

DECLARATION OF ALBINA CRISTOBAL

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

1. I make this declaration based on my own personal knowledge. If called to testify, I could and would do so competently and truthfully to these matters.
2. My name is Albina Cristobal, and I am 27 years old. I was born in Guatemala and now reside in Gadsden, Alabama with my husband and three children.
3. My father's name was Francisco Gaspar Cristobal Andres. I called him "papachico." My mother's name is Lucia Pedro Juan. My sisters, mother, and I are very close. We talk almost every day. We were very close with my father too, when he was alive.
4. On or around September 1, 2025, my sisters and I received a text message from my mother saying that she and my dad had been stopped by immigration officers in Florida and were being detained. I did not know at that time where my parents would be taken.
5. A few days later, I received a phone call from my dad. He asked about my mom and told me he was at an ICE detention center in Krome, Florida. I did not hear from my dad for approximately a week after that call.
6. I was very worried about my dad throughout that week. I thought he might have been deported. We felt desperate to hear from him. So, my sisters and I wrote a letter to my dad, asking him to call us. We included our names and phone numbers. We gave that letter to Krome North Service Processing Center and asked that it be delivered to my dad.
7. On or around September 12, 2025, I finally got a call from my dad from Krome North Service Processing Center. He got our letter. He told me that earlier that week he passed out at the detention center and was taken to a hospital. I asked him how it happened but he could not remember. He told me that the doctors at the hospital said he had a heart attack. We had not heard from ICE or anyone else that my dad was sick or had been in the hospital. My dad sounded very confused and different from his usual self. For example, he asked about my mom and seemed unable to remember they had been detained by ICE on the same day. He believed my mother had visited him in the hospital. In fact, my mother was being held in an ICE detention

center. I know this because at the time, I checked ICE's Online Detainee Locator System using my mom's information. I believe she was being held at Pompano Beach at the time. I was very worried about my dad.

8. On or around September 13, 2025, my dad called me again. He told me that guards at the detention center told him he was being transferred. He told me that he initially thought he would be deported to Guatemala and felt relieved to be out of ICE detention. However, later that day, he called me to say he was being transferred to Texas or Louisiana. He sounded sad. I did not hear from my dad for approximately two or three days after that.

Francisco's detention at Camp East Montana

9. On or around, September 16, 2025, I checked ICE's Online Detainee Locator System using my dad's information. The webpage showed my dad was being held at Camp East Montana in El Paso, Texas.
10. During my dad's detention at Camp East Montana, he called me approximately three or four times a day. When we talked, he sounded sad, discouraged, and not like himself. When I asked him how he was doing, he would usually try to act strong for us, but I could tell he was sad. Before being detained, my dad was a very cheerful and upbeat person. At Camp East Montana, I could hear the sadness in his voice. He asked about his grandchildren often. They were everything to him.
11. In our calls, my dad frequently complained of headaches and body aches. I was very confused and wondered what happened to him. Before my father was detained, he rarely if ever complained of any pain.
12. Many times, my dad mentioned that the food they gave him at Camp East Montana was spoiled. One time, in or around October 2025, he told me that he had not had a bowel movement in about three or four days. He told me his stomach was hurting a lot and felt like it would explode. I asked him if he was offered any medication for this, and he said no. I asked him why the guards at Camp East Montana didn't give him medication or take him to the doctor. My dad told me it was terrible there, and that detainees didn't get any treatment when they were sick. Approximately two days later, he told me he was given a pill and was able to have a bowel movement, but he noticed blood in his stool and his urine.

13. As time went on, my dad sounded more tired every day. During our calls, his voice was soft and shaky, and he sounded out of breath. He complained of body pain and being cold nearly every day. I was worried that his health was deteriorating.
14. One day, on or around mid-October 2025, my dad did not call me. He called multiple times every day, so I was worried. Approximately the next day, he called and told me he was taken to an onsite clinic because he could not move or get up from his bed. I asked him why the guards didn't take him to the hospital. He said that the staff at the clinic had told him it was only a fever and had given him Tylenol.
15. Sometime in October 2025, my dad was scheduled for a court appearance. He called me the day after his court appearance and told me that guards at Camp East Montana put him in a very cold room. He said that guards put him in that room the night before to wait for his court hearing. He called that room "the cooler." He said that he felt so weak and had to lay on the floor while he was in that room. He told me that he felt like he was dying at Camp East Montana. His voice was shaking and he said he couldn't take it anymore.
16. By that point, my family and I were very worried about him. On our calls, my dad would ask about my mom. My mom was also detained at Camp East Montana during that time. One day, my dad told me that he heard my mom yell his name in the hallway. He was so happy to hear her voice. He asked me to tell her that they would soon be together in Guatemala.
17. On or around the second week of November 2025, my dad called and told me he had lost all his strength and could not walk anymore. He complained about chills and a sharp pain in his stomach. He said he was unable to close his hand. He told me that he complained to staff at Camp East Montana about his pain but that they only gave him Tylenol. I had a hard time hearing my dad on that call. His voice was faint, and his words were slurred.
18. My dad was scheduled for another court appearance on or around November 14, 2025. He called me later that afternoon to say he was being deported to Guatemala soon. His voice was trembling again and he sounded weak. I told him to stay strong and that he just needed to hold out a little longer before he was in Guatemala. I had recently seen reporting on social media of a woman who was detained by ICE and died a few months after her deportation to Guatemala. I was terrified for my dad.

