UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

Monica "Luis" RENTERIA-GONZALEZ; Maria Luisa "Mario" GARCIA-VALENZUELA; Kenia CAMPOS-FLORES; and Jane DOE, *Plaintiffs*, -against- THE GEO GROUP, INC.; EMMANUEL REYES; and DAVID COURVELLE, *Defendants*.	**COMPLAINT FOR DAMAGES**

COMPLAINT

I. INTRODUCTION

1. Under the cover of night, immigrants detained at the South Louisiana Immigration and Customs Enforcement Processing Center ("SLIPC")—the nation's largest female immigrant detention facility, operated by GEO Group, Inc. ("GEO"), the nation's largest private prison operator—endured a months-long nightmare of rape, sexual abuse, degrading harassment, and hard manual labor that targeted primarily transgender and non-binary detained people. The primary perpetrator was Defendant Emmanuel Reyes ("Defendant Reyes"), then an Assistant Warden at the facility. Using his position of authority, Defendant Reyes coerced Plaintiffs to perform physical and sexual labor with threats of death, deportation, further sexual abuse, physical harm, harm to their families and loved ones, and through denial of basic necessities, denial of life-sustaining medical care, and isolation in solitary confinement.

2. Specifically, Defendant Reyes coerced sex acts, subjecting detained people at SLIPC to sexual abuse including rape, abusive sexual touching, degrading sexual comments, persistent sexual harassment, and voyeurism. Using his position of power, he cornered vulnerable people in his custody for sexual assault in locations hidden from surveillance cameras, stalked them throughout the facility, extracted information about their families and immigration cases, viewed their naked bodies on surveillance camera footage, and sexually degraded and harassed people in the housing units in the middle of the night.

3. In addition, Defendant Reyes forced Plaintiffs Monica "Luis" Renteria-Gonzalez, Maria Luisa "Mario" Garcia-Valenzuela, and Kenia Campos-Flores to perform hard manual labor and custodial work, including stripping floors, sanitizing housing units and other facility spaces, and moving heavy supplies and machinery, without protective equipment, late into the night. These individuals suffered physical injuries from this back-breaking labor and the toxic fumes of industrial-strength cleaning chemicals.

4. The forced labor scheme maintained the infrastructure, daily operations, and sanitation of SLIPC, enriching Defendant GEO by cutting operational costs. Defendant Reyes also explicitly targeted and punished masculine-presenting detained people who identify as transgender or gender non-conforming with physical abuse. For example, Defendant Reyes forced detained people to move heavy objects like metal cabinets and cinder blocks back and forth across the facility continuously through the night to punish people "who think they are men" by "treating them like men."

5. Many of the detained people subjected to this forced labor scheme were deported before they had the opportunity to alert Immigration and Customs Enforcement ("ICE"), the government agency that maintains their custody and is charged with their care. But the four

Plaintiffs *did* report this abuse. They filed multiple complaints under the Prison Rape Elimination Act ("PREA"), as well as with other government oversight bodies, including the Department of Homeland Security's ("DHS") Office of the Inspector General ("OIG"), and repeatedly complained to ICE officials in person at the facility. But ICE systematically ignored their pleas for help and buried their complaints. Upon information and belief, no disciplinary action was ever taken against Defendant Reyes, who voluntarily left his position in July 2024.

6. Instead, GEO employees waged a campaign of retaliation against Plaintiffs, which continued even after Defendant Reyes's departure, subjecting Plaintiffs to prolonged isolation in solitary confinement, unwarranted use of force, strip searches, baseless disciplinary actions, life-threatening medical neglect, and rampant sexual harassment and degradation.

7. This pervasive culture of sexual misconduct and retaliation at SLIPC did not end when Defendant Reyes left SLIPC. Another GEO employee at SLIPC, Defendant David Courvelle, sexually assaulted Plaintiff Mario three times, repeatedly cornering him in camera blind spots within the facility. And on a near-daily basis for a period of about three months, Defendant Courvelle forced Plaintiffs Luis and Mario, under threat of physical harm, to stand guard outside a utility closet while he raped a detained woman behind a closet door. In June 2026, Defendant Courvelle pled guilty and was sentenced to three years in federal prison for one count of sexual abuse of a ward in connection with his abuse of this woman.[1] When Plaintiffs reported Defendant Courvelle to federal authorities, he threatened them and stalked their family members, but no action was taken against him until years later.

[1] Press Release, United States Attorney's Office, Western District of Louisiana, *Former Louisiana Detention Officer Sentenced to Three Years in Federal Prison for Sexual Abuse of a Detainee* (July 2, 2026), https://perma.cc/GE9E-7XA6.

8. Plaintiffs bring claims against Defendant GEO and Defendant Reyes for damages under the Trafficking Victims Protection Reauthorization Act ("TVPRA"), 18 U.S.C. § 1595, a comprehensive statutory framework imposing civil liability on persons engaging in or attempting to engage in or benefit from sexual exploitation and labor trafficking.

9. Plaintiffs Jane Doe[2] and Luis Renteria-Gonzalez bring claims for damages under Louisiana state law against Defendant Reyes and Defendant GEO for unlawful sexual assault.

10. Plaintiff Mario Garcia-Valenzuela brings a claim for damages under Louisiana state law against Defendant Courvelle and Defendant GEO for unlawful sexual assault.

11. Plaintiffs Luis Renteria-Gonzalez and Mario Garcia-Valenzuela bring claims for damages under Louisiana state law against Defendant Courvelle and Defendant GEO for the infliction of emotional distress.

12. Plaintiffs Luis Renteria-Gonzalez and Mario Garcia-Valenzuela bring claims for damages under Louisiana state law against Defendant Courvelle and Defendant GEO for negligence.

13. Plaintiffs Luis Renteria-Gonzalez and Mario Garcia-Valenzuela bring claims for damages against Defendant GEO for negligent supervision of its employee, Defendant Courvelle.

II. JURISDICTION AND VENUE

14. This action is brought under the TVPRA, 18 U.S.C. § 1581, *et seq*.; and Louisiana state law, LA. CIV. CODE ANN. art. 2315.

15. The Court has subject-matter jurisdiction over this action under 28 U.S.C. § 1331 and 18 U.S.C. § 1595.

[2] Plaintiff Jane Doe will file a motion for leave to proceed under pseudonym.

16. This Court has subject matter jurisdiction over claims arising under state law pursuant to 28 U.S.C. § 1367, because they form part of the same case or controversy giving rise to all other claims. Additionally, this Court has subject matter jurisdiction over claims arising under state law as to Defendants GEO, Reyes, and Courvelle pursuant to 28 U.S.C. § 1332(a) because this action is between "citizens of a State" and a "citizen[] or subject[] of a foreign state," and the amount of controversy exceeds $75,000.

17. Venue is proper under 28 U.S.C. § 1391(b)(2) because the acts or omissions giving rise to these claims all occurred within this district.

III. PARTIES

18. Plaintiff Monica "Luis" Renteria-Gonzalez ("Luis") (he/him) is a 38-year-old transgender man and a citizen and national of Mexico. Luis was detained at SLIPC for approximately thirty-two months, from May 2023 through December 2025. He is a resident of Mexico.

19. Plaintiff Maria Luisa "Mario" Garcia-Valenzuela ("Mario") (he/him) is a 43-year-old transgender man and a citizen and national of Mexico. Mario was detained at SLIPC for approximately 22 months, from February 2024 through November 2025. Mario was diagnosed with epilepsy in 2017 and takes daily medications to control his seizures. Prior to his detention in the United States, Mario was severely injured in Mexico after he was kidnapped and his assailants attempted to cut off his left hand, leaving it partially detached down to the bone. As a result, Mario has mobility issues and nerve damage in his left hand, requiring surgical intervention and physical therapy. He is a resident of Mexico.

20. Plaintiff Kenia Campos-Flores ("Kenia") (they/them) is a 38-year-old non-binary person and a citizen and national of El Salvador. Kenia was detained at SLIPC for approximately

eight months, from April 2024 through November 2024. Kenia is currently in the custody of the Federal Bureau of Prisons in South Carolina.

21. Plaintiff Jane Doe (she/her) was detained at SLIPC for approximately 15 months, from November 2023 through January 2025. In 2010, Jane Doe was diagnosed with epilepsy. In 2013, she had spinal surgery, a laminectomy with fusion in the lumbar region, after she was injured in an accident. In or around 2015, Jane Doe was diagnosed with Post Traumatic Stress Disorder ("PTSD") and anxiety. Plaintiff Jane Doe proceeds pseudonymously in light of privacy and safety concerns surrounding the public disclosure of her identity.

22. Defendant GEO Group, Inc. ("GEO"), is a for-profit corporation that was formed in and has its principal place of business in the State of Florida. GEO operates SLIPC as a center for the civil detention of immigrants the United States has deemed subject to detention. Defendant GEO is the largest private prison operator in the United States, and it runs over 95 facilities containing approximately 76,000 beds worldwide. At all times relevant to this complaint, Defendant GEO was the employer of Defendants Reyes and Courvelle at SLIPC.

23. Defendant Emmanuel Reyes was formerly, and at all times relevant to the allegations pertaining to his conduct in this Complaint, employed by Defendant GEO as an Assistant Warden at SLIPC. Upon information and belief, he currently resides in the State of Florida.

24. Defendant David Courvelle was formerly, and at all times relevant to the allegations pertaining to his conduct in this Complaint, employed by Defendant GEO as a detention officer at SLIPC. He is a citizen of, and is currently incarcerated in, the State of Louisiana.

25. At all relevant times, Plaintiffs were in the custody of ICE at SLIPC, which is operated by GEO pursuant to contract. GEO is responsible for the training, supervision, and actions of its employees who have responsibility for the management and operation of the SLIPC. GEO is responsible for the actions of its employees through the doctrine of *respondeat superior*.

26. At all relevant times, Defendants Reyes and Courvelle were employees of GEO working at SLIPC and knew or should have known that Plaintiffs were detained in ICE custody at SLIPC at all relevant times. At all relevant times, all Defendants maintained a "special relationship" toward each Plaintiff by virtue of the duty of care owed by a prison official to a ward.

IV. STATEMENT OF FACTS

A. South Louisiana ICE Processing Center.

27. Across the United States, ICE confines noncitizens in detention facilities while they await adjudication of their civil immigration cases, or removal to their country of origin. As of July 2026, more than 65,000 people were detained by ICE.[3]

28. ICE relies on a broad network of detention facilities nationwide, many of which are operated pursuant to contract with state agencies or private prison corporations. SLIPC, operated by GEO, is one such facility.

29. SLIPC is the largest female immigration detention facility in the country and currently has a 1,000-bed operational capacity. SLIPC detains women and people of other gender identities, including people who identify as gender non-conforming and transgender. It is privately owned and operated by Defendant GEO.

[3] *Immigration Detention Quick Facts*, Transactional Records Access Clearinghouse (TRAC) Immigration (last visited Nov. 17, 2026), https://perma.cc/Z3EY-4NHW.

30. Upon information and belief, GEO currently operates 23 immigration detention facilities across the country pursuant to contracts either directly with ICE or with another entity, usually a public entity that owns the facility in question and contracts with ICE.

31. As part of its duties as the private operator of SLIPC, GEO is obligated to operate the facility according to a collection of standards, rules, and policies prescribed by ICE.

