

**STATE OF NEW MEXICO  
COUNTY OF TORRANCE  
SEVENTH JUDICIAL DISTRICT**

**SANTA FE DREAMERS PROJECT; ARIAN  
BARBERIA FRIOL; YANDY GARCIA  
BACALLAO; WILLIAN GONZALEZ  
LOPEZ; MIGUEL GUERRA GARCIA;  
YUMAR HERNANDEZ GONZALEZ;  
JUAN MORALES CHAJ; YOEL PEREZ  
PERDOMO; NORGE RAMOS BALBUENA;  
and ERNESTO RODRIGUEZ CALLADO;**

**No.**

**Plaintiffs,**

**v.**

**CORECIVIC, INC., A Foreign For-Profit Corporation;  
CHAD MILLER, in his capacity as the putative  
Warden of TCDF and an employee of CoreCivic;  
MICHAEL SEDGWICK, in his capacity as the  
acting putative Warden of TCDF and an employee of  
CoreCivic; JOHN DOES 1-10, Being certain TCDF Guards  
employed and supervised by CoreCivic; and  
The BOARD OF COUNTY COMMISSIONERS FOR THE  
COUNTY OF TORRANCE,**

**Defendants.**

**COMPLAINT FOR DECLARATORY RELIEF  
AND DAMAGES**

Plaintiffs by counsel listed below, bring this Complaint under New Mexico Common law, New Mexico Tort Claims Act, and the Declaratory Judgment Act for damages and resulting from injuries inflicted upon them by Defendants. Plaintiffs allege as follows:

## INTRODUCTION

CoreCivic and the guards it employs at the Torrance County Detention Facility (TCDF) are responsible for the health and safety of individuals in their custody under administrative immigration detention. CoreCivic and the guards grievously failed to fulfill their responsibilities and abused their power over the individual Plaintiffs detained at TCDF. CoreCivic operated TCDF under conditions that made it impossible to keep detainees safe from the life-threatening dangers of the COVID-19 pandemic. For example, CoreCivic failed to comply with guidelines from the Centers for Disease Control & Prevention (CDC) by refusing to provide adequate supplies of masks, cleaning supplies, and hand soap at TCDF. CoreCivic failed to give information regarding facility protocols to detainees, educate the individual Plaintiffs on COVID-19, or allow staff and detainees to engage in social distancing. CoreCivic refused to meaningfully consider concerns from detainees. The individual plaintiffs feared for their lives and decided to engage in a peaceful demonstration through a hunger strike.

Defendants responded to the individual Plaintiffs' peaceful hunger strike by terrorizing them and attacking them with several canisters and grenades of oleoresin capsicum ("OC") spray, or pepper spray, a harmful chemical agent that irritates the eyes, skin, and respiratory passages. Defendants deployed the chemical agent in a poorly ventilated space and confined the individual Plaintiffs by blocking the exits while they screamed and choked. Defendants also failed to properly decontaminate the individual Plaintiffs, resulting in continued harm from the chemical agent for days after the attack.

Plaintiff Santa Fe Dreamers Project represents clients detained at TCDF and took measures and expended resources to dissuade Defendants from engaging in the use of chemical

agents against detainees, particularly in confined, poorly ventilated spaces when there is no threat to the safety of guards or any detainees in the area. The Santa Fe Dreamers Project brings this action along with the individual Plaintiffs on behalf of many of their clients and constituents who are unable to access the Court. Plaintiffs ask this Court to declare as unlawful Defendants' actions of discharging chemical agents against immigrant detainees when there is no threat of physical harm to anyone in the area and for damages resulting from injuries inflicted upon the individual Plaintiffs.

### **PARTIES, VENUE, AND JURISDICTION**

1. Plaintiff Santa Fe Dreamers Project (SFDP) is a nonprofit organization whose mission is to promote economic empowerment, community development, family unity, and liberation from detention for immigrant populations. Plaintiff SFDP provides free legal services to immigrants and refugees in NM, including direct representation and support for people in immigration detention.
2. Plaintiff **Norge Ramos Balbuena** is a citizen of Cuba and came to the U.S. seeking asylum around April 28, 2019. A known asthmatic, he yelled to alert the guards of his condition as they were spraying the chemical agent. The guards allowed him to suffer inside the fogged dormitory for the entirety of the attack. Mr. Ramos Balbuena was detained at TCDF at all times relevant to this complaint and currently resides in Florida.
3. Plaintiff **Arian Barberia Friol** is a citizen of Cuba and came to the U.S. seeking asylum in May of 2020. He was released from detention and currently resides in Florida.

