention Center which is still operating to this day. Then-Attorney General William French Smith declared that creating a new immigration detention system was “necessary to discourage people like the Haitians from setting sail in the first place.”⁵ Since Krome opened in 1981, the immigration detention system has expanded from a single large detention center to over 180 facilities in use for immigration detention across the country. In 1990, the entire detention system had the capacity to hold fewer than 7,000 people, but by 2007, the system had the capacity to hold over 30,000 people. By 2018, the system first cracked 40,000 people in custody.⁶

The majority of ICE detention centers are not directly operated by ICE. Instead, they are run through contracts made by ICE with private prison companies (so-called Contract Detention Facilities) or through Intergovernmental Services Agreements signed with state and local governments. ICE also has longstanding agreements with the U.S. Marshal Service to use bed space in dozens of facilities leased to the Marshals. Only a small number of facilities remain directly owned by the federal government.

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As of early 2025, roughly 90 percent of people ICE detains were held in facilities either owned or operated by private prison companies.⁷ ICE itself only operates a limited number of facilities, most of which were constructed in the 1980s. The rise of detention under President Trump has been a boon to these companies. Following his election in 2024, the stock price of both CoreCivic and GEO Group, the two largest private prison companies in the United States, doubled, and by the second quarter of 2025, CoreCivic had reported a 103.4 percent increase in net income.⁸

Inside these facilities, inadequate medical care has been a serious problem for many years.⁹ A 2024 study found that 95 percent of deaths in ICE detention could potentially have been prevented with better medical care.¹⁰ Many individuals with serious medical conditions held in detention have reported that medical staff often provide only basic pain medication when asked, and delay referrals to the hospital. Those with chronic medical conditions or cancer

also face delays in care. For example, in 2015 a man died of cancer after four years in ICE detention. Despite months of requesting more serious medical treatment, he reported that staff provided him only ibuprofen.¹¹ Similar scenarios continue to occur today: in July 2025, a man with colon cancer reported officers repeatedly denied him any cancer treatment despite extensive rectal bleeding and a previous diagnosis of colon cancer.¹²

Beyond inadequate medical care, immigration detention centers have long faced problems that exist throughout the United States prison system. While ICE's National Performance-Based Detention Standards require that individuals be treated better than convicted prisoners, individuals are still held in cells, wear jumpsuits, and are subject to the possibility of solitary confinement at the detention center's discretion. And unlike a sentence to jail with a definite end date, some individuals may remain in immigration detention for years fighting their cases. Given these conditions, many immigrants who have never spent time in jail before are pushed to give up their cases rather than remain detained in poor conditions with no clear end date in sight.

Detention itself also has a significant impact on the ability of individuals to remain in the United States. Recent analysis of immigration court data by the American Immigration Council reveals that one of the most important factors in whether a person facing removal is permitted to remain in the United States is detention. People who are detained are more than twice as likely to be ordered removed than people who are able to go through removal proceedings outside of detention.¹³ This is because detention keeps people away from their support base, making it more difficult for them to present a legal case, and more likely to give up rather than fight removal.



Part I: Landscape of Detention Under Trump

Since taking office, the Trump administration has supercharged the interior enforcement system, morphing it into a larger, more aggressive federal presence than ever before. This has occurred through not only shifts in formal policy, but also changes in agency priorities, diversion of resources from other parts of the federal government, and abandonment of long-standing internal policies which had previously limited interior enforcement under administrations of both parties.

At its core, these changes rest on the Trump administration's implicit view that immigration enforcement should be the most important law enforcement priority of the entire federal government.¹⁴ Virtually every law enforcement agency within the federal government, from the FBI to the U.S. Postal Inspection Service, has been co-opted into the mass deportation effort.

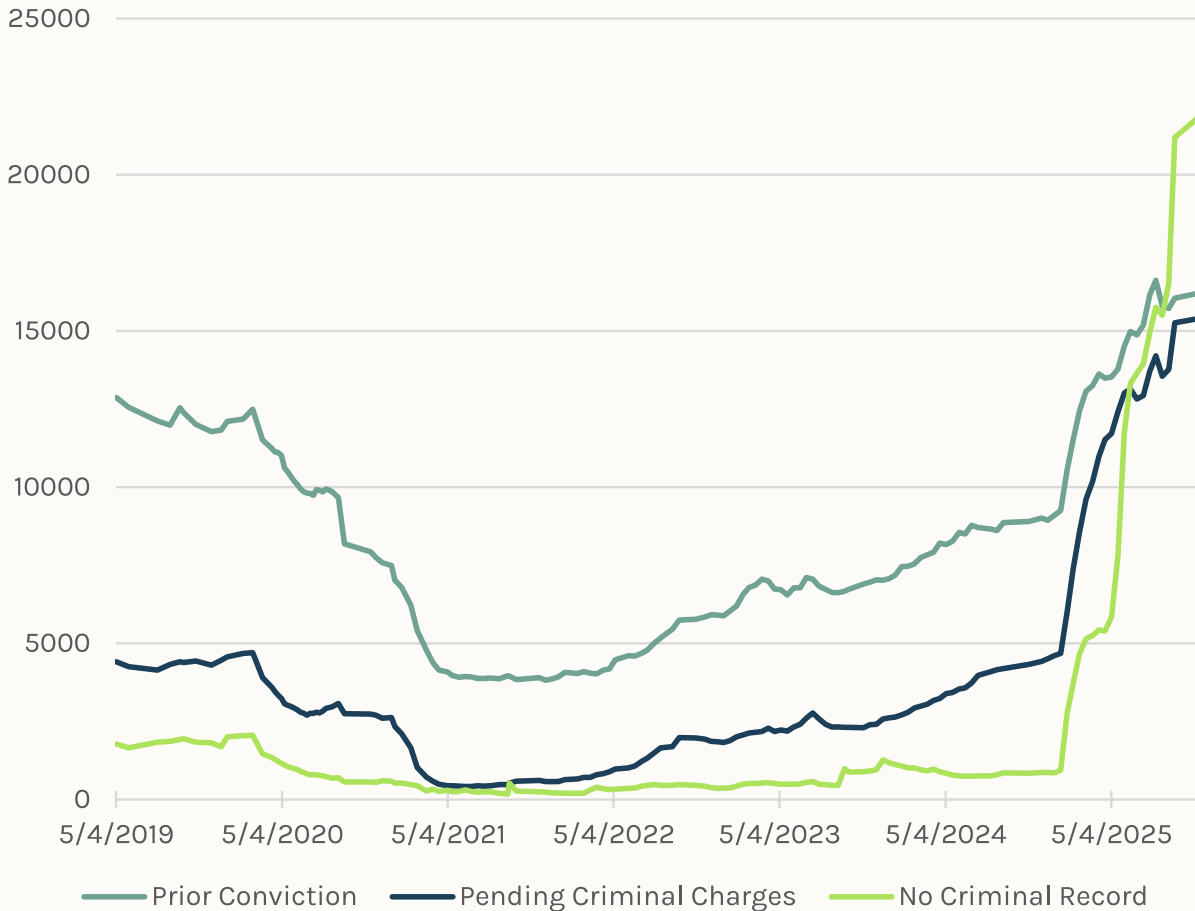
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With over 14 million undocumented immigrants in the United States,¹⁵ ICE has for decades focused its limited resources on those individuals deemed most likely to be public safety threats or fugitives—primarily those with criminal records or prior orders of removal. Large-scale at-large arrests of individuals without criminal records were rare, and most undocumented immigrants lived and worked with little fear of arrest so long as they avoided any contact with the criminal justice system. As a result, most Americans have no experience with large-scale immigration enforcement in their communities. But that is changing.

The Trump administration has dramatically expanded arrests, and subsequent detentions, of people who were not traditionally targets of immigration enforcement through three major shifts in policy: the widespread use of “collateral arrests” and “roving patrols,” the expansion of worksite raids to a level not seen in the modern era, and the creation of new “re-arrest” policies which have seen ICE officers detaining immigrants dutifully appearing for court hearings and ICE check-ins.

The result of these changes has been a massive shift in who is arrested, and a resulting shift in who is being held in detention. Before President Trump took office, the vast majority of people held in ICE detention were either migrants arrested at the border or people arrested by ICE in the interior who had some prior criminal record—either a prior conviction (for any offense at all, including everything from minor traffic violations to serious offenses) or pending criminal charges. That is no longer the case. From January through the end of November, the percent of people held in detention after an ICE arrest without a criminal record rose from six percent to 41 percent (see Figure 2).¹⁶ In total, the number of people with no criminal record arrested by ICE and sent to detention increased by 2,450 percent from January through the end of November.

FIGURE 2: NUMBER OF PEOPLE IN DETENTION ARRESTED BY ICE IN THE INTERIOR, BY CRIMINAL RECORD¹⁷
MAY 2019 THROUGH NOVEMBER 29, 2025



Source: Transactional Records Access Clearinghouse, "ICE Detainees," accessed November 19, 2025, https://tracreports.org/immigration/detentionstats/pop_agen_table.html

As more people end up in detention, their chances of being released are lower than ever. The Trump administration has reshaped the policy landscape of detention by adopting new policies through executive orders and changing legal precedent to make it harder than ever for people to be released. These policies include the adoption of a blanket “no-release” policy which has severely limited discretionary releases from detention and the reclassification of millions of people to be covered under “mandatory detention” laws.

As release from detention has become increasingly difficult to win, ICE detention centers have become overcrowded, and conditions in these facilities have deteriorated. The Trump administration has brought dozens of new facilities online, supported the creation of a new model of state immigration detention, used military bases to detain immigrants in sprawling tent camps, and eliminated or restricted internal and Congressional oversight. The rapid expansion of detention infrastructure has made it even more difficult for those outside of detention to conduct oversight over all the facilities.

Taken together, these changes in arrest practices, in detention policies, and in the detention system itself have created an opaque system where an ever-greater number of people are disappearing into detention centers around the country for days, weeks, or months at a time.

Changes in Enforcement Have Reshaped the Profile of Who is Detained

Historically, the majority of arrests in the interior involved ICE officers traveling to a local, state, or federal law jail or prison, and taking custody of a person who is already in the hands of a law enforcement agency. In the decade before COVID hit and disrupted ICE operations, 83 percent of all ICE arrests were “custodial”—they occurred when a person was already in law enforcement custody and was then transferred to the custody of ICE by a different local, state, or federal law enforcement agency.

“At-large” immigration enforcement arrests, where individuals were arrested at their homes, worksites, or other public locations, were significantly rarer. From Fiscal Years 2008 through 2021, “at-large” arrests averaged roughly 36,000 per year, while custodial arrests fluctuated from a high of 274,937 in Fiscal Year 2010 to a low of 48,089 in Fiscal Year 2021 during the height of the COVID-19 pandemic.¹⁸

Those arrested by ICE in the interior were typically individuals who had previously interacted with the criminal justice system, and either had a prior conviction or a pending criminal charge (most typically minor offenses and misdemeanors). As a result, arrests and “at large” detentions of people who had no criminal records were statistically rare. That is true no longer.

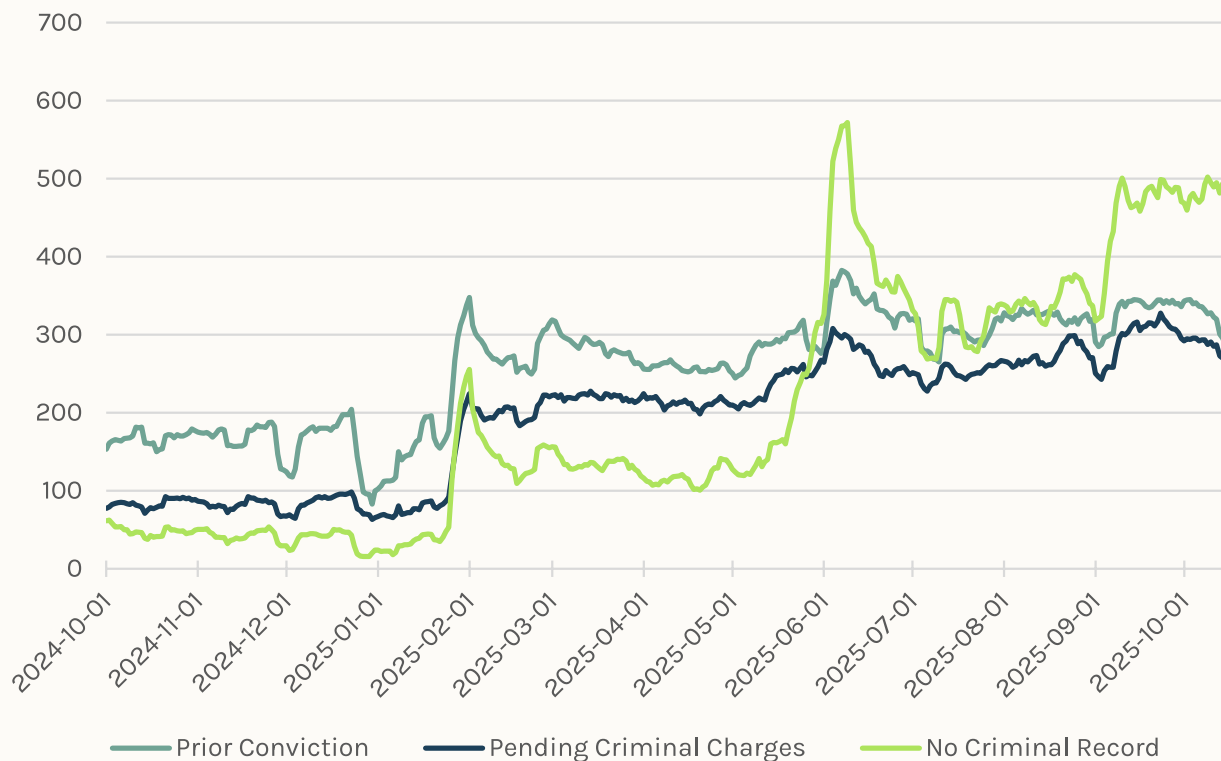


83%

of all ICE arrests prior to 2020 were “custodial,” meaning they occurred when a person was already in custody.

Beginning in early June, arrests of people with no criminal record at all skyrocketed and peaked in late June at the height of the Los Angeles raids. From mid-June through October 15, the largest single group of people arrested by ICE was people with no criminal record (see Figure 3).

FIGURE 3: AVERAGE DAILY ICE ARRESTS, BY CRIMINAL HISTORY, OCTOBER 1, 2024 TO OCTOBER 15, 2025



Source: Data produced under the Freedom of Information Act and published by the Deportation Data Project, available at <https://deportationdata.org/data/ice.html>.

The result of these shifts is that the demographic profile of the average person sent to detention is now categorically different than in the past: this person is less likely to have had any interaction with the criminal legal system and more likely to have been arrested at their workplace.

Expansion of “At-Large” Arrests Through Roving Patrols and Collateral Arrests

Before 2025, most at-large arrests were “targeted” arrests. ICE officers were given the name and address of a specific person and would find that person and arrest them. If there were other people at the location, ICE officers could question anyone they determined to be a noncitizen as to whether they were also in compliance with immigration law. If ICE chose to arrest that person, it became a “collateral” arrest—a person who was not the primary target of the ICE officer.

The Biden administration largely abandoned the practice of collateral arrests, directing ICE officers to follow strict requirements in the law providing that ICE could not arrest individuals unless they had evidence that the person was going to flee rather than appear for a court proceeding.¹⁹

Not all at-large arrests are the result of “targeted” enforcement. “Roving patrols” involve immigration officers, traditionally Border Patrol at or near the land border, driving around, stopping, and questioning people they see on the streets who are suspected of being in the country unlawfully.²⁰ Because immigration status is not visible, roving patrols have often been linked to allegations of racial profiling.²¹

After taking office, the Trump administration quickly reversed previous limits on collateral arrests by ordering agents to take into custody anyone they encounter who is undocumented—effectively ignoring the requirements that such warrantless arrests may only be done where someone is a flight risk.²²



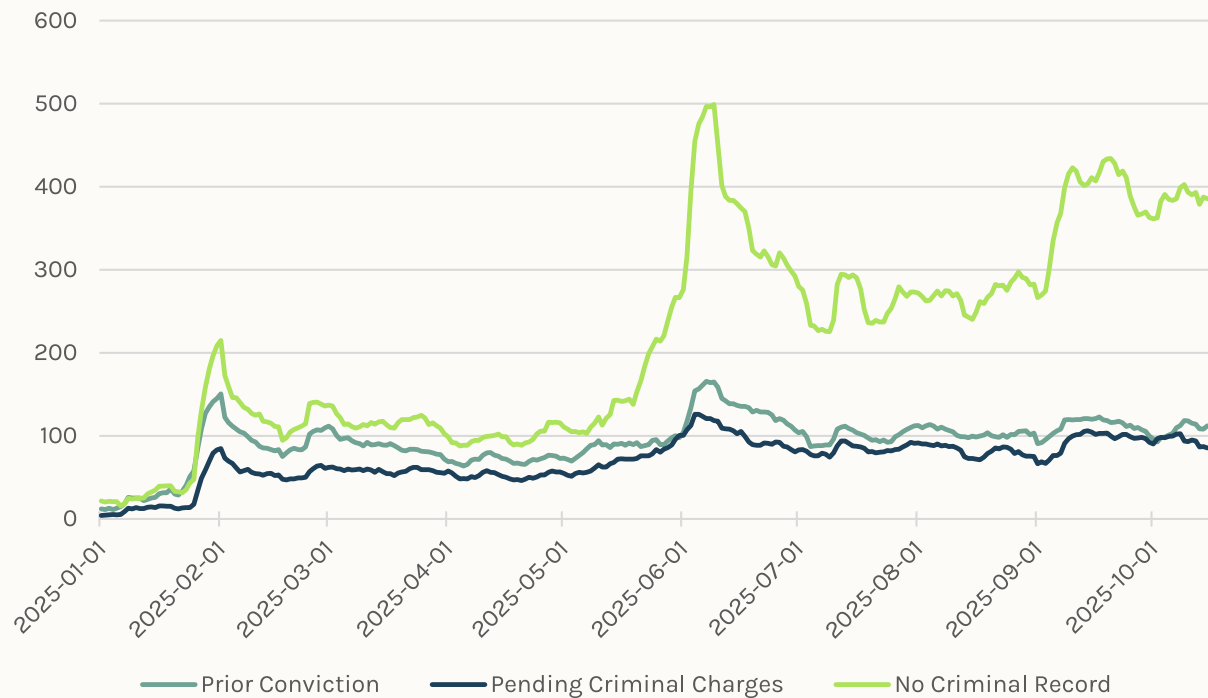
Photo credit: Immigration and Customs Enforcement /Flickr

Tinkering with collateral arrest policies was not sufficient for the Trump administration’s mass deportation goals. At a meeting in Washington, D.C. in late May, White House Senior Advisor Stephen Miller and DHS Secretary Kristi Noem ordered ICE to stop focusing on people with criminal records and instead work towards reaching a goal of 3,000 arrests per day.²³ At this meeting, Miller suggested that agents go to the nearest Home Depot and arrest as many day laborers as they could find to boost arrest numbers.²⁴ Less than two weeks later, DHS officers in Los Angeles began conducting “roving patrols” and raids at Home Depots, flea markets, and other areas where immigrants would congregate—and have continued to target similar sites across the country in the months since.²⁵

After multiple weeks of roving patrols in Los Angeles, a federal court ruled that these actions were unlawful and amounted to racial profiling.²⁶ Although the 9th Circuit upheld this opinion,²⁷ the Supreme Court stepped in on September 8, 2025 to temporarily halt the injunction while it was on appeal, allowing DHS to resume such roving patrols throughout Los Angeles and elsewhere.²⁸

The result of this shift in arrest practices has been a dramatic increase in “at-large” arrests—especially of people with no criminal record who were stopped in public spaces. This includes landscapers, construction workers, and other immigrant laborers. From January 21 through October 15, ICE officers carried out nearly 110,000 at-large arrests—more than the annual total of any of the previous 15 years and a nearly 600 percent increase in average daily arrests since inauguration (see Figure 4).

