

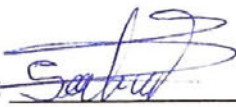
EXHIBIT 4

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. I am currently detained at the Camp East Montana ICE Detention Center, located at Fort Bliss in El Paso, Texas. I have signed a Declaration on January 19, 2026.
3. Since then, on January 22, 2026, at approximately 6pm, I was in my dorm which is D2. Around twenty guards from the company Akima ran inside and three of them were in military uniforms. I saw three guards were part of the "DCT" team because that was on their shirt.
4. They took me and three other people out of D2 even though we had done nothing. These three persons in military uniforms hit my face against the wall. I still feel numb above my lips because of the hits.
5. I was taken to a cell and two Captains of the company Akima arrived to talk to me. They said that they saw what had happened in D2 and that they did not like what they saw from the guards who had hit us.
6. I asked them to take me to the medical area because of the hits that they made to me. No one took me to the medical area.
7. The guards took me back to D2 and a Lieutenant from the company Akima was there. He apologized to me for what had happened after he had seen the video. I was scared of these three guards in military uniforms and I continue to be scared of these three guards.
8. I continue to be scared that they are going to take action against me.
9. 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 24 th of enero, 2026 in El Paso, Texas.

Signature:  _____