

EXHIBIT 3

DECLARATION OF SANTOS JESUS FLORES

I, Santos Jesus Flores, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I, Santos Jesus Flores, make this declaration based on my own personal knowledge and if called to testify, I could and would do so competently and truthfully to these matters.
2. My name is Santos Jesus Flores. I am 47 years old and from El Salvador.
3. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have been detained at this facility since on or about September 9, 2025. I am currently in the D2 unit.
4. Before I was detained by ICE, I lived in New York and worked as a taxi driver and security guard. With the money I made, I supported my two children. I came to the U.S. in 1997 because I experienced violence in my country. I speak Spanish and English. When I had my first immigration hearings with an immigration judge in New York, I did not have a lawyer and I spoke with the immigration judge about my case in English. When I worked as a security guard, I spoke with clients in English.
5. I met Geraldo on January 3, 2026 in "SHU," which is solitary confinement. I was in Cell 5. It was a small and cold cell with only a toilet and a bed. There was wire netting over each cell so detainees wouldn't escape but I could hear everything that was happening in other cells. Out of the corner of my cell window, I could see the entrance door to SHU.
6. On January 3, 2026, I saw through my cell window more than seven guards bring in Geraldo. At that point, I didn't know this person was Geraldo. Geraldo was handcuffed by his hands and his feet. These guards were the same contract security staff who generally run the facility.
7. When the guards brought Geraldo, I saw Geraldo looking at two male nurses preparing medicine for the other detainees in SHU. I heard Geraldo say, "I need my medicine." Then, I heard the guards tell Geraldo to shut up and get in the cell. After, I heard Geraldo say "I won't enter the cell unless you give me my medicine." At this point, I could clearly see Geraldo and the guards.
8. Then, I saw the guards grab Geraldo while he was still handcuffed and force him into the cell. When the guards closed the door of his cell, I could no longer see Geraldo but I could still hear what was happening. I heard the sounds of the guards punching Geraldo, the clanking of Geraldo's handcuffs, and the sound of shoes scraping against the floor. Then, I heard Geraldo saying, "I have asthma. I can't breathe." I also heard Geraldo say, "Me estás

asfixiando,” which means “You’re asphyxiating me.” Then, there was silence. I heard the sounds of the handcuffs being taken off and thrown on the ground.

9. Afterwards, I saw through my cell window the guards start running. The guards looked scared. They did not look injured. I heard one guard call on the radio for medical help. I saw through the cell window nurses and doctors enter Geraldo’s cell with a CPR machine. When they closed the door, I heard the sounds of the electric pulses for the CPR machine.
10. Then, I saw the nurses and doctors leave with the CPR machine. After, I heard one of the guards call for an ambulance. I saw paramedics run through the SHU entrance with a CPR machine and a stretcher. Then, I again heard the sounds of the electric pulses for the CPR machine. I saw a guard standing in front of Geraldo’s cell holding two pairs of handcuffs, one for the hands and one for the feet, in case Geraldo was resuscitated and put in the ambulance to go to the hospital. After the paramedic declared Geraldo dead, I saw the guard throw the two pairs of handcuffs back in the bin. I didn’t hear the paramedic declare Geraldo dead, but [REDACTED], who was in the cell next to Geraldo, heard the paramedic declare him dead.
11. After the paramedics left, I saw through my cell window the guards cover Geraldo’s cell window with paper and tape. I also saw them covering the windows of all the other cells with paper and tape, until they covered my cell window with paper and tape too.
12. There was no reason for the guards to have thrown Geraldo into his cell or hurt him. He was not trying to injure any guards, and he was not trying to injure himself. He was not encouraging anyone else in the unit to do anything, and he was not trying to destroy any property in the facility. All he wanted was his medicine that he needed for his asthma.
13. During this entire incident, I never heard Geraldo say that he was killing himself. During this entire incident, I never heard any of the guards say that Geraldo was killing himself.
14. When I returned to my unit on or around January 6, 2026, my PIN code was suspended and I couldn’t make any phone calls. Others in my unit still had their PIN code and could make phone calls. My telephone access was suspended until on or around January 17, 2026. This was the first time my telephone access had ever been suspended.
15. On or around January 8, 2026, I went to my immigration court hearing in El Paso. I asked for a deportation order because I can’t be in this facility anymore with the way that they killed Geraldo.
16. On or around January 14, 2026, I spoke with a Washington Post journalist about what I saw and heard with Geraldo’s death. That day, Antonio was speaking with the journalist on one of the tablets using his PIN code. Antonio is one of the witnesses who was with Geraldo in the D2 unit when he was asking for his medication. Because my PIN code was suspended, Antonio passed me the tablet and I spoke to the journalist.

17. The next day, on or around January 15, 2026, ICE officials came to my unit and called my name. The ICE officials asked me for my "cedula," which is the El Salvador national identification card. I told the officials that I didn't know my identification number and asked if they were requesting this so they could deport me. They said no and I explained to the ICE officials that I had already signed a removal order to go back to El Salvador.
18. I am scared knowing what happened to Geraldo. But I know that what happened to Geraldo is an injustice and that when there is an injustice, we have to speak up.
19. Everything in this declaration is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.

Executed on the 19 th of enevo, 2026 in El Paso, Texas.

Signature: _____

A handwritten signature in blue ink, appearing to be "Sally", written over a horizontal line.