FIGURE 4: AVERAGE DAILY AT-LARGE ARRESTS (7-DAY AVERAGE), JANUARY 1 TO OCTOBER 15, 2025²⁹



Source: Data produced under the Freedom of Information Act and published by the Deportation Data Project, available at <https://deportationdata.org/data/ice.html>

Worksite Raids at Farms, Construction Sites, Factories, and Other Businesses.

Beyond the expansion of collateral arrests and roving patrols, the Trump administration has also authorized the use of large-scale raids at worksites. Under previous administrations in the 21st century, worksite raids generally involved months of preparation and extensive coordination with local law enforcement. Establishing employment verification processes in the 1980s and 1990s had reduced the need for raids at worksites, and previous administrations focused more on audits to ensure employer compliance with Form I-9 requirements than on largescale raids of factories, farms, and construction sites.³⁰ As a result, these raids have been rare in recent decades: in 2018, for example, under the first Trump administration, ICE highlighted just three “high-profile [worksite] enforcement actions.”³¹

This has changed dramatically under the second Trump administration, which has directed ICE’s Homeland Security Investigations (HSI) to focus on worksite enforcement.³² Worksite raids now occur regularly, with HSI agents raiding everything from small businesses like nail salons,³³ restaurants,³⁴ and bakeries³⁵ to large construction sites,³⁶ meatpacking plants,³⁷ and racetracks.³⁸

These worksite raids have drawn many claims of racial profiling and unnecessary use of force. For example, a raid at a legal cannabis farm in California in July 2025 led to the accidental death of one man as he tried to flee from ICE, as well as the detention of multiple U.S. citizens.³⁹ Similar claims have been brought following worksite raids in the past, including allegations of racial profiling and disparate treatment of white employees than Latino employees.⁴⁰

These [worksite] raids typically lead to the arrest of people with strong ties to their local community and no prior criminal record, and can lead to the disruption of entire communities.

In September, ICE carried out the largest worksite raid in history, arresting 450 people at the construction site for a Hyundai battery plant in Georgia and setting off a minor international incident as a result.⁴¹ These raids typically lead to the arrest of people with strong ties to their local community and no prior criminal record, and can lead to the disruption of entire communities.⁴²

New “Re-arrest” Practices at ICE Check-ins and Immigration Courthouses

In late May, after the White House ordered ICE to increase arrests, the agency began “re-arresting” people attending immigration court hearings and check-ins with the agency.⁴³ These individuals had previously been encountered either by ICE or by CBP and had been released and permitted to attend court hearings outside of detention. Rather than permitting them to continue the court process, the Trump administration instead chose to re-arrest and re-detain these individuals. Often, the administration would collaborate

with immigration judges to dismiss their cases with an effort to place people in “expedited removal,” a fast-track deportation process without any judicial review.⁴⁴

Most people arrested at immigration courts have been individuals who entered the United States as migrants seeking asylum during the Biden administration. Every day, ICE officers appear at immigration courts around the country with lists of names of migrants, who they take into custody moments after leaving their immigration court hearing—regardless of whether the person’s case has been continued or dismissed.⁴⁵ Most frequently, those people are then sent to detention, where ICE either seeks to place them into expedited removal or carry out the remainder of the immigration court process from behind bars.

ICE has also begun ordering immigrants who are out in the country on bond or parole to come into ICE offices for check-ins.⁴⁶ At those meetings, ICE will “re-arrest” the person and send them to detention centers, where they are more likely to eventually be deported. These ICE check-in arrests can involve migrants who entered recently seeking asylum, or, as with the previous Trump administration, individuals who received a reprieve of deportation under a different administration that ICE has now chosen to deport.⁴⁷

These arrests have sent hundreds, if not thousands, of people to detention who were actively complying with the obligations the U.S. government had set for them—turning the notion that they would be “flight risks” on its head. Many of these individuals, having been released at the U.S. border, have never been detained by ICE in the past.



JULY 01, 2025: FEDERAL AGENTS DETAIN A MAN AFTER ATTENDING A COURT HEARING AT IMMIGRATION COURT AT THE JACOB K. JAVITZ FEDERAL BUILDING IN NEW YORK CITY.
Photo Credit: Michael M. Santiago/Getty Images

Changes in Detention Policy Keeps People Locked Up

Once ICE (or other federal law enforcement agents working alongside ICE) arrests someone, the arresting officer then takes the person to an ICE holding cell for initial processing. After that point, ICE determines whether or not to release the person or to transfer them to a long-term detention center for removal or for an eventual court hearing. Over the last year, policy decisions, changes in legal precedent, and new laws passed by Congress have led to ICE choosing detention in the vast majority of cases.

Establishment of Official No-Release Policy

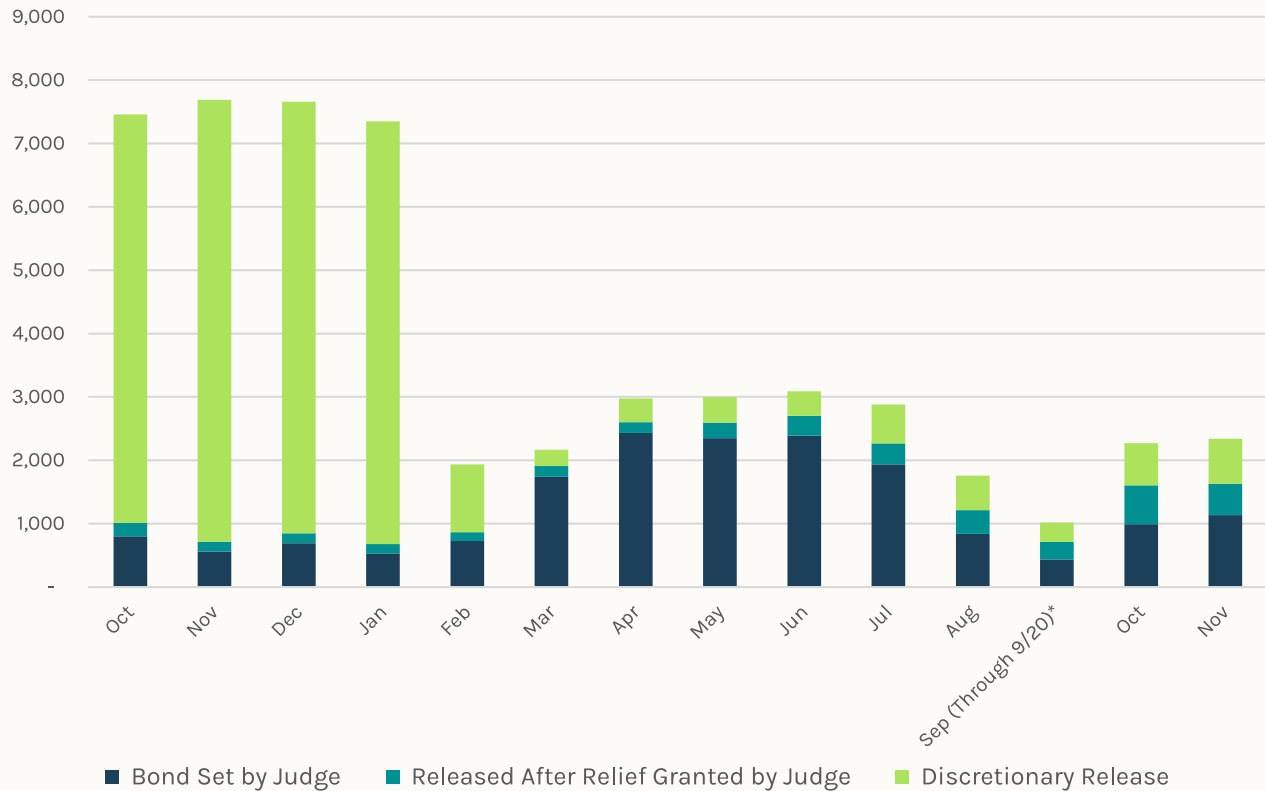
On January 20, 2025, President Trump, issued Executive Order 14165, “Securing Our Borders.”⁴⁸ This order declared that:

“It is the policy of the United States to take all appropriate action to secure the borders of our Nation, through the following means ... (c) Detaining, to the maximum extent authorized by law, aliens apprehended on suspicion of violating Federal or State law, until such time as they are removed from the United States;

These themes were repeated in Executive Order 14159, “Protecting the American People From Invasion.”⁴⁹ Signed the same day, it laid out a roadmap for the expansion of immigration enforcement across the United States, declaring again that “it is the policy of the United States to achieve the total and efficient enforcement of those laws, including through lawful incentives and detention capabilities” and directing government agencies to allocate “all legally available resources” to expanding the immigration detention system.

Following these executive orders, ICE moved quickly to restrict officers from releasing individuals from immigration detention on bond or other forms of conditional release. For example, two weeks after Trump took office, ICE began requiring any releases from custody to be personally approved by the ICE Director.⁵⁰ By March, advocates began reporting that ICE was refusing to release nearly every individual taken into custody.

Data published by ICE itself shows the impact of these changes. After President Trump’s executive orders went into effect, ICE almost immediately stopped releasing people on multiple forms of discretionary release, including humanitarian parole, bond, orders of release on recognizance, or orders of supervision (see Figure 5). In response, immigration judges began granting more requests for release on bond. However, beginning in August, even that limited outlet for release became more difficult as the Trump administration began arguing that most undocumented immigrants were ineligible for release on bond (see below).

FIGURE 5: RELEASES FROM ICE DETENTION INTO THE INTERIOR, OCTOBER 2024 THROUGH NOVEMBER 2025⁵¹

Source: U.S. Immigration and Customs Enforcement, Detention Statistics, <https://www.ice.gov/detain/detention-management>.
 *Data unavailable for the full month of September due to delayed release of information following the government shutdown.

During the first months of this “no-release” policy, releases on bond set by an immigration judge surged 367 percent from January through June. This alternate method of release was heavily restricted soon after. Following new expansions of mandatory detention, as detailed below, immigration judges were stripped of their ability to issue bond to any immigrant who originally entered the country between ports of entry. From August through November, immigration judge releases on bond had fallen to roughly 1,000 per month, leaving those held in detention increasingly trapped there with no option for release other than filing a *habeas corpus* lawsuit.

Releases are not only being denied in the days after an immigrant is taken into custody. ICE is also declining to release people who would previously have been released because they cannot be deported to their home country. As part of ICE’s shift towards deporting people to third countries, many individuals who win “withholding of removal”—a protection that bars the United States from deporting the person to their home country—are being held in detention for possible removal to a third country. These new restrictions continue to make obtaining release from detention harder than ever in the past.

SPOTLIGHT

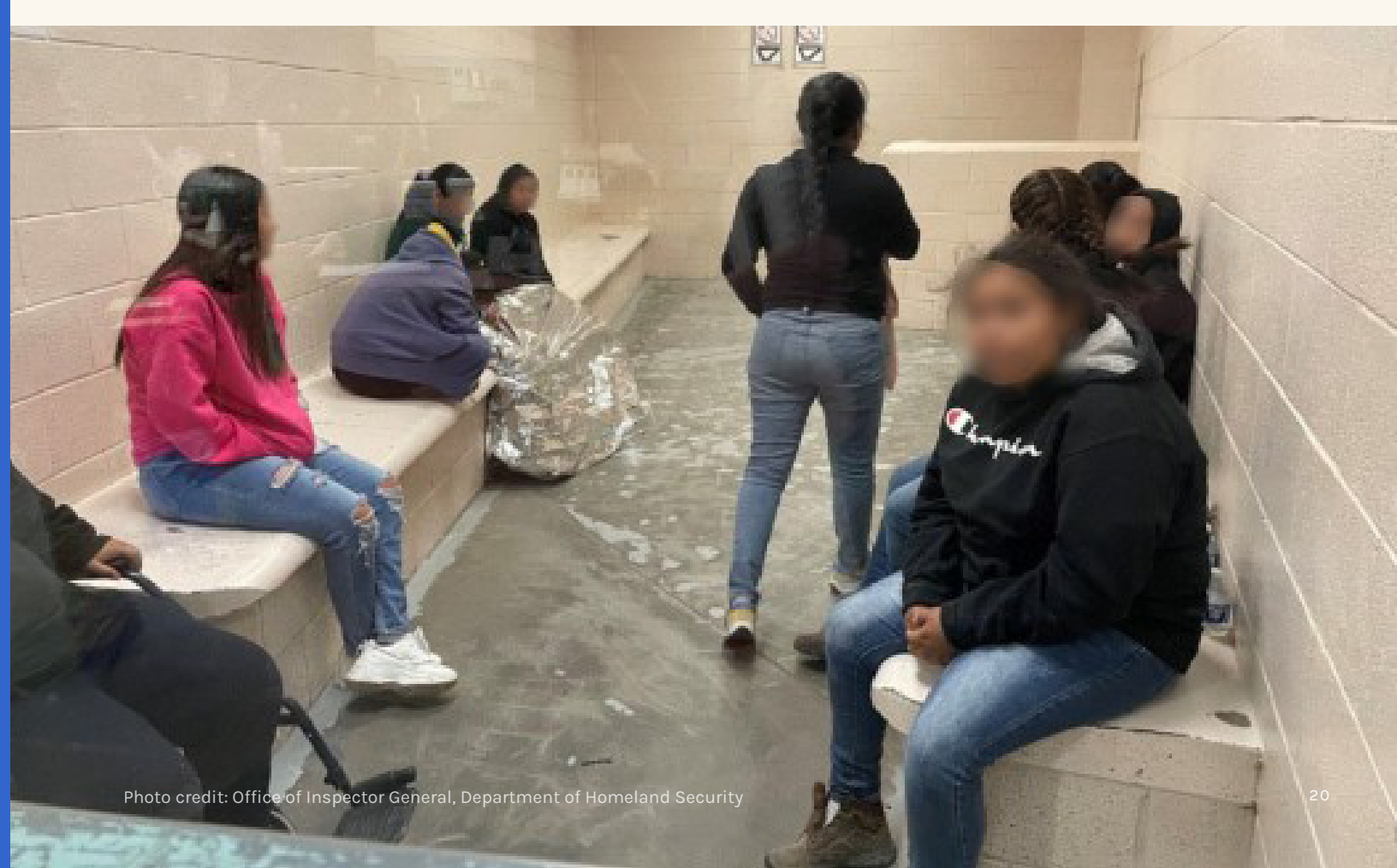
Gabi

It is September 2025. “Gabi” is being held in immigration detention despite winning her case. In May, an immigration judge granted her withholding of removal—a form of humanitarian protection that is not as robust as asylum, but that prevents her from being returned to Ecuador due to likely persecution. But instead of being released, Gabi has been held in detention for five months.

Gabi first arrived in the United States in 2023 and presented herself to a Border Patrol agent to seek asylum from her home country of Ecuador, where her family is under threat from criminals. Border Patrol

held Gabi in an *hielera*—a frigid holding cell—for nine days before arriving for her screening interview with an asylum officer to determine if she had a credible fear of persecution. Upon arrival, she says the officer told her that she could go ahead with the interview, but it had already been decided that she would be denied asylum.

For a month before being deported, Gabi was detained in a large tent where she slept on a single mattress under a blanket of aluminum foil. There was no privacy from others. The bathrooms were just stalls, she says, and they had to go five or six days between baths—for which staff woke them up at 2:00 a.m. On



the flight back to Ecuador, she spent 13 hours chained at the hands, legs, and waist. Officers permitted her only one bathroom break and nothing to eat or drink but a sandwich and a single bottle of water.

But upon arriving to Ecuador, Gabi could not safely return to her home because criminal groups were still watching her family. After several weeks living in a bus terminal, she borrowed \$50 from her mother and took the dangerous journey north again where she was sexually assaulted by authorities at the Mexican-Guatemalan border.

The second time Gabi arrived in the U.S, there was no Border Patrol officer to turn herself into. She walked along the border wall until she arrived in San Diego. She ultimately set off for New York in a Greyhound bus. When she passed through a checkpoint in Texas, federal agents saw she had a removal order and told her she had committed a federal crime by reentering.

After being prosecuted for reentry, Gabi spent months in federal prison before she was returned to immigration detention. But while she felt unsafe in prison, she says it was more professionally run than the detention facility in El Paso where ICE is currently holding her. In detention, she says, many of the staff appear to be first-generation immigrants themselves, but they are vindictive toward the immigrants in their care.

Gabi has been suffering from digestive issues in detention—probably exacerbated by the unvarying diet of cold baloney sandwiches. But even when she has been in severe pain from constipation, she has found it impossible to receive proper medical care. At best, the detention officers will give her two ibuprofen tablets and two

glasses of water. Even when she had an itchy skin rash, Gabi was given ibuprofen instead of the topical cream she asked for. When Gabi tried to explain that ibuprofen would not help her skin, the guard told her, 'Take it or leave it.' "I'm lucky," Gabi says, "that I've never been really sick."

Toilet paper is rationed to four squares a person, as officers complain about immigrants coming to the U.S. to waste resources. When anyone asks for shampoo, the guards will throw the containers at them. A friend of Gabi's told her she had had to wear the same pair of underwear for a year.

Toilet paper is rationed to four squares a person, as detention officers complain about immigrants coming to the U.S. to waste resources.

