



September 15, 2025

VIA CERTIFIED MAIL AND E-MAIL

Office of the General Counsel
U.S. Department of Homeland Security
2707 Martin Luther King, Jr. Ave. SE
Washington, DC 20528-0485
ogc@hq.dhs.gov

Office of the Principal Legal Advisor
Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street SW
Mail Stop 5900
Washington, DC 20536-5900
OPLAServiceIntake@ice.dhs.gov

Re: Notice of Claim for Damages under the Federal Tort Claims Act

██████████ A# ██████████

Dear Sir or Madam:

Enclosed, please find an administrative claim under the Federal Tort Claims Act ("FTCA") against the United States government for the extreme suffering, severe pain and distress, and other harms inflicted upon Ms. ██████████ ("██████████" as a result of severe medical neglect, physical abuse, sexual abuse, verbal abuse, retaliation, and inhumane use of solitary confinement by Immigration and Customs Enforcement ("ICE") at the South Louisiana ICE Processing Center ("SLIPC") in Basile, Louisiana. The U.S. government is responsible for the actions of its employees, including those employed by ICE, under the FTCA.

Sarah Decker, Staff Attorney with Robert F. Kennedy Human Rights, and the undersigned represent ██████████ and serve this complaint on her behalf. ██████████ seeks an award of damages to compensate for the harms she sustained in connection with the medical negligence and events related to inhumane use of solitary confinement and other forms of sexual, physical, and verbal abuse.

As described in detail in the enclosure, while detained under ICE's control, ██████████ was repeatedly sexually assaulted by the Assistant Warden of the facility and denied adequate medical care by ICE, including medication and treatment for her seizure condition, resulting in the deterioration of her physical and mental health. As punishment for the multiple complaints and grievances she

filed reporting this sexual abuse, ICE subjected [REDACTED] to retaliatory and inhumane solitary confinement. This abuse caused [REDACTED] significant physical and psychological harm.

ICE, ICE employees, ICE contractors, and other individuals and entities acting on behalf of the U.S. government knew or should have known that their acts, omissions, and conduct constituted mistreatment, inadequate care, and gross medical negligence. Accordingly, ICE is responsible for the egregious treatment of [REDACTED]

[REDACTED] submits this claim without the benefit of formal discovery and reserves the right to amend or supplement her claim. Please confirm receipt of this administrative claim and the contact information of the attorney who will be handling this matter.

Sincerely,



Sarah Decker
Sarah Gillman
Robert F. Kennedy Human Rights
1300 19th Street NW, Suite 750
Washington, DC 20036
T: (908) 967-3245
E: decker@rfkhumanrights.org;
gillman@rfkhumanrights.org

Nora Ahmed
Andrew Perry
ACLU of Louisiana
1340 Poydras St, Suite 2160
New Orleans, LA 70112
E: Nahmed@laaclu.org;
APerry@laaclu.org

Stephanie Alvarez Jones
Bridget Pranzatelli
National Immigration Project
1763 Columbia Road NW, Suite 175 #896645
Washington, DC 20009
E: stephanie@nipnlg.org;
bridget@nipnlg.org

