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14 Attorneys for Plaintiffs

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 DAWN THALACHER, BRIANNA AVILA,
18 XOCHIKETZALL BAEZ , DEONA
19 BRAGGS, DESIREE BORJON, JADE
20 BROOKFIELD, MELISSA CARILLO,
21 JESSICA COSTELLO, SHANICE DYER,
22 BRIANNA ESPINOZA, ESPERANZA
23 FARFAN, BRIANNA GARCIA, DESIREE
24 GARCIA, DESIREE FOSSETT, SANDY
25 GONZALEZ, KAMIESHA HAGGENS,
26 JASMINE IBARRA, HEATHER
27 JOHNSON, CACHETT LINZY,
28 STEPHANIE LOERA, BRENDA LOPEZ,
MAVIS MANUFEKAI, KIANDRA
MITCHELL, ALEASHA MOODY,
HEATHER MULKEY, DIANA
ONTIVEROS, HEAVEN PARKER,
ZUSSETH PENA, BRITTANY POWELL,
ANGELICA QUINONES, MYKIERA
ROWLES, KIMBERLY SALAZAR, ALINA

CASE NO:
CLASS ACTION COMPLAINT FOR
DAMAGES AND INJUNCTIVE
RELIEF
DEMAND FOR JURY TRIAL

1 SAVADIAN, MARIA SORIANO,
2 OPHELIA TIMMONS, GABRIELLA
3 TOVAR, GRACE VELASQUEZ, AND
4 FELICIA VILLA, individually and as class
representatives,

5 Plaintiffs,

6 vs.

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8 COUNTY OF LOS ANGELES; LOS
9 ANGELES COUNTY SHERIFF’S
DEPARTMENT; SHERIFF ROBERT
10 LUNA, individually, and in his official
capacity; SHERIFF ALEX VILLANUEVA,
11 individually, and in his official capacity;
12 SHERIFF JIM MCDONNELL, individually,
and in his official capacity; SHERIFF LEE
13 BACA, individually, and in his official
capacity; JORGE PADILLA, individually,
14 and in his official capacity; TRAVIS
15 NELSON, individually, and in his official
capacity; and DOES 1 through 10,
16 inclusive,

17
18 Defendants.
19

20 **I. INTRODUCTION**

21 1. This action concerns constitutional deprivations caused by the Los Angeles
22 County Sheriff’s Department’s historical policy and practice of male correctional
23 officers¹ routinely subjecting completely nude female inmates housed in the
24

25
26 ¹ The term “correctional officers” is intended herein to encompass supervisory and non-
27 supervisory Deputy Sheriffs Correctional Officers, Detention Officers, Custody Assistants, and other
28 supervisory and non-supervisory Los Angeles County employees charged with overseeing, monitoring,
guarding, transporting, and otherwise personally interacting with female inmates incarcerated at the
Century Regional Detention Facility.

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1 administrative segregation module of the Century Regional Detention Facility
2 (“CRDF”), located at 11705 South Alameda Street, Lynwood California, to frequent,
3 prolonged, intentional, unrestricted, and completely unobstructed observations of their
4 completely nude bodies in shower facilities designated for female inmates housed in the
5 CRDF’s administrative segregation module.

6 2. This long standing policy is, and has been, historically undertaken without
7 the involved female inmates’ consent and is, and has been, historically undertaken for
8 the purpose of the involved male correctional officers’ voyeuristic sexual gratification,
9 unrelated to any legitimate penological interest.

10 3. The gravamen of this action concerns the privacy rights of female inmates
11 housed in the administrative segregation module within the CRDF, who are routinely
12 subjected to prolonged and unobstructed cross-gender viewing in a state of complete
13 nudity by male correctional officers. This policy, has historically and routinely occurred,
14 and presently does occur, in shower facilities for female inmates housed in the
15 administrative segregation module within the CRDF.

16 **II. JURISDICTION AND VENUE**

17 4. Plaintiffs present federal claims for relief under 42 U.S.C. §1983.
18 Accordingly, federal jurisdiction is conferred upon this Court by 28 U.S.C. §§1331 and
19 1343. Plaintiffs’ state law claims are so related to their federal law claims that they form
20 part of the same case or controversy. Accordingly, supplemental jurisdiction over the
21 state law claims is appropriately conferred upon this Court by 28 U.S.C. §1367.

22 5. Plaintiffs’ claims arise out of acts of the Los Angeles County Sheriff’s
23 Department in the County of Los Angeles, State of California. Accordingly, venue is
24 proper within the Central District of California.

25 **III. PARTIES**

26 ***PLAINTIFFS***

27 6. Plaintiffs and class representatives Dawn Thalacher, Jessica Costello,
28 Brianna Espinoza, Esperanza Farfan, Desiree Fossett, Sandy Gonzales, Heather Johnson,

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1 and Heaven Parker are women who were formerly incarcerated at the Century Regional
2 Detention Facility who were subjected to the constitutional deprivations and related
3 official misconduct giving rise to the federal and state causes of action set forth herein.

4 7. Plaintiffs and class representatives Brianna Avila, Xochiketzall Baez,
5 Deona Braggs, Desiree Borjon, Jade Brookfield, Melissa Carillo, Shanice Dyer, Brianna
6 Garcia, Desiree Garcia, Kamiesha Haggens, Jasmine Ibarra, Cachett Linzy, Stephanie
7 Loera, Brenda Lopez, Mavis Manufekai, Kiandra Mitchell, Aleasha Moody, Heather
8 Mulkey, Diana Ontiveros, Zusseth Pena, Brittany Powell, Angelica Quinones, Mykiera
9 Rowles, Kimberly Salazar, Alina Savadian, Maria Soriano, Ophelia Timmons, Gabriella
10 Tovar, Grace Velasquez, and Felicia Villa, as of the filing of this Complaint, remain
11 incarcerated at the Century Regional Detention Facility, and were, and continue to be,
12 subjected to the constitutional deprivations and related official misconduct giving rise to
13 the federal and state causes of action set forth herein.

14 ***DEFENDANTS***

15 8. Defendant County of Los Angeles (hereafter “County”) is a public entity
16 organized and existing under the laws of the State of California. The County, by and
17 through the Los Angeles County Sheriff’s Department, is sued in its own right for
18 creating, maintaining, and otherwise facilitating a policy, practice or custom which
19 caused Plaintiffs’ injuries in violation of one or more federal constitutional guarantees,
20 and on Plaintiffs’ state law claims based on respondeat superior under California
21 Government Code §815.2.

22 9. As of the filing of this Complaint, Defendant Robert Luna is the Sheriff of
23 Los Angeles County, and at times relevant to the events alleged herein was and is a
24 policy maker for the LASD. He is sued in his official and individual capacities.

25 10. Defendant Alex Villanueva is a former Sheriff of Los Angeles County, and
26 at times relevant to the events alleged herein was a policy maker for the LASD. He is
27 sued in his official and individual capacities.