Gabi does not understand why a friend of hers, also granted withholding, was released while she herself remains locked up. The difference between her first experience in detention and this one, she says, is that when she entered under Biden she could feel the process moving along, if slowly. Under Trump, she feels it is not moving at all.

Multiple detention officers have told Gabi that she has no rights in this country. When lawyers remind her that she does have rights, she half-smiles and shrugs; as if it is hard to believe that, given her current treatment.

The Use of “Mandatory Detention” Increases Dramatically

For generations, immigration law granted nearly all people arrested by immigration officials the right to make a case for release on “bond.” This meant that most people proceeded through the removal system outside of detention. Even those who were detained generally had the ability to go in front of an immigration judge and request release from detention by showing that they presented no flight risk or safety threat. If they were granted release or bond, they could continue their removal proceedings while remaining at home and employed.

Since 1996, two groups of people have been subject to so-called “mandatory detention”: individuals with certain criminal convictions,⁵² and individuals who are “seeking admission” to the United States.⁵³ Individuals who are subject to mandatory detention not only are ineligible for release on orders of supervision or their own recognizance, they are also barred from petitioning an immigration judge to release them on bond.⁵⁴ This is in contrast to the criminal legal system, where only those accused of the most serious crimes are ineligible for release on bond. As a result, when an immigrant is subject to mandatory detention, they may lawfully be detained for months, or even years, without ever having a chance to argue to a judge that they are neither a danger to the community nor a flight risk.

On January 29, one week after President Trump took office, Congress passed and President Trump signed into law the Laken Riley Act. Named after a woman who had been killed in 2024 by a Venezuelan migrant, the law significantly expanded the use of mandatory detention. The law not only added new criminal convictions which would trigger mandatory detention, including “any burglary, theft, larceny, shoplifting, or assault of a law enforcement officer offense, or any crime that results in death or serious bodily injury to another person,” but also provided for the first time that mandatory detention would apply even if a person had only been *arrested* for those offenses, regardless of whether the arrest resulted in criminal charges or a conviction.⁵⁵

In 2025, following two decisions by the Board of Immigration Appeals, mandatory detention has expanded even further. These decisions both came after the Trump administration purged the Board of Immigration Appeals of all members appointed during the Biden administration.⁵⁶

First, in May, the Board of Immigration Appeals decided *Matter of Q. Li*,⁵⁷ which ruled that migrants who had crossed the border and then been released by Border Patrol are subject to mandatory detention and may not seek release on bond—even if they had been released at the border years earlier. The result of this decision was that once the Trump administration began “re-arresting” migrants at court hearings, individuals who may have been living in the country for years were suddenly unable to ask a judge to release them on bond.⁵⁸

This was followed in August by *Matter of Yajure Hurtado*,⁵⁹ when the Board of Immigration Appeals adopted a request by the Trump administration to rule that *all* immigrants who had

entered the country by crossing a border without inspection were categorically ineligible for bond. This decision overturned nearly 30 years of precedent which had held that undocumented immigrants arrested inside the country long after their entry were eligible for bond, no matter their manner of entry. In a single decision, this rendered millions of undocumented immigrants subject to “mandatory detention.”

The result of these changes in legal precedent is that increasingly few people arrested by ICE are eligible for any release on bond. This means that decisions to release have come down to the arbitrary choices of ICE officers—not judges or any independent authority—who are pressured to deny discretionary release by their superiors.

Importantly, there has been substantial legal challenge to these cases. Following *Matter of Yajure Hurtado*, a flood of habeas corpus cases were filed seeking to challenge the detention of individuals on the legal reasoning of that case. Over 300 federal judges, appointed by every living president, have weighed in on the government’s interpretation; just 14 have ruled in favor of it.⁶⁰ On November 25, a federal judge in California granted declaratory relief in a class action lawsuit brought to challenge the policy.⁶¹ Despite this ruling, as of early December immigration judges across the country continued to deny bond to people under *Matter of Yajure Hurtado*, and litigation continues.

Rapid Expansion of Detention Infrastructure Creates New Problems

As ICE arrests expanded and detention became the norm as a result, the largest challenge the Trump administration faced was finding detention space. At the start of Trump’s second term, ICE was funded for 41,500 beds at a cost of \$3.4 billion,⁶² limiting the agency’s capacity to detain the tens of thousands of people that the White House wanted to arrest every month. As a result, under Trump’s January 20 executive order calling for ICE to allocate “all legally available resources,” the administration began moving rapidly to expand the immigration detention infrastructure.

This expansion came at an extraordinary monetary cost. By June 2025, ICE was detaining over 57,000 people,⁶³ leading the agency to overspend its detention budget by \$1 billion.⁶⁴ This looming spending crisis was averted in early July, when Congress voted to give ICE a total of \$45 billion for immigration detention through the end of Fiscal Year 2029. This funding has permitted ICE to continue to expand the detention system at an unprecedented rate.

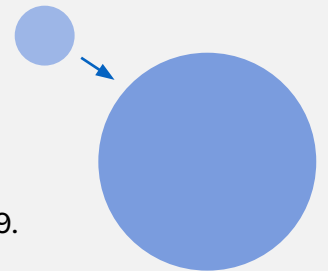
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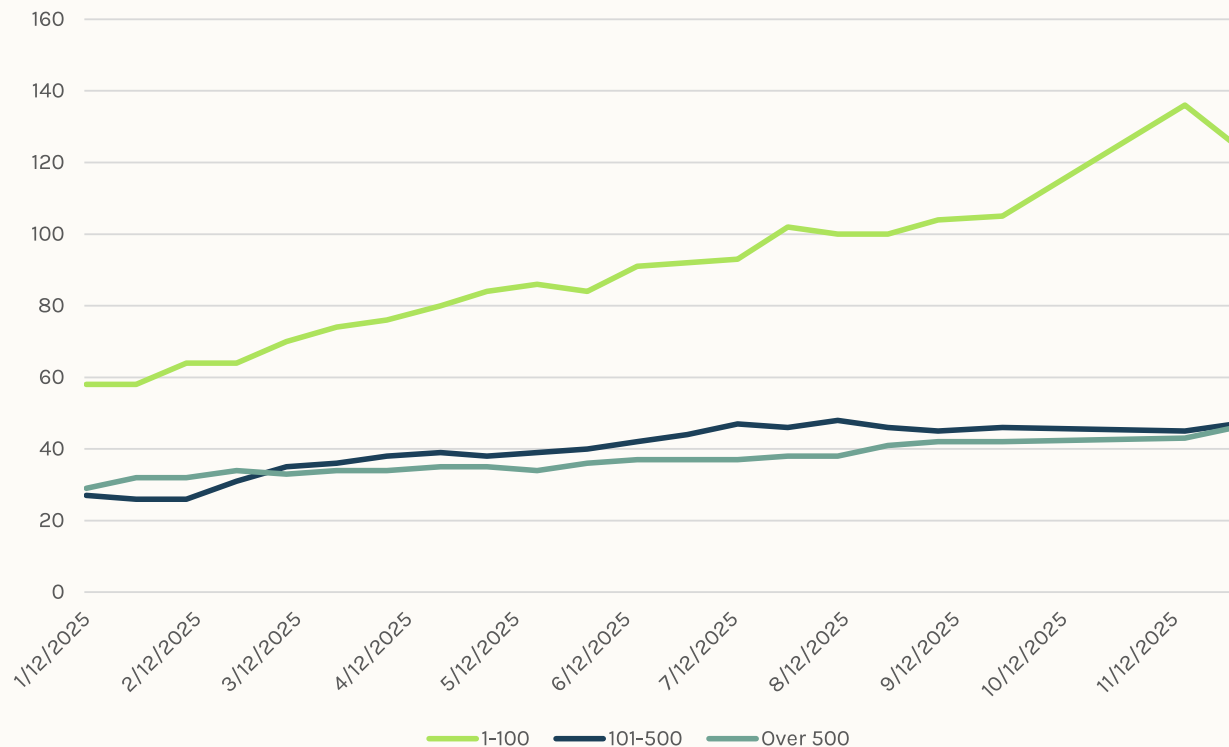


ICE Signs New Contracts With Unused Prisons and Expands Contracts with Existing Detention Centers

To rapidly expand detention infrastructure, ICE has signed contracts for new detention centers not currently holding immigrants while simultaneously paying existing detention centers to expand capacity. Most of the initial contracts ICE signed in 2025 were with local and county jails to hold a few dozen people. But by fall 2025, ICE had brought multiple new facilities online with capacity to detain thousands of people.⁶⁵

From January through the end of November, the number of facilities in use by ICE to detain immigrants increased by 91 percent, rising from 114 to 218. Most of this growth occurred in facilities holding 100 or fewer people a day on average (see Figure 6). The expansion of larger detention centers has been significantly slower. The number of facilities holding an average of more than 100 people a day through November 2025 grew 66 percent, rising from 56 to 93, while the number of facilities holding an average of more than 500 people a day grew by 59 percent, rising from 29 to 46. At the higher end, the number of facilities holding more than 1,000 people per day nearly doubled from 11 to 20.

FIGURE 6: DETENTION CENTERS CONTRACTED WITH ICE, BY DETENTION POPULATION*, JANUARY 2025 THROUGH NOVEMBER 29, 2025⁶⁶



Source: U.S. Immigration and Customs Enforcement, Detention Statistics FY25, <https://www.ice.gov/detain/detention-management>. Detention numbers calculated using the Interval ADP method developed by Adam Sawyer and Austin Kocher, see Adam Sawyer and Austin Kocher, "Interval ADP: A Method for Estimating Recent Populations at ICE Detention Facilities," Relevant Research, May 12, 2025, https://relevant-research.com/assets/pdf/methodology_writeup.pdf.

The majority of new facilities contracted with ICE in the first six months of Trump's term in office were local and county jails which had prior contracts with the U.S. Marshal Service for temporary detention.⁶⁷ Most of these facilities now hold fewer than 100 people a day for ICE.

While this may not seem like a large number of people, the broad geographical range of these facilities permits ICE to move people through the detention system more efficiently, limiting bottlenecks at ICE processing centers and creating holding capacity while the agency waits for beds in larger detention centers to open. Analysis conducted by the New York Times found that a third of all people arrested by ICE under the Trump administration have been detained at least temporarily at a county jail.⁶⁸

Larger facilities have also come online in 2025. Many of these facilities had previously operated through Federal Bureau of Prisons contracts which had been terminated under the Biden administration's decision to stop using private prisons for the federal prison system. In March, ICE signed a contract with GEO Group, a private prison company, to reopen the North Lake Correctional Center to be used for detention.⁶⁹ The facility, which had been shut down in 2022 after the Biden administration terminated its Bureau of Prisons contract, reopened as an ICE facility in June and has a reported maximum capacity of 1,800 people.⁷⁰

Similarly, in late August, another private prison company, CoreCivic, opened the California City Immigration Processing Center in California City, California. This facility previously operated as a state prison until 2023, and with a maximum capacity of 2,560 beds, would today make the largest ICE detention center in history.⁷¹

But even the California City Immigration Processing Center is likely to be dwarfed by another new facility opening in August in El Paso, Texas at the Fort Bliss military base. The Fort Bliss facility, formally known as the East Montana Detention Facility, became the first large-scale ICE detention facility to use "soft-sided" temporary infrastructure composed of air-conditioned tents with detention cells constructed on the inside, initially detained just 1,000 people, but is eventually expected to increase capacity up to 5,000.⁷²



Florida Creates New Model for State Detention

In early July, Florida opened a facility that has become a new model for immigration detention; a facility wholly owned by a state and operated by the state alone, without a contract with ICE. Instead, Florida purports operating the facility under the 287(g) program, which permits ICE to authorize state and local law enforcement to perform some immigration functions such as arrests and detention.⁷³ The facility, a tent camp opened at the Dade-Collier Training and Transition Airport bordering the Everglades in Miami-Dade County, was formally named “Alligator Alcatraz” by Florida Governor Ron DeSantis and by DHS.

Unlike other state facilities used for immigration detention, the Everglades detention camp is not operated through an intergovernmental service agreement (IGSA). It is fully owned and operated by the State of Florida and detains immigrants, supposedly pursuant to a 287(g) agreement signed with the Florida Department of Emergency Management—although reporting suggests Florida may have begun operating the facility before inking the agreement.⁷⁴ Prior to the opening of the facility, no state had ever argued that it could operate its own immigrant detention facility, nor had ICE ever authorized a state to operate such a facility. A lawsuit challenging the legality of this use of the 287(g) program is currently pending in Florida.⁷⁵

The result of this new model has been chaos. It took over a month for people detained at the facility to have the ability to seek release on bond, as immigration judges in Miami initially disclaimed any ability to order release of people held at the facility.⁷⁶ Confusing matters even further, both ICE and the Florida state government have claimed that the other is responsible for key aspects of the facility’s operations, complicating the chain of command and putting those in the facility in an unprecedented limbo.⁷⁷ Although a court order briefly led to a halt in the usage of the facility, after an appeals court lifted that order in August, use of the facility for detention resumed as of October.⁷⁸

Since Florida opened “Alligator Alcatraz,” other states have seized on the idea of using alliterative nicknames when inking new agreements with ICE to operate immigration detention facilities. State facilities contracted through more traditional IGSAs have been given nicknames like the “Speedway Slammer” (a converted state prison in Indiana),



Florida Everglades June 28, 2025:
Protesters line the highway in the Florida Everglades to oppose the construction of “Alligator Alcatraz.”

Photo Credit: Carlos Ochoa/Shutterstock

the “Deportation Depot” (an expanded state prison in Florida), the “Cornhusker Clink” (a converted jail for low-level prisoners receiving rehabilitation support in Nebraska), and more.⁷⁹

Crucially, “Alligator Alcatraz” is still unique in being operated without direct ICE involvement and entirely through the 287(g) program. The fact that other states have not adopted this model suggests that they may be concerned about the legal risks.

Use of Military Bases For Immigration Detention

As ICE searches for new places to detain immigrants it has arrested, it has turned to the locations where immigrants were first held before the creation of the modern detention system: military bases.

The use of military bases for immigrant detention and processing is not new. Following the Mariel Boatlift in 1980, the Carter administration detained thousands of migrants at Elgin Airforce Base in Arkansas.⁸⁰ During the early 1990s, tens of thousands of Cubans and Haitians who were interdicted at sea were detained at Guantánamo Bay in sprawling tent camps infamous for their poor conditions.⁸¹ While mass detention at Guantánamo Bay ended during the Clinton Administration, migrants interdicted at sea have continued to be detained, processed, and repatriated from a “Migrant Operations Center” established at the base ever since.⁸²

The Trump administration has not only sought to use Guantánamo Bay for migrants apprehended inside the United States, but it has also sought to significantly expand detention on military bases in the interior, with reported plans to hold tens of thousands of migrants at military bases across the country.

On January 29, 2025, President Trump signed a memorandum directing that the Migrant Operations Center be expanded and converted into a facility used to detain “high-priority criminal aliens unlawfully present in the United States, and to address attendant immigration enforcement needs identified by the Department of Defense and the Department of Homeland Security.”⁸³ Over 175 people were sent to be detained at the facility on February 5, 2025, almost entirely Venezuelans, and many of whom had no criminal convictions whatsoever.⁸⁴ Following the deportation of these individuals to Honduras, interviews revealed that many of these people were held in solitary confinement and subject to abusive conditions.⁸⁵

Since February, the Trump administration has used Guantánamo Bay only rarely, and primarily as a temporary detention site prior to deportation. The administration has made no serious efforts to convert the facility into the massive tent camp it initially envisioned. One reason for this is the extreme cost, which reportedly amounted to roughly \$100,000 per day for every person detained at the facility.⁸⁶

Having largely abandoned the plan to use Guantánamo Bay as a largescale detention center, the Trump administration has instead shifted to using military bases inside the United States to house migrants in tent camps. The first such facility opened in August in El Paso,

Texas on Fort Bliss. Formally known as Camp East Montana, the Trump administration and Texas officials deemed the facility the “Lone Star Lockup,”⁸⁷ and at maximum capacity is intended to hold up to 5,000 immigrants a day at a cost of \$1.26 billion over two years.⁸⁸

Camp East Montana opened in August, and by the end of November had already expanded to be the largest detention center in the country, with 2,535 men and 238 women in the facility.⁸⁹ Initial oversight of the facility by a member of Congress revealed very similar problems that exist throughout the ICE detention system including “insufficient staffing, lack of access to the facility for legal counsel, [and] unresponsive phones,” as well as rotten food and poor quality water.⁹⁰ and inadequate medical care. One man told a member of Congress that despite a doctor having told him he needed urgent surgery for a urinary issue, he had only received over-the-counter medication.⁹¹

On December 8, a coalition of human rights and legal services organizations sent a letter to Congress and the Trump administration alleging that conditions had only worsened since Camp East Montana opened, and stating that “officers have beaten detainees and used threats of violence, criminal charges, and imprisonment in attempts to coerce people held at Ft. Bliss to leave the United States and cross the border into Mexico, even if they are not subject to a removal order to Mexico.”⁹²

The administration is reportedly planning other similar tent camps at Fort Dix in New Jersey⁹³ and Camp Atterbury in Indiana.⁹⁴ While these facilities had not opened at the time of publication, they are likely to follow the model set by Camp East Montana. Some facilities may be even larger. In October, the Trump administration reportedly transferred \$10 billion of funding from the One Big Beautiful Bill Act to the U.S. Navy to speed up the construction of tent camps by expanding contracting offers to military contractors with experience in construction projects overseas, with the goal of building tent facilities that could house up to 10,000 people each.⁹⁵

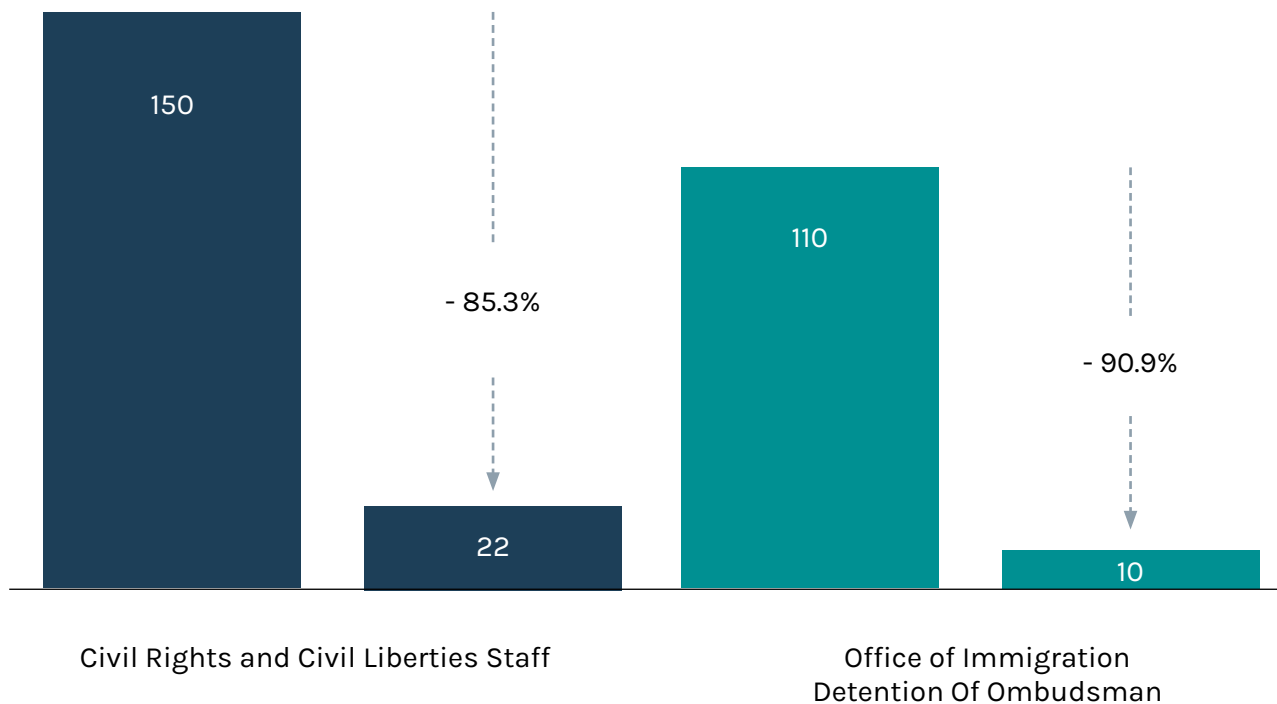
Oversight of Immigration Detention is Heavily Limited

As new detention centers have come online and conditions have deteriorated, the infrastructure created to monitor conditions and ensure compliance with relevant standards has collapsed. In particular, the Trump administration slashed key offices designed to ensure that people held in detention are treated with dignity, and that ICE manages facilities properly.