CLAIM FOR DAMAGE, INJURY, OR DEATH		INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.		FORM APPROVED OMB NO. 1105-0008	
1. Submit to Appropriate Federal Agency: U.S. Department of Homeland Security Immigration and Customs Enforcement Enforcement and Removal Operations			2. Name, address of claimant, and claimant's personal representative if any. (See instructions on reverse). Number, Street, City, State and Zip code. <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> c/o Sarah Decker, Robert F. Kennedy Human Rights 1300 19th Street NW, Suite #750 Washington, DC 20036		
3. TYPE OF EMPLOYMENT <input type="checkbox"/> MILITARY <input type="checkbox"/> CIVILIAN		4. DATE OF BIRTH <div style="background-color: black; width: 100px; height: 20px;"></div>	5. MARITAL STATUS	6. DATE AND DAY OF ACCIDENT See attachment	
7. TIME (A.M. OR P.M.) See Attachment					
8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary). See Attachment					
9. PROPERTY DAMAGE					
NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code). Not Applicable					
BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. (See instructions on reverse side). Not Applicable					
10. PERSONAL INJURY/WRONGFUL DEATH					
STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT. See Attachment					
11. WITNESSES					
NAME		ADDRESS (Number, Street, City, State, and Zip Code)			
See Attachment		See Attachment			
12. (See instructions on reverse). AMOUNT OF CLAIM (in dollars)					
12a. PROPERTY DAMAGE		12b. PERSONAL INJURY		12c. WRONGFUL DEATH	
		5,000,000		12d. TOTAL (Failure to specify may cause forfeiture of your rights).	
				5,000,000	
I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM.					
1. <div style="background-color: black; width: 100px; height: 40px; display: inline-block;"></div> OF CLAIMANT (See instructions on reverse side).				13b. PHONE NUMBER OF PERSON SIGNING FORM <div style="background-color: black; width: 100px; height: 20px;"></div>	
14. DATE OF SIGNATURE 09/14/2025					
CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM				CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS	
The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).				Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)	

INSURANCE COVERAGE

In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property.

15. Do you carry accident Insurance? ☐ Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. ☒ No

16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? ☐ Yes ☒ No

17. If deductible, state amount.

18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts).

19. Do you carry public liability and property damage insurance? ☐ Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). ☒ No

INSTRUCTIONS

Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.

Complete all items - Insert the word NONE where applicable.

A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY

Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.

If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.

The claim may be filled by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.

If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.

DAMAGES IN A **SUM CERTAIN** FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN **TWO YEARS** AFTER THE CLAIM ACCRUES.

The amount claimed should be substantiated by competent evidence as follows:

(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.

(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.

(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.

(d) **Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.**

PRIVACY ACT NOTICE

This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.

A. **Authority:** The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.

B. **Principal Purpose:** The information requested is to be used in evaluating claims.

C. **Routine Use:** See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.

D. **Effect of Failure to Respond:** Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."

PAPERWORK REDUCTION ACT NOTICE

This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Torts Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.

Claim Authorization Form

I, [REDACTED] [REDACTED] hereby authorize Sarah Decker at Robert F. Kennedy Human Rights to submit a claim under the Federal Tort Claims Act on behalf of myself to the U.S. Department of Homeland Security, including U.S. Immigration and Customs Enforcement, and any other government agency, seeking compensation for the unlawful actions of their employees or against me.

DATED: September 15, 2025

[REDACTED]
[REDACTED] [REDACTED]

Claimant: [REDACTED]

1. Date and Day of Accident/Incident

November 2023- January 2025

2. Time (A.M. or P.M.)

N/A, Multiple Incidents

3. Basis of Claim

Factual Basis of FTCA Claim

[REDACTED] a native and citizen of the Dominican Republic, first entered the United States in 2006 and settled in Maryland. She lived in Maryland for ten years, where she raised her two United States citizen children. In 2010, [REDACTED] was diagnosed with epilepsy. In 2013, [REDACTED] had spinal surgery, a laminectomy with fusion in the lumbar region, after she was injured in an accident. She was also previously diagnosed with Post Traumatic Stress Disorder (“PTSD”), anxiety, and depression in or around 2015.

[REDACTED] was taken into custody by the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”) on or about November 1, 2023. She was detained continuously at the South Louisiana ICE Processing Center (“SLIPC”) in Basile, Louisiana until on or about January 6, 2025, when she was removed to the Dominican Republic. SLIPC is an immigration detention facility in Basile, Louisiana that is operated through a contract between ICE and a private prison company, the GEO Group, Inc. (“GEO”).