32. ICE oversees detention center operations through a variety of functions and offices: for example, ICE conducts routine audits to measure contractual compliance; receives and investigates complaints through the Office of Civil Rights and Civil Liberties ("CRCL"); audits compliance with PREA; and can audit and investigate conditions through the DHS OIG, the Office of the Immigration Detention Ombudsman ("OIDO"), and the ICE Offices of Professional Responsibility ("OPR") and Detention Oversight ("ODO").

33. Contracts for operation of detention facilities prescribe, among other things, a specific set of standards for facility conditions and services. Upon information and belief, the standards to which GEO has agreed to adhere, and against which ICE reviews its performance, in the operation of SLIPC are the 2011 Performance-Based National Detention Standards, 2016 revision ("PBNDS").

34. The PBNDS prescribes detention standards for myriad aspects of life and services within detention centers, including but not limited to, response to sexual assault;[4] work, including standards under which detained persons may be asked to work and workplace conditions;[5]

[4] U.S. Immigration & Customs Enforcement, Performance-Based National Detention Standards 2011: Standard 2.11, Sexual Abuse and Assault Prevention and Intervention (rev. Dec. 2016), https://perma.cc/5F2M-T9DD.
[5] U.S. Immigration & Customs Enforcement, Performance-Based National Detention Standards 2011: Standard 5.8, Voluntary Work Program (rev. Dec. 2016), https://perma.cc/3BFQ-VX7L.

discipline;[6] medical care;[7] suicide prevention;[8] imposition of and standards for solitary confinement;[9] and use of force.[10]

35. Additionally, ICE detention facilities are subject to regulations promulgated in furtherance of PREA, 34 U.S.C. § 30301 *et seq.* PREA was enacted to "develop and implement national standards for the detection, prevention, reduction, and punishment of prison rape," 34 U.S.C.A. § 30302. The PREA regulations governing immigrant detention facilities, known collectively as the "DHS PREA," are found at 6 C.F.R. pt. 115.

36. The DHS PREA announced a policy of "zero tolerance toward all forms of sexual abuse," 6 C.F.R. § 115.11(a), and requires that facilities "ensure that detainees have multiple ways to privately report sexual abuse, retaliation for reporting sexual abuse, or staff neglect or violations of responsibilities that may have contributed such incidents." 6 C.F.R. § 115.51(a). Facilities must also accept reports through formal and informal grievance procedures. 6 C.F.R. § 115.52(a). Facilities must undertake "prompt, thorough, objective" investigations of allegations of sexual abuse that are to be conducted by "specially trained, qualified investigators." 6 C.F.R. § 115.71(a). Detention facilities must then "conduct a sexual abuse incident review at the conclusion of every investigation of sexual abuse and, where the allegation was not determined to be unfounded, prepare a written report within 30 days of the conclusion of the investigation." 6 C.F.R. § 115.86(a). The review must include consideration of whether

[6] U.S. Immigration & Customs Enforcement, Performance-Based National Detention Standards 2011: Standard 3.1, Disciplinary System (rev. Dec. 2016), https://perma.cc/4KUY-HGEL.
[7] U.S. Immigration & Customs Enforcement, Performance-Based National Detention Standards 2011: Standard 4.3, Medical Care (rev. Dec. 2016), https://perma.cc/K7JR-FPEU.
[8] U.S. Immigration & Customs Enforcement, Performance-Based National Detention Standards 2011: Standard 4.6, Significant Self-harm and Suicide Prevention and Intervention (rev. Dec. 2016), https://perma.cc/M9AA-F3WK.
[9] U.S. Immigration & Customs Enforcement, Performance-Based National Detention Standards 2011: Standard 2.12, Special Management Units (rev. Dec. 2016), https://perma.cc/44UR-6EES.
[10] U.S. Immigration & Customs Enforcement, Performance-Based National Detention Standards 2011: Standard 2.15, Use of Force and Restraints (rev. Dec. 2016), https://perma.cc/JM6S-5X6V.

the incident or allegation was motivated by, among other things, sexual orientation or gender identity. 6 C.F.R. § 115.86(b). The DHS PREA also provides for the discipline, up to and including termination, of staff who have violated agency or facility PREA policies. *See* 6 C.F.R § 115.76.

37. The regulations, promulgated in 2014, require the incorporation of an obligation to comply with the DHS PREA into all new or renewed contracts for the confinement of people in immigration detention facilities. *See* 6 C.F.R. § 115.12.

38. Upon information and belief, the contract pursuant to which GEO operates SLIPC incorporates the DHS PREA requirements.

39. GEO has a duty of care to people detained at SLIPC and must comply with contractual obligations, including with respect to its response to sexual assault; work, including standards under which detained persons may be asked to work and workplace conditions; discipline; medical care; suicide prevention; imposition of and standards for solitary confinement; and use of force.

40. For years prior to Plaintiffs' detention, numerous credible reports by detained individuals, the media, government oversight agencies, and members of Congress documented a systemic pattern of abuse and neglect at SLIPC. These reports described a pattern of physical and sexual abuse at SLIPC.[11]

[11] These reports also highlight inadequate medical care, inedible and insufficient food, unsanitary living conditions, deprivation of basic necessities including hygiene supplies and warm bedding, and the denial of legal resources and language services. A report submitted to DHS noted that women at SLIPC reported rat and mosquito infestations, as well as black mold, in the housing units. The report further observed that detained people were deprived of basic hygiene supplies, including toilet paper, menstrual products, and soap. As a result, detained people at SLIPC are often forced to rely on the commissary to purchase sufficient food and other basic necessities, including food, clothing, and critical hygiene products, at exorbitant inflated prices. *See, e.g.*, News Release, *Students Document Reports of Abuse at Immigration Detention Center*, Yale Law School at 2 (Jan. 17, 2025), https://perma.cc/EC3B-5Z4H.

41. A 2024 report on conditions in ICE facilities in Louisiana, for example, contains testimonials that guards at SLIPC groped several women's breasts under the pretense of searching for smuggled food, and, upon information and belief, Defendant Reyes, instructed GEO employees to point the cameras toward the showers so he could watch detained women bathe.[12] Another woman detained at SLIPC described how officers threatened to wield disciplinary infractions against detained people if they filed grievances or to place them in '"the smooth'—the solitary confinement cells, where women are stripped naked and left on a cold cell floor."[13]

42. ICE's own oversight offices have likewise documented inadequate care and grossly substandard conditions at SLIPC. Most recently, in March 2026, ODO, a division of OPR, conducted an inspection of the facility and found deficiencies in standards of "Environmental Health and Safety" and "Food Service."[14] In March 2022, the CRCL documented issues including "medical care, mental health care, conditions of detention, and environmental health and safety" and provided 47 recommendations to resolve these issues.[15]

43. A report by the Senate Judiciary Committee documented an incident at SLIPC in which a door severed a detained woman's finger, and a guard responded with laughter.[16]

---

[12] ACLU *et al.*, *Inside The Black Hole, Systemic Human Rights Abuses Against Immigrants Detained & Disappeared in Louisiana*, (Aug. 26, 2024), https://perma.cc/45S5-ZZ69.
[13] *Id*. at 57.
[14] *Inspection of the South Louisiana Detention Center, Basile, Louisiana*, U.S. Immigr. & Customs Enf't, Off. of Det. Oversight (Mar. 17–19, 2026), https://www.ice.gov/doclib/foia/odo-compliance-inspections/SouthLouisianaDetCntr_BasileLA_Mar17-19_2026.pdf [https://perma.cc/MPH7-DSQR].
[15] *See* U.S. Dep't of Homeland Sec., Off. for C.R. & C.L., *Fiscal Year 2022 Annual Report to Congress* 51 (2023), https://www.dhs.gov/sites/default/files/2023-12/23_1117_crcl_fy22-annual-report-508.pdf [https://perma.cc/7PA7-N2FL].
[16] U.S. S. Comm. On the Judiciary, Off. Of Ranking Member Dick Durbin, *Fact Sheet: Immigration Detention Oversight: What is it Really Like to be in ICE Detention? Exclusive Insights from Two Louisiana Immigration Detention Facilities*, (May 19, 2025), https://www.judiciary.senate.gov/imo/media/doc/SENATE%20JUDICIARY%20COMMITTEE%20RANKING%20MEMBER%20REVEALS%20DEVASTATING%20INSIGHTS%20INTO%20ICE%20DETENTION%20IN%20EXCLUSIVE%20SITE%20VISIT.pdf [https://perma.cc/AX5T-4MJQ].

According to witnesses, after the detained woman left for treatment, facility staff passed around the piece of her finger '"like a trophy,'" before later denying her prescribed dosage of medication despite her repeated requests.[17] This incident is consistent with other reports documenting the denial of medical care at SLIPC: officers allegedly denied detained people HIV medication, oncology appointments, and inhalers, among other medical necessities.

44. Despite these failures long and thoroughly documented by detained people, non-governmental organizations, and ICE itself, GEO has continued to operate SLIPC without taking meaningful steps to address mistreatment or otherwise improve conditions of detention. It was under these conditions of lax oversight that Defendants Reyes and Courvelle were allowed to abuse Plaintiffs.

B. Defendant Reyes Implemented a Forced Labor Scheme Designed to Coerce Plaintiffs to Perform Hard Manual Labor, Custodial Work, and Sex Acts at SLIPC.

45. One result of the well-documented poor conditions at SLIPC is an over-reliance by detained people on commissary items, because the facility does not supply adequate food and other basic necessities.[18]

46. Exploiting the desperate circumstances of the people detained at SLIPC, Defendant Reyes operated a forced labor scheme, which he referred to as a "work program." As part of this scheme, Defendant Reyes coerced transgender people and masculine-presenting LGBTQ+ detained people to perform hard manual labor, custodial work, and sex acts. Upon

[17] *Id* at 2.
[18] ACLU *et al., Inside The Black Hole, Systemic Human Rights Abuses Against Immigrants Detained & Disappeared in Louisiana* 37-39 (Aug. 26, 2024), https://www.aclu.org/documents/inside-the-black-hole [https://perma.cc/45S5-ZZ69].

information and belief, the majority of individuals targeted by Defendant Reyes identified as transgender, gender non-conforming, or LGBTQ+.

47. Defendant Reyes had access to Plaintiffs only by virtue of their detention at SLIPC, where he was employed by Defendant GEO as an Assistant Warden. According to GEO's website, the Assistant Facility Manager/Warden position "assists the Facility Administrator in developing, supervising, and implementing standards, policies, and guidelines for the facility" and "[a]ssists in overall administration of the facility." The Assistant Warden's primary duties include, among others, "direct[ing] all department functions, activities, and supervision of personnel," and the Assistant Warden is "[d]irectly responsible for performance control activities of the operations and safety sections[;] . . . ensures adequate procedures, post orders, staff, staff training methods, equipment and space are established in all operations of the security department to ensure safety and security of staff, visitors, inmates and facility"; and "responds on a 24-hour, 7-day basis to significant unusual occurrences."[19]

48. Defendant Reyes had authority over Plaintiffs and the power to control and direct them and their movements, including their placement in solitary confinement, control access to disciplinary and other records, and conduct searches of their person and property.

49. As part of this forced labor scheme, Defendant Reyes raped, otherwise sexually assaulted, and sexually harassed Plaintiffs on a routine basis.