In late March 2025, the Trump administration announced that it would effectively eliminate two offices that served as internal watchdogs: the DHS Office for Civil Rights and Civil Liberties (CRCL) and the Office of the Immigration Detention Ombudsman (OIDO).⁹⁶ CRCL offers input into DHS policies as they are formulated, and carries out investigations of civil rights violations across the Department (including at ICE), while OIDO focuses specifically on ICE detention. As justification for eliminating them, DHS declared that these oversight bodies had “obstructed immigration enforcement” and were “undermining DHS’s mission” because they imposed bureaucratic obstacles to ICE carrying out deportations.⁹⁷

Following outcry by members of Congress⁹⁸ and a lawsuit by the Robert F. Kennedy Human Rights Center,⁹⁹ DHS reversed its plans to eliminate these offices. The agency instead reduced the oversight bodies to a tiny fraction of their former size: CRCL staff was reduced from 150 to 22 and OIDO staff reduced from 110 to 10.¹⁰⁰ The reduction of these oversight bodies has made their work substantially more difficult, and has limited any internal voice from within the federal government from raising alarms surrounding substandard conditions of detention, including basic reporting and monitoring of compliance with the Prison Rape Elimination Act.¹⁰¹

STAFF REDUCTIONS FOR IMMIGRATION DETENTION INTERNAL WATCHDOG OFFICES BY TRUMP SECOND ADMINISTRATION



Beyond cutting internal oversight of immigration detention, the Trump administration has also limited external oversight by blocking Members of Congress from exercising their right to conduct surprise inspections of ICE detention facilities. Since 2020, Members of Congress have had a right to enter any facility used to detain noncitizens for the purposes of conducting oversight without any prior notice.¹⁰² This right also permits their staff to enter within 24 hours of notifying DHS. Members of Congress had previously used this authority to conduct robust oversight into immigration detention centers in their district, or where their constituents were held.¹⁰³

However, beginning June 18, 2025, DHS instituted a policy requiring that Members of Congress submit requests prior to conducting oversight, and that such requests must “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.”¹⁰⁴ Not only has DHS barred Members of Congress from conducting surprise inspection, the agency has also declared that certain ICE facilities, including short-term holding cells where initial processing occurs, are not covered by the law—and thus has outright barred entry to multiple Members of Congress seeking admission.¹⁰⁵ Beyond that, the administration has even cancelled previously scheduled visits, citing vague factors such as “operational tempos” as rationale to prevent even approved access from Members of Congress.¹⁰⁶ In response to these changes, members of Congress filed a lawsuit seeking to ensure their ability to conduct oversight.¹⁰⁷

With both internal and external oversight limited, ensuring the safety and security of people inside ICE detention has become harder than ever. Legal service providers, attorneys, and the people in detention themselves are now the best equipped to bear witness to the realities of conditions inside detention.

Chaotic Transfers and Overwhelmed Processing Lead to People “Disappearing” Inside Detention

The majority of detention centers are concentrated in the South or Southwest part of the United States—many far from large population centers. Once people arrested around the country are processed at local Field Offices, they are often transferred to whichever detention center has available bed space. This means that a person arrested in New York, Massachusetts, or Illinois may end up in Texas within 24 to 48 hours, before their family can even find a lawyer willing to take their case.

These transfers have become even more chaotic in 2025. Information obtained through the Freedom of Information Act reveals that transfers between detention facilities are becoming even more common than ever before. In 2024, 47 percent of people taken into ICE custody were never transferred away from the initial location they were detained.¹⁰⁸ This figured dropped to just 23 percent in the first half of 2025, and the percentage of people transferred four or more times doubled from six percent to 12 percent.¹⁰⁹ As an extreme example, one person identified in ICE’s detention data was arrested in Florida. Prior to his deportation from a facility in Louisiana, ICE transferred him fifteen times back and forth between two detention facilities in Florida, three in Arizona, three in California, and one in Hawaii.¹¹⁰

These transfers have created growing challenges. Rapid transfers prevent attorneys from contacting their clients, making representation incredibly difficult. Many facilities require prior notice before arranging legal calls and every day of delay in finding out where the person is held will layer on additional obstacles to representation. A person’s lawyer may send them documents to be signed, only to discover that ICE has already transferred the person elsewhere before the paperwork can arrive in the mail.

Making matters worse, ICE's own systems to track where it holds people are no longer reliable. For over a decade, ICE has operated a "detainee locator" system which permits people to search where ICE is detaining an immigrant. This system is intended to operate with little delay, with ICE promotional material stating that data could be "up to eight hours old" at most.¹¹¹

With a surge of arrests, dozens of new detention centers, and personnel normally assigned to processing being put onto the streets instead, the ICE detainee locator system has become drastically less reliable. People arrested by ICE now may not appear on detainee locators until days after their arrest—or not at all.¹¹² One man who was arrested on October 15 was not in the detainee system even two weeks after his arrest, forcing desperate family members to resort to searching a detention commissary app to find his location.¹¹³

These detainee locator problems can have significant legal consequences, especially where a person has a lawyer seeking to file a habeas corpus lawsuit—a type of lawsuit which generally must be filed against the warden of the facility a person is being held at. If the detainee locator does not work, or is updated only days later, an attorney may have to guess where their client is being held—and may get it wrong. This famously occurred in the case of Mahmoud Khalil, the Palestinian advocate with a green card who was detained on allegations by Secretary of State Rubio that his presence in the United States harmed U.S. foreign policy. Despite a detainee locator system stating that he was being detained in New Jersey, ICE had already transferred him to Louisiana by the time his lawsuit was filed.¹¹⁴

Beyond legal consequences, rapid transfers and the deteriorating utility of the detainee locator system can lead to panic for family and friends seeking to find out what happened to someone they know who was arrested by ICE or another DHS officer. Many people have no way of determining where ICE is holding their loved one, and can only find out when the person manages to reach them on the phone—if that even happens, as telephone access is often limited and many detention centers limit calls or charge high prices that make it difficult to talk for longer than a few minutes. Transfers far away from support systems can also make it impossible for family members to travel to the detention center for in-person visits, making the pain of separation more difficult.



Photo credit: Here Now/Shutterstock

SPOTLIGHT

Dulce

Even the ICE agents who picked Dulce up didn't know why they were detaining her. She was supposed to be released from jail that day, but while the two women released with her were free to go home, Dulce was kept in a holding cell. When three ICE agents arrived for her, one told her, "We're not really sure why we're taking you because we're aware that your DACA permit is still valid." Dulce is supposed to be protected from deportation under the Deferred Action for Childhood Arrivals (DACA) program, which remains in effect despite the Trump administration's efforts to end it. "But we have orders to pick you up," he informed her. Dulce told them not to worry, that she understood they were just doing their job.

While Dulce was held in a detention facility close to home for a few weeks, ICE ultimately sent her on a bus to Maryland, where she says an officer told them "We're looking for somewhere that has enough room for all of you, because most places are to their capacity." The result was a zigzag, three-day cross-country journey.

Officers put Dulce and others on a Coast Guard plane and flew them to Louisiana where they had to make an emergency landing to avoid a hurricane. After spending the night in the LaSalle Detention Facility, where women were stacked in triple-decker bunk beds with no privacy in the bathroom, officers flew them to a private airport in Texas. From there, Dulce says it was a constant shuffle of picking up and dropping off a few people at each stop: Texas to Arizona, to Nevada, back to Arizona, to Seattle, yet again to Arizona, and finally to

Adelanto, California, where Dulce was finally dropped off herself. In the middle of the trip, they were made to sleep overnight in an airport holding cell. For three days, officers gave Dulce nothing to eat but baloney sandwiches—she thinks she may never be able to stomach baloney again.

When she spoke with others ICE has detained at Adelanto Detention Center, she learned this experience wasn't uncommon: officers had been shuttling many women back and forth for days at a time. "A lot of the women and I believe that it's almost like a form for them to get us to agree to our deportation," she says. And while Dulce is lucky—she has family in San Diego who can make the three-hour drive to the facility—



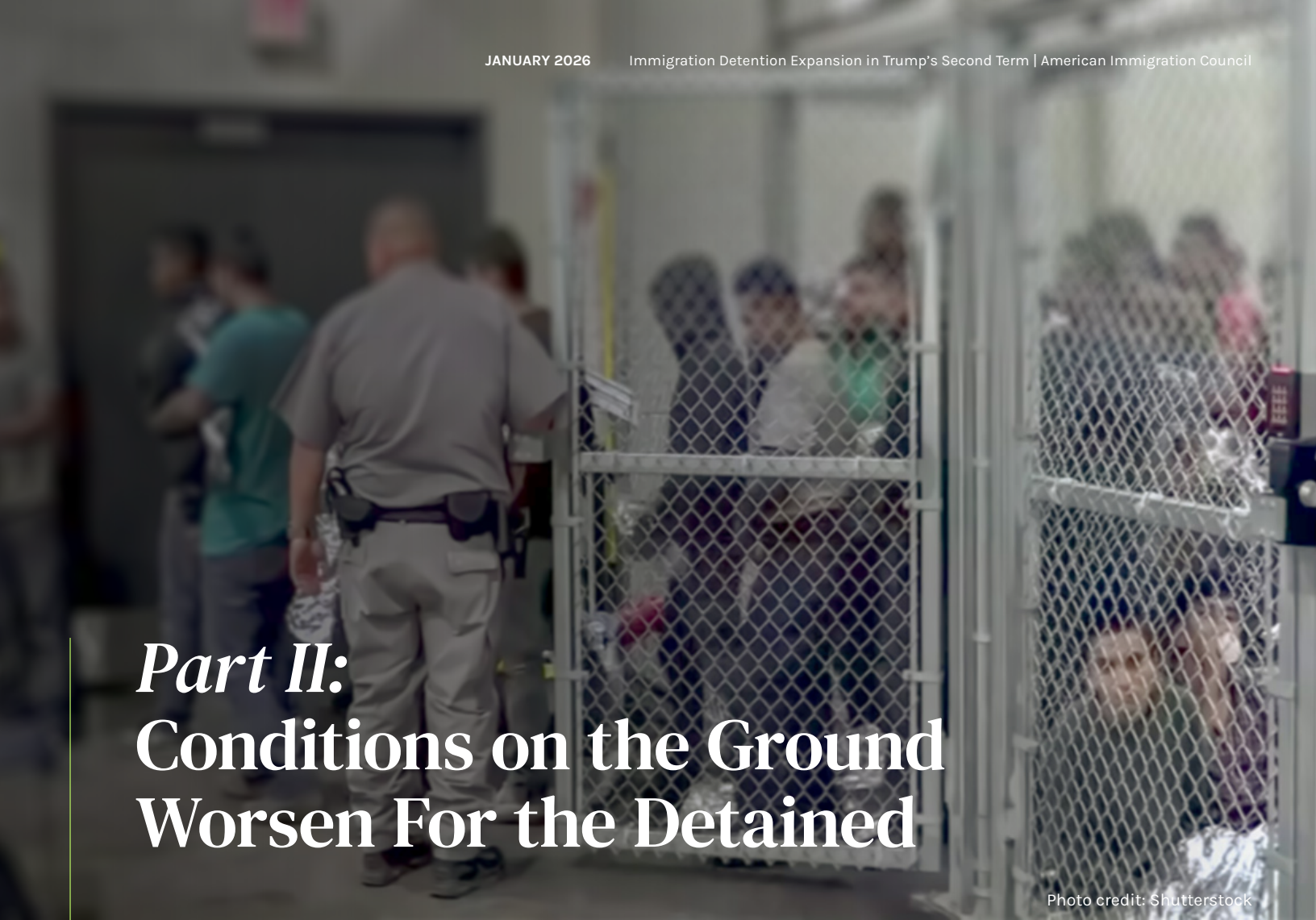
other women she's being held with are hundreds of miles from anyone they know. Even if they are released, she points out, they'll have to buy their own plane tickets home from wherever they ended up.

Having seen conditions in LaSalle, Dulce feels grateful to be in a "fairly nice" place like Adelanto. Women have trouble getting medical attention—Dulce herself had to put in several requests to get a lower bunk, since she uses a prosthetic that makes it hard for her to climb. She gets two hours of yard time a day—which she especially appreciates after having not seen the sun for three straight weeks at the detention center in New Jersey. "It makes you appreciate the basic things in life, like scented lotion, good food," she says. At Adelanto, "everyone gets excited for chicken night: about every two weeks you get a piece of a roasted chicken, and that's literally everyone's highlight of the two weeks."

Officers treat the detention facility like a military bootcamp, she says, with frequent counts where detainees have to stand next to their beds and present their wristbands. Some officers are nicer than others, and some detainees have a harder time adjusting—especially those who have never been to jail before. "It's really hard for them to accept that they don't really have any freedom, and they have to obey the commands that the guards are giving them," she says.

"Officers treat the detention facility like a military bootcamp."

Dulce herself has drawn strength from her fellow detainees who she describes as "a community of women that you hardly know but are there to support you." Women will lend some conditioner to someone who can't afford to buy it from the commissary or use their phone accounts for other detainees to call family (since women cannot always reach their families in the single five-minute phone call they are allowed for free when they arrive in detention). But getting to know the other women at Adelanto has also shown Dulce that many people are in her situation: they thought they were safe from immigration enforcement until this administration made them a target. Some of the women she has gotten to know are green-card holders, picked up at airports on account of decades-old criminal convictions. "It's kind of unbelievable," she says. "It feels like it's a free for all for ICE right about now."



Part II: Conditions on the Ground Worsen For the Detained

Photo credit: Shutterstock

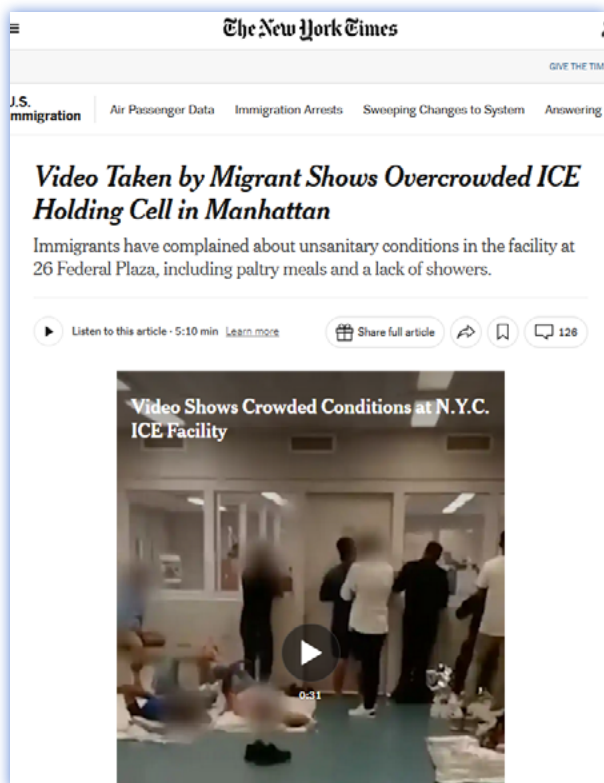
With immigration policy changing rapidly and the detention infrastructure expanding across the course of 2025, conditions in immigration detention centers have worsened dramatically. A system which has always operated in the shadows, often in remote locations far from oversight, has become even more opaque and abusive than ever before. In detention centers across the country—from New York to Illinois to California to Texas to Florida—detention has become, more than ever, a tool by which the Trump administration is pressuring immigrants to give up their chance to remain in the United States and assume a fate they might not otherwise be forced to accept.

While conditions in detention have always been inhumane, access to counsel limited, and medical care substandard, the Trump administration's aggressive expansion of detention has worsened these conditions across the board. Even if the agency had the best interests of those it detained in mind, with dozens of new facilities brought online in a short period of time, it would be impossible to ensure compliance with ICE's own detention standards—standards it has failed to meet for years prior to this latest aggressive expansion.