28 11. Defendant Jim McDonnell is a former Sheriff of Los Angeles County, and

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1 at times relevant to the events alleged herein was a policy maker for the LASD. He is
2 sued in his official and individual capacities.

3 12. Defendant Leroy Baca is a former Sheriff of Los Angeles County, and at
4 times relevant to the events alleged herein was a policy maker for the LASD. He is sued
5 in his official and individual capacities.

6 13. Defendant Jorge Padilla is, and at certain times relevant to the acts and
7 omissions herein alleged was, a sworn Los Angeles County Deputy, holding the rank of
8 Sergeant. At all times relevant to the acts and omissions herein alleged Defendant Padilla
9 acted under color of law and in the course and scope of his employment with the Los
10 Angeles County Sheriff’s Department. At certain times relevant to the acts and omissions
11 herein alleged, Defendant Padilla was employed at the CFDF in the capacity of a Prison
12 Rape Elimination Act (PREA) Compliance Manager, which tasked Sergeant Padilla with
13 ensuring compliance with the Prison Rape Elimination Act (PREA). Defendant Padilla is
14 sued in his official and individual capacities.

15 14. Defendant Travis Nelson is, and at certain times relevant to the acts and
16 omissions herein alleged was a sworn Los Angeles County Deputy, holding the rank of
17 Deputy. At all times relevant to the acts and omissions herein alleged Defendant Nelson
18 acted under color of law and in the course and scope of his employment with the Los
19 Angeles County Sheriff’s Department. At certain times relevant to the acts and omissions
20 herein alleged, Defendant Nelson was employed in the CRDF, and was assigned to
21 monitor inmates the administrative segregation unit within the CRDF, commonly
22 referred to as “the hole”. Defendant Nelson is sued in his official and individual
23 capacities.

24 15. Plaintiffs are ignorant of the true names and capacities of Defendants sued
25 herein as DOES 1 through 10, inclusive, and therefore sue these defendants by such
26 fictitious names. Plaintiffs will give notice of this complaint, and of one of more DOES’
27 true names and capacities, when ascertained. Plaintiffs are informed and believe and
28 thereon allege, that Defendants DOES 1 through 5 are responsible in some manner

1 for the damages and injuries hereinafter complained of.

2 16. DOES 6 through 10 (hereinafter collectively referred to as “LASD
3 Supervisory Defendants”) were and are now responsible for the LASD jails. Among
4 other duties, they are responsible for the training, supervision, control, assignment and
5 discipline of both sworn and civilian personnel of the LASD and County who work in,
6 operate, administer and manage the jails, and for the formulation, promulgation,
7 adoption, application, administration and enforcement of the policies, rules, regulations
8 and practices of the LASD jails, including the CRDF.

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9 **IV. COMMON FACTUAL ALLEGATIONS**

10 17. Since March of 2006, the Los Angeles County Sheriff’s Department has
11 designated the Century Regional Detention Facility (“CRDF”), located at 11705 S.
12 Alameda Street, in Lynwood CA as an all-female jail.

13 18. This action challenges the systemic and ongoing practice which concerns
14 the cross-gender viewing of completely nude female inmates by male correctional
15 officers in shower facilities located in the CRDF’s administrative segregation module,
16 commonly known as “the hole”.

17 19. The challenged practice concerns male correctional officers’ acts of
18 voyeurism in the CRDF’s shower facilities, which historically and routinely involves the
19 unobstructed viewing of the entire bodies of completely female inmates when they are
20 taking showers in shower stalls located in or around the administrative segregation
21 module. This systemic and ongoing practice has become so widespread within the CRDF
22 that there is a historically designated area adjacent to the shower stalls located in or
23 around the administrative segregation module which is commonly referred to as the “cop
24 shop” by both female inmates and correctional officers. The referenced “cop shop” is
25 located adjacent to the shower stalls for inmates housed in the administrative segregation
26 module, and allows a completely unobstructed view of the entire bodies of female
27 inmates taking showers. From the vantage point of the “cop shop”, male correctional
28 officers, during working hours, routinely engage in frequent and prolonged unobstructed

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1 viewing of the entire nude bodies of female inmates taking showers in a matter unrelated
2 to any legitimate penological purpose. While positioned in the “cop shop”, male
3 correctional officers can easily see and make eye contact with showering female inmates,
4 viewing them without their consent for prolonged periods of time during the entire time
5 that they take showers without any legitimate penological purpose.

6 20. Female inmates housed in the “the hole” take showers every other day. Prior
7 to entering the shower stalls, such female inmates are typically removed from their
8 individual cells, while clothed, by an escorting male correctional officer, and are
9 immediately handcuffed with hands behind their back after exiting their cells. While
10 walking to the shower facilities, said female inmates are subjected to acts of non-
11 consensual sexual abuse, while handcuffed, committed by escorting male guards who
12 routinely walk behind them so closely as to intentionally press their crotches against the
13 handcuffed hands of the female inmates in a sexual manner, during which time male
14 guards routinely and intentionally fondle the inmates’ hips, buttocks, and bodies in a
15 sexual manner while escorting them to the shower stalls.

16 21. After arriving at the shower stall, the escorting male correctional officer
17 routinely removes the female inmate’s handcuffs and directs her into the shower stall,
18 while clothed. After being placed in the shower stall, female inmates are subjected to
19 further acts of non-consensual voyeurism as they are then within the full and
20 unobstructed view of any additional male correctional officers present at the “cop shop”.
21 After the female inmate is placed in the shower stall, the escorting male officer, while
22 constantly observing the entire body of the female inmate at close distance, then directs
23 her to remove her clothes in his immediate presence and under his constant and obvious
24 observation, and within the full and unobstructed view of any additional male
25 correctional officers present and looking on at the “cop shop”. Once she is completely
26 nude, the escorting male officer directs the female inmate to hand him her clothes to him
27 through a slot in the door adjacent to the shower stall.

28 22. Once the shower begins, the completely nude female inmate takes a shower

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1 in full view of the male escorting officer, and any male officers who may be present in
2 the “cop shop”. Once the shower begins, male correctional officers routinely and
3 intentionally set the water temperature at a scalding or near-scalding level, which forces
4 the female inmates taking showers to move hurriedly and squirm erratically to avoid the
5 pain generated from the hot water while showering, which often results in the female
6 inmates’ breasts jiggling and wiggling demonstrably in full view of the male correctional
7 officers in the adjacent “cop shop”, which constitutes a further act of voyeurism
8 undertaken exclusively for the sexual gratification of the male correctional officers
9 viewing the showering female inmates.