4. Plaintiff **Yandy Garcia Bacallao** is a citizen of Cuba and came to the U.S. seeking asylum on March 4, 2020. At all times relevant to this complaint, Mr. Garcia Bacallao was detained at TCDF. He was deported to Cuba.
5. Plaintiff **Willian Gonzalez Lopez** is a citizen of Guatemala who came to the U.S. seeking asylum on March 20, 2020. Mr. Gonzalez Lopez was detained at TCDF. He was deported to Guatemala.
6. Plaintiff **Miguel Guerra Garcia** is a citizen of Cuba and came to the U.S. seeking asylum on March 8, 2020. Mr. Guerra Garcia was detained at TCDF. He was deported to Cuba.
7. Plaintiff **Juan Morales Chaj**, a citizen of Guatemala, came to the U.S. seeking asylum on March 13, 2020. Mr. Morales Chaj was detained at TCDF and then deported to Guatemala.
8. Plaintiff **Yoel Perez Perdomo**, a citizen of Cuba, came to the U.S. seeking asylum on January 21, 2020. Mr. Perez Perdomo was detained at TCDF and then deported to Cuba.
9. Plaintiff **Yumar Hernandez Gonzalez** is a citizen of Cuba and came to the U.S. seeking asylum on May 2, 2019. Mr. Hernandez Gonzalez was detained at TCDF and currently resides in Florida.
10. Plaintiff **Ernesto Rodriguez Callado** is a citizen of Cuba and came to the U.S. seeking asylum on March 3, 2020. Mr. Rodriguez Callado was detained at TCDF and currently resides in Florida.
11. The Plaintiffs described above in paragraphs two through ten are collectively referred to herein as “the individual Plaintiffs.”
12. Defendant CoreCivic Inc. (hereinafter referred to as “CoreCivic”), is a foreign for-profit limited corporation that owns and operates numerous prison facilities within the State of New Mexico, including Torrance County Detention Facility (TCDF) located at 209 County Road

A049, Estancia, New Mexico 87016. Based on information and belief, CoreCivic's registered agent is Kennedy, Moulton and Wells, PC, located in Bernalillo County, New Mexico.

13. Defendant Chad Miller is an individual who was employed by CoreCivic at TCDF as its warden. Based on information and belief, Defendant Miller is a resident of Bernalillo County, New Mexico.

14. Defendant Michael Sedgwick, based on information and belief, is an individual who is employed by CoreCivic at TCDF and is its acting warden. Based on information and belief, Defendant Sedgwick is a resident of Bernalillo County, New Mexico.

15. The identities and capacity of Defendants Doe One through Ten are presently unknown to Plaintiffs, and on this basis, Plaintiffs identify the Defendants by these fictitious names. Plaintiffs will amend the Complaint to substitute their true names and capacities. Defendants Doe One through Ten shall hereafter be collectively referred to as the "Guards."

16. Defendant Board of County Commissioners for the County of Torrance (Torrance County) is now and was at all times material to this Complaint responsible for the maintenance operations at TCDF. Torrance County is a local public body pursuant to the New Mexico Tort Claims Act. NMSA 1978 § 41-4-3.

17. Jurisdiction and venue are proper pursuant to Article VI, Section 13 of the New Mexico Constitution, NMSA 1978 § 38-3-1, and § 44-6-1.

#### **FACTS RELATED TO THE TORRANCE COUNTY-CORECIVIC RELATIONSHIP**

18. Torrance County owns the Torrance County Detention Facility located at 209 County Road A049, Estancia, New Mexico 87016.

19. TCDF is a county facility operated as a private for profit detention center by CoreCivic Inc., pursuant to a contract between CoreCivic and Torrance County.
20. Torrance County profits from this agreement.
21. By contracting with CoreCivic and through its charter to ensure public safety, the County of Torrance assumes responsibility for the maintenance and operation of TCDF and for the proper training and supervision for those who use the building.
22. CoreCivic is responsible for the training, supervision, and actions of its employees by the doctrine of Respondeat Superior.