Rapid Expansion Brings Overcrowding, Poor Medical Care, And Abusive Conditions

As the Trump administration dramatically increased arrests and limited options for release from detention, the population of those held in detention centers began to increase faster than the capacity of the detention system. This overcrowding has occurred at all levels of the detention system, from the short-term holding cells typically located in ICE field offices to the largest detention centers in the country. With overcrowding has come an increase in poor conditions, as people have been jammed into crowded cells designed for far smaller numbers of people—or even places not even intended to hold anyone in detention, such as basement rooms in federal buildings.¹¹⁵

As ICE expanded arrests through roving patrols, collateral arrests, worksite raids, and courthouse arrests, initial processing cells in federal buildings were quickly filled beyond normal capacity. These holding cells were not designed for long-term detention—yet as enforcement surged, local ICE Field Offices quickly overcrowded the cells, and releases ended up bottlenecked by the aggressive new tactics. For example, by early March, reports emerged of immigrants being held up to nine days at the Baltimore Field Office in cells designed for short-term stays of no more than 12 hours.¹¹⁶ In total, during the first six months of President Trump's second term, roughly 18 percent of people detained by ICE were kept in short-term holding cells for longer than 12 hours, compared to just four percent under President Biden.¹¹⁷



When President Trump took office, ICE policy provided that “absent exceptional circumstances,” no person should be detained in a holding cell longer than 12 hours.¹¹⁸ In June 2025, ICE formally waived this limitation and authorized all Field Offices to detain people in holding cells for up to 72 hours instead.¹¹⁹ Conditions in many short-term detention centers have remained poor since then. On September 17, 2025, a federal judge in New York determined that conditions at the New York Field Office were constitutionally inadequate and issued a preliminary injunction prohibiting ICE from detaining people in any cell that is overcrowded, and ordered the Field Office to provide basic necessities to those it detained.¹²⁰ On November 5, a federal judge in Chicago granted a similar order, finding that ICE was subjecting people to unconstitutional conditions of confinement at the Broadview ICE

holding facility.¹²¹ Other lawsuits seeking access to counsel at short-term detention sites have been brought in Los Angeles¹²² and Portland.¹²³

By April 2025, nearly half of all ICE detention centers were operating above their contractual capacities.¹²⁴ One of the starkest examples of this overcrowding occurred at the Krome North Service Processing Center in Miami—the oldest existing detention center in the country. Krome's maximum contractual capacity is 611 people,¹²⁵ a level at which it operated at for the entirety of 2024.¹²⁶ But beginning in March 2025, ICE began holding over 1,000 people at the facility, peaking at 1,806, nearly 1,200 people above capacity.¹²⁷ During this period, overcrowding was so bad at the facility that multiple women were left in chains on a bus outside the intake processing area for hours without access to a restroom, forcing them to urinate and defecate on the floor of the bus.¹²⁸ Inside the facility, people were fed just rice and bread for days at a time.¹²⁹ Illness ran rampant through the facility, including a tuberculosis outbreak,¹³⁰ leading to a dramatic increase in recorded 911 calls from the facility calling about serious health problems.¹³¹

Overcrowding has also overwhelmed the logistical capacity of long-term ICE and private detention center operators to meet many required standards resulting in long delays in medical screening and care, and even a lack of adequate food and water. As of July, people held at detention facilities in seven different states reported going hungry or being served inadequate or spoiled meals because detention centers had not acquired enough food for the unexpected increase in detention population.¹³² Videos recorded by people who managed to get cellphones inside crowded detention centers show people sleeping on the ground with no beds and nothing but thin blankets.¹³³

As detention expanded, human rights researchers interviewed people detained in Florida and documented consistent violations of ICE's custodial standards, including “dangerously substandard medical care, overcrowding, abusive treatment, and restrictions on access to legal and psychosocial support.”¹³⁴ During the worst of the overcrowding at Krome in spring 2025, people in detention described the conditions in the facility as “hellish,” with 60-80 people crowded in rooms with maximum capacity of 25, leaving not enough space for every person to lie down at night and some people forced to sleep on top of the toilet.¹³⁵ One member of Congress who conducted a surprise inspection of the facility declared the conditions “extremely unpleasant, not conditions that you would want anyone you care about to be subjected to.”¹³⁶

Despite the addition of new detention capacity, the pace of arrests means that facilities remain overcrowded. As of September 2, 2025, ICE was detaining roughly 860 people at the facility—more than 40 percent higher than the stated capacity, in part because ICE was forced to construct a “plexiglass tent city” next to the facility to hold the overflow.¹³⁷

Access to counsel at these facilities has also deteriorated, as overstressed phone systems and understaffing interfere with legal visits and access to lawyers. With dozens of new facilities in use, ICE is not enforcing uniform processes across all facilities, requiring lawyers to navigate a maze of different processes to contact their clients—and leaving those in detention unable to access help, or even basic information about their cases.¹³⁸ Transfers

to remote detention centers with unknown access protocols can make even basic things like signing a legal document difficult and expensive.¹³⁹

Denial of medical treatment has also been a common complaint as overcrowding stresses prison healthcare systems. Multiple people held at Krome and at the Broward County Transitional Facility described staff refusing to provide medical care to those that needed it, including denial of medication to people with diabetes, asthma, and kidney conditions.¹⁴⁰ In one incident, staff reportedly “brutalized detainees who were protesting about a lack of medical attention” for a man who was “coughing up blood.”¹⁴¹ These conditions are not limited to Florida, and have led to unrest in other locations. For example, in New Jersey, ICE contracted with the Delaney Hall facility in Newark, which was operated by private prison company GEO Group. The facility had been unused for years following previous allegations of poor conditions. Despite these concerns, ICE brought the facility online quickly and sent people in detention there even while basic plumbing was not fully operational.¹⁴² Medical care was limited, with some people reporting multi-day delays in receiving basic prescriptions. Families arriving to visit loved ones held inside were told that visitation was impossible. Even food was limited, with people being fed only twice a day.¹⁴³ Conditions became so dire that on June 12, a riot broke out in the facility after guards provided only slices of bread for dinner, and four people escaped by punching a hole in a poorly constructed external wall and climbing out.¹⁴⁴

Similarly, Louisiana opened a facility at the notorious Angola prison in September, which had previously been closed due to aging infrastructure and violations of basic prison standards. Unsurprisingly, individuals held at the facility in the weeks after opening reported lack of basic medical care, lack of hygiene supplies, and access to federal officials to address grievances.¹⁴⁵ In California, more than 100 people detained at a prison in the Mojave Desert newly converted into an immigration detention center went on hunger strike protesting inadequate medical care, broken hygiene infrastructure, and other similar problems.¹⁴⁶

As ICE holds more people in worsening conditions, deaths have risen. Many of these deaths are linked to failure to provide adequate medical care. At the Broward County Transitional Facility in Florida,¹⁴⁷ Marie Blaise, a 44-year-old Haitian woman, passed away on April 25, 2025. While an official investigation from ICE attributes her death to failure to take medication,¹⁴⁸ her family disputes this report and says that she had been denied adequate medical care, and a woman who witnessed her collapse says detention staff responded slowly to her medical crisis and left her in crisis on the floor for nearly 30 minutes before a rescue team arrived.¹⁴⁹ Similarly, Ismael Ayala-Urbe, who had lived in the United States since he was four, died in a California detention center after repeatedly complaining to his family that detention staff would not take his fever and deteriorating medical condition seriously.¹⁵⁰

Unfortunately, 2025 is set to be the deadliest year on record in decades, with 30 people dying in ICE detention facilities as of December 18, 2025—more than during the COVID pandemic.¹⁵¹

SPOTLIGHT

Dannell

Dannell grew up in New Jersey. His family got green cards when he was 4 years old. He occasionally visits family back in Trinidad, where he was born, but his life is in the United States: his ten-year-old daughter, his seventeen-year-old son, and the nonprofit organizations that hired him to DJ their events.

Dannell had no reason to expect that his most recent trip to Trinidad would end anywhere but home. But when he landed in Houston to make his connecting flight to New Jersey, he was pulled aside at customs by CBP officers. After checking his files, they told him that he'd been found to be deportable from the U.S., due to a 2023 conviction.

Dannell acknowledged that he'd pled guilty to that charge in 2023. But he'd done so because he'd been assured "If you plead guilty, you cannot be deported." But when he explained to the officers that his conviction was an "immigration-safe" one, they told him, "Well, not here in Texas." After 48 hours in customs—in which he had to sleep on the floor at one point—and another 24 hours at a processing facility, where he was held in a cell with several other men and given only a half sandwich after 10 hours without food, he was booked into the Corley facility in Texas.

What surprised Dannell the most was how filthy the detention center was. Instead of having cleaning staff, he says, they made others in detention do the cleaning. "We just got arrested, we're frustrated, who really wants to clean?" he points out. As a result, though, the bathrooms and showers were



disgusting. For over three months, he slept on the top bunk of a dorm where officers kept the lights on 24 hours a day; by the time he switched to a “dark dorm,” he said, he had all but forgotten what darkness looked like.

Dannell has several medical conditions that require monitoring and care – which he didn’t receive in detention. Every time he had a flareup, he needed to request medication—which could take days or even weeks to arrive. At one point, Dannell had to be taken to the emergency room. But after he got back, detention officers were no more responsive when he needed medication than they had been before. That neglect is common, Dannell said from detention: “I see people in here having seizures, and nobody was attending to them at the time.”

As Dannell’s immigration court hearing kept getting delayed, his frustration grew. His daughter had been so excited to spend time with her dad over the summer. She had made plans for a hibachi dinner and a movie night but had instead gone months without seeing him at all. His son was about to start his senior year of high school, and Dannell was anxious that he wasn’t there day by day to offer advice and support.

Ultimately, Dannell managed to accomplish something exceedingly rare under the Trump administration: he won his case and got released. In court, the judge agreed that he qualified for “cancellation of removal,” a special protection for people with deep roots in the United States that can allow green-card holders to avoid deportation on criminal grounds. And instead of appealing the decision and keeping Dannell in detention—as usually happens under this administration when an immigration judge grants relief—the prosecutors agreed to waive appeal and let the decision stand.

Dannell’s case is the exception that proves the rule: it’s possible for the federal government to release people from detention, especially when they’ve already won their cases, rather than fighting tooth and nail to keep them in.

“I see people in here having seizures, and nobody was attending to them at the time.”

Construction of New Tent Facilities Lead to Poor Conditions and Violations of Detention Standards

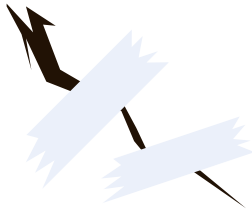
While “Alligator Alcatraz” was the first modern “soft-sided” facility opened specifically for detention purposes, ICE itself has been expanding the use of temporary tent-like facilities for detention. Such facilities had been in use for years by Customs and Border Protection (CBP) to process migrants. By 2023, CBP had five such facilities along the southern border.¹⁵² Unlike permanent detention centers, the facilities were not designed for long-term stays and offered few of the basic requirements provided in regular detention centers, like beds, hot food cooked on site, and attorney visitation areas.¹⁵³

This model for detention, with expanded access to basic requirements like beds and attorney visitation space, has now been adopted by ICE for the first time. Planning for federal construction of additional soft-sided facilities began even before Trump took office,¹⁵⁴ but after inauguration, ICE put out a Request for Information and private prison operators began pitching new soft-sided facilities.¹⁵⁵ As border numbers fell throughout 2025, ICE took over operation of a CBP soft-sided facility in El Paso, Texas that had first been constructed in 2023. By June, ICE was transferring individuals there from around the country.¹⁵⁶

Problems with conditions in tent camps have emerged within weeks of their opening. When “Alligator Alcatraz” opened in Florida, it became the first state tent camp for detaining immigrants. The tent camp was built in one week, leading to what those held at the facility described as shoddy construction and serious flaws. Individuals held in chain-link cages built inside tent-like structures described “unlivable” conditions: clouds of mosquitos inside the tents, overflowing toilets, and lights turned on 24 hours a day making sleep impossible.¹⁵⁷ As with many other facilities, those held there describe a persistent failure to provide adequate medical care. One man hospitalized after suffering a medical incident at the facility described officers denying him basic pain medication post-surgery and leaving him for hours in blood and feces-soaked clothing.¹⁵⁸ Attorney access was also a serious problem as ICE worked to integrate the new facility into its existing systems. It took a lawsuit filed by the ACLU for ICE to ensure that individuals held at the facility had access to their attorneys and the right to seek bond.¹⁵⁹

In August, Camp East Montana on Fort Bliss in El Paso, Texas became the first ever large-scale tent camp operated for ICE. The facility initially held capacity for 1,000 beds, but intends to expand to 2,700 by the end of 2025 and eventually reach a population of 5,000.¹⁶⁰ ICE is funding this facility through a \$1.2 billion contract signed with a Virginia company with no prior detention management experience, raising questions as to how the facility would be run and whether it would be able to meet federal standards.¹⁶¹ Inspection reports revealing violations of 60 different standards soon after the facility opened validated these concerns.¹⁶²

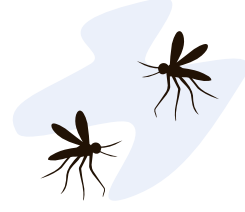
CONDITIONS OF ALLIGATOR ALCATRAZ AT A GLANCE



Flimsy construction



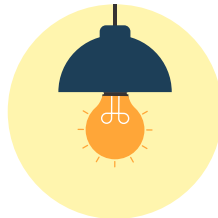
Chain-link cages



Clouds of mosquitoes



Overflowing toilets



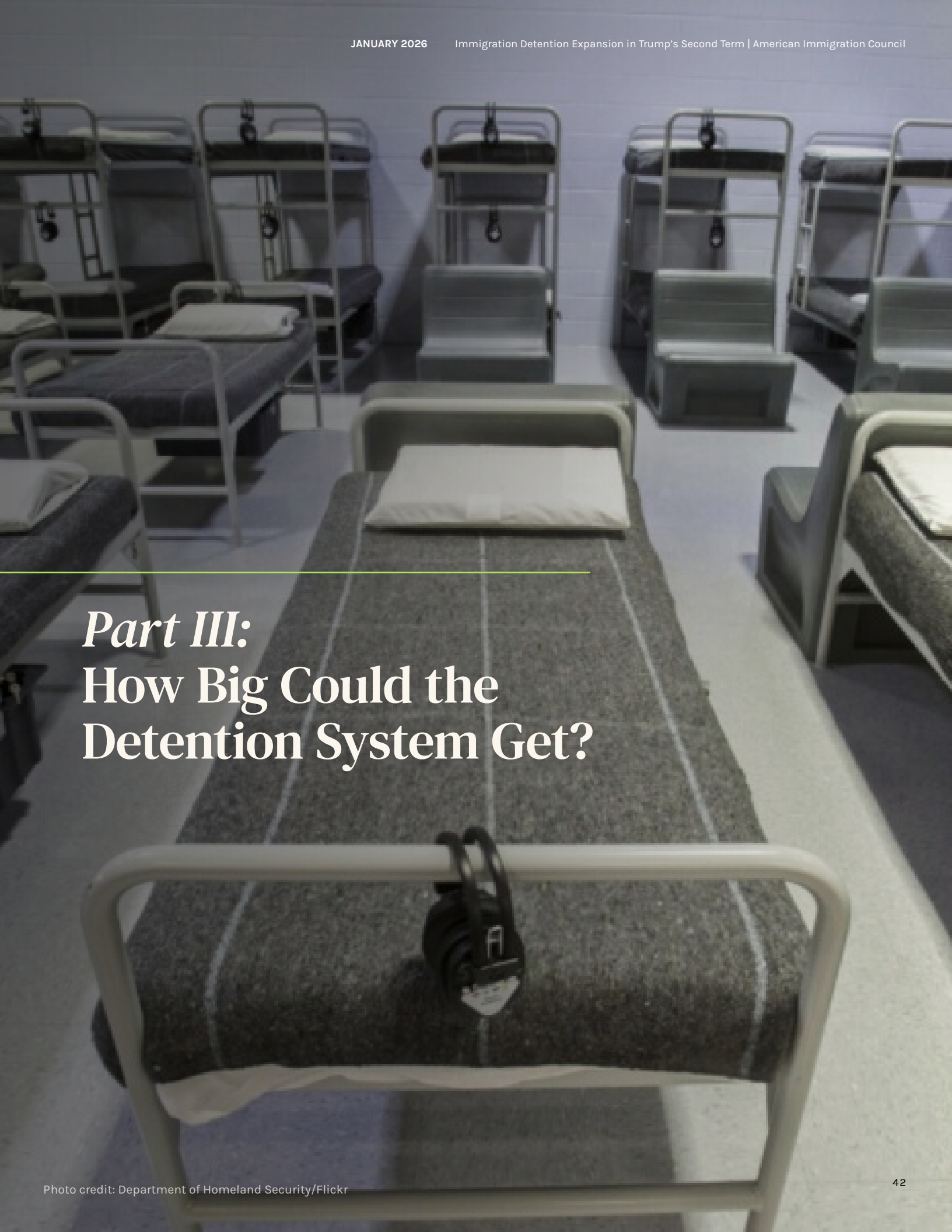
Lights on 24/7



Lack of medical care

Internal inspection reports reveal that initial operation of the facility began while construction was still ongoing. Officers fed people held there “cookies, candies, and potato chips” rather than normal meals. Plumbing issues caused water to seep between cells whenever a person showered. Attorney access and visitation were highly limited. Medical care was poorly documented and basic screenings not conducted. Staffing was far below required standards. Cells weren’t closed on the top, so noise levels were unacceptably high, and despite plans to limit detention to 14 days maximum, multiple people had been held at the facility for over 20 days.¹⁶³

As ICE brings more new soft-sided facilities online, similar problems will continue to emerge. Persistent nationwide staffing shortages in corrections officers and prison medical care will leave new facilities understaffed and overworked.¹⁶⁴



Part III: How Big Could the Detention System Get?

While the Trump administration has dramatically increased the size of the detention system in 2025, increasing its capacity by nearly 75 percent through the end of November, that growth is far from complete—and is even picking up pace. In the One Big Beautiful Bill Act of 2025, Congress gave ICE \$45 billion to expand immigration detention—money which can be spent through September 30, 2029.¹⁶⁵ That funding comes on top of ICE's increased annual budget, which in Fiscal Year 2025 reached \$10 billion for the first time, nearly \$4 billion of which went to detention, which was already a record sum. That sum is likely to increase; a Fiscal Year 2026 budget bill passed by the House of Representatives would provide \$4.45 billion for ICE Custody Operations.¹⁶⁶

Taken together, this sum averages an annual detention budget through Fiscal Year 2029 of nearly \$15 billion—and should Congress continue to increase ICE's annual budget, perhaps an even higher sum. This amount of funding would make ICE's detention budget alone nearly twice that of the Federal Bureau of Prisons at \$8.6 billion.¹⁶⁷

For now, the Trump administration has stated a clear goal: a minimum of 100,000 detention beds in total, if not more.¹⁶⁸ The administration may hit this goal sooner rather than later. By August 2025, ICE had reportedly begun the process of obtaining enough capacity to be able to detain nearly 108,000 people as of January 2026, with plans to bring over 41,000 new beds online from August through December.¹⁶⁹ Because ICE may soon run out of abandoned or underused, already-constructed prisons and jails, thousands of these beds will be in soft-sided tent camps like Camp East Montana or “Alligator Alcatraz.”