50. Defendant Reyes regularly entered the SLIPC housing unit in the middle of the night, while Plaintiffs and other detained people were sleeping. He sexually harassed and degraded detained people in plain view. For example, Plaintiffs Luis and Mario witnessed Defendant Reyes ask a detained woman walking back to her bunk in her nightshirt, in substance,

[19] *Assistant Facility Administrator/Warden*, The GEO Group, Inc., (last visited Nov. 17, 2026), https://jobs.geogroup.com/working-at-geo/jobs/15675?lang=en-us [https://perma.cc/58ED-F4A9].

"Is that how your breasts bounce when you are fucking?" Defendant Reyes also patrolled the unit while people were sleeping and routinely took used underwear and sanitary pads from the housing unit.

51. The work shifts organized by Defendant Reyes under his forced labor program occurred late at night, between the hours of approximately 8:00 p.m. and 6:00 a.m.

52. Upon information and belief, these work shifts were not recorded in a formal logbook or shift schedule, as is standard for labor performed under a voluntary work program. In or about March 2024, after they had already been working in Defendant Reyes's forced labor scheme for several weeks without any paper trail, Luis and Mario were instructed by a GEO staff member to sign a form in English entitled "Detainee Voluntary Facility Activities Program Application." After signing the agreement, the character of Defendant Reyes's forced labor scheme did not change and the conditions of the forced labor remained identical.

53. On random nights, Defendant Reyes entered the housing units and awakened Plaintiffs Luis, Mario, and Kenia and others and brought them to perform hard manual labor and custodial work at various locations inside SLIPC, including heavy-duty cleaning work and repairs using machinery. In furtherance of his duties as the Assistant Warden, Defendant Reyes relied on this coerced labor to maintain the facility, including its physical upkeep and sanitation, at negligible cost to his employer, Defendant GEO.

54. The "shifts" were apparently random and Plaintiffs Luis, Mario, and Kenia and the other detained people subject to this scheme did not have a designated schedule.

55. At times, Defendant Reyes added minimal amounts of money to Plaintiffs' commissary accounts. Sometimes, he brought a trash bag of commissary items and gave them to Plaintiffs and others subject to the labor scheme.

56. Defendant Reyes required Luis, Mario, and Kenia to perform hard manual labor without any personal protective equipment, resulting in significant health risks and physical injuries. Despite repeated requests, Plaintiffs were denied access to gloves, face shields, and steel-toed boots. They were forced to perform this labor while exposed to harsh chemicals, dangerous equipment, and unsafe conditions. Plaintiffs routinely experienced burning eyes and nostrils and chest pain after inhaling industrial strength cleaning chemicals without any personal protective equipment. In response to their requests for personal protective equipment, Defendant Reyes asked Luis and Kenia something to the effect of: "What, you aren't strong enough?" To Mario, who is transgender, he asked, in substance: "Aren't you a man? Can't you do manly work?"

57. Defendant Reyes used his authority as the Assistant Warden to monitor surveillance cameras. According to his own statements to Plaintiffs, Defendant Reyes viewed video footage of Plaintiffs while they were naked in private spaces, including the medical unit and the bathroom. He abused his access to video footage to stalk, locate, and threaten Plaintiffs throughout the facility, including when they sought treatment in the medical unit.

58. Defendant Reyes used his position of authority to coerce information regarding Plaintiffs' family members from them or obtain information from their immigration files and wielded this information to force Plaintiffs into performing manual labor and sex acts.

59. Defendant Reyes also obtained access to Plaintiffs' family members' social media accounts and used his phone in the facility to show Plaintiffs photographs of their family members, including their minor children. He then used this information to further sexually harass and threaten Plaintiffs, repeatedly asking them personal details about their minor children, their relationship status, and sexual preferences. For example, Defendant Reyes showed another

transgender man involved in the forced labor scheme a photograph of the man's then 16-year-old teenage daughter and commented on his sexual attraction to her body, stating, in substance, that she had "a curvy body for her age" and implying that he would like to meet her. Plaintiffs feared for the safety and well-being of their family members and decided to forego in-person visitation with their family members to protect them from Defendant Reyes.

60. Defendant Reyes coerced participation in his forced labor scheme by making Plaintiffs understand that if they did not perform this labor, he would enact any number of harms against them and their families, including: subjecting them to further physical and sexual abuse; intervening in their immigration cases to secure their deportation from the United States; isolating them in solitary confinement; denying them basic human necessities; denying them medical care, including life-sustaining medical treatment for Plaintiff Jane Doe's and Plaintiff Mario's seizure conditions; and locating and physically harming their family members.

61. Plaintiffs' individual experiences of the abuse described above are detailed below.

1. Plaintiff Luis Renteria-Gonzalez

62. All of Luis's interactions with Defendant Reyes occurred between August 2023, when Luis first met Defendant Reyes, and July 2024, when Defendant Reyes stopped working at SLIPC.

63. During his detention, Luis participated in SLIPC's standard day-shift voluntary work program, in which he cleaned his assigned housing unit. In late September 2023, Defendant Reyes approached Luis about the possibility of also joining a "cleaning crew" to work an "off the books night shift program," alongside another transgender man detained at SLIPC. Incentivized by the prospect of having an opportunity to earn commissary money to buy basic essentials at SLIPC, Luis initially agreed to participate in the "cleaning crew." That month, Luis

began to perform hard manual labor at the instruction of Defendant Reyes. He quickly learned the compensation he would receive for this work came irregularly—if at all—and in negligible amounts, and instead he would be subjected to sexual abuse and forced to perform grueling and dangerous manual labor under threat of retaliation.

64. Defendant Reyes sexually assaulted Luis and subjected him to persistent sexual harassment and psychological torment. In one incident in December 2023, Luis was on his hands and knees while laying a coat of wax on the floor. Defendant Reyes approached Luis from behind and forcibly placed his groin, with his penis erect, directly against Luis's buttocks.

65. Approximately one month later, while Luis was mopping floors in the training room, Defendant Reyes came up behind him and again forcibly placed his groin, with his penis erect, directly against Luis's buttocks. He then told Luis in Spanish that his buttocks were "very firm."

66. Defendant Reyes routinely stalked Luis throughout the facility and sexually harassed him, making comments about his appearance and gender identity. Defendant Reyes repeatedly gave Luis makeup items and questioned his identity as a transgender man.

67. On another occasion, Defendant Reyes told Luis, in substance, that he "watched [Luis] shower through the cameras" and asked him why he took "so long" in the shower and why he "took a chair into the shower," ensuring with those details that Luis would know Reyes had, in fact, watched him in the shower.

68. Defendant Reyes frequently instructed Luis and others to move heavy cabinets and cinder blocks across the facility warehouse spaces. When Luis finally finished moving these objects, Defendant Reyes then instructed him to move them back to their starting position. When

Luis objected to this instruction, Defendant Reyes responded to the effect of: "If you think you are a man, I'm going to treat you like a man."

69. Luis was also physically injured by Defendant Reyes's conduct. On one occasion, a chemical Luis was given to strip coating off the facility floors burned through his fabric shoes and the skin of his feet.

70. Luis reported this injury to an ICE officer at SLIPC and was taken to the medical unit. After learning that Luis had reported and sought medical treatment for this injury, Defendant Reyes became enraged and instructed Luis not to seek medical care or intervention from other officials at SLIPC.

71. On another occasion, Luis was painting the floors in the SLIPC medical unit when a metal frame that Defendant Reyes was holding fell and landed on Luis's foot, resulting in a severe injury. Luis's foot turned black and he could not put weight on it for over two weeks. Due to fear of retaliation by Defendant Reyes, Luis did not seek medical treatment for this injury.

72. In the spring of 2024, due to consistent sexual and physical abuse, sexual harassment, and threats from Defendant Reyes, Luis reached a breaking point and told Defendant Reyes that he would no longer participate in his forced labor scheme. A few hours later, another GEO employee came to Luis's housing unit and escorted Luis and another detained person to a different housing unit, and instructed them to start cleaning it. Defendant Reyes then entered the unit and threatened Luis, demanding to know why he was refusing to work for him. Luis felt extreme emotional stress and began to cry. Defendant Reyes told Luis, in substance, that he (Defendant Reyes) was "protected by the higher ups" and there was "nothing anyone could say or do to hurt or affect him."

73. In the spring of 2024, when Luis went to the medical unit to register as transgender with ICE, Defendant Reyes approached Luis and spoke to him in Spanish. Two other GEO employees (upon information and belief, "Officer Tichy" and "Officer Lege") witnessed this interaction. Defendant Reyes asked Luis whether he was attracted to men or women. Luis told Defendant Reyes that his sexual preferences were none of the Assistant Warden's concern. An ICE officer, upon information and belief, "Officer Ruiz," then approached Luis and Defendant Reyes. Defendant Reyes told Officer Ruiz, in substance: "I don't know what is going on with Monica [Luis]. She was such a beautiful girl who always wore makeup."

74. In addition to the physical injuries he suffered during his work in the night shift program, Luis suffered extreme emotional distress related to his interactions with and abuse at the hands of Defendant Reyes.

75. In April 2024, Luis sought the assistance and intervention of ICE. Luis verbally reported the sexual abuse and harassment to the PREA officer in the SLIPC medical unit. Upon information and belief, the complaint was "dismissed as unsubstantiated" by ICE in August 2024.

76. Luis also filed multiple complaints by phone with the OIG hotline, detailing Defendant Reyes's sexual abuse and threats of physical harm.

77. On or about April 17, 2024, Luis was placed in a solitary confinement cell. Defendant Reyes told Luis something like "this is what happens" when "you aren't where you are supposed to be," referring to Luis's attempts to not participate in Defendant Reyes's forced labor scheme.

78. Luis then submitted a written statement to ICE, detailing this abuse by Defendant Reyes. The next day, on or about April 18, 2024, Defendant Reyes came to the segregated

housing unit and screamed at Luis regarding the complaint, telling him, in substance, "You should have never put my name on it!" Luis was then subjected to 14 days of solitary confinement.

79. During this time at SLIPC, Luis was also subjected to sexual abuse and harassment by another GEO employee at SLIPC who is named, upon information and belief, "Sergeant Poullard." Sergeant Poullard repeatedly handed Luis notes with words to the effect of "I know you are gay and like girls." On one occasion, in front of his housing unit, Sergeant Poullard showed Luis a sexually explicit picture of herself and stated words to the effect of, "This is a sexy dress. You wear it with no panties." This incident caused Luis significant emotional distress.

80. In May 2024, Luis filed a PREA complaint detailing the sexual harassment by Sergeant Poullard. After Luis filed this complaint, Sergeant Poullard approached him in the housing unit and said words to the effect of, "Yeah, they can't do nothing to me." Upon information and belief, the complaint was "dismissed as unsubstantiated" in July 2024.

81. Upon information and belief, Defendant Reyes voluntarily left his position at SLIPC in July 2024.

82. On or about August 6, 2024, agents from the Federal Bureau of Investigation ("FBI") interviewed Luis and others at SLIPC. Luis disclosed the sexual and physical abuse by Defendant Reyes to the FBI agents. On or about August 27, 2024, Luis was interviewed by ICE officials conducting an audit of SLIPC. Luis disclosed the sexual and physical abuse by Defendant Reyes to auditors.

