

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

RENTERIA-GONZALEZ, Monica, A# [REDACTED]

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 Mx. Monica Renteria-Gonzalez ("Monica") as a result of sexual abuse, physical 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 Monica and serve this complaint on his behalf. Monica seeks an award of damages to compensate for the harms he 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, Monica was repeatedly sexually abused and forced to perform hard manual labor by ICE, resulting in the deterioration of his physical and mental health. As punishment for his self-advocacy and the multiple grievances and complaints he filed, ICE subjected Monica to retaliatory and inhumane solitary confinement,

physical and verbal abuse, and sexual assault. This abuse caused Monica 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 Monica.

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


Sincerely,



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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. Monica RENTERIA-GONZALEZ 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 5,000,000		12c. WRONGFUL DEATH	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.					
13a. SIGNATURE 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, Monica Renteria-Gonzalez, 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



Monica Renteria-Gonzalez

1. Date and Day of Accident/Incident

September 2023- August 2025

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

N/A, Multiple Incidents

3. Basis of Claim

Factual Basis of FTCA Claim

Monica Renteria-Gonzalez (“Monica”) is a native and citizen of Mexico who identifies as a transgender man. Monica was taken into custody by the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”) on or about May 9, 2023. Since that date, he has been detained continuously at the South Louisiana ICE Processing Center (“SLIPC”) in Basile, Louisiana. SLIPC is an immigration detention facility that is operated through a contract between ICE and a private prison company, the GEO Group, Inc. (“GEO”).

Forced Labor, Physical Abuse, and Sexual Abuse by Assistant Warden Reyes at SLIPC

In August 2023, Monica first encountered the Assistant Warden, Mr. Manuel Reyes (“AW Reyes”). In late September 2023, AW Reyes approached Monica about joining a “cleaning crew” to work an “off the books night shift program,” alongside another transgender man detained at SLIPC. That month, Monica began to perform hard manual labor at the instruction of AW Reyes. The “shifts” occurred late at night, between the hours of 8:00 pm and 6:00 am. Unlike the other work programs at SLIPC, these work shifts were not recorded in a formal log book or shift schedule. AW Reyes approached transgender people and masculine-presenting LGBTQ+ people to participate in this “program.” Each person targeted by AW Reyes identified as transgender or LGBTQ+.

AW Reyes would enter the housing units and wake up Monica and the others and bring them to do hard manual labor in various locations inside SLIPC. The “shifts” were randomized and Monica and the others did not have a designated schedule. AW Reyes would compensate them for their labor at times by adding \$1/day into their commissary accounts. Other times, he would bring a trash bag full of commissary items and give them to Monica and the others.

AW Reyes routinely entered the housing unit late at night, between two and three o’clock in the morning, while detained people were sleeping. He would walk around the unit while people were sleeping and take people’s used underwear and sanitary pads from the housing unit. Monica witnessed him say to a detained woman walking to her bunk in her nightshirt, “Is that how your breasts bounce when you are fucking?”

AW Reyes required Monica and others to perform hard manual labor without any personal protective equipment, resulting in significant health risks and physical injuries. Despite repeated requests, Monica and others were denied access to gloves, face shields, and steel-toed boots. In response to these requests, AW Reyes would say: “What, you aren’t strong enough?” Monica and others were forced to perform this labor while exposed to harsh chemicals, equipment, and dangerous conditions. For example, on one occasion, a stripper chemical Monica was using to strip the facility floors burned through his fabric shoes and the skin of his feet. Monica reported this injury to an ICE officer and was taken to the medical unit. On another occasion, Monica was painting the floors in the SLIPC medical unit when a metal frame that AW Reyes was holding fell and landed on Monica’s foot, resulting in a severe injury. Monica’s foot turned black and he could not put weight on it for over two weeks. Due to fear of retaliation by AW Reyes, Monica did not seek medical treatment for this injury. Monica and others routinely experienced burning eyes and nostrils and chest pain after inhaling industrial strength cleaning chemicals without personal protective equipment.

AW Reyes also sexually harassed and assaulted the detained people he targeted for this “work program.” Monica witnessed AW Reyes sexually abuse at least two other detained people, engaging in forced sexual intercourse in SLIPC. AW Reyes also began to sexually harass and abuse Monica. In December 2023, Monica was working in the Echo unit at SLIPC, laying a coat of wax on his hands and knees. AW Reyes approached Monica from behind and forcibly placed his groin directly against his buttocks. AW Reyes had an erection. Approximately one month later, while mopping floors in the training room, AW Reyes came up behind Monica and again forcibly placed his groin directly against Monica’s buttocks. He then stated, “Monica is very firm.” After this incident, Monica experienced significant emotional distress. AW Reyes continued to stalk Monica throughout the facility and sexually harass him, making comments about his appearance and gender identity. For example, AW Reyes repeatedly gave Monica makeup items and questioned his identity as a transgender man. AW Reyes told Monica that he “watched [Monica] shower through the cameras” and asked him “Why do you take so long in the shower? Why do you take the chair inside the shower with you?”