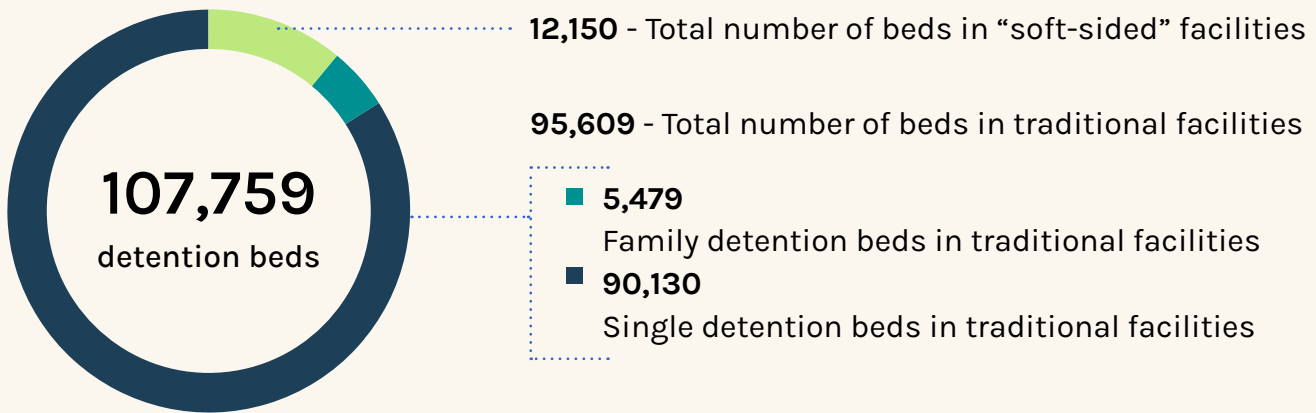
As the Trump administration has embarked on this ambitious plan to rapidly scale up the detention system, it has run into significant obstacles: Secretary Noem's efforts to expand partnerships with conservative states to use their pre-existing jails and prisons has reportedly slowed the contracting process with private prison companies.¹⁷⁰ New contracting rules put in place by Secretary Noem, which requires her to personally sign off on all contracts above a certain size, has also reportedly slowed down the process of obtaining new detention capacity.¹⁷¹

Despite these obstacles, we can estimate the scale of the detention system that ICE may eventually be able to build using the funding provided in the One Big Beautiful Bill Act. **We estimate that the agency could eventually operate above 135,000 beds per year, more than three times the size of the entire detention system when Trump first took office.**

In August, the Washington Post reported on an internal ICE planning document which laid a goal of reaching 107,759 beds in facilities under contract by January 2026: 12,150 of these beds would be in “soft-sided” facilities and the remainder in traditional facilities. 5,479 beds in traditional facilities would be operated as “family detention” beds and the remaining 90,130 would be standard adult detention beds.¹⁷²

Using existing cost estimates for the average ICE contract bed at roughly \$194.18 per day per adult detention bed and \$481.79 per day per bed in a family detention center,¹⁷³ to reach ICE's 107,759 goal, we estimate that it would cost ICE roughly \$7.35 billion per year for contracts with traditional detention facilities. As for soft-sided facilities, in January 2025, ICE estimated that adding a single additional bed in a traditional detention facility (an existing

ICE'S 2026 DETENTION GOALS AT A GLANCE



DETENTION NUMBERS AT A GLANCE

TRUMP'S GOAL:

100,000detention beds total
(if not more)

FUNDING:

\$45 billionGiven to ICE by Congress in the One Big
Beautiful Bill Act of 2025

OUR ESTIMATE:

135,000+Number of detention beds that could be
operated per year given the additional funding

DETENTION BUDGET (ANNUAL):

\$15 billion

Through FY 2029

ADDING ONE DETENTION BED:

\$76,613Per year for a traditional detention facility
(existing prison or jail)

ADDING ONE DETENTION BED:

\$195,000

Per year for a soft-sided facility

prison or jail) would cost \$76,613 per year, while a bed in a soft-sided facility would cost \$195,000 per year.¹⁷⁴ Therefore, it would cost ICE an additional \$2.37 billion to operate 12,150 soft-sided detention beds.

Taken together, this estimate suggests that ICE's total detention budget for 2026, if its plan is carried out, would amount to an annual detention cost of \$9.7 billion—over \$5 billion below the amount ICE would be budgeted for detention through Fiscal Year 2029. The implication of this estimate is that ICE could expand the detention system significantly further over the next four years beyond even the unprecedented level planned by the Trump administration in 2025. We estimate that with an additional \$5.3 billion per year not utilized under ICE's current detention plans, ICE could operate an additional 27,000 beds in soft-sided facilities per year, bringing the size of the total detention system to more than 135,000 beds.

These figures are estimates, and different costs at facilities could substantially impact these estimates. For example, Florida is reportedly paying \$450 million per year to operate the 1,000-bed “Alligator Alcatraz” facility, which would suggest an annual cost of \$450,000 per bed.¹⁷⁵

By contrast, Camp East Montana on Fort Bliss is reportedly under a two-year contract for \$1.24 billion¹⁷⁶ to eventually run a 5,000 bed facility, which would suggest an annual bed cost of roughly \$124,000. This contract cost, far below even ICE's previous estimate of \$195,000 per bed, came after ICE previously cancelled a contract with a different company that would have cost the agency \$3.8 billion to run the facility,¹⁷⁷ supposedly because the contractor was politically linked to Democrats.¹⁷⁸ This emphasizes the role that private contractors will have in determining the ultimate price for detention and its capacity. With enormous profit motives involved, many contractors may be willing to offer low-ball estimates to run these facilities on shoestring budgets, raking in additional profits for the operator at the cost of basic necessities for the people held in detention.

SOFT-SIDED FACILITY OPERATING COST EXAMPLES

ALLIGATOR ALCATRAZ

Total operating cost:
\$450,000,000/year

÷ **Total detention beds:**
1,000 beds

Annual cost per bed:
\$450,000

CAMP EAST MONTANA

Total operating cost:
\$620,000,000/year

÷ **Total detention beds:**
5,000 beds

Annual cost per bed:
\$124,000

As a result, our estimate of 135,000 beds is a conservative estimate, especially if ICE manages to identify additional beds in permanent facilities that can be contracted with for cheaper than a soft-sided facility. For example, if ICE identified an additional 10,000 beds in permanent facilities, that would cost \$709 million of the leftover funding, leaving enough for 23,740 beds in soft-sided facilities and a total detention capacity of 141,500 beds.

Given the profit motive for many operators of private prisons, it is likely that additional capacity exists or will come online before the end of Fiscal Year 2029. For example, in Colorado, despite only three new facilities appearing on ICE's list of facilities to reach 108,000 beds, proposals relating to at least seven different facilities in Colorado (six permanent, one soft-sided) have been submitted to ICE in response to the agency's Request for Information seeking bids for detention expansion.¹⁷⁹ The cheaper ICE can obtain new detention capacity, the more beds it can acquire. Thus, depending on the capacity that ICE is able to obtain in existing detention centers and prisons, ICE could potentially *triple* the size of the detention system by the end of Trump's second term in office—or more.

Conclusion

President Trump has three years left in office. By the time he leaves office, ICE will likely operate either the second-largest or largest prison system in the United States. Should Congress choose to continue funding detention at that level, the system may become metastasized, with private companies and state and local governments lobbying to keep the billions flowing.

Mass detention is unnecessary. Most immigrants are not flight risks. Studies consistently show that the vast majority of immigrants placed into removal proceedings appear for all of their hearings.¹⁸⁰ Most immigrants are also not dangers to the community.

Fewer than 10 percent of people held in immigration detention have a serious criminal conviction.¹⁸¹ Alternatives to detention are proven to ensure compliance with court attendance and removal.¹⁸² A better system is possible.

Immigration detention comes at great cost to families, communities, and taxpayers; and great profit to private prison companies. Rather than supporting the Trump administration's mass detention plans, Congress could instead provide funding to support individuals as they pursue their immigration cases outside of detention—permitting them to continue to care for themselves and their families without wasting taxpayer resources to lock people in detention who are neither flight risks nor dangers to the community.

Congress could move to reduce the use of immigration detention at any point, but the most obvious one will come on October 1, 2029, when the \$45 billion for ICE detention in the One Big Beautiful Bill Act is set to expire. This presents an opportunity for reform. Congress should consider not just reducing funding to the detention system, but also expanding access to counsel, increasing the use of alternatives to detention programming, and eliminating statutory mandatory detention in favor of a risk-based approach which prioritizes limited resources while permitting the vast majority of people facing removal to have a fair day in court outside of jail.

Endnotes

- 1 U.S. Immigration and Customs Enforcement, Detention Statistics FY 2026, <https://www.ice.gov/detain/detention-management>.
- 2 Camilo Montoya-Galvez, "ICE's detainee population reaches 66,000, a new record high, statistics show," CBS News, November 6, 2025, <https://www.cbsnews.com/news/ices-detainee-population-reaches-66000-a-new-record-high-statistics-show/>.
- 3 Data for FY 1990 through FY 2018 via Emily Kassie, "Detained: How the United States created the largest immigrant detention system in the world," *The Marshall Project*, September 24, 2018, <https://www.themarshallproject.org/2019/09/24/detained>; Data for FY 2019 through FY 2025 via U.S. Immigration and Customs Enforcement, Detention Statistics, accessed November 11, 2025, <https://www.ice.gov/detain/detention-management>.
- 4 See, e.g., American Immigration Council, "Complaint Demands Investigation Into Inadequate Medical and Mental Health Care Condition in Immigration Detention Center," June 4, 2018, <https://www.americanimmigrationcouncil.org/advocacy/immigrants-inadequate-medical-care-aurora/>.
- 5 Stuart Taylor Jr., "Smith Sees Immigration Plan As a Means to Avert Boatlifts," *The New York Times*, October 23, 1981, <https://www.nytimes.com/1981/10/23/us/smith-sees-immigration-plan-as-a-means-to-avert-boatlifts.html>.
- 6 Emily Kassie, "Detained: How the United States created the largest immigrant detention system in the world," *The Marshall Project*, September 24, 2018, <https://www.themarshallproject.org/2019/09/24/detained>.
- 7 Transactional Records Access Clearinghouse, "Immigration Detention Statistics: A Retrospective and a Look Forward," February 21, 2025, <https://tracreports.org/reports/753/>.
- 8 Taylor Giorno, "Private Prisons Cash In on 'Unprecedented' ICE Demands," *NOTUS*, August 7, 2025, <https://www.notus.org/money/private-prisons-q2-earnings-corecivic-geo-ice-detention>.
- 9 U.S. Department of Homeland Security, "ICE Policies Related to Detainee Deaths and the Oversight of Immigration Detention Facilities," OIG-08-52 (June 11, 2008), at 11, https://www.oig.dhs.gov/sites/default/files/assets/Mgmt/OIG_08-52_Jun08.pdf.
- 10 Eunice Cho, "95 Percent of Deaths in ICE Detention Could Likely Have Been Prevented With Adequate Medical Care: Report," *American Civil Liberties Union*, June 25, 2024, <https://www.aclu.org/press-releases/95-percent-of-deaths-in-ice-detention-could-likely-have-been-prevented-with-adequate-medical-care-report>.
- 11 Human Rights Watch, "Systemic Indifference: Dangerous & Substandard Medical Care in US Immigration Detention," May 8, 2017, <https://www.hrw.org/report/2017/05/08/systemic-indifference/dangerous-substandard-medical-care-us-immigration-detention>.
- 12 Kate Morrissey, "With a Jar of Blood as Evidence, Detained Man Tells Immigration Judge 'I am Dying Little by Little'," *Capital & Main*, July 8, 2025, <https://capitalandmain.com/with-a-jar-of-blood-as-evidence-detained-man-tells-immigration-judge-i-am-dying-little-by-little>.
- 13 American Immigration Council, "Where Can You Win in Immigration Court?" November 20, 2025, <https://www.americanimmigrationcouncil.org/report/immigration-court/>.
- 14 American Immigration Council, "Mass Deportation: Analyzing the Trump Administration's Attacks on Immigrants, Democracy, and America," July 23, 2025, <https://www.americanimmigrationcouncil.org/report/mass-deportation-trump-democracy/>.
- 15 Jeffrey S. Passel, Jens Manuel Krogstad, "U.S. Unauthorized Immigrant Population Reached a Record 14 Million in 2023," *Pew Research Center*, August 21, 2025, <https://www.pewresearch.org/race-and-ethnicity/2025/08/21/u-s-unauthorized-immigrant-population-reached-a-record-14-million-in-2023/>.
- 16 U.S. Immigration and Customs Enforcement, Detention Statistics FY 2025, <https://www.ice.gov/detain/detention-management>.
- 17 See Transactional Records Access Clearinghouse, "ICE Detainees," accessed November 19, 2025, https://tracreports.org/immigration/detentionstats/pop_age_table.html.
- 18 Analysis of arrest data produced in annual DHS congressional budget justifications, available at U.S. Department of Homeland Security, "DHS Budget," last updated July 9, 2025, <https://www.dhs.gov/dhs-budget>.

- 19 Vernal Coleman, "ICE Quietly Pushes Legal Boundaries With So-Called Collateral Arrests," *Truthout*, March 25, 2025, <https://truthout.org/articles/ice-quietly-pushes-legal-boundaries-with-so-called-collateral-arrests/>.
- 20 See U.S. Department of Homeland Security, "Transportation Checks and Roving Enforcement, Fiscal Year 2025 Report to Congress," August 26, 2025, https://www.dhs.gov/sites/default/files/2024-10/2024_0826_cbp_transportation_checks_and_roving_enforcement_semiannual_1.pdf.
- 21 Matt Apuzzo and Michael S. Schmidt, "U.S. to Continue Racial, Ethnic Profiling in Border Policy," *The New York Times*, December 5, 2014, http://www.nytimes.com/2014/12/06/us/politics/obama-to-impose-racial-profiling-curbs-with-exceptions.html?_r=0.
- 22 Lili Zheng, "ICE now going '100 miles per hour' under new administration, director says," *Fox 5 DC*, February 13, 2025, <https://www.fox5dc.com/news/ice-now-going-100-miles-per-hour-under-new-administration-director-says>; Camilo Montoya-Galvez, "ICE head says agents will arrest anyone found in the U.S. illegally, crack down on employers of unauthorized workers," *CBS News*, July 21, 2025, <https://www.cbsnews.com/news/ice-head-todd-lyons-agents-will-arrest-anyone-found-illegally-crack-down-on-employers/>.
- 23 Elizabeth Findell et. al, "The White House Marching Orders That Sparked the L.A. Migrant Crackdown," *Wall Street Journal*, June 9, 2025, <https://www.wsj.com/us-news/protests-los-angeles-immigrants-trump-f5089877>; Brittany Gibson and Stef W. Kight, "Scoop: Stephen Miller, Noem tell ICE to supercharge immigrant arrests," *Axios*, May 28, 2025, <https://www.axios.com/2025/05/28/immigration-ice-deportations-stephen-miller>.
- 24 Anna Giaritelli, "Stephen Miller 'eviscerated' ICE officials in private meeting for low deportation numbers," *Washington Examiner*, May 30, 2025, <https://www.washingtonexaminer.com/news/3425297/stephen-miller-eviscerated-ice-officials-deportation-numbers>.
- 25 Alicia Victoria Lozano, "Home Depots become prime locations for immigration enforcement," *NBC News*, August 23, 2025, <https://www.nbcnews.com/news/us-news/home-depots-become-prime-locations-immigration-enforcement-rcna226643>.
- 26 Order Granting Plaintiffs' Ex Parte Applications For Temporary Restraining Order and Order to Show Cause Regarding Preliminary Injunction, *Vasquez Perdomo v. Noem*, No. 2:25-cv-05605, ECF No. 87 (C.D. Cal July 11, 2025), available at https://storage.courtlistener.com/recap/gov.uscourts.cacd.975351/gov.uscourts.cacd.975351.87.0_7.pdf.
- 27 *Vasquez Perdomo v. Noem*, No. 25-4312 (9th Cir. Aug. 1, 2025), available at <https://cdn.ca9.uscourts.gov/datastore/opinions/2025/08/01/25-4312.pdf>.
- 28 https://www.supremecourt.gov/opinions/24pdf/25a169_5h25.pdf *ibid*.
- 29 Data produced under the Freedom of Information Act and published by the Deportation Data Project, available at <https://deportationdata.org/data/ice.html>.
- 30 American Immigration Council, "Understanding ICE Raids at American Workplaces," October 9, 2025, <https://www.americanimmigrationcouncil.org/fact-sheet/understanding-ice-worksite-raids/>.
- 31 U.S. Immigration and Customs Enforcement, "ICE worksite enforcement investigations in FY18 surge," December 11, 2018, <https://www.ice.gov/news/releases/ice-worksite-enforcement-investigations-fy18-surge>.
- 32 Brad Heath, Joshua Schneyer, et. al, "Exclusive: Thousands of agents diverted to Trump immigration crackdown," *Reuters*, March 22, 2025, <https://www.reuters.com/world/us/thousands-agents-diverted-trump-immigration-crackdown-2025-03-22/>.
- 33 FOX 5 Atlanta Digital Team "Federal immigration authorities arrest 12 undocumented workers at Marietta nail salon," *Fox 5 Atlanta*, June 4, 2025, <https://www.fox5atlanta.com/news/federal-immigration-authorities-arrest-12-undocumented-workers-marietta-nail-salon>.
- 34 Nicole Acevedo, "Pennsylvania restaurant employees say ICE raid left a trail of destruction for the business," *NBC News*, August 15, 2025, <https://www.nbcnews.com/news/latino/ice-raids-pittsburgh-mexican-restaurant-emilianos-pennsylvania-rcna224726>.
- 35 Berenice Garcia, "South Texas bakery owners housed undocumented workers next to business before ICE raid, feds allege in hearing," *Texas Tribune*, February 21, 2025, <https://www.texastribune.org/2025/02/21/texas-rio-grande-bakery-undocumented-immigrants-los-fresnos/>.
- 36 Tim Reid, "This construction project was on time and on budget. Then came ICE," *Reuters*, July 28, 2025, <https://www.reuters.com/world/us/this-construction-project-was-time-budget-then-came-ice-2025-07-28/>.
- 37 Nicole Acevedo, "How a city in Nebraska is recovering after the state's largest worksite immigration raid," *NBC News*, June 15, 2025, <https://www.nbcnews.com/news/us-news/omaha-immigration-workplace-raid-aftermath-rcna212931>.
- 38 Jack Brook, "Immigration raid at Louisiana racetrack ends with more than 80 arrests," *Associated Press*, June 18, 2025, <https://apnews.com/article/louisiana-racetrack-ice-raid-arrests-delta-downs-629c62a2fc7dee46ac5c305ba7f664b5>.
- 39 American Immigration Council, "Understanding ICE Raids at American Workplaces," October 9, 2025, <https://www.americanimmigrationcouncil.org/fact-sheet/understanding-ice-worksite-raids/>.
- 40 *Ibid*.