83. Following his disclosure of the abuse to these entities, GEO employees targeted Luis for searches and baseless disciplinary write ups. Luis filed grievances reporting this retaliation and filed verbal reports using the DHS OIG phone hotline.

84. On or about September 23, 2024, Luis was interviewed by two ICE officials and again reported the sexual and physical abuse by Defendant Reyes. He received no additional response following these reports.

2. Plaintiff Mario Garcia-Valenzuela

85. All of Mario's interactions with Defendant Reyes occurred between February 2024 and July 2024.

86. Mario first encountered Defendant Reyes at SLIPC in February 2024, who approached him about joining a "cleaning crew" to work an "off the books night shift program." Mario was aware that other detained transgender people in his unit, including Luis, worked for Defendant Reyes in this "program." Desperate to earn commissary money to buy necessities at SLIPC, Mario initially agreed to participate in the "cleaning crew." Beginning in or about mid-February 2024, he began to perform hard manual labor at the instruction of Defendant Reyes. Like Luis, Mario quickly learned the compensation he would receive for this work came irregularly—if at all—and in negligible amounts, and instead he would be subjected to sexual abuse and forced to perform grueling and dangerous manual labor under threat of retaliation.

87. Defendant Reyes frequently instructed Mario and others to move heavy cabinets and cinder blocks across the facility warehouse spaces. When Mario finally finished moving these objects, Defendant Reyes then instructed him to move them back to their starting position. When Mario objected to this instruction, Defendant Reyes responded to the effect of: "If you think you are a man, I'm going to treat you like a man."

88. Although Mario repeatedly confirmed that his name was "Mario," Defendant Reyes and other officers at SLIPC taunted him on a near-daily basis, chanting "Maria! Maria!"

89. Mario experienced severe psychological distress, including suicidal ideation, as a result of this constant taunting and harassment, which he could not escape. He was placed in solitary confinement, in an administrative segregation "suicide watch" cell, on at least two occasions.

90. In response to this sexual harassment, Mario filed a PREA complaint with the PREA officer. He had an interview with the PREA officer, in which he described the abuse by Defendant Reyes and expressed that he felt sexually harassed on the basis of his gender identity. He requested that his transgender marker be removed from ICE and SLIPC's records. The PREA officer responded with a statement to the effect of, "even if we take off your transgender marker, there is no hiding that you are transgender," referring to Mario's physical appearance. No additional action was taken by Defendants.

91. On or about April 17, 2024, at the same time as Luis, Mario was placed in a solitary confinement cell. Defendant Reyes instructed the officers to keep Mario separated from Luis in the solitary confinement unit. Mario was subjected to 14 days of solitary confinement.

92. After he was released from solitary confinement, on or about May 2, 2024, Mario attempted to report Defendant Reyes's abuse to the Warden of SLIPC, but Defendant Reyes refused to allow Mario to speak to the Warden. Defendant Reyes then instructed officers to handcuff Mario and take him back to a solitary confinement cell. At the direction of Defendant Reyes, a GEO employee at SLIPC named, upon information and belief, "Officer Tichy," approached Mario in the Bravo hallway and informed him that he was going to solitary confinement. A group of approximately five GEO employees, all upon information and belief,

correctional officers, then surrounded Mario, threw him to the ground, handcuffed him, and slammed his face against the floor.

93. While they transported Mario to the cell, one officer grabbed Mario's left wrist—which he had recently had surgery to repair—and tightly squeezed the bone, causing Mario excruciating pain. This is the same wrist that kidnappers in Mexico had cut down to the bone when attempting to cut off Mario's hand. The officers laughed and mocked Mario's screams. The officer then tightened the handcuffs on Mario's wrists, causing severe pain. After this incident, Mario's wrists were bruised and swollen.

94. Mario began to experience suicidal ideation and was placed on suicide watch in segregation. The officers forcefully stripped him naked and mocked his body. Afterwards, Defendant Reyes went to the solitary confinement unit where Mario was being held and asked Mario in a threatening manner, whether Mario "liked him."

95. Mario was subjected to an additional five days of solitary confinement. After release from solitary confinement, Mario filed a written report to ICE describing the retaliation and physical abuse he had experienced. Approximately seven days after the incident, Mario was taken to the medical unit and received an x-ray of his wrist but never received the x-ray results or any additional medical information.

96. After Defendant Reyes left his position at SLIPC in July 2024, on or about August 6, 2024, agents from the FBI interviewed Mario and others at SLIPC. Mario disclosed the sexual harassment and physical abuse by Defendant Reyes to the FBI agents. On or about August 27, 2024, Mario was interviewed by ICE officials conducting an audit of SLIPC. Mario disclosed the sexual harassment and physical abuse by Defendant Reyes to auditors.

97. Following his disclosure of the abuse to these entities, GEO employees at SLIPC targeted Mario for searches and baseless disciplinary write-ups. Mario filed grievances reporting this retaliation and filed verbal reports using the DHS OIG phone hotline located within SLIPC. He received no additional response following these reports.

3. Plaintiff Kenia Campos-Flores

98. Kenia first encountered Defendant Reyes at SLIPC in May 2024, when Defendant Reyes approached Kenia about joining a "cleaning crew" to work an "off the books night shift program," alongside other transgender people detained at SLIPC, including Luis and Mario. That month, incentivized by the opportunity to earn money to buy essential items from the SLIPC commissary, Kenia began to perform hard manual labor at the instruction of Defendant Reyes. Like Luis and Mario, Kenia quickly learned the compensation they would receive for this work came irregularly—if at all—and in negligible amounts, and instead they would be subjected to sexual abuse and forced to perform grueling and dangerous manual labor under threat of retaliation.

99. During their participation in his late-night labor scheme, Defendant Reyes sexually harassed Kenia, making comments about their appearance and gender identity on a near daily basis. These included derogatory comments about Kenia's choice of hair style and dress, and questions about their family and sexual preferences, including invasive questions about the conception and birth of Kenia's minor children. The pervasive harassment from Defendant Reyes and questions about their children made Kenia feel unable to decline ongoing participation in the night shift program.

100. When other people subjected to Defendant Reyes's labor scheme filed complaints against him under PREA, Reyes demanded that Kenia find out who reported him. When Kenia

refused, he said in substance, "Watch out, we are watching you." After this, Defendant Reyes became increasingly hostile and aggressive towards Kenia, forcing them to perform continuous hard manual labor and custodial work during the late-night labor scheme without breaks or rest. Other GEO employees began to harass Kenia, warning them, in substance to "watch out." Following this harassment, Kenia filed at least two complaints using the DHS OIG phone hotline, detailing this abuse. During this time, Kenia was placed in solitary confinement on two occasions in retaliation for refusing Defendant Reyes's demands, for approximately four days and seven days respectively.

101. On or about November 29, 2024, Kenia was deported to El Salvador. They continue to suffer ongoing emotional distress from their mistreatment and abuse by Defendant Reyes.

4. Plaintiff Jane Doe

102. Jane Doe first encountered Defendant Reyes shortly after arriving at SLIPC in November 2023. Without introducing himself, Defendant Reyes asked Jane Doe for her name, country of origin, personal contact information, and immigration sponsor contact information. Believing him to be an ICE officer, Jane Doe provided him with the information, including her own cell phone number and the name, address, and phone number of her mother, who lives in Jane Doe's country of origin. Jane Doe later learned from other detained people that Defendant Reyes was not an ICE officer but rather an employee of GEO.

103. Defendant Reyes approached Jane Doe about her participation in his "cleaning crew." Because of her health conditions, including her epilepsy, Jane Doe declined to participate. But when she declined his offer, Defendant Reyes became enraged and stated something to the effect of: "Don't worry about it, you'll come work for me."

104. Following her refusal to participate in his forced labor scheme, Defendant Reyes began to persistently sexually harass and stalk Jane Doe within SLIPC. Eventually, this treatment led to sexual assault.

105. Beginning in November 2023, Defendant Reyes learned Jane Doe's schedule, including what time she was required to go to the SLIPC medical unit to receive her seizure medication. When Jane Doe went to the medical unit to receive her medication, Defendant Reyes regularly waited for her in the hallway outside the medical unit. He persistently made inappropriate and aggressive sexual comments to her. For example, on one occasion, he made a statement to the effect of, "you have a nice body," and asked her if her "butt was fake" and "whether she had had plastic surgery." When Jane Doe asked him to stop making the comments because they were making her uncomfortable, Defendant Reyes stated, in substance, "a lot of things are going to make you uncomfortable." On another occasion, Defendant Reyes, referring to the fact that he had Jane Doe's mother's address in her country of origin, stated in substance, "you know [country of origin] isn't too big. I can find you there. I used to work there."

106. These near-daily instances of sexual harassment continued to escalate. For example, in January 2024, Defendant Reyes approached Jane Doe as she left the medical unit. He asked if she was okay and forcefully grabbed her hands. Jane Doe moved away from him and said words to the effect of, "Please leave me alone." A few weeks later, Defendant Reyes approached Jane Doe in the kitchen and asked her if she had told everyone that he was her "boyfriend." Jane Doe replied "no" and walked away.

107. In February 2024, an officer in the housing unit instructed Jane Doe to go to the warehouse to get sanitation and hygiene items. Once she was in the warehouse, in a back corner by the shampoo supply, Defendant Reyes approached Jane Doe from behind and trapped her

against the wall. He began groping her breasts and genitals with his hands. He forcefully moved his hands underneath her clothing and touched her breasts and genitals. Jane Doe 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 Jane Doe and allowed her to return to the housing unit.

108. After this incident, Jane Doe experienced significant emotional distress. She was unable to sleep and had recurring nightmares and flashbacks. Jane Doe filed a PREA complaint with a PREA officer by paper form and through the phone hotline. She received no response and no action was taken by Defendants.

109. For four months, from approximately February to May 2024, Defendant Reyes repeatedly stalked and cornered Jane Doe in the warehouse or medical hallway, locations he told her were "camera blind spots" in the facility. He forced her to perform oral sex on him on nearly a daily basis, threatening to kill her if she refused.

110. When Jane Doe attempted to resist performing oral sex on Defendant Reyes, he threatened her. He told her she would be sent to "the smooth," or the solitary confinement unit where detained people are held without clothing, and stated, in substance, that "your family will know everything" and "I know where you are. I know where your family is. In [country of origin], 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."

111. Based on these threats, Jane Doe believed that if she refused to perform oral sex, Defendant Reyes would secure her deportation from the United States and instruct people he was in contact with in her country of origin to find and kill her. This abuse caused Jane Doe extreme

emotional distress. She suffered from insomnia, nightmares, flashbacks, extreme anxiety, intrusive thoughts, and increased stress.

112. In the spring of 2024, Defendant Reyes blocked Jane Doe as she was leaving the medical unit and trapped her in the hallway. He began to look at her body. She excused herself and attempted to walk away, but he blocked her way. He then groped her buttocks using his hands and began to rub his groin against her buttocks. Jane Doe attempted to flee and said, in substance, "Please stop and leave me alone." Defendant Reyes responded by smiling and saying something to the effect of: "What are you going to do? There's nothing you can do. Remember I can say hi to your mom." After this incident, Jane Doe filed an additional PREA complaint with a PREA officer by paper form. She received no response, and no action was taken by Defendants.

113. After she filed this PREA complaint, Jane Doe was sent to solitary confinement for three days. GEO employees did not serve Jane Doe with any notification of the reason for her placement in the segregated housing unit or any alleged disciplinary violations.