Sexual Abuse by Assistant Warden Reyes at SLIPC

In November 2023, shortly after entering ICE custody at SLIPC, [REDACTED] first encountered the Assistant Warden, Mr. Manuel Reyes (“AW Reyes”). Without introducing himself, he asked [REDACTED] her name and country of origin. Believing him to be an ICE officer overseeing her custody, [REDACTED] provided him with her name and told him that she is from the Dominican Republic. He also asked for her sponsor contact information and personal contact information. Again, believing him to be an ICE officer in charge of her custody, [REDACTED] provided him with her cell phone number and the name, cell phone number, and address of her mother, who resides in the Dominican Republic. [REDACTED] later learned from other detained people that this individual was not an ICE officer but rather the Assistant Warden of SLIPC.

At this time, [REDACTED] also learned from other detained people that AW Reyes ran an unofficial “night shift program,” unsanctioned by the facility, where detained people could perform tasks for AW Reyes between the hours of 8:00 pm and 6:00 am in exchange for money in their commissary accounts. In November 2023, AW Reyes and [REDACTED] discussed whether she would like to participate in this program. As a bilingual English-Spanish speaker, [REDACTED] often

volunteered to translate for officials at SLIPC. However, because of her health conditions, including epilepsy, [REDACTED] decided to decline the offer to participate in AW Reyes' "night shift program." When she declined his offer, AW Reyes became enraged and stated: "Don't worry about it, you'll come work for me." He then began persistently sexually harassing and stalking [REDACTED] at SLIPC.

AW Reyes learned [REDACTED] daily schedule, including the specific times she was required to go to the SLIPC medical unit to receive her seizure medication. Each day, when [REDACTED] would go to the medical unit to receive her medication, AW Reyes would be waiting for her in the hallway outside the medical unit. He would make inappropriate and aggressive sexual comments to her. For example, on one occasion, he stated "you have a nice body" and asked her if her "butt was fake" and whether she "had plastic surgery." When [REDACTED] replied and asked him to stop making the comments because "it was making her uncomfortable," AW Reyes stated "a lot of things are going to make you uncomfortable." On another occasion AW Reyes, referring to the fact that he had [REDACTED] mother's address in the Dominican Republic, stated "you know the DR isn't too big. I can find you there. I used to work there."

These near-daily instances of sexual harassment continued to escalate. For example, in January 2024, AW Reyes approached [REDACTED] as she left the medical unit. He asked her "Are you okay?" and forcefully grabbed her hands. [REDACTED] moved away from him and said "Please leave me alone." A few weeks later, AW Reyes approached [REDACTED] in the kitchen and said "You told everyone I'm your boyfriend, right?" [REDACTED] replied "no" and walked away.

In February 2024, an officer in the housing unit instructed [REDACTED] to go to the warehouse to get sanitation and hygiene items. When she was in the warehouse, in a back corner by the shampoo supply, AW Reyes approached [REDACTED] from behind. He began groping her breasts and genitals with his hands. He forcefully moved his hands underneath her clothing and touched her breasts and genitals. [REDACTED] began crying and shaking. She repeatedly asked him to stop. He placed his face close to her face and body and smelled her. After approximately five minutes, he released [REDACTED] and allowed her to return to the housing unit. After this incident, [REDACTED] experienced significant emotional distress. She was unable to sleep and would have recurring nightmares and flashbacks. [REDACTED] filed a Prison Rape Elimination Act ("PREA") complaint with ICE by paper form and through the phone hotline. She received no response and no action was taken by ICE.

After this incident, for approximately four months, from approximately February to May 2024, AW Reyes repeatedly stalked and cornered [REDACTED] in the warehouse or medical hallway, places he told her were "camera blind spots" in the facility. There, he would force her to perform oral sex on him on a near daily basis, threatening to kill her if she refused. When [REDACTED] attempted to resist, he stated "If you don't do this, you will go to the smooth [solitary confinement] and your family will know everything." On another occasion, he stated "I know where you are. I know where your family is. In the DR, you won't have any protection and anybody can go over there and give you a visit." He also stated that he knew "all about her case" and would know "when she was getting deported." This abused caused [REDACTED] extreme emotional distress. She suffered from insomnia, nightmares, flashbacks, extreme anxiety, intrusive thoughts, and increased stress.