10 ***The CRDF’s Non-compliance with the Prison Rape Elimination Act***

11 23. The Prison Rape Elimination Act (PREA) of 2003 is a federal law
12 established to address the elimination and prevention of sexual assault and rape in all
13 correctional systems, including all federal state, and local jails and prisons, including the
14 CRDF. Compliance with PREA is required among all Los Angeles County Jail Facilities,
15 including the CRDF. Among other provisions, PREA states: “The facility shall
16 implement policies and procedures that enable inmates to shower, perform bodily
17 functions, and change clothing without nonmedical staff of the opposite gender viewing
18 their breasts, buttocks, or genitalia, except in exigent circumstances or when such
19 viewing is incidental to routine cell checks. Such policies and procedures shall require
20 staff of the opposite gender to announce their presence when entering an inmate housing
21 unit.”

22 24. Additionally, the PREA mandates a “zero tolerance” policy pertaining to
23 acts categorized as “sexual abuse” against inmates in all Los Angeles County Jail
24 Facilities, including the CRDF. Among PREA’s definitions of sexual abuse, the term
25 “voyeurism” is a specific form of sexual abuse defined by the inappropriate visual
26 surveillance of a detainee for sexual gratification unrelated to official duties.

27 25. As set forth herein, the historical and long standing policies of the Sheriff’s
28 Department, as they presently exist, and have historically existed, within the CRDF

1 constitute flagrant and willful violations of the aforementioned policies, among other
2 policies, mandated by PREA.

3 **V. CLAIMS OF CLASS REPRESENTATIVES**

4 **LEAD CLASS REPRESENTATIVE - DAWN THALACHER**

5 26. As of the filing of this Complaint, Plaintiff and lead class representative,
6 Dawn Thalcher, is no longer incarcerated at the CRDF. Ms. Thalcher was originally
7 incarcerated at the CRDF in or around March of 2006. Since March of 2006, Ms.
8 Thalcher has at times been incarcerated in the administrative segregation module at the
9 CRDF on multiple occasions. Beginning on or around March of 2006, while housed in
10 the administrative segregation module, Ms. Thalcher has experienced, and been
11 subjected to, the voyeurism, increased punishment, sexual abuse, and sexual harassment,
12 and described in the foregoing paragraphs of this Complaint without her consent at least
13 100 times. Known male correctional officers who have committed these acts include
14 Defendants Jorge Padilla and Travis Nelson.

15 **CLAIMS OF ADDITIONAL CLASS REPRESENTATIVES**

16 **BRIANNA AVILA**

17 27. As of the filing of this Complaint, Plaintiff Brianna Avila is presently
18 incarcerated at the CRDF. Ms. Avila has been incarcerated at the CRDF at times which
19 have included, but are not limited to, May 18, 2023 through the date of the filing of this
20 Complaint. While housed in the administrative segregation module, Ms. Avila has
21 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
22 and sexual harassment described in the foregoing paragraphs of this Complaint without
23 her consent multiple times. Known male correctional officers who have committed these
24 acts include Defendants Jorge Padilla and Travis Nelson.

25 **XOCHIKETZALL BAEZ**

26 28. As of the filing of this Complaint, Plaintiff Xochiketzall Baez is presently
27 incarcerated at the CRDF. Ms. Baez has been incarcerated at the CRDF at times which
28 have included, but are not limited to, February 3, 2024 through the date of the filing of

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1 this Complaint. While housed in the administrative segregation module, Ms. Baez has
2 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
3 and sexual harassment described in the foregoing paragraphs of this Complaint without
4 her consent multiple times.

5 ***DESIREE BORJON***

6 29. As of the filing of this Complaint, Plaintiff Desiree Borjon is presently
7 incarcerated at the CRDF. Desiree Borjon has been incarcerated at the CRDF at times
8 which have included, but are not limited to, November 25, 2023 through the date of the
9 filing of this Complaint. While housed in the administrative segregation module, Ms.
10 Borjon has experienced, and been subjected to, the voyeurism, increased punishment,
11 sexual abuse, and sexual harassment described in the foregoing paragraphs of this
12 Complaint without her consent multiple times.

13 ***JADE BROOKFIELD***

14 30. As of the filing of this Complaint, Plaintiff Jade Brookfield is presently
15 incarcerated at the CRDF. Ms. Brookfield has been incarcerated at the CRDF at times
16 which have included, but are not limited to, April 10, 2023 through the date of the filing
17 of this Complaint. While housed in the administrative segregation module, Ms.
18 Brookfield has experienced, and been subjected to, the voyeurism, increased
19 punishment, sexual abuse, and sexual harassment described in the foregoing paragraphs
20 of this Complaint without her consent multiple times.

21 ***MELISSA CARRILLO***

22 31. As of the filing of this Complaint, Plaintiff Melissa Carillo is presently
23 incarcerated at the CRDF. Ms. Carillo has been incarcerated at the CRDF at times which
24 have included, but are not limited to, June 23, 2025 through the date of the filing of this
25 Complaint. While housed in the administrative segregation module, Ms. Carillo has
26 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
27 and sexual harassment described in the foregoing paragraphs of this Complaint without
28 her consent multiple times.

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1 **JESSICA COSTELLO**

2 32. As of the filing of this Complaint, Plaintiff Jessica Costello is no longer
3 incarcerated at the CRDF. Ms. Costello was incarcerated in the CRDF's administrative
4 segregation module at times which have included, but are not limited to, a three week
5 period in February of 2023. While housed in the, Ms. Costello has experienced, and been
6 subjected to, the voyeurism, increased punishment, sexual abuse, and sexual harassment
7 described in the foregoing paragraphs of this Complaint without her consent multiple
8 times.

9 **SHANICE DYER**

10 33. As of the filing of this Complaint, Plaintiff Shanice Dyer has been
11 incarcerated at the CRDF at times which have included, but are not limited to, September
12 18, 2024 through the date of the filing of this Complaint. While housed in the
13 administrative segregation module, Ms. Dyer has experienced, and been subjected to, the
14 voyeurism, increased punishment, sexual abuse, and sexual harassment described in the
15 foregoing paragraphs of this Complaint without her consent multiple times. Known male
16 correctional officers who have committed these acts include Deputy Travis Nelson.

17 **BRIANNA ESPINOZA**

18 34. As of the filing of this Complaint, Plaintiff Brianna Espinoza is no longer
19 incarcerated at the CRDF. Ms. Espinoza has been incarcerated at the CRDF at times
20 which have included, but are not limited to, March 26, 2024 through February 4, 2025.
21 While housed in the administrative segregation module, Ms. Espinoza has experienced,
22 and been subjected to, the voyeurism, increased punishment, sexual abuse, and sexual
23 harassment described in the foregoing paragraphs of this Complaint without her consent
24 multiple times.

25 **ESPERANZA FARFAN**

26 35. As of the filing of this Complaint, Plaintiff Esperanza Farfan is no longer
27 incarcerated at the CRDF. Ms. Farfan has been incarcerated at the CRDF at times which
28 have included, but are not limited to, May 12, 2024 through September 4, 2025. While

1 housed in the administrative segregation module, Ms. Farfan has experienced, and been
2 subjected to, the voyeurism, increased punishment, sexual abuse, and sexual harassment
3 described in the foregoing paragraphs of this Complaint without her consent multiple
4 times. Known male correctional officers who have committed these acts include Sergeant
5 Jorge Padilla and Deputy Travis Nelson.