114. While she was in the solitary confinement cell, Defendant Reyes approached Jane Doe. He laughed and said in substance: "You're supposed to be more submissive because you're [nationality]. You have an attitude. If you were just submissive, you would have had all this special treatment in here."

115. Approximately two days later, when she was back in her dorm, Defendant Reyes entered Jane Doe's housing unit at approximately 2:00 a.m. Jane Doe awoke to Defendant Reyes inappropriately touching her body while shaking her awake. He told her he needed to search her bunk. Jane Doe replied that she needed privacy to put on clothes, but Defendant Reyes refused and forced her out of her bed. Defendant Reyes 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.

116. Later that month, Defendant Reyes approached Jane Doe when she entered the bathroom in the processing area of SLIPC. Defendant Reyes blocked Jane Doe from exiting the bathroom and told her, in substance, that he was "masturbating to her because he saw her body in medical when she was in an observation cell." She responded something like, "You are sick." Defendant Reyes smiled and said something like, "I have been masturbating to you. I have eyes everywhere." He then referred to a specific day Jane Doe had been in the medical unit, February 28, 2024, and told her in substance that he had access to "all of the video."

117. After this incident, Jane Doe began to experience significant emotional distress and her mental and physical health deteriorated. Her seizure activity began to rapidly increase in frequency. She filed an additional PREA complaint with a PREA officer. In response, a GEO employee, upon information and belief, Officer Guillory, met with Jane Doe and watched the surveillance video from the processing area that, upon information and below, captured the incident described in Paragraph 116 above. Officer Guillory acknowledged the video, but she took no further action.

118. In addition to the PREA complaint that prompted the interview with Officer Guillory, Jane Doe filed multiple grievances and made verbal reports of this abuse to SLIPC personnel, including medical personnel, as documented in her medical records.

119. During the spring of 2024, Defendant Reyes began to restrict Jane Doe's movement at SLIPC. When Jane Doe attempted to leave the dorm for her hour of outdoor recreation time or any other reason, the GEO officer in her housing unit told her she was not allowed out of the dorm, according to rules Defendant Reyes had set.

120. Reyes's restrictions on her movement in the facility prevented Jane Doe from accessing medical care. For example, on or about May 3, 2024, Jane Doe 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 GEO officer refused to allow her to leave the dorm, referring to "Assistant Warden Reyes's orders." This caused Jane Doe extreme emotional distress and physical pain, as her arm continued to throb and swell without medical treatment.

121. Finally, thirty minutes later, the GEO officer escorted Jane Doe to the medical unit. As she exited the medical unit, Defendant Reyes blocked her path and stated in a threatening manner that Jane Doe's ICE officer "knows all about" what is happening, implying that he (Defendant Reyes) had the ability to impact her immigration case. Jane Doe then approached a nearby ICE officer named, upon information and belief, Officer Ruiz, and verbally reported that Defendant Reyes was sexually assaulting and harassing her. She then wrote a formal grievance to ICE detailing her sexual abuse by Defendant Reyes.

122. The next day, Defendant Reyes approached Jane Doe and stated something to the effect of, "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."

123. On or about May 15, 2024, Jane Doe filed another PREA complaint detailing the sexual abuse and harassment by Defendant Reyes. No further action was taken by Defendants.

124. Prior to her detention by ICE, Jane Doe 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 Jane Doe's epilepsy diagnosis and recorded it in her medical records. However, during her 14 months in ICE custody at SLIPC, facility staff repeatedly denied Jane Doe access

to her seizure medications. Jane Doe was also denied access to a neurologist for the entirety of her 14-month detention at SLIPC.

125. Triggered by stress, Jane Doe's seizures became more frequent and increased in intensity, beginning in February 2024, following the escalation of sexual abuse by Defendant Reyes.

126. Jane Doe's 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.

127. After Defendant Reyes's departure in July 2024, Jane Doe experienced ongoing abuse and retaliation by other GEO employees at SLIPC in the form of placement in solitary confinement and medical neglect. In August 2024, GEO employees targeted Jane Doe for searches and baseless disciplinary write ups. On one occasion, after Jane Doe filed a grievance regarding a wrongfully confiscated bath towel, the GEO officer named in the grievance said words to the effect of, "I wish I could slap your face."

128. On or about August 6, 2024, agents from the FBI interviewed Jane Doe and others at SLIPC. Jane Doe disclosed the sexual and physical abuse by Defendant Reyes to the FBI agents. On or about August 7, 2024, Jane Doe was subjected to five days of solitary confinement, resulting in at least four severe seizures that left her with face numbness.

129. GEO personnel at SLIPC routinely denied Jane Doe access to emergency medical care in response to her seizures in the housing unit. For example, in December 2023, Jane Doe had a severe seizure and lost consciousness. GEO personnel provided no initial emergency medical response. Instead, they brought a stretcher near the housing unit in an external hallway and forced Jane Doe to get up and walk to the stretcher. On another occasion, officials placed

Jane Doe into a wheelchair while she was unconscious, post-seizure. She fell out of the wheelchair and into a concrete wall, injuring herself. On a separate occasion, post-seizure, medical personnel instructed Jane Doe 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.

130. On multiple occasions throughout her 14-month detention, Jane Doe 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, shortly after Defendant Reyes had begun his pattern of sexual harassment and abuse, Jane Doe had a series of severe near-daily seizures. Following these seizures, in a weakened post-ictal state, Jane Doe 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, GEO personnel at SLIPC instructed Jane Doe 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, Jane Doe requested to remain in the general housing unit. In order to receive her daily seizure medication, Jane Doe was required to go to the medical unit at SLIPC three times per day. Jane Doe filed multiple grievances to ICE and GEO detailing this mistreatment and neglect.

131. On January 6, 2025, Jane Doe was deported to her country of origin. Jane Doe continues to suffer from severe pain in her back. She also continues to suffer ongoing emotional distress from her mistreatment, abuse, and repeated rape by Defendant Reyes.

C. Defendant Courvelle Subjected Plaintiffs Mario and Luis to Harassment and Abuse, Which They Reported, Resulting in Retaliation by GEO Employees.

132. In April 2025, Luis and Mario were forced by Defendant Courvelle, a detention officer at SLIPC employed by GEO, to facilitate his access to another detained woman in their unit who he was sexually abusing.

133. Defendant Courvelle repeatedly called Luis and Mario to the medical unit and other areas of the facility and forced them to pass the woman letters and notes he had written.

134. When he passed the letters to Mario, Defendant Courvelle made sexual comments and gestures to Mario and inappropriately grabbed and massaged his hands.

135. On an almost daily basis from April through July 2025, Defendant Courvelle demanded that Luis and Mario stand guard outside a janitorial closet while he sexually assaulted a woman behind the closed closet door. Luis and Mario complied for fear that Defendant Courvelle would retaliate against them or harm them if they refused.

136. Defendant Courvelle sexually assaulted Mario on three occasions.

137. In May 2025, near the front entry of the SLIPC facility, while returning from the chow hall, Defendant Courvelle cornered Mario and forcibly pressed his genitals against Mario's backside for approximately one minute. Defendant Courvelle laughed and then let Mario walk away.

138. In June 2025, Defendant Courvelle cornered Mario in the sally port area between the officer station and the janitorial closet, which is, upon information and belief, a known camera blind spot. Defendant Courvelle forcibly groped Mario's chest and genitals. He then laughed and walked away.

139. Defendant Courvelle sexually assaulted Mario again in July 2025, in the same sally port location, groping his chest and genitals.

140. Defendant Courvelle also frequently made sexual and threatening comments to Mario. Defendant Courvelle instructed the woman he was abusing to ask Mario in Spanish something to the effect of, "if he wants to come to the closet with us," implying his desire to rape Mario.

141. On or about June 21, 2025, using his access to information as a detention officer, Defendant Courvelle learned that Luis's and Mario's family members, including children, were coming to Basile, Louisiana, for family visitation in detention. When the families arrived at their hotel in Basile the evening before visitation, Defendant Courvelle was waiting for them in the parking lot. He approached the family members and attempted to speak to them. The family members feared for their safety and attempted to avoid Defendant Courvelle, but he continued to harass them for approximately 20 minutes before leaving the hotel parking lot. After family visitation, Defendant Courvelle approached Luis and Mario in the facility and questioned them about their families.

142. After this incident, Luis and Mario decided to forego family visitation at SLIPC out of fear that Defendant Courvelle would again locate, stalk, and harass their family members.

143. On or about July 2, 2025, a medical provider at the facility, who, upon information and belief, is named "Dr. Heinen," discontinued all of Mario's medications without explanation, including his daily seizure medication. Mario filed several grievances and submitted complaints about the denial of access to his seizure medication. His access to his seizure medication was not restored until on or about October 12, 2025, after he was hospitalized following a severe seizure.

144. On or about July 12, 2025, Defendant Courvelle attempted to enter Luis's housing unit. He instructed another detained person to wake Luis up because he had the "toilet paper that Luis had requested." When Luis exited the unit and approached Defendant Courvelle, Defendant

Courvelle became enraged and started shaking and strangling the roll of toilet paper in his hand and said, in substance, "I could kill you right now. We had a forty-minute window but you were too busy sleeping," referring to Luis's unavailability to act as a guard outside the janitorial closet so he could sexually abuse the detained woman.

145. In addition to reporting the abuse inflicted by Defendant Reyes, Luis and Mario were also witnesses interviewed during the FBI's investigation into the sexual abuse of the detained woman by Defendant Courvelle.

146. Mario reported the May, June, and July incidents of sexual abuse he endured to FBI officers investigating Defendant Courvelle.

147. Both Luis and Mario experienced severe retaliation from GEO employees at SLIPC after reporting this abuse, speaking to the media,[20] and participating in the FBI's investigation. Specifically, on October 9, 2025, both Luis and Mario were placed in solitary confinement under similar circumstances and without justification.

148. That morning, a GEO employee approached Luis in the dormitory at approximately 8:30 a.m. and instructed him that he "had a sick call in the medical unit." Luis had not placed a sick call request and was unaware of any scheduled medical appointment. He was then escorted to the medical unit. Once inside the medical unit, Luis asked another GEO employee why he was brought to the medical unit. The GEO employee responded that she believed Luis was going to see a healthcare provider but did not have additional information.

149. Luis then saw that the door of the medical unit was locked, and that GEO SLIPC employees, including, on information and belief, a major and multiple sergeants, had gathered

[20] *See* Maanvi Singh, *Queer and trans immigrants allege forced labor and sexual assault in Ice facility: 'I was treated worse than an animal'*, The Guardian (Oct. 16, 2025), https://www.theguardian.com/us-news/2025/oct/16/ice-immigration-queer-trans-louisiana [https://perma.cc/UT52-U79L]

in the hallway outside the medical unit. A GEO employee told Luis the officers needed to speak with him, and he was escorted from the medical unit into a holding room. Luis was told that he was going to the solitary confinement unit, known as the Segregated Housing Unit or the "SHU." Luis asked why he was being taken to the SHU but no one would communicate the reason. Luis then asked to call his attorney, but the GEO employees refused.

150. Luis was taken out of the holding room. In the hallway between the medical unit and the SHU, approximately six GEO detention officers in tactical gear surrounded Luis. Upon information and belief, the officers were members of the Correctional Emergency Response Team ("CERT").