In April 2024, AW Reyes blocked [REDACTED] as she was leaving the medical unit and trapped her next to the Delta unit ice machine in the hallway. He began to look at her body. She said “excuse me” and attempted to walk away, but he blocked her using his body. He then groped her buttocks using his hands and began to rub his groin against her buttocks. [REDACTED] attempted to flee and said “please stop and leave me alone.” He responded by smiling at her and stated “What are you going to do? There’s nothing you can do. Remember I can say hi to your mom.” [REDACTED] then fled the hallway and returned to her housing unit. After this incident, [REDACTED] filed an additional PREA complaint with ICE by paper. She received no response and no action was taken by ICE.

After she filed this PREA complaint, [REDACTED] was subjected to three days in solitary confinement. She was not served with any notification of the reason for her placement in the segregated housing unit or any alleged disciplinary violations. While in the solitary confinement cell, AW Reyes approached [REDACTED]. He laughed and said “You’re supposed to be more submissive because your Dominican. You have an attitude. If you were just submissive, you would have had all this special treatment in here.” [REDACTED] then received paperwork indicating that ICE had closed her PREA complaint because her claims were “unsubstantiated.”

Approximately two days later, AW Reyes entered [REDACTED] housing unit, Bravo-Charlie, at 2:00 am and approached her as she slept in her bunk. He began touching her body and shook her awake. He told her he needed to “search her bunk.” [REDACTED] replied that she was sleeping in her underwear and needed privacy to put on clothes. He refused and forced her out of her bed. He made her stand in front of him in her bra and underwear and looked at her body for several minutes. He then laughed and walked away.

Later that month, AW Reyes approached [REDACTED] when she entered the bathroom in the processing area following a legal call with her immigration attorney. AW Reyes used his body to block [REDACTED] from exiting the bathroom. He then told her that he was “masturbating to her because he saw her body in medical when she was in an observation cell.” She responded “You are sick.” AW Reyes smiled and said “I have been masturbating to you. I have eyes everywhere.” He then referred to a date when [REDACTED] was in medical on February 28, 2024, and told her he had access to “all of the video.”

After this incident, [REDACTED] began to experience significant emotional distress and her mental and physical health deteriorated. Her seizure activity began to rapidly increase in frequency to near-daily seizures. After this incident, [REDACTED] filed an additional PREA complaint with ICE by paper. In response, a PREA officer, upon information and belief, “Officer Guillory,” met with [REDACTED] and watched the surveillance video from the processing area. The PREA officer acknowledged the video, which upon information and belief, captured this incident, but took no further action. In addition, [REDACTED] also filed multiple grievances and made verbal reports of this abuse to SLIPC personnel, including medical personnel, as documented in her medical records.

During this time, AW Reyes began to restrict [REDACTED] movement at SLIPC. When [REDACTED] attempted to leave the dorm, the officer in the Bravo-Delta housing unit stated “You are not allowed out of the dorm. This is Mr. Reyes’ rules, not mine.” For example, on or about May 3, 2024, [REDACTED] was bitten by a spider in the housing unit. Her right arm became painfully inflamed and swollen. She asked to go to the medical unit to receive emergency medical

care, but the officer refused, referring to “AW Reyes’ orders.” Finally, thirty minutes later, the officer escorted [REDACTED] to the medical unit. When she went to exit the medical unit, AW Reyes blocked her path and stated in a threatening manner that [REDACTED] ICE officer “knows all about” what is happening, implying that he has the ability to impact her immigration case. [REDACTED] then approached an ICE officer in her proximity, upon information and belief, “Officer Ruiz” and verbally reported that AW Reyes was sexually assaulting and harassing her. She then wrote a formal grievance to ICE detailing her sexual abuse by AW Reyes.