#### **FACTS RELATED TO PLAINTIFFS' CLAIMS**

23. On Monday, May 11, 2020, the individual Plaintiffs began a peaceful hunger strike to protest the lack of precautions against COVID-19, the dismal living conditions, and to request status updates on their individual immigration cases.
24. On Thursday, May 14, 2020 from 10:45 A.M. to 11:44 A.M., Defendants Miller and Guards entered Dormitory 2A and conducted a “town hall” meeting during which Defendants Miller and Guards pressured the individual Plaintiffs to cease their hunger strike. When the individual Plaintiffs refused, Defendants Miller and Guards gave them five minutes to change their minds.
25. At no time before, during, or after the town hall meeting, were the individual Plaintiffs a threat to persons or property. Security footage shows that Guards were freely entering and exiting dormitory 2A from 11:44 A.M. to 12:30 P.M.

26. Security camera videos show that on May 14, 2020 at around 12:30 P.M., 18 CoreCivic Guards, equipped with shields, gas masks, chemical agents, and Personal Protective Equipment, entered dormitory 2A at TCDF.
27. Dormitory 2A is an enclosed space with only two doors and no outside ventilation. Guards blocked both exit doors.
28. Approximately five minutes after entering the dormitory, the Guards aimed directly at the individual Plaintiffs and deployed multiple canisters and grenades filled with the OC chemical agent.
29. Upon dispersion of the chemical agent, the dormitory was completely fogged with OC spray.
30. The Guards blocked the individual Plaintiffs from leaving the dormitory during the attack, using their shields to confine about 20 men to one half of the basketball court-sized dormitory.
31. The individual Plaintiffs screamed in pain and anguish as the chemical agent irritated their skin, eyes, and lungs. The chemical made their skin feel as though it were on fire. They were blinded from the burning chemical in their eyes. They choked as the chemical inflamed their throat and lungs. As the room filled with the pepper spray, the individual Plaintiffs began to cry, cough, and gasp for oxygen. Some individuals lost consciousness.
32. Unable to breathe, some of the detainees sought relief from the pepper spray by attempting to leave the room or go to the showers. Guards blocked their movement and used their shields to push the individual Plaintiffs back into the density of the OC spray.
33. CoreCivic Guards used their shields to force the individual Plaintiffs against a wall.
34. CoreCivic Guards shouted at the Spanish-speaking individual Plaintiffs in English and they were unable to understand much of what was being said.

35. The individual Plaintiffs begged and pleaded with the Guards to stop attacking them.
36. The individual Plaintiffs were left in the enclosed fogged dormitory for approximately 19 minutes, after which the Guards began spraying them a second time with the chemical agent.
37. Upon information and belief, the Guards acted with the intent to injure and inflict pain on the individual Plaintiffs.
38. Upon information and belief Defendant Miller directed CoreCivic Guards to engage in the chemical attack against the individual Plaintiffs with the purpose of punishing them for engaging in a hunger strike.
39. CoreCivic Guards had no lawful purpose to attack the individual Plaintiffs with the OC chemical agent.
40. The individual Plaintiffs did not resist the Guards, were not violent, and attempted to follow the Guards' directions.
41. After being drenched with OC spray and suffocated by the chemical irritant for approximately 15 minutes, the individual Plaintiffs were released from the dormitory one at a time, at an inexplicably slow pace which further subjected them to suffocation and confinement in a poorly ventilated area against their will.
42. The individual Plaintiffs were handcuffed and taken to the hallway through the emergency door. Some individuals were taken out in wheelchairs due to immobility or loss of consciousness.
43. The individual Plaintiffs were further physically injured by CoreCivic Guards when they restrained their wrists with unreasonably tight zip tie handcuffs with the intent of inflicting pain.



44. The individual Plaintiffs begged for, but were not provided, medical attention when they were taken to the hallway.
45. The individual Plaintiffs were then taken to the high security unit 7C, where they were not given instructions on the decontamination process in Spanish. Because they could not understand what was happening or being communicated, many of them did not rinse off the chemical agent.
46. The individual Plaintiffs were left in their OC-drenched clothing for hours before being given a change of clothes.
47. Many of the individual Plaintiffs were not allowed to shower until days after the attack, causing rashes and burning sensations on their skin. When they were finally able to shower, they were not given instructions on how to properly rinse. The water reactivated the OC spray, causing intense burning of their skin and eyes.
48. The individual Plaintiffs were placed in segregated housing alone or with one other detainee.
49. The individual Plaintiffs were stripped of their access to their commissary accounts for 30 days.
50. The individual Plaintiffs suffered extreme emotional and psychological distress following the chemical attack.
51. Following the chemical attack, Plaintiff Ernesto Rodriguez Collado, who has a documented history of depression and suicidal behavior, attempted to commit suicide the night of the attack.
52. Plaintiff Yumar Hernandez Gonzalez was diagnosed with depression and was placed on an antidepressant. Following the pepper spray attack, he tried to commit suicide.