In February 2024, after suffering from consistent sexual and physical abuse, Monica told AW Reyes that he refused to work. A few hours later, an officer came to the housing unit and escorted Monica and another detained trans man to the Charlie housing unit. They were instructed to start cleaning the unit. AW Reyes then entered the unit and cornered Monica, demanding to know why he was refusing to work for him. Monica felt extreme emotional stress and began to cry. AW Reyes told Monica that he was “protected by the higher ups” and there was “nothing anyone could say or do to hurt or affect him.”

When Monica registered as transgender with ICE, AW Reyes approached Monica in the medical unit and spoke to him in Spanish. Two other SLIPC officers (upon information and belief, “Officer Tichy” and “Officer Lege” witnessed this interaction). Monica told AW Reyes “my sexual preferences are none of your concern.” ICE officer, “Officer Ruiz,” then approached Monica and AW Reyes. AW Reyes told Officer Ruiz, “I don’t know what is going on with Monica. She was such a beautiful girl who always wore makeup.”

Retaliation and Placement in Solitary Confinement by SLIPC Officials

In April 2024, Monica again attempted to refuse AW Reyes “work program.” Monica verbally reported the sexual abuse and harassment to the Prison Rape Elimination Act (“PREA”) officer in the SLIPC medical unit. Upon information and belief, the complaint was “dismissed as unsubstantiated” by ICE in August 2024. Monica also filed multiple complaints by phone with the Office of the Inspector General (“OIG”) hotline.

On or about April 17, 2024, Monica was placed in a solitary confinement cell after having a minor verbal altercation with another detained person in the housing unit and sentenced to 14 days in segregation. The other person received no disciplinary segregation. Another transgender person in his dorm who also filed grievances against AW Reyes was also placed in solitary confinement on this date. AW Reyes told Monica, “this is what happens when you aren’t where you are supposed to be,” referring to Monica’s refusal to participate in his “work program.” Monica then submitted a written statement to ICE, detailing this sexual and physical abuse by AW Reyes. The next day, on or about April 18, 2024, AW Reyes came to the segregated housing unit and screamed at Monica, telling him “You should have never put my name on it!”—referring to Monica’s statement to ICE. Monica was subjected to 14 days of solitary confinement.

During this time, Monica was also subjected to sexual abuse and harassment by another officer at SLIPC, upon information and belief, “Sergeant Poullard.” Sergeant Poullard repeatedly handed Monica notes reading, “I know you are gay and like girls.” On one occasion, in front of the Echo unit, Sergeant Poullard showed Monica an inappropriate pornographic picture of herself and stated “This is a sexy dress. You wear it with no panties.” This incident caused Monica significant emotional distress.

In May 2024, Monica filed a PREA complaint detailing the sexual harassment by Sergeant Poullard. After Monica filed this complaint, Sergeant Poullard approached him in the housing unit and said “Yeah, they can’t do nothing to me.” Upon information and belief, the complaint was “dismissed as unsubstantiated” by ICE in July 2024.

Upon information and belief, AW Reyes left his position at SLIPC in July 2024. On or about August 6, 2024, agents from the Federal Bureau of Investigation (“FBI”) interviewed Monica and others at SLIPC. Monica disclosed the sexual and physical abuse by AW Reyes to the FBI agents. On or about August 27, 2024, Monica was interviewed by ICE officials conducting an audit of SLIPC. Monica disclosed the sexual and physical abuse by AW Reyes to auditors. Following his disclosure of the abuse to these entities, SLIPC officials targeted Monica for searches and baseless disciplinary write ups. Monica filed grievances reported this retaliation and filed verbal reports using the OIG phone hotline. On or about September 23, 2024, Monica was interviewed by two ICE officials and again reported the sexual and physical abuse by AW Reyes. He received no additional response following these reports.

As of the date of this filing, Monica remains detained at SLIPC. He continues to suffer ongoing emotional distress from his mistreatment and abuse by AW Reyes and other officials at the facility.

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, Monica suffered extreme physical, mental, and emotional pain and distress.

C. Negligence, Gross Negligence and Recklessness

ICE had a duty to maintain safe conditions for Monica. 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, Monica was subjected to months of suffering without access to medical care or adequate supervision to ensure his safety and wellbeing. ICE's negligence, gross negligence, and recklessness caused Monica 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, Monica 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 Monica was in their custody. As a direct and proximate result of ICE's acts, omissions, and conduct, Monica 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 Monica 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 Monica.

G. Intentional Infliction of Physical Harm

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

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. Monica 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 September 2023 and August 2025 are witnesses to these incidents. Some individuals working at SLIPC between September 2023 and August 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, [REDACTED]