The next day, AW Reyes approached [REDACTED] and stated “No one is going to trust what you say about me because I have a lot of contacts higher up who will cover for me. You are going to be deported in the next two weeks and this will come back to your case. But if you prefer, you can reject a relationship with me.” On May 15, 2024, [REDACTED] filed another PREA complaint with ICE detailing the sexual abuse and harassment by AW Reyes.

Upon information and belief, AW Reyes left his position at SLIPC in July 2024. After his departure, [REDACTED] experienced ongoing abuse and retaliation by other officials at SLIPC. For example, in August 2024, officials targeted [REDACTED] for searches and baseless disciplinary write ups. On one occasion, an officer wrongfully confiscated [REDACTED] bath towel. When [REDACTED] filed a grievance, the officer said “I wish I could slap your face.” On or about August 6, 2024, agents from the Federal Bureau of Investigation (“FBI”) interviewed [REDACTED] and others at SLIPC. [REDACTED] disclosed the sexual and physical abuse by AW Reyes to the FBI agents. On or about August 7, 2024, [REDACTED] was subjected to five days of solitary confinement after a disciplinary writeup, resulting in at least four severe seizures that left her with face numbness.

Medical Neglect at SLIPC

Prior to her detention by ICE, [REDACTED] had two or three seizures per year and her epilepsy was properly managed by a medical regimen developed by her neurologist, including two daily medications—Trileptal and Gabapentin. During her intake processing, ICE acknowledged [REDACTED] epilepsy diagnosis and recorded it in her medical records. However, during her 14 months in ICE custody at SLIPC, officials repeatedly denied [REDACTED] access to her seizure medications. ICE and SLIPC officials also denied [REDACTED] access to a neurologist for the entirety of her 14 month detention. [REDACTED] seizures became more frequent and increased in intensity, beginning in February 2024, following the escalation of her sexual abuse by AW Reyes. [REDACTED] frequent seizures severely aggravated her pre-existing spinal injury. However, ICE denied her access to x-ray scans of her spine or access to a neurologist to assess and treat her back pain.

SLIPC officials routinely denied [REDACTED] access to emergency medical care in response to her seizures in the housing unit. For example, in December 2023, [REDACTED] had a severe seizure in the Delta-Alpha unit and lost consciousness. SLIPC provided no initial emergency medical response. Instead, they brought a stretcher near the housing unit in an external hallway and forced [REDACTED] to get up and walk to the stretcher. On another occasion, officials placed [REDACTED] into a wheelchair while she was unconscious, post-seizure. She fell out of the wheelchair and into a concrete wall, injuring herself. A separate occasion, post-seizure, medical personnel instructed [REDACTED] to walk from the medical unit back to the general housing unit with no assistance, without

socks or shoes. During the walk, she collapsed twice due to post-ictal weakness, injuring herself on the concrete floor.

On multiple occasions throughout her 14-month detention, [REDACTED] was denied access to her seizure medication because she was unable to walk to the medical unit due to dizziness and weakness post-seizure. These denials were documented by SLIPC medical personnel as “refusals of medical care.” For example, from November 20, 2023 to December 3, 2023, [REDACTED] had a series of severe near-daily seizures. Following these seizures, in a weakened postictal state, [REDACTED] was unable to walk to the medical unit to receive her medication or the chow hall to receive her meals. She requested that the medical unit bring her meals and medications to her housing unit as an accommodation, but the officials denied this request. Instead, the officials at SLIPC instructed [REDACTED] that she could be “voluntarily placed” in solitary confinement for “medical observation.” Due to fear that solitary confinement would worsen her pre-existing mental health conditions, [REDACTED] requested to remain in the general housing unit. In order to receive her daily seizure medication, [REDACTED] was required to go to the medical unit at SLIPC three times per day. [REDACTED] filed multiple grievances detailing this mistreatment and neglect.