53. Most of the individual Plaintiffs currently suffer from post-traumatic stress disorder, depression, and general anxiety disorders as a result of the chemical attack.
54. Several of the individual Plaintiffs contracted COVID-19 and tested positive within days of the chemical attack.
55. The individual Plaintiffs' mental and physical injuries continue to manifest with time.
56. When Plaintiff SFDP learned about this attack, it engaged in advocacy to bring awareness to the attack on the individual Plaintiffs and others in the facility and to prevent future similar attacks on those in the facility who have little to no agency to advocate on their own behalf.

**COUNT I - BATTERY**

(Individual Plaintiffs Against CoreCivic, Chad Miller, Michael Sedgwick and CoreCivic Guards)

57. Plaintiffs reallege and incorporate the allegations set forth in the preceding paragraphs as though fully set forth herein.
58. On May 14, 2020, at the direction of Defendant Miller, CoreCivic Guards at TCDF unlawfully battered Plaintiffs without consent or justification.
59. In manners not limited to those described herein, Defendants acted intending to cause a harmful or offensive contact with Plaintiffs or an imminent apprehension of such a contact.
60. In manners not limited to those described herein, Defendants' actions succeeded in causing harmful and offensive contact with Plaintiffs.
61. Such conduct was extreme and outrageous and would be deemed offensive to a reasonable person.
62. As a result of the aforementioned conduct of CoreCivic Guards, Plaintiffs suffered pain and terror and were harmed physically and psychologically.

63. Defendants CoreCivic Guards were at all times relevant, acting as employees of CoreCivic and within the scope of their employment. Defendant CoreCivic is responsible for the wrongful conduct of its employees under the law of vicarious liability, including the doctrine of respondeat superior.
64. Defendants' acts complained of herein were willful, wanton, malicious, reckless, oppressive, and grossly negligent, making them liable for punitive damages *See Loucks v. Albuquerque National Bank*, 76 N.M. 735, 418 P.2d 191 (1966).

**COUNT II - ASSAULT**

(Individual Plaintiffs Against CoreCivic, Chad Miller, Michael Sedgwick and CoreCivic Guards)

65. Plaintiffs reallege and incorporate the allegations set forth in the preceding paragraphs as though fully set forth herein.
66. On May 14, 2020, at the direction of Defendant Miller, CoreCivic Guards at TCDF unlawfully assaulted Plaintiffs, as defined by NMSA 1978 § 30-3-1, without consent or justification and with the intent to cause harm or with certainty that their actions would cause Plaintiffs harm.
67. In manners not limited to those described herein, Defendants caused Plaintiffs to reasonably believe they were in danger of an immediate battery by using threatening and menacing conduct and deploying several canisters of OC spray at individual Plaintiffs.
68. Such conduct was extreme and outrageous and would be deemed offensive to a reasonable person.
69. As a result of the aforementioned conduct of CoreCivic Guards, individual Plaintiffs suffered terror and were harmed physically and psychologically.

70. Defendants CoreCivic Guards and Defendant Miller were, at all times relevant, acting as employees of CoreCivic and within the scope of their employment when they harmed individual Plaintiffs. Defendant CoreCivic is responsible for the wrongful conduct of its employees under the law of vicarious liability, including the doctrine of respondeat superior.
71. Defendants' acts complained of herein were willful, wanton, malicious, reckless, oppressive, and grossly negligent, making them liable for punitive damages *See Loucks v. Albuquerque National Bank*, 76 N.M. 735, 418 P.2d 191 (1966).