6 **DESIREE FOSSETT**

7 36. As of the filing of this Complaint, Plaintiff Desiree Fossett is no longer
8 incarcerated at the CRDF. Ms. Fossett has been incarcerated at the CRDF at times which
9 have included, but are not limited to, July 17, 2024 through September 24, 2025. While
10 housed in the administrative segregation module, Ms. Fossett has experienced, and been
11 subjected to, the voyeurism, increased punishment, sexual abuse, and sexual harassment
12 described in the foregoing paragraphs of this Complaint without her consent multiple
13 times. Known male correctional officers who have committed these acts include Sergeant
14 Jorge Padilla and Deputy Travis Nelson.

15 **BRIANNA GARCIA**

16 37. As of the filing of this Complaint, Plaintiff Brianna Garcia is presently
17 incarcerated at the CRDF. Ms. Garcia has been incarcerated at the CRDF at times which
18 have included, but are not limited to, June 3, 2021 through the date of the filing of this
19 Complaint. While housed in the administrative segregation module, Ms. Garcia has
20 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
21 and sexual harassment described in the foregoing paragraphs of this Complaint without
22 her consent multiple times.

23 **DESIREE GARCIA**

24 38. As of the filing of this Complaint, Plaintiff Desiree Garcia is presently
25 incarcerated at the CRDF. Ms. Garcia has been incarcerated at the CRDF at times which
26 have included, but are not limited to, July 9, 2024 through the date of the filing of this
27 Complaint. While housed in the administrative segregation module, Ms. Garcia has
28 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,

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1 and sexual harassment described in the foregoing paragraphs of this Complaint without
2 her consent multiple times. Known male correctional officers who have committed these
3 acts include Deputy Travis Nelson.

4 ***SANDY GONZALEZ***

5 39. As of the filing of this Complaint, Plaintiff Sandy Gonzalez is no longer
6 incarcerated at the CRDF. Ms. Gonzalez has been incarcerated at the CRDF at times
7 which have included, but are not limited to, May 8, 2025 through October 23, 2025.

8 While housed in the administrative segregation module, Ms. Gonzalez has experienced,
9 and been subjected to, the voyeurism, increased punishment, sexual abuse, and sexual
10 harassment described in the foregoing paragraphs of this Complaint without her consent
11 multiple times.

12 ***KAMIESHA HAGGENS***

13 40. As of the filing of this Complaint, Plaintiff Kamiesha Haggens is presently
14 incarcerated at the CRDF. Ms. Haggens has been incarcerated at the CRDF at times
15 which have included, but are not limited to, September 21, 2021 through the date of the
16 filing of this Complaint. While housed in the administrative segregation module, Ms.
17 Haggens has experienced, and been subjected to, the voyeurism, increased punishment,
18 sexual abuse, and sexual harassment described in the foregoing paragraphs of this
19 Complaint without her consent multiple times. Known male correctional officers who
20 have committed these acts include Deputy Travis Nelson.

21 ***JASMINE IBARRA***

22 41. As of the filing of this Complaint, Plaintiff Jasmine Ibarra is presently
23 incarcerated at the CRDF. Ms. Ibarra has been incarcerated at the CRDF at times which
24 have included, but are not limited to, July 2, 2025 through the date of the filing of this
25 Complaint. While housed in the administrative segregation module, Ms. Ibarra has
26 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
27 and sexual harassment described in the foregoing paragraphs of this Complaint without
28 her consent multiple times.

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1 **HEATHER JOHNSON**

2 42. As of the filing of this Complaint, Plaintiff Heather Johnson is presently
3 incarcerated at the CRDF. Ms. Johnson has been incarcerated at the CRDF at times
4 which have included, but are not limited to, April 2, 2024 through the date of the filing
5 of this Complaint. While housed in the administrative segregation module, Ms. Johnson
6 has experienced, and been subjected to, the voyeurism, increased punishment, sexual
7 abuse, and sexual harassment described in the foregoing paragraphs of this Complaint
8 without her consent multiple times.

9 **CACHETT LINZY**

10 43. As of the filing of this Complaint, Plaintiff Cachett Linzy is presently
11 incarcerated at the CRDF. Ms. Linzy has been incarcerated at the CRDF at times which
12 have included, but are not limited to, April 4, 2025 through the date of the filing of this
13 Complaint. While housed in the administrative segregation module, Ms. Linzy has
14 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
15 and sexual harassment described in the foregoing paragraphs of this Complaint without
16 her consent multiple times.

17 **STEPHANIE LOERA**

18 44. As of the filing of this Complaint, Plaintiff Stephanie Loera is presently
19 incarcerated at the CRDF. Ms. Loera has been incarcerated at the CRDF at times which
20 have included, but are not limited to, November 8, 2023 through the date of the filing of
21 this Complaint. While housed in the administrative segregation module, Ms. Loera has
22 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
23 and sexual harassment described in the foregoing paragraphs of this Complaint without
24 her consent multiple times.

25 **BRENDA LOPEZ**

26 45. As of the filing of this Complaint, Plaintiff Brenda Lopez is presently
27 incarcerated at the CRDF. Ms. Lopez has been incarcerated at the CRDF at times which
28 have included, but are not limited to, April 17, 2024 through the date of the filing of this

1 Complaint. While housed in the administrative segregation module, Ms. Lopez has
2 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
3 and sexual harassment described in the foregoing paragraphs of this Complaint without
4 her consent multiple times.

5 ***MAVIS MANUFEKAI***

6 46. As of the filing of this Complaint, Plaintiff Mavis Manufekai is presently
7 incarcerated at the CRDF. Ms. Manufekai has been incarcerated at the CRDF at times
8 which have included, but are not limited to, October 31, 2023 through the date of the
9 filing of this Complaint. While housed in the administrative segregation module, Ms.
10 Manufekai has experienced, and been subjected to, the voyeurism, increased punishment,
11 sexual abuse, and sexual harassment described in the foregoing paragraphs of this
12 Complaint without her consent multiple times.

13 ***KIANDRA MITCHELL***

14 47. As of the filing of this Complaint, Plaintiff Kiandra Mitchell is presently
15 incarcerated at the CRDF. Ms. Mitchell has been incarcerated at the CRDF at times
16 which have included, but are not limited to, February 24, 2025 through the date of the
17 filing of this Complaint. While housed in the administrative segregation module, Ms.
18 Mitchell has experienced, and been subjected to, the voyeurism, increased punishment,
19 sexual abuse, and sexual harassment described in the foregoing paragraphs of this
20 Complaint without her consent multiple times.