151. CERT is a tactical unit within SLIPC, made up of GEO employees, tasked with handling high-risk security situations.

152. Although Luis was not resisting, approximately six CERT officers then forcibly dragged Luis through the hallway, tightly gripping his arms and legs. As they dragged Luis, the officers also forcibly removed his shirt, exposing his chest. Luis continually vocalized that he was not resisting and only wanted to know the reason for his placement in the SHU.

153. The officers ignored Luis, lifted him from the ground, and slammed him into a wheelchair. As they pushed him in the wheelchair, his foot caught a lip on the concrete floor. The officers forcibly pushed the wheelchair, causing extreme pain to Luis's leg. Luis then toppled from the chair and slammed into the concrete floor. This incident left bruises on Luis's arms and legs and his foot became swollen and painful to the touch.

154. The officers put Luis on a stretcher and wheeled him to the medical unit. The medical provider, on information and belief, "Dr. Heinen," performed no medical assessment of

Luis, but instead laughed when he saw him and said something like, "She is fine. You can take her to the smooth."

155. The officers refused to provide any explanation or documentation justifying Luis's placement in solitary confinement.

156. Luis was denied meals for the remainder of that day.

157. In significant pain, Luis placed multiple sick call requests over the course of several days, but these requests were ignored. Finally, approximately one week after the incident, a nurse in the medical unit provided Luis with pain medication.

158. On or about October 14, 2025, Luis received a disciplinary hearing and was sentenced to seven days of disciplinary segregation for "refusal to comply with staff orders."

159. Luis was held in solitary confinement for a total of 43 continuous days, from October 9 through November 22, 2025.

160. Once released back to the general housing unit, Luis continued to face unjustified searches of his belongings in retaliation. On or about November 24, 2025, the CERT team came into the unit and searched Luis's belongings, confiscating his commissary items.

161. Mario was likewise placed in solitary confinement without justification on October 9, 2025. That morning at about 10:00 a.m., a GEO employee approached Mario in the dormitory and instructed him to report for a sick call in the medical unit. Mario had not placed a sick call and was unaware of any scheduled medical appointment.

162. Outside his dormitory, Mario was approached by several CERT officers, who informed Mario that he was being placed in solitary confinement. The officers refused to provide any explanation or documentation justifying Mario's placement in solitary confinement.

163. Mario was denied meals for the remainder of that day.

164. Mario never received any disciplinary write-up or justification for his placement in segregation. On a near-daily basis, Mario asked officers why he was in solitary and how long he would be in solitary confinement. The officers refused to provide any information.

165. Mario remained in solitary confinement for 34 days, from October 9 through November 12, 2025.

166. During the time he was held in the SHU, Mario was repeatedly denied access to his daily seizure medication. When he did receive medication, it was frequently given at the wrong time.

167. As a result of the extreme stress of being placed in solitary confinement and exacerbated by the disruption in his medication regimen, Mario suffered at least ten seizures in the SHU at SLIPC from October 2025 through November 2025. The constant buzzing noises from the security door further triggered Mario's epilepsy.

168. When Mario was placed in SHU, SPLIC staff removed him from medical monitoring. On multiple occasions, Luis, detained in the cell next to Mario's, had to scream for medical assistance. On one occasion, Mario told Luis that he thought he was going to die, and asked Luis to call the officer; he then had a severe seizure and lost consciousness. Luis screamed for help and banged on the cell door for more than five minutes before an officer entered the SHU to provide assistance.

169. These seizures resulted in Mario's emergent hospitalization on or about October 11, 2025. On this date, Mario began to experience auditory hallucinations and suicidal ideations. After he was returned from the hospital, Mario had another severe seizure in the solitary confinement cell at SLIPC on or about October 12, 2025.

170. Mario submitted multiple complaints and grievances regarding his detention in the SHU during October and November 2025.

171. On or about November 12, 2025, Mario was deported to Mexico. He continues to suffer ongoing emotional distress from his mistreatment and abuse by Defendant Reyes, Defendant Courvelle, and other officials at the facility.

172. On or about December 31, 2025, Luis was deported to Mexico. He continues to suffer ongoing emotional distress from his mistreatment and abuse by Defendant Reyes, Defendant Courvelle, and other officials at the facility.

173. On June 26, 2026, David Courvelle was sentenced to three years in federal prison after he pled guilty to Sexual Abuse of a Ward on December 29, 2025.[21]

V. CLAIMS FOR RELIEF

COUNT I: FORCED LABOR (TVPRA)

All Plaintiffs Against Defendant Emmanuel Reyes

18 U.S.C. §§ 1589; 1595(a)

174. Plaintiffs repeat and re-allege the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

175. The Trafficking Victims Protection Reauthorization Act prohibits anyone from

> knowingly provid[ing] or obtain[ing] the labor or services of a person by any one of, or by any combination of, the following means--(1) by means of force, threats of force, physical restraint, or threats of physical restraint to that person or another person; (2) by means of serious harm or threats of serious harm to that person or another person; (3) by means of the abuse or threatened abuse of law or legal process; or (4) by means of any scheme, plan, or pattern intended to cause the person to believe that, if that person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint[.]

[21] Judgment, *United States v. Courvelle*, No. 25-cr-00354-RRS-DJA-1 (W.D. La. July 26, 2026), ECF No. 21.

18 U.S.C. § 1589(a). The TVPRA provides a private right of action that permits aggrieved parties to recover damages and attorneys' fees. 18 U.S.C. § 1595(a).

176. Under 18 U.S.C. § 1589(a), in addition to manual labor, forced sex acts also constitute labor.

177. "The term 'abuse or threatened abuse of law or legal process' means the use or threatened use of a law or legal process, whether administrative, civil, or criminal, in any manner or for any purpose for which the law was not designed, in order to exert pressure on another person to cause that person to take some action or refrain from taking some action." 18 U.S.C. § 1589 (c)(1).

178. "The term 'serious harm' means any harm, whether physical or nonphysical, including psychological, financial, or reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing labor or services in order to avoid incurring that harm." 18 U.S.C. § 1589(c)(2).

179. Forced sexual acts constitute "labor or services" within the meaning of the TVPRA. *See Bistline v. Parker*, 918 F.3d 849, 872 (10th Cir. 2019) (quoting *Ricchio v. McLean*, 853 F.3d 553, 556 (1st Cir. 2017)) ("Labor or services in § 1589 is not limited to work in an economic sense and extends to forced sexual acts."); s*ee also United States v. Kaufman*, 546 F.3d 1242, 1263 (10th Cir. 2008) ("[W]e are persuaded that the involuntary servitude and forced labor statutes apply to coerced acts other than 'work in an economic sense.'").

180. Plaintiffs were each subjected to forced labor within the meaning of 18 U.S.C. § 1589(a).

181. Defendant Reyes violated the TVPRA when he coerced Plaintiffs into performing mandatory, uncompensated custodial work, other forms of hard labor, and nonconsensual sex acts. Defendant Reyes coerced this labor through threats of further sexual abuse, physical harm, deportation, and isolation in solitary confinement if Plaintiffs refused to perform such labor.

182. Using force, restraint, and abuse of law or process within the meaning of 18 U.S.C. § 1589, Defendant Reyes knowingly forced Luis to perform hard manual labor, custodial work, and sex acts, including being subject to groping and sexual touching. Specifically, Defendant Reyes:

a. Forced Luis to perform hard manual labor, custodial work, and sex acts, including being subject to forced sexual touching, in areas where he could not easily escape;

b. Used physical force to make Plaintiff Luis perform these sex acts;

c. Used his status as Assistant Warden with the power to control and direct detained people and their movements, control access to disciplinary and other records, and conduct searches, in order to facilitate the forced labor and sex acts;

d. Threatened abuse of process in the form of isolation in solitary confinement, warrantless searches, and other disciplinary actions if he did not perform this forced labor and sex acts;

e. Threatened abuse of process in the form of deportation from the United States if Luis did not perform this forced labor and sex acts;

f. Threatened physical harm and further sexual abuse if Luis did not perform this forced labor and sex acts;

g. Stalked and threatened physical harm to Luis's family members if he did not perform this forced labor and sex acts;

h. Restricted Luis's access to basic necessities, including sanitation supplies and clothing items, if he did not perform this forced labor and sex acts.

183. Using force, restraint, and abuse of law or process within the meaning of 18 U.S.C. § 1589, Defendant Reyes knowingly forced Mario to perform hard manual labor, and custodial work. Specifically, Defendant Reyes:

a. Forced Mario to perform hard manual labor and custodial work in areas where he could not easily escape;

b. Used physical force to make Mario perform this hard manual labor and custodial work;

c. Used his status as Assistant Warden with the power to control and direct detained people and their movements, control access to disciplinary and other records, and conduct searches, in order to facilitate the forced labor;

d. Threatened abuse of process in the form of isolation in solitary confinement, warrantless searches, and other disciplinary actions if he did not perform this forced labor;

e. Threatened abuse of process in the form of deportation from the United States if Plaintiff Mario did not perform this forced labor;

f. Threatened physical harm and sexual abuse if he did not perform this forced labor;

g. Stalked and threatened physical harm to Mario's family members if he did not perform this forced labor;

h. Restricted access to basic necessities and medical care for his seizure condition if he did not perform this forced labor.

184. Using force, restraint, and abuse of law or process within the meaning of 18 U.S.C. § 1589, Defendant Reyes knowingly forced Kenia to perform hard manual labor and custodial work. Specifically, Defendant Reyes:

a. Forced Kenia to perform hard manual labor and custodial work in areas where Kenia could not easily escape;

b. Used his status as the Assistant Warden with the power to control and direct detained people and their movements, control access to disciplinary and other records, and conduct searches, in order to facilitate the forced labor;

c. Threatened abuse of process in the form of isolation in solitary confinement, warrantless searches, and other disciplinary actions if Kenia did not perform this forced labor;

d. Threatened abuse of process in the form of deportation from the United States if Kenia did not perform this forced labor;

e. Threatened physical harm and sexual abuse if Kenia did not perform this forced labor;

185. Using force, restraint, and abuse of law or process within the meaning of 18 U.S.C. § 1589, Defendant Reyes knowingly forced Jane Doe to perform labor in the form of sex acts, including oral sex, groping, and sexual touching. Specifically, Defendant Reyes:

a. Forced Jane Doe to perform these sex acts in areas where she could not easily escape;

b. Used physical force to make Jane Doe perform these sex acts;

c. Used threats to her life to make Jane Doe perform these sex acts;

d. Used his status as the Assistant Warden with the power to control and direct detained people and their movements, control access to disciplinary and other records, and conduct searches, in order to facilitate the forced sex acts;

e. Threatened abuse of process in the form of isolation in solitary confinement, warrantless searches, and other disciplinary actions if Jane Doe did not perform these sex acts;

f. Threatened abuse of process in the form of deportation from the United States if Jane Doe did not perform these sex acts;

g. Threatened physical harm and sexual abuse if Jane Doe did not perform these sex acts;

h. Stalked and threatened physical harm to Jane Doe's mother, including threats on her life, if Jane Doe did not perform these sex acts;

i. Restricted access to basic necessities and medical care, including daily medical care for her seizure condition, if Jane Doe did not perform these sex acts.