On January 6, 2025, [REDACTED] was deported to the Dominican Republic. Upon her deportation, ICE denied her a full 30-day supply of all medically necessary medications, only providing her with a 10-day supply of her seizure medications. She continues to suffer ongoing emotional distress from her mistreatment and abuse by AW Reyes.

Legal Basis of FTCA Claim

A. Sexual Assault, Assault, and Battery

ICE is responsible for intentional conduct involving the use of sexual and physical violence, which constitutes battery. Sexual assault is an intentional act of nonconsensual sexual contact involving the touching of an individual’s body, directly or through clothing. Assault is an attempt to commit a battery, or the intentional placing of another in reasonable apprehension of receiving a battery.

B. Medical Negligence

ICE had a duty to ensure adequate medical care. As a direct and proximate result of the inadequate, substandard medical testing, treatment, and supervision provided by physicians and other health care providers employed by and/or agents of ICE, [REDACTED] suffered extreme physical, mental, and emotional pain and distress.

C. Negligence, Gross Negligence and Recklessness

ICE had a duty to maintain safe conditions for [REDACTED] ICE also had a duty to ensure that those detained received adequate medical care. ICE breached its duties by failing to ensure safe, and humane conditions. As a direct and proximate result of ICE’s negligent, grossly negligent, and reckless acts, omissions, and conduct, [REDACTED] was subjected to months of suffering without access to medical care or adequate supervision to ensure her safety and

wellbeing. ICE's negligence, gross negligence, and recklessness caused [REDACTED] to suffer extreme and extended physical, mental, and emotional pain and distress.

D. Negligence Per Se

ICE had a duty to ensure that those detained received adequate care and supervision that adhered to standards. ICE breached its duty by failing to meet these standards. As a direct and proximate result, [REDACTED] suffered extreme and extended physical, mental, and emotional pain and distress.

E. Negligent Supervision

ICE had a duty to prevent its employees or agents from causing physical harm to a third party. ICE breached its duty by failing to ensure safe, humane, and sanitary conditions when [REDACTED] was in their custody. As a direct and proximate result of ICE's acts, omissions, and conduct, [REDACTED] was subjected to sexual abuse, physical abuse, medical neglect, threats and retaliation, and the inhumane use of solitary confinement. ICE's negligence and gross negligence caused [REDACTED] to suffer extreme physical, mental, and emotional pain and distress.

F. Intentional Infliction of Emotional Distress

ICE is responsible for intentional or reckless conduct that was extremely outrageous and caused severe emotional distress to [REDACTED]

G. Intentional Infliction of Physical Harm

ICE is responsible for conduct that caused a physical impact on [REDACTED] that caused physical injury, and the injury caused [REDACTED] mental suffering or emotional distress. ICE's acts, omissions, and conduct directly resulted in severe physical pain and suffering to [REDACTED]

H. Other Causes of Action

This is not intended to be an exhaustive list of possible causes of action, including attorneys' fees, *Bivens* claims, violations of 42 U.S.C. §§ 1983 and 1985, violations of 18 U.S.C. § 242, violations of Section 504 of the Rehabilitation Act, violations of the Fifth Amendment Due Process Clause, and violations of the Convention Against Torture. [REDACTED] reserves the right to assert these and other claims in an appropriate forum at an appropriate time, to the extent not already asserted.

11. Witnesses

Other individuals who were detained at SLIPC between November 2023 and January 2025 are witnesses to these incidents. Some individuals working at SLIPC between November 2023 and January 2025 are witnesses to these incidents. Upon information and belief, some of the incidents described above were captured by stationary security cameras at SLIPC and video footage exists to substantiate these claims of abuse.

13B. Phone Number of Person Signing the Form

Sarah Decker,