21 ***ALEASHA MOODY***

22 48. As of the filing of this Complaint, Plaintiff Aleasha Moody is presently
23 incarcerated at the CRDF. Ms. Moody has been incarcerated at the CRDF at times which
24 have included, but are not limited to, October 23, 2024 through the date of the filing of
25 this Complaint. While housed in the administrative segregation module, Ms. Moody has
26 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
27 and sexual harassment described in the foregoing paragraphs of this Complaint without
28 her consent multiple times.

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1 **HEATHER MULKEY**

2 49. As of the filing of this Complaint, Plaintiff Heather Mulkey is presently
3 incarcerated at the CRDF. Ms. Mulkey has been incarcerated at the CRDF at times which
4 have included, but are not limited to, November 17, 2022 through the date of the filing of
5 this Complaint. While housed in the administrative segregation module, Ms. Mulkey has
6 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
7 and sexual harassment described in the foregoing paragraphs of this Complaint without
8 her consent multiple times.

9 **DIANA ONTIVEROS**

10 50. As of the filing of this Complaint, Plaintiff Diana Ontiveros is presently
11 incarcerated at the CRDF. Ms. Ontiveros has been incarcerated at the CRDF at times
12 which have included, but are not limited to, June 30, 2025 through the date of the filing
13 of this Complaint. While housed in the administrative segregation module, Ms.
14 Ontiveros has experienced, and been subjected to, the voyeurism, increased punishment,
15 sexual abuse, and sexual harassment described in the foregoing paragraphs of this
16 Complaint without her consent multiple times.

17 **HEAVEN PARKER**

18 51. As of the filing of this Complaint, Plaintiff Heaven Parker is no longer
19 incarcerated at the CRDF. Ms. Parker has been incarcerated at the CRDF at times which
20 have included, but are not limited to, June 20, 2024 through July 16, 2025. While housed
21 in the administrative segregation module, Ms. Parker has experienced, and been
22 subjected to, the voyeurism, increased punishment, sexual abuse, and sexual harassment
23 described in the foregoing paragraphs of this Complaint without her consent multiple
24 times.

25 **ZUSSETH PENA**

26 52. As of the filing of this Complaint, Plaintiff Zusseth Pena is presently
27 incarcerated at the CRDF. Ms. Pena has been incarcerated at the CRDF at times which
28 have included, but are not limited to, August 30, 2023 through the date of the filing of

1 this Complaint. While housed in the administrative segregation module, Ms. Pena has
2 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
3 and sexual harassment described in the foregoing paragraphs of this Complaint without
4 her consent multiple times.

5 ***BRITTANY POWELL***

6 53. As of the filing of this Complaint, Plaintiff Brittany Powell is presently
7 incarcerated at the CRDF. Ms. Powell has been incarcerated at the CRDF at times which
8 have included, but are not limited to, February 22, 2024 through the date of the filing of
9 this Complaint. While housed in the administrative segregation module, Ms. Powell has
10 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
11 and sexual harassment described in the foregoing paragraphs of this Complaint without
12 her consent multiple times.

13 ***ANGELICA QUINONES***

14 54. As of the filing of this Complaint, Plaintiff Angelica Quinones is presently
15 incarcerated at the CRDF. Ms. Quinones has been incarcerated at the CRDF at times
16 which have included, but are not limited to, July 26, 2024 through the date of the filing
17 of this Complaint. While housed in the administrative segregation module, Ms. Quinones
18 has experienced, and been subjected to, the voyeurism, increased punishment, sexual
19 abuse, and sexual harassment described in the foregoing paragraphs of this Complaint
20 without her consent multiple times. Known male correctional officers who have
21 committed these acts include Defendants Jorge Padilla and Travis Nelson.

22 ***MYKIERA ROWLES***

23 55. As of the filing of this Complaint, Plaintiff Mykiera Rowles is presently
24 incarcerated at the CRDF. Ms. Rowles has been incarcerated at the CRDF at times which
25 have included, but are not limited to, April 25, 2025 through the date of the filing of this
26 Complaint. While housed in the administrative segregation module, Ms. Rowles has
27 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
28 and sexual harassment described in the foregoing paragraphs of this Complaint without

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1 her consent multiple times. Known male correctional officers who have committed these
2 acts include Defendant Travis Nelson.

3 ***KIMBERLY SALAZAR***

4 56. As of the filing of this Complaint, Plaintiff Kimberly Salazar is presently
5 incarcerated at the CRDF. Ms. Salazar has been incarcerated at the CRDF at times which
6 have included, but are not limited to, December 7, 2022 through the date of the filing of
7 this Complaint. While housed in the administrative segregation module, Ms. Salazar has
8 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
9 and sexual harassment described in the foregoing paragraphs of this Complaint without
10 her consent multiple times. Known male correctional officers who have committed these
11 acts include Defendant Travis Nelson.

12 ***ALINA SAVADIAN***

13 57. As of the filing of this Complaint, Plaintiff Alina Savadian is presently
14 incarcerated at the CRDF. Ms. Savadian has been incarcerated at the CRDF at times
15 which have included, but are not limited to, January 1, 2024 through the date of the filing
16 of this Complaint. While housed in the administrative segregation module, Ms. Savadian
17 has experienced, and been subjected to, the voyeurism, increased punishment, sexual
18 abuse, and sexual harassment described in the foregoing paragraphs of this Complaint
19 without her consent multiple times. Known male correctional officers who have
20 committed these acts include Deputy Travis Nelson.

21 ***MARIA SORIANO***

22 58. As of the filing of this Complaint, Plaintiff Maria Soriano is presently
23 incarcerated at the CRDF. Ms. Soriano has been incarcerated at the CRDF at times which
24 have included, but are not limited to, July 30, 2024 through the date of the filing of this
25 Complaint. While housed in the administrative segregation module, Ms. Soriano has
26 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
27 and sexual harassment described in the foregoing paragraphs of this Complaint without
28 her consent multiple times.

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1 ***OPHELIA TIMMONS***

2 59. As of the filing of this Complaint, Plaintiff Ophelia Timmons is presently
3 incarcerated at the CRDF. Ms. Timmons has been incarcerated at the CRDF at times
4 which have included, but are not limited to, February 25, 2024 through the date of the
5 filing of this Complaint. While housed in the administrative segregation module, Ms.
6 Timmons has experienced, and been subjected to, the voyeurism, increased punishment,
7 sexual abuse, and sexual harassment described in the foregoing paragraphs of this
8 Complaint without her consent multiple times. Known male correctional officers who
9 have committed these acts include Defendant Travis Nelson.

10 ***GABRIELLA TOVAR***

11 60. As of the filing of this Complaint, Plaintiff Gabriella Tovar is presently
12 incarcerated at the CRDF. Ms. Tovar has been incarcerated at the CRDF at times which
13 have included, but are not limited to, June 22, 2023 through the date of the filing of this
14 Complaint. While housed in the administrative segregation module, Ms. Tovar has
15 experienced, and been subjected to, the voyeurism, increased punishment, sexual abuse,
16 and sexual harassment described in the foregoing paragraphs of this Complaint without
17 her consent multiple times. Known male correctional officers who have committed these
18 acts include Defendants Jorge Padilla and Travis Nelson.