### **COUNT III - FALSE IMPRISONMENT**

(Individual Plaintiffs Against CoreCivic, Chad Miller, Michael Sedgwick and CoreCivic Guards)

72. Plaintiffs reallege and incorporate the allegations set forth in the preceding paragraphs as though fully set forth herein.
73. On May 14, 2020, at the direction of Defendant Miller, CoreCivic Guards at TCDF unlawfully and knowingly confined Plaintiffs without consent, justification, and/or legal authority, in manners described herein, with the intent to cause harm or with certainty that their actions would cause individual Plaintiffs harm.
74. Defendants intentionally confined individual Plaintiffs, in manners not limited to those described herein, with knowledge that they had no lawful authority to do so.
75. Such conduct was extreme and outrageous and would be deemed offensive to a reasonable person.
76. As a result of the aforementioned conduct of Defendants, individual Plaintiffs suffered pain and terror and were harmed physically and psychologically.

77. Defendants CoreCivic Guards and Defendant Miller were, at all relevant times, acting as employees of CoreCivic and within the scope of their employment. Defendant CoreCivic is responsible for the wrongful conduct of its employees under the law of vicarious liability, including the doctrine of respondeat superior.

78. Defendants' acts complained of herein were willful, wanton, malicious, reckless, oppressive, and grossly negligent, making them liable for punitive damages. *See Loucks v. Albuquerque National Bank*, 76 N.M. 735, 418 P.2d 191 (1966).

**COUNT IV - INTENTIONAL INFLECTION OF  
EMOTIONAL DISTRESS**

(Individual Plaintiffs Against CoreCivic, Chad Miller, Michael Sedgwick  
and CoreCivic Guards)

79. Plaintiffs reallege and incorporate the allegations set forth in the preceding paragraphs as though fully set forth herein.

80. On May 14, 2020, at the direction of Defendant Miller, CoreCivic Guards at TCDF intentionally inflicted emotional distress on individual Plaintiffs in manners described herein. Under the circumstances, Defendants' conduct was extreme and outrageous and intentional or in reckless disregard of the harm it could cause individual Plaintiffs.

81. As a result of the aforementioned conduct of CoreCivic Guards, individual Plaintiffs suffered severe emotional distress.

82. Defendants CoreCivic Guards and Defendant Miller were, at all times relevant, acting as employees of CoreCivic and within the scope of their employment. Defendant CoreCivic is responsible for the wrongful conduct of its employees under the law of vicarious liability, including the doctrine of respondeat superior.

83. Defendants CoreCivic Guards' and Defendant Miller's acts complained of herein were willful, wanton, malicious, reckless, oppressive, and grossly negligent, making them liable for punitive damages. *See*. Loucks v. Albuquerque National Bank, 76 N.M. 735, 418 P.2d 191 (1966).

**COUNT V - NEGLIGENCE**

(Individual Plaintiffs Against CoreCivic, Chad Miller, Michael Sedgwick  
and CoreCivic Guards)

84. Plaintiffs reallege and incorporate the allegations set forth in the preceding paragraphs as though fully set forth herein.

85. These Defendants had a duty to exercise reasonable care to ensure the safety of Plaintiffs while they were detained at TCDF.

86. The great risk of danger to the individual Plaintiffs created by these Defendants' actions and failures to act as described above would be easily foreseen by a reasonable person.

87. Defendants' actions were such that a reasonably prudent person would foresee them as involving an unreasonable risk of injury to Plaintiffs, in the exercise of ordinary care.

88. As a direct result of Defendants' negligent breach of their duty, Plaintiffs were injured on May 14, 2020 in the TCDF, physically and psychologically, and suffered grievous harm.

**COUNT VI - NEGLIGENT HIRING, TRAINING, AND SUPERVISION**

(Individual Plaintiffs Against CoreCivic, Chad Miller, Michael Sedgwick  
and CoreCivic Guards)

89. Plaintiffs reallege and incorporate the allegations set forth in the preceding paragraphs as though fully set forth herein.

90. CoreCivic was the employer of Guards Doe One through Ten.

91. CoreCivic and Defendants Miller and Sedgwick knew or should have known that lack of training on the deployment of chemical agents against detainees for the Guards would create an unreasonable risk of harm to individual Plaintiffs.
92. These Defendants failed to use the ordinary care in training and supervising the Guards.
93. These Defendants' negligence in training the Guards and supervising their conduct was a cause of the individual Plaintiffs' injuries.
94. Plaintiffs suffered severe physical and psychological harm as a direct result of these Defendants' negligence in supervision and training.

