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7 *Counsel for Plaintiff*

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 BENJAMIN JOB CASTAÑEDA, in his
11 individual capacity and his representative
12 capacity as founder and director of California
13 Association of Family Services, a nonprofit
association headquartered in Los Angeles,
California, Plaintiff, on behalf of himself and
all others similarly situated,

14 Plaintiff,

15 v.

16 UNITED STATES IMMIGRATION AND
17 CUSTOMS ENFORCEMENT (ICE); LOS
18 ANGELES POLICE DEPARTMENT
19 (LAPD); LOS ANGELES COUNTY
20 SHERIFF'S DEPARTMENT (LASD);
21 DONALD J. TRUMP; TOM HOMAN;
GAVIN NEWSOM, in his official capacity as
Governor of California; and JOHN DOES 1–
50,

22 Defendants.
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Case No.

**COMPLAINT AND
DEMAND FOR JURY TRIAL**

INTRODUCTION

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2 1. This is a class action lawsuit brought under the U.S. Constitution and California
3 law seeking damages and immediate injunctive relief from ongoing violations of civil rights.

4 2. Plaintiffs challenge a coordinated campaign of unlawful cooperation between local
5 police departments and U.S. Immigration and Customs Enforcement (ICE), in violation of the
6 Fourth and Fourteenth Amendments, the California Values Act, and other federal and state laws.
7

8 3. Since November 2024, there has been a sharp rise in immigration raids across
9 California — particularly in Latino neighborhoods — conducted with the active cooperation of
10 local law enforcement. These raids have resulted in unlawful arrests, family separations, and
11 violations of due process.

12 4. Defendant Governor Gavin Newsom failed to enforce California’s sanctuary laws
13 or restrain local law enforcement from coordinating with federal agents, despite ample notice and
14 legal authority to do so.
15

16 5. The organizational plaintiff, CAFSBenefits.net, headquartered in Los Angeles,
17 provides legal and financial assistance to immigrant families and has diverted significant
18 resources to respond to this crisis, suffering institutional harm.
19

JURISDICTION AND VENUE

20 6. Jurisdiction is proper under 28 U.S.C. §§ 1331 and 1343 because this case
21 involves federal constitutional questions and civil rights statutes.
22

23 7. Supplemental jurisdiction exists over related state claims under 28 U.S.C. § 1367.

24 8. Venue is proper in the Northern District of California because many plaintiffs
25 reside in this district and substantial events occurred here.
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PARTIES

Plaintiff Benjamin Job Castañeda is a resident of California and founder of CAFSBenefits.net. He brings this suit on behalf of impacted immigrant families and the organization harmed by the unlawful actions described herein.

Defendant ICE is a federal agency responsible for immigration enforcement, sued for its unconstitutional conduct in California.

Defendant LAPD and LASD are law enforcement agencies with a record of cooperation with ICE, including inmate transfers and intelligence sharing.

Defendant Donald J. Trump resumed office in January 2025 and reinstituted aggressive deportation policies. He is sued for supervisory and policy-making conduct.

Defendant Tom Homan is ICE's acting director and is sued in his individual and official capacity for his role in designing and implementing raids in violation of constitutional and state law.

Defendant Gavin Newsom, Governor of California, is sued for failure to act in accordance with his duties under the California Values Act and the state constitution.

FACTUAL ALLEGATIONS

- On **January 17, 2025**, ICE agents, aided by LAPD, conducted a pre-dawn raid in East Los Angeles. No judicial warrants were presented.
- On **February 12, 2025**, LASD facilitated the handoff of 17 detainees directly to ICE, in violation of the California Values Act.
- Between **November 2024 and May 2025**, at least **29 major ICE operations** took place statewide, disproportionately targeting Latino communities.

1 • Governor Newsom was repeatedly notified by advocacy groups and legal
2 observers, including ACLU, but declined to issue enforcement actions or investigate local law
3 enforcement.

4 **CAUSES OF ACTION**

5 **Count I**

6 **Fourth Amendment (Unlawful Seizure)**

- 7
- 8 • ICE and local police conducted arrests without valid judicial warrants.
 - 9 • Plaintiffs were seized without probable cause, violating constitutional protections.

10 **Count II**

11 **Fourteenth Amendment (Equal Protection)**

- 12
- 13 • ICE and local law enforcement targeted Latino individuals almost exclusively.
 - 14 • The pattern of enforcement demonstrates discriminatory intent or impact.

15 **Count III**

16 **Violation of California Values Act (Gov. Code § 7284 et seq.)**

- 17
- 18 • LAPD and LASD shared information, conducted transfers, and assisted ICE in enforcement.
 - 19 • These acts violate California's sanctuary policies.

20 **Count IV**

21 **Supervisory Negligence (Governor Gavin Newsom)**

- 22
- 23 • Governor Newsom failed to direct the Attorney General to investigate violations.
 - 24 • He allowed illegal cooperation to continue despite legal obligations.

25 **Count V**

26 **Supervisory Liability (Donald J. Trump and Tom Homan)**

- 27
- 28 • Trump and Homan directed field offices to circumvent sanctuary policies.

- They are responsible for enabling and encouraging these violations.

Count VI

Bivens Claim (ICE Agents' Conduct)

- ICE agents violated federal constitutional rights without immunity.
- Direct violations of plaintiffs' Fourth and Fifth Amendment rights occurred.

CLASS ALLEGATIONS

- Plaintiffs seek certification of a class including:

“All undocumented persons residing in California who have been or are at risk of being targeted by ICE raids carried out in coordination with local law enforcement since November 2024.”

PRAYER FOR RELIEF

Plaintiffs seek:

1. **Preliminary and permanent injunctive relief** ordering all Defendants to cease collaboration with ICE unless expressly authorized by judicial order;
2. **Declaratory judgment** that Defendants' actions violated Plaintiffs' constitutional rights;
3. **Compensatory and punitive damages** in an amount to be proven at trial;
4. **Attorneys' fees and costs** under 42 U.S.C. § 1988;
5. Any other relief the Court deems just and proper.

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that Plaintiffs herein individually and on behalf of all others
3 similarly situated hereby demand a jury trial pursuant to Rule 38(a) of the Federal Rules of Civil
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6 DATED: June 7, 2025

LAW OFFICES OF MICHAEL E. REZNICK
A Professional Corporation

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8 *By: /s/Bryan Christopher Castaneda*
9 Bryan Christopher Castaneda

10 Counsel for Plaintiff
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