19 ***GRACE VELASQUEZ***

20 61. As of the filing of this Complaint, Plaintiff Grace Velasquez is presently
21 incarcerated at the CRDF. Ms. Velasquez has been incarcerated at the CRDF at times
22 which have included, but are not limited to, January 25, 2024 through the date of the
23 filing of this Complaint. While housed in the administrative segregation module, Ms.
24 Velasquez has experienced, and been subjected to, the voyeurism, increased punishment,
25 sexual abuse, and sexual harassment described in the foregoing paragraphs of this
26 Complaint without her consent multiple times. Known male correctional officers who
27 have committed these acts include Defendant Travis Nelson.

28 ///

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1 **FELICIA VILLA**

2 62. As of the filing of this Complaint, Plaintiff Felicia Villa is no longer
3 incarcerated at the CRDF. Ms. Villa has been incarcerated at the CRDF at times which
4 have included, but are not limited to, March 28, 2025 through October 6, 2025. While
5 housed in the administrative segregation module, Ms. Villa has experienced, and been
6 subjected to, the voyeurism, increased punishment, sexual abuse, and sexual harassment
7 described in the foregoing paragraphs of this Complaint without her consent multiple
8 times.

9 **VI. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

10 63. As of the date of the filing of this Complaint, Plaintiff Angelica Quinones
11 has filed at least two administrative grievances based on the constitutional deprivations
12 set forth herein. As a result of filing grievances, Ms. Quinones has been subjected to acts
13 of retaliation which have included, but are not limited to, punitive placement in the
14 CRDF's administrative segregation module, and punitive placement in the CRDF's "high
15 power" module. As to both of Ms. Quinones's grievances, no action was taken by the
16 CRDF within 30 days of the filing of each such grievance. As such, Ms. Quinones has
17 satisfied her obligation to exhaust available remedies because the CRDF has rendered
18 the complaint process unavailable by ignoring her complaints.

19 64. As of the date of the filing of this Complaint, Plaintiff Grace Velasquez has
20 filed two administrative grievances based on the constitutional deprivations set forth
21 herein. On each occasion, Ms. Velasquez was specifically told by Defendant Sergeant
22 Jorge Padilla, when he was acting in his capacity as a PREA coordinator within the
23 CRDF, that no action would be taken on any complaint that she may ever file. On one
24 such occasion, Defendant Padilla, while acting in his capacity as a PREA coordinator
25 within the CRDF, specifically told Ms. Velazquez, "I'm going to back up my deputies
26 100%" and "Your complaint doesn't matter." As to both of Ms. Velasquez's grievances,
27 no action was taken by the CRDF within 30 days of the filing of each such grievance. As
28 such, Ms. Velasquez has satisfied her obligation to exhaust available remedies because

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1 the CRDF has rendered the complaint process unavailable by ignoring her complaints.
2 65. As of the date of the filing of this complaint, Plaintiff Shanice Dyer has
3 filed five administrative grievances based on the constitutional deprivations set forth
4 herein. No action was been taken by the CRDF within 30 days of the filing of any of Ms.
5 Dyer's five grievances, nor has Ms. Dyer been told that any action would be taken as to
6 any of her five grievances. As such, Ms. Dyer has satisfied her obligation to exhaust
7 available remedies because the CRDF has rendered the complaint process unavailable by
8 ignoring her complaints.

9 66. As of the date of the filing of this complaint, Plaintiff Briana Avila has filed
10 at least one grievance based on the constitutional deprivations set forth herein. No action
11 was been taken by the CRDF within 30 days of the filing of Ms. Avila's grievance, nor
12 has Ms. Avila been told that any action would be taken as to her grievance. As such, Ms.
13 Avila has satisfied her obligation to exhaust available remedies because the CRDF has
14 rendered the complaint process unavailable by ignoring her complaints.

15 67. Prior to the filing of this complaint, counsel for all Plaintiffs has filed
16 administrative grievances on behalf of all class representatives named herein, and has
17 requested to be updated on the status of all administrative grievances filed by Plaintiff's
18 counsel on behalf of all class representatives.

19 68. By and through Plaintiff's counsel, all Plaintiffs herein have filed
20 government tort claims for any and all state law claims set forth herein pursuant to
21 Government Code § 910 et seq.

22 **VII. RULE 23 PREREQUISITES**

23 **1. Numerosity**

24 69. In accordance with F.R.Civ. P. Rule 23(a), the members of the class are so
25 numerous that joinder of all members is impracticable. Plaintiffs do not know the exact
26 number of class members. Plaintiffs are informed and believe, and thereon allege, that
27 there at least 30-50 inmates per day housed in the CRCD's administrative segregation
28 module, who are subjected to cross gender viewing by male correctional officers while

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1 taking showers, which routinely occur every other day within the CRCD’s administrative
2 segregation module. Accordingly, the class period, which may include Plaintiffs
3 asserting constitutional deprivations and related state law claims occurring as early as
4 2006 with respect to certain causes of action, may include over one thousand Plaintiffs.

5 **2. Common Issues of Law**

6 70. In accordance with F.R. Civ. P. Rule 23(a), there are questions of law and
7 fact common to the class. In the Ninth Circuit, “[i]t is clearly established that the
8 Fourteenth Amendment protects a sphere of privacy, and the most ‘basic subject of
9 privacy ... the naked body.’ ” *Hydrick v. Hunter*, 500 F.3d 978, 1000 (9th Cir. 2007). The
10 Ninth Circuit has long recognized that “[t]he desire to shield one’s unclothed figure[]
11 from [the] view of strangers, and particularly strangers of the opposite sex, is impelled
12 by elementary self-respect and personal dignity.” *York v. Story*, 324 F.2d 450, 455 (9th
13 Cir. 1963). Accordingly, common questions of law may include, but may not limited to,
14 the following: (1) Whether the LASD’s historical policy involving male correctional
15 officers routinely engaging in the practice of prolonged and unobstructed viewing
16 completely nude female inmates taking showers in the CRDF’s administrative
17 segregation modules is constitutionally permissible under the Fourteenth Amendment;
18 (2) Whether the LASD’s historical policy involving male correctional officers routinely
19 transporting handcuffed female inmates in the CRDF’s administrative segregation
20 module to shower facilities where they are forced to disrobe to a state of complete nudity
21 in the immediate and unobstructed presence of the escorting male correctional officers is
22 constitutionally permissible under the Fourteenth Amendment; and (3) Whether any
23 individual Defendant is entitled to qualified immunity, among other common questions
24 of law.