186. The conduct of Defendant Reyes has caused Plaintiffs serious harm, including physical, psychological, emotional, and financial harm.

COUNT II: FORCED LABOR (TVPRA)

All Plaintiffs Against Defendant GEO Group, Inc.

18 U.S.C. §§ 1589, 1595(a)

187. Plaintiffs repeat and re-allege the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

188. Liability under the TVPRA extends to anyone who "knowingly benefits, or attempts or conspires to benefit, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of" the TVPRA. 18 U.S.C. § 1595(a).

189. *Venture Liability.* Defendant GEO knowingly benefited from the forced labor venture undertaken by Defendant Reyes. Defendant GEO benefited by saving costs associated with upkeep of SLIPC as a result of the uncompensated manual labor and custodial work performed by Luis, Mario, and Kenia, in violation of 18 U.S.C. § 1589.

190. Defendant GEO knew, or should have known, that this forced labor venture violated the TVPRA.

191. *Vicarious Liability.* Because Defendant Reyes was acting within the course and scope of his employment when he forced Luis, Mario, and Kenia to perform manual labor and custodial work and when he forced Luis and Jane Doe to perform sex acts, Defendant GEO, as Defendant Reyes's employer, is also vicariously liable for Defendant Reyes's violations of the TVPRA, 18 U.S.C. § 1589.

192. The conduct of Defendant GEO has caused Plaintiffs serious harm, including physical, psychological, emotional, and financial harm.

COUNT III: INVOLUNTARY SERVITUDE (TVPRA)

All Plaintiffs Against Defendant Emmanuel Reyes

18 U.S.C. §§ 1584, 1595(a)

193. Plaintiffs repeat and re-allege the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

194. The TVPRA prohibits the knowing and willful "hold[ing] to involuntary servitude [of] any . . . person for any term." 18 U.S.C. § 1584(a). The TVPRA provides a private right of action that permits aggrieved parties to recover damages and attorneys' fees. 18 U.S.C. § 1595(a).

195. For purposes of 1584(a), "involuntary servitude" is "a condition of servitude in which the victim is forced to work for the defendant by the use or threat of physical restraint or injury or by the use or threat of coercion through law or the legal process." *United States v. Kozminski*, 487 U.S. 931, 108 S. Ct. 2751, 101 L. Ed. 2d 788 (1988). A victim's "special vulnerability may be relevant in determining whether a particular type or a certain degree of physical or legal coercion is sufficient to hold that person to involuntary servitude." *Id.* at 948. For example, "threatening . . . an immigrant with deportation could constitute the threat of legal coercion that induces involuntary servitude." *Id.*

196. Plaintiffs were each held in involuntary servitude as that term is used in 18 U.S.C. § 1584(a).

197. Defendant Reyes violated the TVPRA when he knowingly and willingly held Plaintiffs in a condition of compulsory service at SLIPC and forced Plaintiffs to perform custodial work, other forms of hard labor, and forced sex acts. 18 U.S.C. § 1584(a).

198. Defendant Reyes forced Luis and Jane Doe to engage in non-consensual sex acts by use of physical restraint and actual physical harm in the form physical coercion, threats of deportation, and threats that refusal to perform such acts would lead to their being subjected to physical harm and discipline, including isolation in solitary confinement. 18 U.S.C. § 1584(a).

199. Employing the tactics as alleged in Paragraph 182, *supra*, Defendant Reyes knowingly and willingly held Luis in a condition of compulsory service at SLIPC and forced

him to perform custodial work, other forms of hard labor, and sex acts, in violation of 18 U.S.C. § 1584(a).

200. Employing the tactics as alleged in Paragraph 183, *supra*, Defendant Reyes knowingly and willingly held Mario in a condition of compulsory service at SLIPC and forced him to perform custodial work and other forms of hard labor, in violation of 18 U.S.C. § 1584(a).

201. Employing the tactics as alleged in Paragraph 184, *supra*, Defendant Reyes knowingly and willingly held Kenia in a condition of compulsory service at SLIPC and forced them to perform custodial work and other forms of hard labor, in violation of 18 U.S.C. § 1584.

202. Employing the tactics as alleged in Paragraph 185, *supra*, Defendant Reyes knowingly and willingly held Jane Doe in a condition of compulsory service at SLIPC and forced her to perform sex acts in violation of 18 U.S.C. § 1584.

203. Defendant Reyes's conduct has caused Plaintiffs serious harm including physical, psychological, emotional, and financial harm.

COUNT IV: INVOLUNTARY SERVITUDE (TVPRA)

All Plaintiffs Against Defendant GEO Group, Inc.

18 U.S.C. §§ 1584, 1595(a)

204. Plaintiffs repeat and re-allege the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

205. Liability under the TVPRA extends to anyone who "knowingly benefits, or attempts or conspires to benefit, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of" the TVPRA. 18 U.S.C. § 1595(a).

206. *Venture Liability.* Defendant GEO knowingly benefited from the forced labor venture undertaken by Defendant Reyes. Defendant GEO benefited by saving costs associated

with upkeep of SLIPC as a result of the uncompensated manual labor and custodial work performed by Luis, Mario, and Kenia, in violation of 18 U.S.C. § 1584.

207. Defendant GEO knew, or should have known, that this involuntary servitude violated the TVPRA.

208. *Vicarious Liability.* Because Defendant Reyes was acting within the course and scope of his employment when he forced Luis, Mario, and Kenia to perform manual and custodial labor and forced Plaintiffs Luis and Jane Doe to perform sex acts, Defendant GEO, as Reyes's employer, is also vicariously liable for Reyes's violation of 18 U.S.C. § 1584.

209. Defendant GEO's conduct has caused Plaintiffs serious harm including physical, psychological, emotional, and financial harm.

COUNT V: SEXUAL ASSAULT

Plaintiffs Jane Doe and Luis Renteria-Gonzalez
Against Defendants Emmanuel Reyes and GEO Group, Inc.
LA. CIV. CODE arts. 2315, 2317, 2320

210. Plaintiffs repeat and re-allege the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

211. Louisiana law provides that "[e]very act whatever of man that causes damage to another obliges him by whose fault it happened to repair it." LA. CIV. CODE art. 2315.

212. Likewise, under Louisiana law, "employers are answerable for the damage occasioned by their servants and overseers, in the exercise of the functions in which they are employed." LA. CIV. CODE art. 2320; *see also* LA. CIV. CODE art. 2317 ("We are responsible, not only for the damage occasioned by our own act, but for that which is caused by the act of persons for whom we are answerable. . .").

213. In addition to compensatory damages, exemplary damages are available for injuries that "were caused by an act or acts of sexual assault in the workplace." LA. CIV. CODE art. 2315.11(A).

214. "Sexual assault" is "any nonconsensual sexual contact including but not limited to any act" listed in LA. REV. STAT. ANN. § 15:541(24) or obscenity as defined in LA. REV. STAT. ANN. § 14:106. LA. REV. STAT. ANN. § 46:2184; LA. CIV. CODE art. 2315.11(E). In turn, LA. REV. STAT. ANN. § 15:541(24) contains a list of sex offenses that includes, *inter alia*, sexual battery, rape, and video voyeurism.

215. "Rape" is defined under Louisiana law as the "act of anal, oral, or vaginal sexual intercourse . . . committed without the person's lawful consent." LA. REV. STAT. ANN. § 14:41(a). This definition is incorporated into various statutes (e.g., first-degree rape, forcible rape) listed in LA. REV. STAT. ANN. § 15:541(24).

216. "Sexual battery" is defined under Louisiana law as "the intentional touching of the anus or genitals of the victim by the offender using any instrumentality or any part of the body of the offender, directly or through clothing, or the touching of the anus or genitals of the offender by the victim using any instrumentality or any part of the body of the victim, directly or through clothing, when . . . [t]he offender acts without the consent of the victim." LA. REV. STAT. ANN. § 14:43.1.

217. "Video voyeurism" is defined as "[t]he use of any camera . . . or any other image recording device . . . for the purpose of observing, viewing, photographing, filming, or videotaping a person where that person has not consented . . ." and "is for lewd or lascivious purpose." LA. REV. STAT. ANN. § 14:283(1).

218. At all relevant times, Plaintiffs were detained in the custody of ICE and GEO at SLIPC. Defendant Reyes knew or reasonably should have known that Plaintiffs were in custody, and therefore could not provide consent, at all relevant times.

A. Sexual Assault of Plaintiff Jane Doe by Defendant Reyes

219. Defendant Reyes sexually assaulted Jane Doe when he repeatedly forced her to perform oral sex on him on a near-daily basis for four months, from approximately February 2024 through May 2024. LA. REV. STAT. ANN. §§ 46:2184, 15:541(24).

220. He further sexually assaulted Jane Doe when he forcibly groped her breasts and genitals underneath her clothing in February 2024 and forcibly groped her buttocks using his hands and placed his groin directly against Jane Doe's buttocks in April 2024. LA. REV. STAT. ANN. §§ 46:2184, 15:541(24).

221. Defendant Reyes sexually assaulted Jane Doe when he used his position of authority at SLIPC to observe Jane Doe through facility cameras and "masturbate to" her. LA. REV. STAT. ANN. §§ 46:2184, 15:541(24).

222. Defendant Reyes intended, knew, or should have known, that his actions were substantially certain to result in severe emotional distress to Jane Doe.

223. As direct and proximate result of numerous sexual assaults by Defendant Reyes, Jane Doe suffered the injuries detailed above, including long-lasting emotional distress, entitling her to compensatory and special damages, in amounts to be determined at trial. LA. CIV. CODE arts. 2315, 2315.11.

224. At the time of events set forth herein, Defendant Reyes was an employee of GEO acting within the course and scope of employment. As the employer of Defendant Reyes,

Defendant GEO is vicariously liable for the damage caused by him. LA. CIV. CODE arts. 2317, 2320.

B. Sexual Assault of Plaintiff Luis Renteria-Gonzalez by Defendant Emmanuel Reyes

225. Defendant Reyes engaged in nonconsensual sexual contact with Luis twice, in or about December 2023 and January 2024, when he forcibly placed his erect penis directly against Luis's buttocks. LA. REV. STAT. ANN. §§ 46:2184, 15:541(24).

226. Defendant Reyes intended, knew, or should have known, that his actions would result in severe emotional distress to Luis.

227. Defendant Reyes sexually assaulted Luis when he used his position of authority within SLIPC to observe Luis in the showers for lewd and lascivious purpose. LA. REV. STAT. ANN. §§ 46:2184 (defining sexual assault by referring to sexual offenses), 15:541(24) (including video voyeurism, among other offenses, as a sexual offense).

228. As direct and proximate result of the sexual assault by Defendant Reyes, Luis suffered the injuries detailed above, including long-lasting emotional distress, entitling him to compensatory and special damages, in amounts to be determined at trial. Because Defendant Reyes's actions occurred while Plaintiff Luis was working at Defendant Reyes's direction, Plaintiff Luis is entitled to special damages. LA. CIV. CODE arts. 2315, 2315.11.

229. At the time of events set forth herein, Defendant Reyes was an employee of GEO acting within the course and scope of employment. As the employer of Defendant Reyes, Defendant GEO is vicariously liable for the damage caused by him. LA. CIV. CODE arts. 2317, 2320.