- 41 Micah McCartney, “How Trump’s ICE Raid Triggered Nationwide Outrage in South Korea,” *Newsweek*, last updated September 10, 2025, <https://www.newsweek.com/trump-ice-raid-hyundai-outrage-south-korea-2126752>.
- 42 American Immigration Council, “Understanding ICE Raids at American Workplaces,” October 9, 2025, <https://www.americanimmigrationcouncil.org/fact-sheet/understanding-ice-worksites-raids/>.
- 43 Hamed Aleaziz, Luis Ferré-Sadurní, and Miriam Jordan, “How ICE Is Seeking to Ramp Up Deportations Through Courthouse Arrests,” *New York Times*, last updated June 1, 2025, <https://www.nytimes.com/2025/05/30/us/politics/ice-courthouse-arrests.html>.
- 44 Asylum Seeker Advocacy Project, “ICE is making arrests in immigration court – what to know,” last updated November 14, 2025 <https://asaptogether.org/en/detained-at-immigration-court/>.
- 45 Ximena Bustillo, “Confusion, explosive anger and waiting: NPR spent a day in New York immigration court,” *NPR*, August 25, 2025, <https://www.npr.org/2025/08/25/nx-s1-5503595/immigration-court-new-york>.
- 46 Ben Fractenberg and Gwynne Hogan, “Families in Tears and Panic Outside Immigration Office as ICE Accelerates Round-Ups,” *The City*, June 4, 2025, <https://www.thecity.nyc/2025/06/04/ice-immigration-enforcement-manhattan-roundup-geo-group/>.
- 47 Valerie Gonzalez, Cedar Attanasio, and Sophia Tareen, “Once-routine immigration check-ins become high-stakes calculation as some are detained,” *Associated Press*, March 14, 2025, <https://apnews.com/article/immigration-fears-appointments-detained-deported-a6d465c177eb4880699e9c40210508fb>.
- 48 President Donald J. Trump, “Securing Our Borders,” Executive Order 14165 (January 20, 2025), Section 2.
- 49 President Donald J. Trump, “Protection the American People From Invasion,” Executive Order 14169 (January 20, 2025), Section 2.
- 50 Adam Shaw, “Trump’s ICE limits illegal immigrant releases amid moves to shake off Biden ‘hangover,’” *Fox News*, February 6, 2025, <https://www.foxnews.com/politics/trumps-ice-limits-illegal-immigrant-releases-amid-moves-shake-off-biden-hangover>.
- 51 U.S. Immigration and Customs Enforcement, Detention Statistics FY 2025, [LINK LATEST CHART]
- 52 8 U.S.C. § 1226(c).
- 53 8 U.S.C. § 1225(b)(5).
- 54 See American Immigration Council, “Seeking Release from Immigration Detention,” September 13, 2019, <https://www.americanimmigrationcouncil.org/fact-sheet/release-immigration-detention/>.
- 55 8 U.S.C. § 1226(c).
- 56 See, e.g., Miriam Jordan, “Under Trump Policy, Bonds for Immigrants Facing Deportation Are Vanishing,” *The New York Times*, September 24, 2025, <https://www.nytimes.com/2025/09/24/us/immigrants-trump-detention.html>.
- 57 *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025).
- 58 Clinic Legal, “What Is Going on at the BIA? Is a Release From Detention at the Border Considered Parole or Not?,” June 26, 2025, <https://www.cliniclegal.org/resources/what-going-bia-release-detention-border-considered-parole-or-not>.
- 59 *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).
- 60 Steve Vladeck, “195. The Immigration Detention Flood,” *One First*, December 1, 2025, <https://www.stevevladeck.com/p/195-the-immigration-detention-flood>; American Immigration Council, “Detention under INA § 235(b): The Statutory Scheme and Strategies for Release,” September 2, 2025, <https://www.americanimmigrationcouncil.org/practice-advisory/ina-235b-detention-practice-advisory/>; see, e.g., American Civil Liberties Union of Colorado, “ACLU of Colorado and ACLU Challenge New ICE Policy Mandating Detention of Immigrants Without Bond,” September 3, 2025, <https://www.aclu.org/press-releases/aclu-of-colorado-and-aclu-challenge-new-ice-policy-mandating-detention-of-immigrants-without-bond>.
- 61 Rebecca Beitsch, “Trump administration ordered to provide bond hearings to long-term migrants in class-action ruling,” *The Hill*, November 26, 2025, <https://thehill.com/regulation/court-battles/5623333-migrant-deportation-bond-hearings-ruling/>.
- 62 American Immigration Council, “The Cost of Immigration Enforcement and Border Security,” August 14, 2024, <https://www.americanimmigrationcouncil.org/fact-sheet/the-cost-of-immigration-enforcement-and-border-security/>.
- 63 U.S. Immigration and Customs Enforcement, Detention Statistics FY 2025, <https://www.ice.gov/detain/detention-management>.
- 64 Brittany Gibson, “ICE’s cash crisis deepens amid immigration crackdown,” *Axios*, June 16, 2025, <https://www.axios.com/2025/06/16/ice-cash-crisis-immigration-crackdown-trump>.
- 65 See, e.g., CoreCivic, “Contract Wins Total Nearly 3,600 beds,” September 29, 2025, <https://ir.corecivic.com/news-releases/news-release-details/corecivic-announces-new-contract-awards-california-city>.
- 66 U.S. Immigration and Customs Enforcement, Detention Statistics FY25, <https://www.ice.gov/detain/detention-management>.
- 67 <https://www.ice.gov/detain/detention-management> Ibid.

- 68 Allison McCann, "Local Sheriffs Are Turning Their Jails Into ICE Detention Centers," *The New York Times*, September 8, 2025, <https://www.nytimes.com/interactive/2025/09/08/us/politics/ice-detention-county-jails-sheriffs-deportation.html>.
- 69 The GEO Group Inc., "The GEO Group Announces Contract for Company-Owned 1,800-Bed North Lake Facility in Michigan," March 20, 2025, <https://investors.geogroup.com/news-releases/news-release-details/geo-group-announces-contract-company-owned-1800-bed-north-lake>.
- 70 Mark Rivera et. al, "Largest Midwest ICE detention center opens in Michigan, could soon house people detained in Chicago," *ABC 7 Chicago*, June 26, 2025, <https://abc7chicago.com/post/largest-midwest-ice-detention-center-opens-geo-north-lake-baldwin-michigan-could-soon-house-people-detained-chicago/16857442/>.
- 71 Tyche Hendricks, "California's Newest Immigration Facility Is Also Its Biggest. Is It Operating Legally?," *KQED*, September 4, 2025, <https://www.kqed.org/news/12054544/californias-newest-immigration-facility-is-also-its-biggest-is-it-operating-legally>.
- 72 Cindy Ramirez, "\$1.2B ICE detention complex opens at Fort Bliss in East El Paso under Trump's mass deportation strategy," *El Paso Matters*, August 18, 2025, <https://elpasomatters.org/2025/08/18/ice-east-montana-detention-center-el-paso-fort-bliss-enhanced-hardened-facility/>.
- 73 American Immigration Council, "The 287(g) Program: An Overview," July 8, 2021, <https://www.americanimmigrationcouncil.org/fact-sheet/287g-program-immigration/>.
- 74 Tampa Bay Times, "Who runs Alligator Alcatraz? Florida or the federal government?," August 8, 2025, <https://www.yahoo.com/news/articles/runs-alligator-alcatraz-florida-federal-210438880.html>.
- 75 American Civil Liberties Union of Florida, "New Lawsuit Challenges Florida's Authority to Detain People at Notorious 'Alligator Alcatraz' Detention Center," August 23, 2025, <https://www.aclu.org/press-releases/new-lawsuit-challenges-floridas-authority-to-detain-people-at-notorious-alligator-alcatraz-detention-center>.
- 76 Mike Schneider, "'Alligator Alcatraz' detainees held without charges, barred from legal access, attorneys say," *PBS*, July 28, 2025, <https://www.pbs.org/newshour/nation/alligator-alcatraz-detainees-held-without-charges-barred-from-legal-access-attorneys-say>.
- 77 Jackie Llanos, "Feds tell court they're not in charge of Everglades detention center after migrants arrive," *Florida Phoenix*, July 3, 2025, <https://floridaphoenix.com/2025/07/03/feds-tell-court-theyre-not-in-charge-of-everglades-detention-center-after-migrants-arrive/>.
- 78 Richard Luscombe, "Alligator Alcatraz snaps back to life after judges' reprieve of Florida's migrant jail," *The Guardian*, October 7, 2025, <https://www.theguardian.com/us-news/2025/oct/07/trump-alligator-alcatraz-florida>.
- 79 Maria Tedesco, "'Cornhusker Clink,' Trump admin to open new migrant detention center in Nebraska," *Local 21 News*, August 19, 2025, <https://local21news.com/news/nation-world/cornhusker-clink-trump-admin-to-open-new-migrant-detention-center-nebraska-alligator-alcatraz-deportation-depot-coyote-compound-lonestar-lockup-aclu-trump-administration-tom-homan>.
- 80 Kristina K. Shull, "'Nobody Wants These People': Reagan's Immigration Crisis and America's First Private Prisons," *University of California, Irvine*, (2014), <https://escholarship.org/uc/item/4v54x9hp>.
- 81 See Edwidge Danticat, "The Fate of Migrants Detained at Guantánamo," *The New Yorker*, March 9, 2025, <https://www.newyorker.com/culture/photo-booth/the-fate-of-migrants-detained-at-guantanamo>.
- 82 International Refugee Assistance Project, "Offshoring Human Rights: Detention of Refugees at Guantanamo Bay," September 11, 2024, <https://refugeerights.org/wp-content/uploads/2024/09/Offshoring-Human-Rights-Guantanamo-Bay-English-Report-September-2024.pdf>.
- 83 President Donald J. Trump, Memorandum, "Expanding Migrant Operations Center at Naval Station Guantanamo Bay to Full Capacity," January 29, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/expanding-migrant-operations-center-at-naval-station-guantanamo-bay-to-full-capacity/>.
- 84 Maia Davies, "Trump sends first migrant detainees to Guantanamo Bay," *BBC News*, February 5, 2025, <https://www.bbc.com/news/articles/cy0p1ykxyzjo>; Perla Trevizo, "U.S. claims migrants held at Guantanamo are 'worst of the worst.' Their families say otherwise.," *Texas Tribune*, February 13, 2025, <https://www.texastribune.org/2025/02/13/immigration-flights-el-paso-guantanamo/>.
- 85 Mauricio Torres, "Venezuelan migrants in Guantanamo subjected to isolation, poor hygiene and stale food, HRW says," *CNN*, August 29, 2025, <https://www.cnn.com/2025/08/29/americas/guantanamo-venezuela-migrants-detained-hrw-intl-latam>.
- 86 Ted Hesson, "Trump migrant detentions at Guantanamo Bay cost \$100,000 per person daily, senator says," *Reuters*, May 20, 2025, <https://www.reuters.com/world/us/trump-migrant-detentions-guantanamo-bay-cost-100000-per-person-daily-senator-2025-05-20/>.
- 87 Cindy Ramirez, "Fort Bliss in East El Paso under Trump's mass deportation strategy," *El Paso Matters*, August 18, 2025, <https://elpasomatters.org/2025/08/18/ice-east-montana-detention-center-el-paso-fort-bliss-enhanced-hardened-facility/>.

- 88 Kelly Rissman, “A company was awarded a \$1.2B contract for a detention center to house migrants. The group behind it remain a mystery,” *The Independent* August 28, 2025, <https://www.the-independent.com/news/world/americas/us-politics/army-texas-detention-center-company-unknown-b2816139.html>, <https://www.yahoo.com/news/articles/company-awarded-1-2b-contract-222312401.html>
- 89 U.S. Immigration and Customs Enforcement, Detention Statistics, <https://www.ice.gov/detain/detention-management>; Jeff Abbott, “ICE’s Camp East Montana immigrant detention facility expands, new photos show,” *El Paso Times*, October 13, 2025, <https://www.elpasotimes.com/story/news/immigration/2025/10/13/ice-camp-east-montana-migrant-detention-facility-expands-in-fort-bliss-el-paso-texas>.
- 90 Rep. Veronica Escobar, “Congresswoman Escobar Expresses Further Concern Over Lack of Transparency and Communication from ICE, DHS,” September 26, 2025, <https://escobar.house.gov/news/documentsingle.aspx?DocumentID=2964>.
- 91 Jeff Abbott, “ICE’s Camp East Montana immigrant detention facility expands, new photos show,” *El Paso Times*, October 13, 2025, <https://www.elpasotimes.com/story/news/immigration/2025/10/13/ice-camp-east-montana-migrant-detention-facility-expands-in-fort-bliss-el-paso-texas>
- 92 American Civil Liberties Union et. al, Letter to Acting ICE Director Todd Lyons, “Re: Coercive Third Country Deportations and Abusive Conditions of Confinement in Immigration Detention at Fort Bliss, TX (Camp East Montana),” December 8, 2025, available at <https://assets.aclu.org/live/uploads/2025/12/Ft-Bliss-ICE-Detention-Letter-FINAL-To-Post.pdf>.
- 93 Benjamin J. Hulac, “Trump administration plans to detain immigrants at NJ military base,” *NJ Spotlight News*, July 17, 2025, <https://www.njspotlightnews.org/2025/07/trump-administration-to-use-nj-military-base-as-temporary-immigrant-detention-site/>.
- 94 Casey Smith, “This is a dark time for our nation’ | US congressman responds to federal plan to hold immigrant detainees at Indiana’s Camp Atterbury,” *WTHR*, July 18, 2025, <https://www.wthr.com/article/news/politics/defense-letter-confirms-indiana-camp-atterbury-used-immigrant-detention-edinburgh-pete-hegseth/531-353bcf5b-f92f-4f26-be9c-b34556244b4a>.
- 95 Natasha Bertrand and Priscilla Alvarez, “Looking to speed up building network of migrant detention centers, Trump administration turns to the US Navy,” *CNN*, October 24, 2025, <https://www.cnn.com/2025/10/24/politics/navy-building-ice-detention-facilities>.
- 96 Ellen M. Gilmer, “Trump Aides Shutter Homeland Security Civil Rights Office,” *Bloomberg*, March 21, 2025, <https://news.bgov.com/bloomberg-government-news/civil-rights-advocates-brace-for-cuts-in-homeland-security-unit>.
- 97 <https://news.bgov.com/bloomberg-government-news/civil-rights-advocates-brace-for-cuts-in-homeland-security-unit> Ibid.
- 98 Letter from 49 Members of Congress to DHS Secretary Kirsti Noem, Re: the Closure of DHS Oversight Offices, April 8, 2025, available at <https://perma.cc/8K27-XHL3>.
- 99 Robert F. Kennedy Human Rights, “RFK Human Rights v. Department of Homeland Security: Ensuring oversight of immigration enforcement,” April 24, 2025, <https://rfkhumanrights.org/litigation/rfk-human-rights-v-noem-fighting-for-accountability-in-immigration-enforcement/>.
- 100 Robert F. Kennedy Human Rights, “FAQ: Status of DHS Civil Rights Oversight Offices and Litigation Against Their Closure,” last updated June 2025, <https://rfkhumanrights.org/wp-content/uploads/2025/06/DHS-oversight-agencies-FAQ-June-2025.pdf>.
- 101 Zain Lakhani, “Too Swift for Human Rights: The Catastrophic Cost of Eliminating Government Oversight over Immigration Enforcement,” *Women’s Refugee Commission*, April 9, 2025, <https://www.womensrefugeecommission.org/blog/too-swift-for-human-rights-the-catastrophic-cost-of-eliminating-government-oversight-over-immigration-enforcement/>.
- 102 Pub. L. No. 116-93; Pub. L. No. 116-260; Pub. L. No. 117-103; Pub. L. No. 117-328.
- 103 See, e.g., Office of Representative Jason Crow, “ICE Accountability Report,” <https://crow.house.gov/transparency/ice-accountability-report>.
- 104 U.S. Immigration and Customs Enforcement, “Office of Congressional Relations,” <https://www.ice.gov/leadership/ocr>, last updated September 18, 2025.
- 105 Francesca D’Annunzio, “Dems in Congress Are Being Denied Access to ICE Facilities. Now They’re Suing,” *Texas Observer*, August 25, 2025, <https://www.texasobserver.org/dems-congress-ice-detention-oversight-lawsuit/>.
- 106 Pablo Manriquez, “Camp East Montana: The ICE Jail Kristi Noem Really Doesn’t Want Congress to See,” *Migrant Insider*, September 26, 2025, <https://migrantinsider.com/p/camp-east-montana-an-ice-jail-kristi>.
- 107 Martha Bellisle, “12 members of Congress sue Trump administration to ensure access to ICE detention centers,” *Associated Press*, July 30, 2025, <https://apnews.com/article/ice-detention-centers-congress-oversight-f94f1226ee3d8c0c57302370485cad0a>.
- 108 Gabrielle LaMarr LeMee, “How ICE detainees are moved miles away from families and attorneys,” *Los Angeles Times*, September 26, 2025, <https://www.latimes.com/politics/story/2025-09-26/faster-more-frequent-transfers-of-immigrant-ice-detainees-sow-fear-and-cut-off-resources>.