25 **3. Common Issues of Fact**

26 71. In accordance with F.R. Civ. P. Rule 23(a) common questions of fact
27 include, but are not limited to, the following: (1) Whether there is a legitimate
28 nonpunitive governmental objective for the LASD’s historical policy and practice

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1 involving male correctional officers routinely engaging in the practice of prolonged and
2 unobstructed viewing completely nude female inmates taking showers in the CRDF's
3 administrative segregation module; (2) Whether the manner in which the CRDF's male
4 correctional officers have historically and routinely transported, viewed, and/or
5 conducted showers for female inmates housed in the CRDF's administrative segregation
6 module amounts to increased harm and/or punishment that exceeds, or is independent of,
7 the inherent discomforts of confinement; (3) To the extent that class members are
8 deemed to have been convicted prisoner(s) at any relevant time, whether the manner in
9 which the CRDF's male correctional officers have historically and routinely transported,
10 viewed, and/or conducted showers for the involved female inmates constitutes cruel and
11 unusual punishment in violation of the Eighth Amendment; and, (4) Whether the manner
12 in which class members have been forced to disrobe in the immediate presence of male
13 correctional officers constitutes a constitutionally impermissible cross-gender strip
14 search in violation of the Fourth Amendment, among other common questions of fact

15 4. Typicality

16 72. In accordance with F.R. Civ. P. Rule 23(a), the claims of the representative
17 Plaintiffs are typical of the class. All Plaintiffs are and have been in LASD custody, and
18 housed within the administrative segregation module of the CRDF when they were
19 subjected to the constitutional deprivations while taking showers, and being transported
20 to and from shower facilities as set forth herein.

21 73. Thus, Plaintiffs have the same interests and have suffered the same type of
22 damages as all class members. Plaintiffs' claims are based upon the same or similar legal
23 theories as the claims of all class members. Each class member suffered actual damages
24 as a result of being subjected to the voyeurism, increased punishment, sexual abuse, and
25 sexual harassment while taking showers and being transported to and from showers
26 when housed in the CRDF's administrative segregation module. The actual damages
27 suffered by Plaintiffs are similar in type and amount to the actual damages suffered by
28 each class member.

1 74. In accordance with F.R. Civ. P. Rule 23(a), the representative Plaintiffs,
2 which, as of the filing of this Complaint, include 38 (thirty-eight) former and current
3 female pretrial detainees who have been housed in the CRDF's administrative
4 segregation module, each of whom has experienced and been subjected to all of the
5 constitutional deprivations set forth in the foregoing paragraphs of this Complaint, will
6 fairly and adequately protect the interests of the class, and the interests of the
7 representative Plaintiffs are consistent with, and not antagonistic to, the interests of the
8 class.

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9 **4. Maintenance and Superiority**

10 75. In accordance with Fed.R.Civ.P. Rule 23(b)(1)(A), prosecutions of separate
11 actions by individual members of the class would create a risk that inconsistent or
12 varying adjudications with respect to individual members of the class, and would create a
13 risk of establishing incompatible standards of conduct for the parties opposing the class.

14 76. In accordance with Fed.R.Civ.P. Rule 23(b)(1)(B), prosecutions of separate
15 actions by individual members of the class would create a risk of adjudications with
16 respect to individual members of the class which would, as a practical matter,
17 substantially impair or impede the interests of the other members of the class to protect
18 their interests.

19 77. In accordance with Fed.R.Civ.P. Rule 23(b)(2), Plaintiffs are informed and
20 believe, and thereon allege that Defendants have acted on grounds generally applicable
21 to the class.

22 78. In accordance with Fed.R.Civ.P. Rule 23(b)(3), the questions of law or fact
23 common to the members of the class predominate over any questions affecting only
24 individual members, and this class action is superior to other available methods for the
25 fair and efficient adjudication of the controversy between the parties. Plaintiffs are
26 informed and believe, and thereon allege, that the interests of class members in
27 individually controlling the prosecution of a separate action is low in that most class
28 members would be unable to individually prosecute any action at all. Plaintiffs are

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1 informed and believe, and thereon allege that the amounts at stake for individuals are
2 such that separate suits would be impracticable in that most members of the class will not
3 be able to find counsel to represent them. Plaintiffs are informed and believe, and
4 thereon allege, that it is desirable to concentrate all litigation in one forum because all of
5 the claims arise in the same location, i.e., the County of Los Angeles. It will promote
6 judicial efficiency to resolve the common questions of law and fact in one forum rather
7 than in multiple courts.

8 79. Plaintiffs do not know the identities of all class members. Plaintiffs are
9 informed and believe, and thereon allege, that the identities of the class members are
10 readily ascertainable from LASD records, in particular the LASD Automated Justice
11 Information System (“AJIS) database used to track and identify LASD inmates. Plaintiffs
12 are informed and believe, and thereon allege, that AJIS reflects the identities, including
13 addresses and telephone numbers, of the persons who have been held in custody by
14 LASD; when inmates were arrested and booked, taken to court, returned from court; why
15 inmates were released; and when inmates were released.

16 80. Plaintiffs know of no difficulty that will be encountered in the management
17 of this litigation that would preclude its maintenance as a class action. The class action is
18 superior to any other available means to resolve the issues raised on behalf of the class.
19 The class action will be manageable because so many different records systems exist
20 from which to ascertain the members of the class. Liability can be determined on a class-
21 wide basis. Damages can be determined on a class-wide basis using a damages matrix set
22 by a trier of fact, or by trying the damages of a statistically valid sample of the class to a
23 trier of fact and extrapolating those damages to the class as a whole.

24 81. In accordance with Fed.R.Civ.P. Rule 23(b)(3), class members must be
25 furnished with the best notice practicable under the circumstances, including individual
26 notice to all members who can be identified through reasonable effort. Plaintiffs are
27 informed and believe that LASD computer records contain a last known address for class
28 members. Plaintiffs contemplate that individual notice be given to class members at such

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1 last known address by first class mail. Plaintiffs contemplate that the notice inform class
2 members of the following:

- 3 A. The pendency of the class action, and the issues common to the class;
- 4 B. The nature of the action;
- 5 C. Their right to ‘opt out’ of the action within a given time, in which event they
6 will not be bound by a decision rendered in the class action;
- 7 D. Their right, if they do not ‘opt out,’ to be represented by their own counsel
8 and enter an appearance in the case; otherwise, they will be represented by
9 the named Plaintiffs and their counsel; and
- 10 E. Their right, if they do not ‘opt out,’ to share in any recovery in favor of the
11 class, and conversely to be bound by any judgment on the
12 common issues, adverse to the class.

13 **VIII. CLAIMS AND CAUSES OF ACTION**

14 **COUNT ONE – 42 U.S.C. §1983**

15 **[FOURTEENTH AMENDMENT]**

16 **(Against All Defendants)**

17 82. Plaintiffs restate and incorporate by reference each of the foregoing and
18 ensuing paragraphs as if each paragraph is fully set forth herein.