COUNT VI: SEXUAL ASSAULT

Plaintiff Mario Garcia-Valenzuela
Against Defendants David Courvelle and GEO Group, Inc.
LA. CIV. CODE arts. 2315, 2317, 2320

230. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

231. Louisiana law provides that "[e]very act whatever of man that causes damage to another obliges him by whose fault it happened to repair it." LA. CIV. CODE art. 2315.

232. Likewise, under Louisiana law, "employers are answerable for the damage occasioned by their servants and overseers, in the exercise of the functions in which they are employed." LA. CIV. CODE art. 2320; *see also* LA. CIV. CODE art. 2317 ("We are responsible, not only for the damage occasioned by our own act, but for that which is caused by the act of persons for whom we are answerable. . .").

233. In addition to compensatory damages, exemplary damages are available for injuries that "were caused by an act or acts of sexual assault in the workplace." LA. CIV. CODE art. 2315.11(A).

234. "Sexual assault" is "any nonconsensual sexual contact including but not limited to any act" listed in LA. REV. STAT. ANN. § 15:541(24) or obscenity as defined in LA. REV. STAT. ANN. § 14:106. LA. REV. STAT. ANN. § 46:2184 (defining sexual assault by referring to sexual offenses); LA. CIV. CODE art. 2315.11(E). In turn, LA. REV. STAT. ANN. § 15:541(24) contains a list of sex offenses that includes, *inter alia*, sexual battery, rape, and video voyeurism.

235. "Sexual battery" is defined under Louisiana law as "the intentional touching of the anus or genitals of the victim by the offender using any instrumentality or any part of the body of the offender, directly or through clothing, or the touching of the anus or genitals of the offender by the victim using any instrumentality or any part of the body of the victim, directly

or through clothing when . . . [t]he offender acts without the consent of the victim." LA. REV. STAT. ANN. § 14:43.1.

236. At all relevant times, Mario was detained in the custody and care of ICE and GEO at SLIPC. Defendant Courvelle knew or reasonably should have known that Mario was in custody, and therefore could not provide consent, at all relevant times.

237. Defendant Courvelle intended, knew, or should have known, that his actions would result in severe emotional distress to Mario.

238. Defendant Courvelle engaged in nonconsensual sexual contact with Mario when he forcibly groped Mario's chest and genitals on three separate occasions in May 2025, June 2025, and July 2025.

239. As direct and proximate result of Defendant Courvelle's nonconsensual sexual contact, Mario suffered the injuries detailed above, including long-lasting emotional distress, entitling him to compensatory and special damages, in amounts to be determined at trial. LA. CIV. CODE arts. 2315, 2315.11.

240. At the time of events set forth herein, Defendant Courvelle was an employee of GEO acting within the course and scope of employment. As the employer of Defendant Courvelle, Defendant GEO is vicariously liable for the damage caused by him. LA. CIV. CODE arts. 2317, 2320.

COUNT VII: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Plaintiffs Luis Renteria-Gonzalez and Mario Garcia-Valenzuela
Against Defendants David Courvelle and GEO Group, Inc.
LA. CIV. CODE art. 2315, 2317, 2320

241. Plaintiffs repeat and re-allege the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

242. Louisiana law provides that "[e]very act whatever of man that causes damage to another obliges him by whose fault it happened to repair it." LA. CIV. CODE art. 2315.

243. Likewise, under Louisiana law, "employers are answerable for the damage occasioned by their servants and overseers, in the exercise of the functions in which they are employed." LA. CIV. CODE art. 2320; *see also* LA. CIV. CODE art. 2317 ("We are responsible, not only for the damage occasioned by our own act, but for that which is caused by the act of persons for whom we are answerable. . .").

244. Defendant Courvelle's conduct toward Luis as described herein—including stalking, harassment, harassment of family members, threats of violence and other retribution, and requiring that Luis stand guard while Defendant Courvelle sexually assaulted another person—was extreme and outrageous.

245. By his actions, Defendant Courvelle intended, knew, or should have known, that his actions would result in severe emotional distress to Luis.

246. Defendant Courvelle's conduct toward Luis was the direct and proximate cause of severe, long-lasting emotional injury to Luis; accordingly, Luis is entitled to compensatory damages in an amount to be determined at trial.

247. Defendant Courvelle's conduct toward Mario as described herein—including sexual assault, stalking, harassment, harassment of family members, threats of violence and other retribution, and requiring that Mario stand guard while Courvelle sexually assaulted another person—was extreme and outrageous.

248. By his actions Courvelle intended, knew, or should have known, that his actions would result in severe emotional distress to Mario.

249. Defendant Courvelle's conduct toward Mario was the direct and proximate cause of severe, long-lasting emotional injury to Mario; accordingly, Mario is entitled to compensatory damages in an amount to be determined at trial.

250. At the time of events set forth herein, Defendant Courvelle was an employee of GEO acting within the course and scope of employment. As the employer of Defendant Courvelle, Defendant GEO is vicariously liable for the damage caused by him. LA. CIV. CODE arts. 2317, 2320.

COUNT VIII: NEGLIGENCE

Plaintiffs Luis Renteria-Gonzalez and Mario Garcia-Valenzuela
Against Defendants David Courvelle and GEO Group, Inc.

LA. CIV. CODE art. 2315, 2317, 2320

251. Plaintiffs repeat and re-allege the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

252. Louisiana law provides that "[e]very act whatever of man that causes damage to another obliges him by whose fault it happened to repair it." LA. CIV. CODE art. 2315.

253. Likewise, under Louisiana law, "employers are answerable for the damage occasioned by their servants and overseers, in the exercise of the functions in which they are employed." LA. CIV. CODE art. 2320; *see also* LA. CIV. CODE art. 2317 ("We are responsible, not only for the damage occasioned by our own act, but for that which is caused by the act of persons for whom we are answerable. . .").

254. Defendant Courvelle owed a duty of care to Luis and Mario, who were in the custody and control of his employer, GEO.

255. Defendant Courvelle knew or should have known that his conduct toward Luis as described herein—including stalking, harassment, harassment of family members, threats of

violence and other retribution, and requiring that Luis stand guard while Defendant Courvelle sexually assaulted another person—would cause injury to Luis.

256. Defendant Courvelle's conduct was the direct and proximate cause of severe, long-lasting emotional injury to Luis; accordingly, Luis is entitled to compensatory damages in an amount to be determined at trial.

257. Defendant Courvelle knew or should have known that his conduct toward Mario as described herein—including sexual assault, stalking, harassment, harassment of family members, threats of violence and other retribution, and requiring that Mario stand guard while Courvelle sexually assaulted another person that his actions would result in injury to Mario.

258. Defendant Courvelle's conduct toward Mario was the direct and proximate cause of severe, long-lasting emotional injury to Mario; accordingly, Mario is entitled to compensatory damages in an amount to be determined at trial.

259. At the time of events set forth herein, Defendant Courvelle was an employee of GEO acting within the course and scope of employment. As the employer of Defendant Courvelle, Defendant GEO is vicariously liable for the damage caused by him. LA. CIV. CODE arts. 2317, 2320.

COUNT IX: NEGLIGENT SUPERVISION

Plaintiffs Luis Renteria-Gonzalez and Mario Garcia-Valenzuela
Against Defendant GEO Group, Inc.

LA. CIV. CODE art. 2315

260. Plaintiffs repeat and re-allege the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

261. Under Louisiana law, an employer may be held liable for the torts of its employee based on the employer's negligent hiring, training, and supervision. *Gomez v. Galman*, 18 F.4th 769, 780 (5th Cir. 2021) (citing *Kelley v. Dyson*, 10 So. 3d 283, 287 (La. Ct. App. 5 Cir. 2009)).

262. Defendant GEO owed a duty of care to Luis and Mario. At all relevant times, Luis and Mario were in custody at SLIPC.

263. At the time of the events set forth herein, Defendant Courvelle was an employee of Defendant GEO and was acting within the course and scope of his employment.

264. Defendant GEO is responsible for the training, supervision, and actions of its employees, who have responsibility for the management and operation of the SLIPC.

265. Defendant GEO breached its duty of care to Luis and Mario by engaging in the negligent hiring, training, and supervision of its employee Defendant Courvelle.

266. As a direct and proximate result of Defendant GEO's negligent hiring, training, and supervision, Luis and Mario suffered the injuries detailed above, including long-lasting emotional distress.

RELIEF REQUESTED

WHEREFORE, Plaintiffs respectfully requests that this Court:

1) Award Plaintiffs all available compensatory, punitive, and special damages in an amount to be proven at trial;

2) Award Plaintiffs mandatory restitution in the full amount of their losses;

3) Award Plaintiffs reasonable attorneys' fees under 18 U.S.C. § 1595(a), and all other available avenues;

4) Grant such other relief as the Court deems just and equitable.

DATED: November 23, 2026

Respectfully submitted,

/s/ Sarah E. Decker

/s/ Bridget Pranzatelli

Sarah E. Decker*†
ROBERT & ETHEL KENNEDY HUMAN RIGHTS CENTER
1300 19th Street NW, Suite 750
Washington, DC 20036
Tel.: (908) 967-3245
decker@kennedyhumanrights.org

Sarah T. Gillman*
Anthony Enriquez*
ROBERT & ETHEL KENNEDY HUMAN RIGHTS CENTER
88 Pine Street, 8th Floor, Suite 801
New York, New York 10005
Tel.: (929) 656-1871
gillman@kennedyhumanrights.org
enriquez@kennedyhumanrights.org

Eunice H. Cho*
Gerardo Romo*
NATIONAL IMMIGRANT JUSTICE CENTER
111 W. Jackson Blvd., Suite 800
Chicago, IL 60604
Tel: (312) 660-1630
echo@immigrantjustice.org
gromo@immigrantjustice.org

Charles Andrew Perry (La. Bar No. 40906)
Nora Ahmed* (NY Bar No. 5092374)
ACLU OF LOUISIANA
1340 Poydras St., Ste. 2160
New Orleans, LA 70112
Phone: (504) 250-4879
aperry@laaclu.org
nahmed@laaclu.org

Bridget Pranzatelli (La. Bar No. 41899)
Stephanie M. Alvarez-Jones (GA Bar No. 237979)*‡
NATIONAL IMMIGRATION PROJECT OF THE NATIONAL LAWYERS GUILD (National Immigration Project)
1763 Columbia Road NW
Ste. 175 #896645
Washington, DC 20009
Tel: (504) 940-4777
bridget@nipnlg.org
Tel: (202) 470-2082
stephanie@nipnlg.org

/s/ Susan M. Meyers
Susan M. Meyers (La. Bar No. 29346)
Emily B. Lubin (La. Bar No. 38823)
Julia T. Mudd (La. Bar No. 40886)
SOUTHERN POVERTY LAW CENTER
200 St. Charles Avenue, Suite 2000
New Orleans, Louisiana 70170
Tel: (504) 512-8649
susan.meyers@splcenter.org
emily.lubin@splcenter.org
julia.mudd@splcenter.org

Nicholas Taichi Steiner*
SOUTHERN POVERTY LAW CENTER
1101 17th Street NW, Suite 550
Washington, DC 20036
Tel.: (301) 233-5747
nick.steiner@splcenter.org

**Pro hac vice* application forthcoming
† Not admitted in DC; admitted in New York only.
‡ Not admitted in DC; working remotely from and admitted in Georgia.

Attorneys for Plaintiff