19. On or around November 15, 2025, my dad called again to tell me he believed he would be deported to Guatemala soon. He said he could not move or eat anymore, so he would not be able to call me as often. He apologized. He sounded weak.
20. On or around November 16, 2025, my dad called me again. I could barely hear him during that call. He said he felt very sick and tired and was in a lot of pain. My dad told me that he was taken to the clinic the night before, after other men in his pod saw him laying in bed and thought he was dead. He said that they heard him agonizing, so they carried him to where the security guards sat and demanded that the guards take him to the clinic. My dad said that if it wasn't for his podmates, he would've died already. I told him to please be strong and that he would be home soon. That was the last call I got from him at Camp East Montana.

Francisco's hospitalization and passing

21. On or around November 17, 2025, I received a call from a doctor at a hospital in El Paso, Texas. I do not remember the name of the doctor. The doctor said my dad was hospitalized at the Hospitals of Providence in El Paso. He said my dad arrived in critical condition and was very sick. He told me, "they waited until the last minute to take him to the hospital." I understood that he seemed to be referring to the staff at Camp East Montana.
22. Later that day, the same doctor called me to say my dad was in grave condition. He told me my dad was in septic shock and his organs were infected. The doctor asked if I authorized them to do a procedure on my dad. I do not remember what the procedure was. I said yes and asked the doctor to do everything he could to save my dad. My mother called me later that day. She was still in ICE detention in El Paso, Texas. I told her that my dad was in the hospital and that he was very sick.
23. Over the next few days, staff at the hospital called me to provide updates on my dad's condition and treatment. During one of those calls, the doctor told me there was a high probability that my dad would die. He said my dad was not responding well to the treatment.
24. Throughout my dad's hospitalization, I asked the nurses to let me speak to him on the phone. Most of the time, he did not respond and the nurses said my dad was very tired and his eyes were closed. My dad's birthday is on [REDACTED]. He was hospitalized that day. My entire family and I sang happy birthday to him over the phone.

25. On or around November 29, 2025, my mom called me and said she had been taken to Guatemala.
26. On or around November 30, 2025, the doctor told me that my dad's health continued to deteriorate. The doctor said my dad was in a lot of pain.
27. One of my friends from Florida flew to El Paso to see my dad. On or around December 2, 2025, she was allowed to visit my dad at the hospital. Once she was with him, she called me, my mom, and my sisters on video. I was shocked and devastated to see my dad's face. He had lost so much weight. It looked like he had blisters or dry blood in his mouth and nose. It was like he was drowning in his own blood.
28. I broke down in tears at the sight of my dad on the video. I told him I loved him deeply. My mom told him she loved him and would never forget him. She told him to be strong and to go to sleep. My dad closed his eyes when we all said our goodbyes. That was the last time I ever saw his face.
29. That night, I called the hospital approximately three or four times to check on my dad's condition. Approximately at 7 am, on December 3, 2025, a nurse told me my dad had passed. That morning, I called my mom and sisters to tell them my dad had died.

After Francisco's death

30. After my dad died, an ICE officer called me. His last name was Chavez. He told me he was the director at Camp East Montana. He said he didn't want me to think that he killed my dad. I never heard from him again after that call. Later, in or around January 2026, another ICE officer called me. His name was Angel Garite. He said they were shipping my dad's belongings to our house. A few weeks later, I received a box with my dad's empty wallet, pants, and cellphone.
31. Shortly after my dad died, I requested the medical records from the Hospital of Providence over the phone. Hospital staff said my dad had to personally sign and approve the release of his medical records. I could not understand how they could ask us for that if they knew my dad had already died. To this date, the facility has not provided me with my dad's medical records.

32. Approximately one week after my dad's passing, a forensic examiner in El Paso called and said they would cremate my dad's body if we didn't claim it. On or about December 9, 2025, I contacted a funeral home in Houston, Texas to arrange for my dad's body to be taken to Guatemala. The forensic examiner released my dad's body to the funeral home approximately 15 days after he died. The forensic examiner did not provide me with a copy of his report.
33. My dad's body arrived in Guatemala on or around January 29, 2026. He was buried in his hometown in Santa Eulalia on or around January 30, 2026.
34. I feel horrible, indescribable pain. I feel so confused about how my beloved papachico could get so sick and die in less than 3 months. It hurts to know that my dad suffered so much during the last months of his life. My sons pray for their grandpa every day. They loved him and miss him so much. My dad was a joyful person. His joy and laughter was contagious. Me and my family remember him like that every day.
35. I am making this declaration because I do not want other families to suffer what we have suffered.

Everything in this declaration is true and correct to the best of my recollection.

Executed on the 27 of August, 2026, in Gadsden, Alabama.

Signature:  _____

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, **Perla F Alvelais**, certify that I am fluent in both English and Spanish. On August 27, 2026, I personally spoke with **Albina Cristobal** and read the foregoing declaration to her, translated into Spanish faithfully and accurately. **Albina Cristobal** affirmed she understood my translation and that the information in the above declaration is true and accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Signed: 
NAME: Perla F Alvelais

Date: 08/27/2026