19 83. In the Ninth Circuit, “[i]t is clearly established that the Fourteenth
20 Amendment protects a sphere of privacy, and the most ‘basic subject of privacy ... the
21 naked body.’ ” *Hydrick v. Hunter*, 500 F.3d 978, 1000 (9th Cir. 2007). The Ninth Circuit
22 has long recognized that “[t]he desire to shield one’s unclothed figure[] from [the] view
23 of strangers, and particularly strangers of the opposite sex, is impelled by elementary
24 self-respect and personal dignity.” *York v. Story*, 324 F.2d 450, 455 (9th Cir. 1963).

25 84. In subjecting Plaintiffs and class members who are pretrial detainees to the
26 prolonged, intentional, unrestricted, and completely unobstructed observations of their
27 completely nude bodies in shower facilities for female inmates housed in the CRDF’s
28 administrative segregation module, Defendants, and each of them, have violated, and

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1 continue to violate, Plaintiffs' and class members' rights to bodily privacy, and
2 Plaintiffs' and class members' rights to be free from violations of their bodily integrity as
3 guaranteed by the Fourteenth Amendment to the United States Constitution.
4 Additionally, in subjecting Plaintiffs and class members to improper punishment and
5 harm that significantly exceeds, and is independent of, the inherent discomforts of
6 confinement, Defendants, and each of them, have subjected, and continue to subject,
7 Plaintiffs and class members to improper punishment in violation of the Fourteenth
8 Amendment to the United States Constitution to 42 U.S.C. §1983. Additionally, in
9 subjecting Plaintiffs and class members to unreasonable force when transporting them to
10 and from shower stalls alleged herein, Defendants, and each of them, have violated
11 Plaintiffs' and class members' rights to be free from violations of their bodily integrity as
12 guaranteed by the Fourteenth Amendment to the United States Constitution.

13 85. The aforementioned acts of Defendants have proximately caused, and
14 continue to proximately cause, Plaintiffs to be deprived of their rights as stated above,
15 thereby entitling Plaintiffs and the class to damages in an amount to be proven at trial.

16 86. As of the date of the filing of this Complaint, Plaintiffs Brianna Avila,
17 Xochiketzall Baez, Deona Braggs, Desiree Borjon, Jade Brookfield, Melissa Carillo,
18 Shanice Dyer, Brianna Garcia, Desiree Garcia, Kamiesha Haggens, Jasmine Ibarra,
19 Heather Johnson, Cachett Linzy, Stephanie Loera, Brenda Lopez, Mavis Manufekai,
20 Kiandra Mitchell, Aleasha Moody, Heather Mulkey, Diana Ontiveros, Zusseth Pena,
21 Brittany Powell, Angelica Quinones, Mykiera Rowles, Kimberly Salazar, Alina
22 Savadian, Maria Soriano, Ophelia Timmons, Gabriella Tovar, Grace Velasquez, and
23 Felicia Villa remain incarcerated at the Century Regional Detention Facility. Because the
24 CRDF will require them to submit to the voyeurism, increased punishment, sexual abuse,
25 and sexual harassment while taking showers if they are or remain housed in the CRDF's
26 administrative segregation module, these Plaintiffs and class members will continue to
27 suffer deprivations of their rights, and therefore seek injunctive relief on behalf of
28 themselves and the class of similarly situated individuals.

COUNT TWO – 42 U.S.C. §1983

[EQUAL PROTECTION]

(Against All Defendants)

87. Plaintiffs restate and incorporate by reference each of the foregoing and ensuing paragraphs as if each paragraph is fully set forth herein.

88. Plaintiffs are informed and believe, and thereon allege, that similarly situated male inmates in Los Angeles County Jails have not and are not subjected to the same type and manner of cross-gender observations of their completely nude bodies in shower facilities that female inmates housed in the CRDF’s administrative segregation module are subjected to, as described herein, thereby depriving the female class members of the protections afforded by provisions of the 14th Amendment Equal Protection guarantees. Therefore, the female Plaintiffs and class members are entitled to bring suit and recover damages pursuant to 42 U.S.C. §1983.

89. The aforementioned acts of Defendants proximately caused Plaintiffs to be deprived of their rights as stated above, thereby entitling Plaintiffs and the class to damages in an amount to be proven at trial. Because the CRDF will require them to submit to the voyeurism, increased punishment, sexual abuse, and sexual harassment while taking showers in the CRDF’s administrative segregation module, these Plaintiffs will continue to suffer deprivations of their rights, and therefore seek injunctive relief on behalf of themselves and the class of similarly situated individuals.

COUNT THREE – 42 U.S.C. §1983 [

EIGHTH AMENDMENT]

(Against All Defendants)

90. Plaintiffs restate and incorporate by reference each of the foregoing and ensuing paragraphs as if each paragraph is fully set forth herein.

91. Plaintiffs are informed and believe some class members may be convicted prisoners at certain times relevant to the acts and omissions herein alleged. In subjecting any Plaintiffs who may fall within the status of convicted prisoners housed in the

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1 CRCD’s administrative segregation module to the voyeurism, increased punishment,
2 sexual abuse, and sexual harassment while taking showers, and while being transported
3 to and from shower facilities, such Plaintiffs and class members are entitled to bring suit
4 and recover damages pursuant to 42 U.S.C. §1983 for violations of the Eighth
5 Amendment’s protections against cruel and unusual punishment.

6 92. The aforementioned acts of Defendants proximately caused Plaintiffs to be
7 deprived of their rights as stated above, thereby entitling Plaintiffs and the class to
8 damages in an amount to be proven at trial. Because the CRDF will require them to
9 submit to the voyeurism, increased punishment, sexual abuse, and sexual harassment
10 while taking showers if they are or remain housed in the CRDF’s administrative
11 segregation module, these Plaintiffs will continue to suffer deprivations of their rights,
12 and therefore seek injunctive relief on behalf of themselves and the class of similarly
13 situated individuals.

14
15 **IX. PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiffs, on behalf of themselves and the class members they
17 represent, request damages against each defendant as follows:

- 18 1. General and special damages according to proof;
- 19 2. Temporary, preliminary and permanent injunctive relief prohibiting
20 Defendants from continuing to engage in the unlawful practices complained
21 of herein;
- 22 3. As against the individual Defendants only, punitive damages according to
23 proof;
- 24 4. In addition to actual damages, statutory damages and treble damages as
25 allowed by law;
- 26 5. Attorneys’ fees and costs under 42 U.S.C. §1988 and other applicable state
27 or federal statutory provisions;
- 28

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6. The costs of this suit and such other relief as is just and proper.

DATED: October 27, 2025

Respectfully submitted,

THE COCHRAN FIRM - CALIFORNIA

/s/ Brian T. Dunn

BRIAN T. DUNN

Attorneys for ALL PLAINTIFFS

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DEMAND FOR JURY TRIAL

Plaintiffs, on behalf of themselves individually and on behalf of the class, hereby demand a jury trial.

DATED: October 27, 2025

Respectfully submitted,

THE COCHRAN FIRM - CALIFORNIA

/s/ Brian T. Dunn

BRIAN T. DUNN

Attorneys for ALL PLAINTIFFS