**COUNT VII - NEGLIGENT OPERATION AND MAINTENANCE**  
(Individual Plaintiffs Against Torrance County)

95. Torrance County has a duty to exercise ordinary care in the operation and maintenance of the TCDF.
96. Torrance County breached its duty by failing to afford ordinary care, such as setting and regulating sufficient safety precautions for the operation of a detention center, to Plaintiffs.
97. A reasonable person would have foreseen the great risk created by the use of a county building to detain large numbers of people against their will.
98. As a result of Defendant Torrance County's negligence, Plaintiffs were harmed physically psychologically and suffered greatly.

**COUNT VIII - DECLARATORY RELIEF PURSUANT TO ARTICLE II, SECTIONS 10  
and 18 OF THE NEW MEXICO CONSTITUTION**  
(Plaintiff Santa Fe Dreamers Project Against Torrance County and CoreCivic)

99. Plaintiff seeks a declaration that it was unlawful to subject detainees to arbitrary use of force by deploying chemical agents when detainees were engaged in peaceful protest and there was no threat to the safety of any of the detainees or guards.
100. Plaintiff also seeks an injunction prohibiting the use of chemical agents at TCDF when there is no threat to the safety of anyone in the area.
101. Defendants violated the individual Plaintiffs' rights to be free from unlawful detention and excessive or arbitrary force without reasonable or probable cause under Article II, Section 10 of the New Mexico Constitution when Defendants assaulted and battered individual Plaintiffs and placed them in segregation without legal authority.
102. As a result of Defendants' unlawful conduct, the individual Plaintiffs suffered severe physical and emotional distress.
103. Defendants' unlawful conduct caused Plaintiff Santa Fe Dreamers Project financial harm when it was forced to expend resources to address the effects of the attack.
104. CoreCivic's policies, customs and practices, including its failure to discipline or retrain officers, led to the constitutional violations at issue. Moreover, Torrance County's administrators chose to subcontract the operation of the detention facility to CoreCivic and failed to inspect the facility or monitor the adequacy of training for CoreCivic's Guards.
105. Plaintiff Santa Fe Dreamers Project brings this claim to prevent the harms inflicted on the individual Plaintiffs in this matter from happening against its clients and constituents currently detained in TCDF.

**COUNT IX - DECLARATORY RELIEF PURSUANT TO ARTICLE II, SECTION 18 OF  
THE NEW MEXICO CONSTITUTION**

(Plaintiff Santa Fe Dreamers Project Against Torrance County and CoreCivic)



106. Plaintiff realleges and incorporates the allegations set forth in the preceding paragraphs as though fully set forth herein.
107. Plaintiff seeks a declaration that it was unlawful to subject detainees to arbitrary use of force by deploying chemical agents when detainees were engaged in peaceful protest and there was no threat to the safety of any of the detainees or guards.
108. Plaintiff also seeks an injunction prohibiting the use of chemical agents at TCDF when there is no threat to the safety of anyone in the area.
109. By assaulting and battering the individual Plaintiffs, Defendants deprived Plaintiffs of liberty without due process of law under Article II, Section 18 of the New Mexico Constitution.
110. As a result of Defendants' unlawful conduct, the individual Plaintiffs suffered severe physical injury and emotional distress.
111. Defendants' unlawful conduct caused Plaintiff Santa Fe Dreamers Project financial harm when it was forced to expend resources to address the effects of the attack.
112. CoreCivic and its officers and/or employees were acting at all relevant times under color of state law as an agent of Torrance County. CoreCivic's policies, customs and practices, including its failure to discipline or retrain officers, led to the constitutional violations at issue. Moreover, Torrance County's administrators chose to subcontract the operation of the detention facility to CoreCivic and failed to inspect the facility or monitor the adequacy of training given to CoreCivic's Guards.
113. Plaintiff Santa Fe Dreamers Project brings this claim to prevent the harms inflicted on the individual Plaintiffs in this matter from happening against its clients and constituents currently detained in TCDF.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully pray for relief as follows:

1. The award of damages in an amount a jury deems sufficient to compensate Plaintiffs for Defendants' unlawful conduct;
2. Damages for the nature, extent, and duration of Plaintiffs' injuries;
3. Punitive damages in an amount a jury deems sufficient to deter Defendants from acting in gross disregard of, or indifference to, the rights and safety of Plaintiffs and similarly situated detainees;
4. Declaratory and relief;
5. An award of pre- and post-judgment interest; and
6. For such other and further relief as the Court deems just.

Respectfully submitted by:

***/s/ Leon Howard*** \_\_\_\_\_  
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