- 109** Ibid.
- 110** Ibid.
- 111** U.S. Immigration and Customs Enforcement, “Online Detainee Locator System,” December 2021, <https://www.ice.gov/doclib/news/library/factsheets/pdf/odls-brochure.pdf>.
- 112** Ruth Simon, Elizabeth Findell, and Tarini Parti, “Migrants Vanish Into Opaque ICE Detention System,” *The Wall Street Journal*, August 6, 2025, <https://www.wsj.com/us-news/law/ice-detention-migrants-vanish-38fd798f>
- 113** C.J. Ciaramella, “A Portland Family Says Their Dad Was Wrongly Arrested by ICE. Now He’s Lost in Immigration Detention,” *Reason*, October 30, 2025, <https://reason.com/2025/10/30/a-portland-family-says-their-dad-was-wrongly-arrested-by-ice-now-hes-lost-in-immigration-detention/>.
- 114** Dalia Fahed, “A glimpse at complaints inside the Louisiana and Texas ICE detention centers holding Mahmoud Khalil and Badar Khan Suri,” *CNN*, March 26, 2025, <https://www.cnn.com/2025/03/26/us/mahmoud-khalil-badar-khan-suri/index.html>.
- 115** Nidia Cavazos, “Immigrants at ICE check-ins detained, held in basement of federal building in Los Angeles, some overnight,” *CBS News*, June 7, 2025, <https://www.cbsnews.com/news/immigrants-at-ice-check-ins-detained-and-held-in-basement-of-federal-building-in-los-angeles/>.
- 116** Tolly Taylor, “Conditions are atrocious: Attorney says some migrants sleeping on floor at Baltimore ICE office,” *WBAL TV*, March 14, 2025, <https://www.wbaltv.com/article/attorney-migrants-sleeping-floor-baltimore-ice-office/64189623>.
- 117** Casey Tolan and Isabelle Chapman, “Immigrants spend days in ‘miserable’ ICE hold rooms, violating longstanding policy,” *CNN*, September 8, 2025, <https://www.cnn.com/2025/09/08/us/detainees-ice-immigrants-hold-rooms>.
- 118** U.S. Immigration and Customs Enforcement, “Directive 11087.2, Operations of ERO Holding Facilities,” January 31, 2024, <https://www.ice.gov/doclib/foia/policy/directive11087.2.pdf>.
- 119** Monica S. Burke, “National Hold Room Waiver,” *U.S. Immigration and Customs Enforcement*, June 24, 2025, available at <https://storage.courtlistener.com/recap/gov.uscourts.mdd.582507/gov.uscourts.mdd.582507.40.3.pdf>.
- 120** Preliminary Injunction, *Barco Mercado v. Noem*, No. 25-cv-6568, ECF No. 97 (S.D.N.Y. Sept. 17, 2025), available at <https://www.aclu.org/documents/barco-mercado-v-noem-preliminary-injunction-order>.
- 121** Christine Fernando, “Judge orders improvements at Broadview ICE facility after claims of inhumane conditions,” *Associated Press*, November 5, 2025, <https://www.pbs.org/newshour/politics/judge-orders-improvements-at-broadview-ice-facility-after-claims-of-inhumane-conditions>.
- 122** Edvard Pettersson, “Attorneys demand access to ICE detainees at LA facility,” *Courthouse News Service*, October 23, 2025, <https://www.courthousenews.com/attorneys-demand-access-to-ice-detainees-at-la-facility/>.
- 123** Immigration Law Lab, “Clear Clinic v. Noem,” <https://innovationlawlab.org/cases/clear-clinic-v-noem/>.
- 124** Transactional Records Access Clearinghouse, “ICE Contractual Capacity and Number Detained: Overcapacity vs. Overcrowding,” July 8, 2025, <https://tracreports.org/reports/762/>.
- 125** <https://tracreports.org/reports/762/ibid>
- 126** Relevant Research, “KROME NORTH SERVICE PROCESSING CENTER: ICE Detention Facility Statistical Report,” last updated September 5, 2025 https://detentionreports.com/facility/KROME_NORTH_SERVICE_PROCESSING_CENTER.html.
- 127** Transactional Records Access Clearinghouse, “ICE Contractual Capacity and Number Detained: Overcapacity vs. Overcrowding,” July 8, 2025, <https://tracreports.org/reports/762/>.
- 128** Lauren Villagran, “Immigrant women describe ‘hell on earth’ in ICE detention,” *USA Today*, last updated March 24, 2025, <https://www.usatoday.com/story/news/nation/2025/03/23/immigrant-women-hell-on-earth-trump-ice-detention/82029368007/>.
- 129** Alex DeLuca, “‘Help Us’: TikTok Videos Show Inside Crowded Miami ICE Facility,” *Miami New Times*, March 21, 2025, <https://www.miaminewtimes.com/news/overcrowded-miami-ice-facility-seen-in-new-tiktok-video-22704351/>.
- 130** Eduardo Cuevas, “Immigrants forced to eat ‘like a dog’ in ‘overcrowded and chaotic’ detention centers,” *USA Today*, July 24, 2025, <https://www.usatoday.com/story/news/nation/2025/07/24/trump-immigration-detention-conditions-dog/85338970007/>.
- 131** Anna-Catherine Brigada, “Increased medical emergencies at Krome as immigrant detention swells,” *WLRN*, August 29, 2025, <https://www.wlrn.org/immigration/2025-08-29/increased-medical-emergencies-at-krome-as-immigrant-detention-swells>.
- 132** Didi Martinez, Julia Ansley, and Laura Strickler, “Immigrants in overcapacity ICE detention say they’re hungry, raise food quality concerns,” *NBC News*, July 14, 2025, <https://www.nbcnews.com/news/us-news/immigrants-overcapacity-ice-detention-say-hungry-raise-food-quality-co-rcna214193>.

- 133 Alex DeLuca, “‘Help Us’: TikTok Videos Show Inside Crowded Miami ICE Facility,” *Miami New Times*, March 21, 2025, <https://www.miaminewtimes.com/news/overcrowded-miami-ice-facility-seen-in-new-tiktok-video-22704351/>; Luis Ferré-Sadurní, “Video Taken by Migrant Shows Overcrowded ICE Holding Cell in Manhattan,” *New York Times*, July 22, 2025, <https://www.nytimes.com/2025/07/22/nyregion/video-immigration-holding-cells-overcrowded-unsanitary.html>.
- 134 Human Rights First, “‘You Feel Like Your Life Is Over’: Abusive Practices at Three Florida Immigration Detention Centers Since January 2025,” July 21, 2025, <https://www.hrw.org/report/2025/07/21/you-feel-like-your-life-is-over/abusive-practices-at-three-florida-immigration>.
- 135 Ethan Stein, “Detainees detail ‘hellish,’ overcrowded conditions at Krome Detention Center near Miami,” WFLX, April 26, 2025, <https://www.wflx.com/2025/04/25/detainees-detail-hellish-overcrowded-conditions-krome-detention-center-miami/>; Americans for Immigrant Justice, “Submission of Americans for Immigrant Justice, 4th Cycle of the Universal Periodic Review,” April 7, 2025, <https://aijjustice.org/wp-content/uploads/2025/04/AIJ-Krome-Detention-Center-Human-Rights-Violations-UPR-Submission.pdf>.
- 136 Jacqueline Charles, “A member of Congress made a surprise visit to Krome. What she saw left her concerned,” *Miami Herald*, May 30, 2025, <https://www.miamiherald.com/news/local/immigration/article307457731.html>.
- 137 Verónica Egui Brito and Syra Ortiz Blanes, “ICE has built a plexiglass tent city in Krome to house hundreds of immigrants,” *Miami Herald*, April 26, 2025, <https://www.miamiherald.com/news/local/immigration/article305046601.html>.
- 138 Julia Rock and Isabella Taft, “ICE Detainees in New York Jails Can’t Talk to Their Lawyers,” *New York Focus*, October 6, 2025, <https://nysfocus.com/2025/10/06/ice-detention-jails-legal-phone-access-new-york>.
- 139 Emma Jansen, “How ICE Hides Detainees From Their Lawyers,” *The American Prospect*, October 6, 2025, <https://prospect.org/2025/10/06/2025-10-06-how-ice-hides-detainees-from-their-lawyers/>.
- 140 Human Rights First, “‘You Feel Like Your Life Is Over’: Abusive Practices at Three Florida Immigration Detention Centers Since January 2025,” July 21, 2025, <https://www.hrw.org/report/2025/07/21/you-feel-like-your-life-is-over/abusive-practices-at-three-florida-immigration>.
- 141 Ricahrd Luscombe, “Migrants at Ice jail in Miami made to kneel to eat ‘like dogs’, report alleges,” *The Guardian*, July 21, 2025, <https://www.theguardian.com/us-news/2025/jul/21/migrants-miami-ice-jail-abuses>.
- 142 Tracey TullyLuis Ferré-Sadurní and Raúl Vilchis, “Inside the Tumult That Led 4 Men to Escape from a Migrant Facility,” *The New York Times*, June 14, 2025, <https://www.nytimes.com/2025/06/14/nyregion/newark-ice-detainees-escape.html>.
- 143 Ricardo Kaulessar, “Before recent Delaney Hall uprising, detainees frequently complained about conditions,” *NorthJersey.com*, June 18, 2025, <https://www.northjersey.com/story/news/2025/06/18/delaney-hall-history-conditions-newark-nj-ice-facility/84149059007/>.
- 144 Tracey TullyLuis Ferré-Sadurní and Raúl Vilchis, “Inside the Tumult That Led 4 Men to Escape from a Migrant Facility,” *The New York Times*, June 14, 2025, <https://www.nytimes.com/2025/06/14/nyregion/newark-ice-detainees-escape.html>.
- 145 National Immigration Project of the National Lawyers Guild, “Four people detained at the Louisiana ICE Processing Center in Angola’s Camp J continue on a ten-day hunger strike against inhumane conditions,” September 26, 2025, <https://nipnl.org/news/press-releases/four-people-detained-louisiana-ice-processing-center-angolas-camp-j-continue>.
- 146 Rachel Uranga, “Immigrants decry conditions at former prison, ICE’s largest detention center in California,” *Los Angeles Times*, September 29, 2025, <https://www.latimes.com/california/story/2025-09-29/detainees-protest-at-californias-largest-and-newest-immigration-detention-center>.
- 147 NBC 6, “Haitian woman dies in ICE custody at facility in Pompano Beach,” April 29, 2025, <https://www.nbcmiami.com/news/local/haitian-woman-dies-in-ice-custody-at-facility-in-pompano-beach/3602905/>.
- 148 U.S. Immigration and Customs Enforcement, “Detainee Death Report: BLAISE, Marie Ange,” 2025, <https://www.ice.gov/doclib/foia/reports/ddrMarieAngeBlaise.pdf>.
- 149 Jake Shore and Elizabeth Insuasti, “Conflicting reports emerge in death of Haitian woman detained by ICE in Broward,” WLRN, August 1, 2025, <https://www.wlrn.org/immigration/2025-08-01/haitian-ice-death-broward-blaise>.
- 150 Martha Kelner, “Man who moved to US aged four dies after being detained in immigration raid,” *Sky News*, October 16, 2025, <https://news.sky.com/story/man-who-moved-to-us-aged-four-dies-after-being-detained-in-immigration-raid-13450941>.
- 151 Ximena Bustillo and Rahul Mukherjee, “It’s the deadliest year for people in ICE custody in decades; next year could be worse,” *NPR*, October 23, 2025, <https://www.npr.org/2025/10/23/nx-s1-5538090/ice-detention-custody-immigration-arrest-enforcement-dhs-trump>.

- 152 Ximena Bustillo and Rahul Mukherjee, "It's the deadliest year for people in ICE custody in decades; next year could be worse," NPR, October 23, 2025, <https://www.npr.org/2025/10/23/nx-s1-5538090/ice-detention-custody-immigration-arrest-enforcement-dhs-trump>; Rep. Pramila Jayapal, @RepJayapal, Twitter, 2:01 PM, December 18, 2025, <https://x.com/RepJayapal/status/2001729462585692172>.
- 153 See, e.g., American Oversight, "Conditions in Migrant Detention Centers," May 23, 2023, <https://americanoversight.org/investigation/conditions-in-migrant-detention-centers/>.
- 154 Nick Miroff, "Trump's top border adviser says he will bring back family detention," *The Washington Post*, December 26, 2024, <https://www.washingtonpost.com/immigration/2024/12/26/immigration-border-tom-homan-trump/>.
- 155 American Civil Liberties Union of Colorado, "Updated Documents Reveal New Details for ICE Detention Expansion in Colorado," August 28, 2025, <https://www.aclu-co.org/press-releases/updated-documents-reveal-new-details-for-ice-detention-expansion-in-colorado/>.
- 156 Robert Moore and Cindy Ramirez, "Women from turbulent New Jersey ICE detention facility moved to El Paso," *El Paso Matters*, June 15, 2025, <https://elpasomatters.org/2025/06/15/ice-moves-detainees-to-el-paso-after-escape-at-new-jersey-delaney-hall/>.
- 157 Nicole Acevedo, "Detainees held at Alligator Alcatraz describe cage-like units swarmed by mosquitoes," NBC News, July 22, 2025, <https://www.nbcnews.com/news/us-news/alligator-alcatraz-florida-detainees-conditions-fungus-mosquitoes-rcna220205>.
- 158 Josephine Casserly and Ellie House, "Life inside notorious immigration centre 'Alligator Alcatraz' as it enters final days," BBC, August 30, 2025, <https://www.bbc.com/news/articles/cwy3zel0r3go>.
- 159 Democracy Now, "'Unprecedented and Not Normal': ACLU Sues over Legal Black Hole at 'Alligator Alcatraz' ICE Jail," August 20, 2025, https://www.democracynow.org/2025/8/20/aclu_alligator_alcatraz.
- 160 Tyaun Marshburn, "Camp East Montana Opens for Operation," KVIA, August 18, 2025, <https://kvia.com/news/2025/08/17/camp-east-montana-opens-for-operation/>.
- 161 Michael Biesecker and Joshua Goodman, "Mystery surrounds \$1.2 billion Army contract to build huge detention tent camp in Texas desert," *Associated Press*, August 28, 2025, <https://apnews.com/article/trump-immigration-detention-camp-contract-army-ice-3595746cd420c6f83c4ffd0b331ae056>.
- 162 Douglas MacMillan, Samuel Oakford, N. Kirkpatrick and Aaron Schaffer, "60 violations in 50 days: Inside ICE's giant tent facility at Ft. Bliss," *The Washington Post*, September 16, 2025, <https://www.washingtonpost.com/business/2025/09/16/ice-detention-center-immigration-violations/>.
- 163 Ibid.
- 164 See, e.g., Makenzie Huber, "Prison medical staff shortage worsens as security shortage eases," *South Dakota Searchlight*, January 23, 2025, <https://southdakotasearchlight.com/2025/01/23/south-dakota-prison-medical-staff-shortage-worsens-security-shortage-eases-department-corrections-legislature/>; Mario Koran, "Why pay raises haven't solved staffing shortages in prisons around Wisconsin," PBS Wisconsin, July 14, 2025, <https://pbswisconsin.org/news-item/why-pay-raises-havent-solved-staffing-shortages-in-prisons-around-wisconsin/>.
- 165 American Immigration Council, "What's in the Big Beautiful Bill? Immigration and Border Security Unpacked," July 14, 2025, <https://www.americanimmigrationcouncil.org/fact-sheet/big-beautiful-bill-immigration-border-security/>.
- 166 Committee Report, Department of Homeland Security Appropriations Bill 2026, H.Rep. 119-173, at 40, June 24, 2025, <https://www.congress.gov/119/crpt/hrpt173/CRPT-119hrpt173.pdf>.
- 167 6 U.S. Dep't of Justice, "Fiscal Year 2026 Budget and Performance Summary," June 13, 2025, at 223.
- 168 Alexandra Berzon, Allison McCann and Hamed Aleaziz, "Private Prisons Are Ramping Up Detention of Immigrants and Cashing In," *The New York Times*, March 7, 2025, <https://www.nytimes.com/2025/03/07/us/politics/private-prisons-immigrants-detention-trump.html>.
- 169 Douglas MacMillan, N. Kirkpatrick and Lydia Sidhom, "ICE documents reveal plan to double immigrant detention space this year," *The Washington Post*, August 15, 2025, <https://www.washingtonpost.com/immigration/2025/08/15/ice-documents-reveal-plan-double-immigrant-detention-space-this-year/>.
- 170 Nick Miroff, "As Money Rushed In, ICE's Rapid Expansion Stalled Out," *The Atlantic*, October 6, 2025, <https://www.theatlantic.com/politics/archive/2025/10/ice-immigration-detention-centers/684465/>.
- 171 Ibid.
- 172 Douglas MacMillan, N. Kirkpatrick and Lydia Sidhom, "ICE documents reveal plan to double immigrant detention space this year," *The Washington Post*, August 15, 2025, <https://www.washingtonpost.com/immigration/2025/08/15/ice-documents-reveal-plan-double-immigrant-detention-space-this-year/>.

- 173 See U Committee Report, Department of Homeland Security Appropriations Bill 2026, H.Rep. 119-173, at 43, June 24, 2025, <https://www.congress.gov/119/crpt/hrpt173/CRPT-119hrpt173.pdf>; American Immigration Council, “Mass Deportation: Devastating Costs to America, its Budget and Economy,” October 2, 2024, at 14, https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/mass_deportation_report_2024.pdf.
- 174 Ximena Bustilo, @Ximena_Bustillo, Twitter, January 16, 2025, 11:39 AM, https://x.com/Ximena_Bustillo/status/1879931476604862819.
- 175 Adriana Gomez and Will Weissert, “Trump tours Florida immigration lockup and jokes about escapees having to run from alligators,” Associated Press, July 1, 2025, <https://apnews.com/article/trump-everglades-immigrant-detention-facility-visit-5dc5568ec15534947c29c9149b773d1d>.
- 176 Michael Biesecker and Joshua Goodman, “Mystery surrounds \$1.2 billion Army contract to build huge detention tent camp in Texas desert,” Associated Press, August 28, 2025, <https://apnews.com/article/trump-immigration-detention-camp-contract-army-ice-3595746cd420c6f83c4ffd0b331ae056>.
- 177 Jeff Ernsthausen, Mica Rosenberg, and Avi Asher-Schapiro, “ICE Awarded a \$3.8 Billion Contract to Hold Immigrants on a Military Base. Days Later, It Was Canceled,” ProPublica, April 24, 2025, <https://www.propublica.org/article/ice-cancels-contract-immigrant-detention-camp-fort-bliss>.
- 178 Samantha Michaels, “How a Tiny, Inexperienced Firm Landed a \$1.3 Billion Detention Deal,” Mother Jones, October 2025, <https://www.motherjones.com/politics/2025/10/acquisition-logistics-ice-fort-bliss-detention-center-billion-dollar-contract/>.
- 179 American Civil Liberties Union of Colorado, “Updated Documents Reveal New Details for ICE Detention Expansion in Colorado,” August 28, 2025, <https://www.aclu-co.org/press-releases/updated-documents-reveal-new-details-for-ice-detention-expansion-in-colorado/>.
- 180 American Immigration Council, “Measuring In Absentia Rates in Immigration Court,” January 28, 2021, <https://www.americanimmigrationcouncil.org/report/measuring-absentia-removal-immigration-court/>.
- 181 Casey Tolan, Curt Devine, Priscilla Alvarez, Majlie de Puy Kamp and Yahya Abou-Ghazala, “Less than 10% of immigrants taken into ICE custody since October had serious criminal convictions, internal data shows,” CNN, June 16, 2025, <https://www.cnn.com/2025/06/16/us/la-ice-raids-violent-criminals-records-invs>.
- 182 American Immigration Council, “Alternatives to Immigration Detention: An Overview,” July 11, 2023, <https://www.americanimmigrationcouncil.org/report/alternatives-immigration-detention-overview/>.